



**TITLE IV FEDERAL STUDENT AID
POLICIES & PROCEDURES
2025-2027**

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Reference

Administrative Capability Regulation: [668.16](#); [668.34](#); [668.244 \(b\)](#); [668.164](#); [668.165](#); [668.166](#)



Dymond Designs Beauty School Overview

OPEID: 04305100

Mission Statement

Dymond Designs Beauty School is a Licensed Trade School focused on Cosmetology. We are dedicated to offering the most up-to-date training with an innovative curriculum with the core objective of job placement after completion of course.

Vision Statement

Our vision is to educate our students with glamorous trends, cutting edge training, technologies, and real-world skills. Dymond Designs focuses on developing students to become certified professionals in the subject areas Core, Adaptive, and Creative. We foster an atmosphere of respect and trust to ensure that students perfect their craft and express their individuality and creativity.

Core Values

Our foundation is built on an innovative curriculum, which provides a place for our students to thrive and our team's passion to implement a model with proven success.

Student Focus

Our organization has an innovative model of education and a clear focus on student success. Our facility and support staff are industry leaders dedicated to uplifting students through coaching, peer counseling, and career development.

Diversity and Inclusion / EEO Statement

Our DDBS team members and students demonstrate professionalism through diversity and inclusion and business culture. Our organization prides itself on integrity and having respect for all individuals. We continually build lasting relationships with all communities to promote excellence and professionalism in the beauty industry. Further, DDBS provides equal employment opportunities to all and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, and protected veteran status.

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General Information

Dymond Designs Beauty School, located at 3300 E. Jefferson Ste. 450, Detroit, MI 48207, is a private institution, which was granted institutional approval from the State of Michigan Bureau of Professional Licensing and initial accreditation through the Council on Occupational Education (COE). Approved compliance allows DDBS to operate to minimum state standards and does not imply any endorsement or recommendation by the state or by the Bureau. Institutional approval must be approved every two years and is subject to continuing review.

History & Administration

Dymond Designs Beauty School (DDBS) is a cosmetology school licensed through the State of Michigan (LARA) Department of Licensing and Regulatory Affairs and Nationally Accredited through the Council on Occupational Education (COE). DDBS is in the beautiful Rivertown - Warehouse District near Downtown Detroit. DDBS offers excellent education in the fields of Cosmetology, Esthetics, and Advanced Esthetics, courses. We have provided the highest level of education, with staff members that have been experienced in the fields of education, cosmetology, business, and finance for over 25 years. Marlene Brooks (founder) has over 24 years' experience as a licensed cosmetologist and salon owner. Marlene started her first apprenticeship program in cosmetology in 2013 which grew into opening Dymond Designs Beauty School in 2017. DDBS has 6 different administrative offices and skilled educators that assist with the day-to-day operations and instructional needs of our students. Our institution has partnered with local, state, and federal organizations to offer our community the highest level of training in the beauty industry, along with job-placement upon the completion of our programs. DDBS also has approval through the Department of Education to offer Federal Student Aid funding.

Administrative Capability Policy and Procedure

Date of Last Revision: 3/26/2025

Purpose

The Administrative Capability Policy is the school's ability to administer Title IV programs in accordance with statute and regulations. This policy helps to document the responsibilities of the various offices with respect to the approval, disbursement, and delivery of Title IV, Higher Education Act Program Assistance (HEA), and the preparation and submission of reports to the U.S. Department of Education (ED).

Administrative Capability Procedure

The administrative capability of a school is reviewed through annual compliance audits, program reviews through FSA, The Council on Occupational Education Accrediting Agency (COE), and within the internal office of the school.

The procedure for all reviews is the responsibility of the Business Center Liaison, Director of Financial Aid, and the CEO. Each office will submit documentation of all administrative offices to the auditor, accrediting agency, and FSA annually or when needed to provide documentation

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of the administrative capabilities and responsibilities of each office in accordance with statute and regulations.

Verifying BEN's Policies, Procedures and Practices

DDBS understands that its contractual agreement with The Boston Educational Network (BEN) is an integral part of the Title IV process. DDBS acknowledges that the signed contract with BEN provides a detailed delineation of functions and duties that outline the responsibilities of DDBS and BEN. In addition, DDBS has reviewed BEN's Policy and Procedure Manual that provides a more detailed account to further enhance its understanding of the functions and responsibilities of each party. Finally DDBS annually reviews a copy of BEN's Third-Party Servicer Compliance Attestation Examination of the Title IV Programs, completed by an independent certified public accountant. DDBS is therefore aware of any limitations, suspensions or terminations imposed on BEN. DDBS utilizes all this information to verify that BEN is adhering to all aspects of the Title IV, HEA regulations as prescribed by the U.S. Department of Education.

Personally Identifiable Information (PII) and BEN

DDBS secures student PII when dealing with The Boston Educational Network, by using the secure portal upload functions made available through the servicer. There are different options available, depending upon the documentation that is being provided to BEN. If a situation arises wherein DDBS is unavailable to use one of the uploading functions, the document is password protected and sent to BEN using a secure email. The password is then provided to BEN using a separate email to maintain the integrity of PII.

Federal Student Aid Policies and Procedures Manual ("Manual")

Federal Regulations require institutions to keep a written record of the policies and procedures used in the administration of student financial aid. This Federal Student Aid Policies and Procedures Manual ("Manual") is comprehensive enough to allow a new financial aid administrator to continue the financial aid process as it had been previously administered. This Manual is for the staff, management, and students of Dymond Designs Beauty School (DDBS) and is available for review by all interested parties via website or in any administrative office at Dymond Designs Beauty School. Availability for this manual is available to auditors and program reviewers also.

The intent of this Manual is to:

1. Standardize procedures for consistency - an important step in quality control,
2. Be consulted as a reference manual whenever questions arise,
3. Serve as a training resource, and
4. Document the establishment of policies that are required by Federal Regulations.

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All major management functions with respect to the financial aid process are included in this Manual, including office organization, responsibilities and workflow. The following general office information and procedures are also included in this Manual:

1. An organizational chart of the personnel of the school.
2. Job descriptions and responsibilities of the Financial Aid staff, including reporting and counseling functions.
3. The School's Satisfactory Academic Progress (SAP) Policy and the process for monitoring continued student eligibility.
4. The School's Cash Management Policy.
5. The processing cycle for financial aid applications from start to finish, including the school's withdrawal policies and Return to Title IV (R2T4) funds information.
6. Information regarding the Family Educational Rights and Privacy Act (FERPA).

Calendar of Activities Policy

Policy Reason

To include a calendar of all financial aid activities for the calendar years 2025 through 2027. The calendar includes an explanation of activities for each month of the year.

2025-2027

<u>December 1, 2024,</u>	FAFSA form available for 2025-26 aid year
<u>January 1, 2025,</u>	New Year's Day – No school
<u>January 20, 2025,</u>	Martin Luther King Jr. Day
<u>February 1, 2025,</u>	First Day of Black History Month
<u>February 17, 2025,</u>	Presidents' Day
<u>April 20, 2025,</u>	Easter
<u>May 26, 2025,</u>	Memorial Day – No school
<u>June 19, 2025,</u>	Juneteenth
<u>June 30, 2025,</u>	2024-25 FAFSA Federal deadline
<u>July 4, 2025,</u>	Independence Day – No school

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September 1, 2025, Labor Day – No school

September 17, 2025, Constitution Day

Each educational institution that receives Federal funds for a fiscal year is required to hold an educational program about the U.S. Constitution for its students.

October 1, 2025, FAFSA application available online for 2026-27 aid year

November 11, 2025, Veterans Day

November 27, 2025, Thanksgiving Day – No school

December 24, 2025, Christmas Eve – No school

December 25, 2025, Christmas Day – No school

December 26, 2025, Kwanzaa

December 31, 2025, New Year’s Eve – No school

2026

January 1, 2026, New Year’s Day – No school

January 19, 2026, Martin Luther King Jr. Day

February 1, 2026, First Day of Black History Month

February 16, 2026, Presidents’ Day

April 5, 2026, Easter

May 25, 2026, Memorial Day – No school

June 19, 2026, Juneteenth

June 30, 2026, 2025-26 FAFSA Federal deadline

July 4, 2026, Independence Day – No school

September 7, 2026, Labor Day – No school

September 17, 2026, Constitution Day

Each educational institution that receives Federal funds for a fiscal year is required to hold an educational program about the U.S. Constitution for its students.

October 1, 2026, FAFSA application available online for 2027-28 aid year

November 11, 2026, Veterans Day

November 26, 2026, Thanksgiving Day – No school

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<u>December 24, 2026,</u>	Christmas Eve – No school
<u>December 25, 2026,</u>	Christmas Day – No school
<u>December 26, 2026</u>	Kwanzaa
2027	
<u>January 1, 2027,</u>	New Year’s Day – No school
<u>January 18, 2027,</u>	Martin Luther King Jr. Day
<u>February 1, 2027,</u>	First Day of Black History Month
<u>February 15, 2027,</u>	Presidents’ Day
<u>March 28, 2027,</u>	Easter
<u>May 31, 2027,</u>	Memorial Day – No school
<u>June 19, 2027,</u>	Juneteenth
<u>June 30, 2027,</u>	2026-27 FAFSA Federal deadline
<u>July 4, 2027,</u>	Independence Day – No school
<u>September 6, 2027,</u>	Labor Day – No school
<u>September 17, 2027,</u>	Constitution Day
Each educational institution that receives Federal funds for a fiscal year is required to hold an educational program about the U.S. Constitution for its students.	
<u>November 11, 2027,</u>	Veterans Day
<u>November 25, 2027,</u>	Thanksgiving Day – No school
<u>December 24, 2027,</u>	Christmas Eve – No school
<u>December 25, 2027,</u>	Christmas Day – No school
<u>December 26, 2027,</u>	Kwanzaa

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Class Schedule Updated 1/27/2025

Holiday and Calendar Information:

DDBS allows the following holidays off: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and December 24 – 25th. Calendar subject to change.

Day Class Monday - Tuesday 8:30am – 3:30pm; Wednesday – Saturday 8:30am - 4:00pm
Evening Class Tuesday – Friday 5:00pm - 9:00pm, and Saturday 8:30am - 4:00pm

Cosmetology

Length: 11 - 16 Months (1500 Hours)

	Full-time (45 weeks)	Part-time (66 weeks)
<u>Course Start Date</u>	<u>Expected Graduation Date</u>	<u>Expected Graduation Date</u>
January 6, 2025	November 17, 2025	April 13, 2026
January 7, 2025	November 18, 2025	April 14, 2026
February 3, 2025	December 15, 2025	May 11, 2026
February 4, 2025	December 16, 2025	May 12, 2026
March 3, 2025	January 12, 2026	June 8, 2026
March 4, 2025	January 13, 2026	June 9, 2026
March 31, 2025	February 9, 2026	July 6, 2026
April 1, 2025	February 10, 2026	July 7, 2026
May 5, 2025	March 16, 2026	August 10, 2026
May 6, 2025	March 17, 2026	August 11, 2026
June 2, 2025	April 13, 2026	September 7, 2026
June 3, 2025	April 14, 2026	September 8, 2026
June 30, 2025	May 11, 2026	October 5, 2026
July 1, 2025	May 12, 2026	October 6, 2026
August 4, 2025	June 15, 2026	November 9, 2026
August 5, 2025	June 16, 2026	November 10, 2026
September 1, 2025	July 13, 2026	December 7, 2026
September 2, 2025	July 14, 2026	December 8, 2026
October 6, 2025	August 17, 2026	January 11, 2027
October 7, 2025	August 18, 2026	January 12, 2027
November 3, 2025	September 14, 2026	February 8, 2027
November 4, 2025	September 15, 2026	February 9, 2027
December 1, 2025	October 12, 2026	March 8, 2027
December 2, 2025	October 13, 2026	March 9, 2027
January 5, 2026	November 16, 2026	April 12, 2027
January 6, 2026	November 17, 2026	April 13, 2027
February 2, 2026	December 14, 2026	May 10, 2027
February 3, 2026	December 15, 2026	May 11, 2027
March 2, 2026	January 11, 2027	June 7, 2027

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March 3, 2026	January 12, 2027	June 8, 2027
April 6, 2026	February 15, 2027	July 12, 2027
April 7, 2026	February 16, 2027	July 13, 2027
May 4, 2026	March 15, 2027	August 9, 2027
May 5, 2026	March 16, 2027	August 10, 2027
June 1, 2026	April 12, 2027	September 6, 2027
June 2, 2026	April 13, 2027	September 7, 2027
July 6, 2026	May 17, 2027	October 11, 2027
July 7, 2026	May 18, 2027	October 12, 2027
August 3, 2026	June 14, 2027	November 8, 2027
August 4, 2026	June 15, 2027	November 9, 2027
August 31, 2026	July 12, 2027	December 6, 2027
September 1, 2026	July 13, 2027	December 7, 2027
October 5, 2026	August 16, 2027	January 10, 2028
October 6, 2026	August 17, 2027	January 11, 2028
November 2, 2026	September 13, 2027	February 7, 2028
November 3, 2026	September 14, 2027	February 8, 2028
November 30, 2026	October 11, 2027	March 6, 2028
December 1, 2026	October 12, 2027	March 7, 2028
January 4, 2027	November 15, 2027	April 10, 2028
January 5, 2027	November 16, 2027	April 11, 2028
February 1, 2027	December 13, 2027	May 8, 2028
February 2, 2027	December 14, 2027	May 9, 2028
March 1, 2027	January 10, 2028	June 5, 2028
March 2, 2027	January 11, 2028	June 6, 2028
April 5, 2027	February 14, 2028	July 10, 2028
April 6, 2027	February 15, 2028	July 11, 2028
May 3, 2027	March 13, 2028	August 7, 2028
May 4, 2027	March 14, 2028	August 8, 2028
May 31, 2027	April 10, 2028	September 4, 2028
June 1, 2027	April 11, 2028	September 5, 2028
July 5, 2027	May 15, 2028	October 9, 2028
July 6, 2027	May 16, 2028	October 10, 2028
August 2, 2027	June 12, 2028	November 6, 2028
August 3, 2027	June 13, 2028	November 7, 2028
September 6, 2027	July 17, 2028	December 11, 2028
September 7, 2027	July 18, 2028	December 12, 2028
October 4, 2027	August 14, 2028	January 8, 2029
October 5, 2027	August 15, 2028	January 9, 2029
November 1, 2027	September 11, 2028	February 5, 2029
November 2, 2027	September 12, 2028	February 6, 2029
December 6, 2027	October 16, 2028	March 12, 2029
December 7, 2027	October 17, 2028	March 13, 2029

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Esthetics & Advanced Esthetics - 750 Clock Hours

Length: 6-9 Months (750 Hours)

	Full-time (23 weeks)	Part-time (35 weeks)
<u>Course Start Date</u>	<u>Expected Graduation Date</u>	<u>Expected Graduation Date</u>
January 7, 2025	June 17, 2025	September 9, 2025
February 4, 2025	July 15, 2025	October 7, 2025
March 4, 2025	August 12, 2025	November 4, 2025
April 1, 2025	September 9, 2025	December 2, 2025
May 6, 2025	October 14, 2025	January 6, 2026
June 3, 2025	November 11, 2025	February 3, 2026
July 1, 2025	December 9, 2025	March 3, 2026
August 5, 2025	January 13, 2026	April 7, 2026
September 2, 2025	February 10, 2026	May 5, 2026
October 7, 2025	March 17, 2026	June 9, 2026
November 4, 2025	April 14, 2026	July 7, 2026
December 2, 2025	May 12, 2026	August 4, 2026
January 6, 2026	June 16, 2026	September 8, 2026
February 3, 2026	July 14, 2026	October 6, 2026
March 3, 2026	October 6, 2026	November 3, 2026
April 7, 2026	September 15, 2026	December 8, 2026
May 5, 2026	October 13, 2026	January 5, 2027
June 2, 2026	November 10, 2026	February 2, 2027
July 7, 2026	December 15, 2026	March 9, 2027
August 4, 2026	January 12, 2027	April 6, 2027
September 1, 2026	February 9, 2027	May 7, 2027
October 6, 2026	March 16, 2027	June 8, 2027
November 3, 2026	April 13, 2027	July 6, 2027
December 1, 2026	May 11, 2027	August 3, 2027
January 5, 2027	June 15, 2027	September 7, 2027
February 2, 2027	July 13, 2027	October 5, 2027
March 2, 2027	August 10, 2027	November 2, 2027
April 6, 2027	September 14, 2027	December 7, 2027
May 4, 2027	October 12, 2027	January 4, 2028
June 1, 2027	November 9, 2027	February 1, 2028
July 6, 2027	December 14, 2027	March 7, 2028
August 3, 2027	January 11, 2028	April 4, 2028
September 7, 2027	February 15, 2028	May 9, 2028
October 5, 2027	March 14, 2028	June 6, 2028
November 2, 2027	April 11, 2028	July 4, 2028
December 7, 2027	May 16, 2028	August 8, 2028

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School Information Available to Students

Informational materials are made available to all enrolled students and all prospective students requesting such information digital/hardcopy. These materials include the school's Program Catalog and Student Handbook, the Jeanne Clery Disclosure of the school's Security Policy, Title IV Policies and Procedures Manual, and the school's Consumer Information. Please refer to the school's website and the school's hard copy Title IV Manual for information regarding policies and procedures which are located under the Admissions and Financial Aid tab, the Policies and Procedures tab.

The current Program Catalog & Student Handbook provides information regarding the following:

1. Licensing, accrediting agencies and other memberships
2. Academic programs and length of programs
3. Policies regarding satisfactory academic progress and attendance
4. Graduation requirements
5. Institutional refund policy
6. School regulations regarding conduct
7. Guidelines for instruction as the student progresses through the program
8. Organizational chart including faculty and administrative staff
9. Description of instructional facility
10. Health, safety, security, and emergency procedures
11. Physical, safety, and licensing requirements of the profession; and
12. Graduation, licensure, and placement rates

The Jeanne Clery Disclosure of DDBS Security Policy can be found digitally on the school's website under the Admissions and Financial Aid tab, in hardcopy form inside the Title IV Manual upon request. Which will provide information regarding the following:

1. Policies for reporting crimes and other emergencies
2. Campus emergency response and evacuation
3. Security of and access to campus facilities
4. Campus law enforcement policy
5. Security awareness and crime prevention programs
6. Drug and alcohol regulations
7. Sexual assault, rape, and misconduct information and rules
8. Sex offender registry information
9. Campus crime statistics report
10. Gramm Leach Bliley Program
11. Child Protection Act
12. Violence against Women's Act

Financial aid information included in the Title IV Manual or in the Consumer Information Disclosures provides:

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1. Description of all financial aid programs available at the school
2. Procedures and descriptions of forms used to apply for aid
3. Student eligibility criteria
4. How awards are determined, including the amounts of each award
5. Estimates of typical costs for off-campus room and board, transportation and any additional costs the student may expect
6. Student rights and responsibilities
7. Requirements the student must maintain to continue to be eligible for financial aid (e.g., standards for satisfactory progress)
8. Method and frequency of payment; and
9. Refund distribution policy

Adequate Staffing Procedure

General Administrative Requirement

The Federal Student Aid Policies and Procedures Manual (Title IV Policies and Procedures Manual) is intended to reflect updated federal, state, and institutional regulations and to provide guidance to financial aid representatives on the administration and monitoring of financial aid processes at Dymond Designs Beauty School. The Title IV Manual is also useful to other offices at our school in cases of appeal, academic review, financial and compliance audits, and state and federal program reviews.

Introduction to the Financial Aid Department

DDBS's Financial Aid Department is central to the processing and monitoring of all Federal Student Aid. This includes federal, state, outside agencies, and/or institutional financial assistance. The Financial Aid Department works closely with the Admissions and Business Offices, the Director of Operations, and the instructional staff and is accessible during school hours.

Mission & Purpose of the Financial Aid Department

The Financial Aid Department follows DDBS's mission to provide the most up-to-date training and an innovative curriculum with the core objective of job placement after completion of course. We strive to inspire individuals and help them implement their education into becoming industry professionals within the scope of their study. The Financial Aid Department provides information, guidance, and advice to students regarding securing funding for their educational and financial obligations. The Department is responsible for processing and reporting all Title IV aid for which students are eligible. The Director of Financial Aid and staff are available during the normal business hours of the school.

Structure and Responsibilities of the Financial Aid Department

The Director of Financial Aid and Business Center Liaison are responsible for the administration of all Title IV Higher Education Act (HEA) awards. This includes awarding, cancelling, confirming completion of requirements, and the return of Title IV funds calculations.

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The Business Center Liaison, and Director of Financial Aid, will complete all regulatory reporting.

The Director of Financial Aid, Admissions Coordinator, and Business Center Liaison along with the supportive staff members counsel, package, complete the verification process. The Director of Financial Aid also resolves comment (“C”) codes concerning applications for Federal Student Aid. The financial aid and business center departments coordinate and consult with the third-party servicer, Boston Educational Network (BEN), for processing of all Title IV financial aid.

The Business Center Department is responsible for generating a report to review the group of such students and monitor the 14 days’ time to comply with the regulations 668.22(a)(4)(ii) and 668.165(a)(2) -(5) of HEA 1965.

Financial Aid Department Administration

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

Tuesday	8:30am to 3:30pm
Wednesday	8:30am to 4:00pm
Friday	8:30am to 4:00pm
Saturday	8:30am to 4:00pm
Telephone:	(313) 974-6164 Ext 103
Email:	raynakarpuk@ddbs.edu
Website:	www.ddbs.edu

The DDBS Financial Aid staff provides the tools and resources necessary to open the door to quality education. Regardless of the size of the school, the Financial Aid Department will always retain enough qualified personnel to administer the Title IV programs effectively. DDBS currently has enough qualified personnel to administer the Title IV programs. While the primary responsibility of meeting postsecondary education costs rests with the student and family, our staff of financial aid professionals seeks to maximize financial aid opportunities by providing guidance and information about Title IV grant and loan programs, student employment, and payment options.

Policies & Procedures Development Responsibilities

The Director of Financial Aid is responsible for the development, implementation, and updates of all Title IV policies and procedures and performs/maintains periodic reviews and updates. The Director of Operations is responsible for ensuring all departments are aware of any changes and implementations of policies and procedures or the development of new ones. Updates are implemented as the federal and state regulations change. Policies and procedures are reviewed annually at a minimum and notification is sent to all concerned parties via email and inter-office memorandum.

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The Policies and Procedures manual is available online on the institution's official website, ddbs.edu. The Director of Financial Aid frequently reviews the Department of Education's FSA Partner Connect website, as it is a Title IV HEA requirement for schools to have access to the FSA Partner Connect website. All Financial Aid staff subscribe to the FSA Partner Connect Knowledge Center updates via email for up-to-date information.

Adequate Checks and Balances Procedure

Administrative Organization & Department Management

The administration at DDBS is made up of the Admissions Office, Business Offices, Financial Aid Office, Records Department, and Director of Operations/CEO. The administrative staff work together cohesively to ensure compliance and to create a system of checks and balances. This ensures that DDBS is following Title IV, HEA regulations.

Administrative Organizational Staff

Director of Operation/CEO

Position Summary:

Dymond Designs Beauty School seeks a full-time Director of Operations to oversee all day-to-day operations and assist with the facilitation of all programs at the school's main campus. He / She is responsible for daily operations of all aspects and for the schools FSA programs, in addition to managing its resources, developing, and implementing an operational plan and ensuring that procedures are carried out properly. This position provides active and visible leadership through promotion of DDBS's culture, mission, and core beliefs. Candidates are strongly urged to have excellent organizational management. The ideal candidate will be enthusiastic, patient, a team player, friendly, and excited to learn. Excellent communication skills and the ability to manage multiple details and tasks in a fast-paced environment are essential. Interested candidates should submit a cover letter and resume to the Director of Operations.

ESSENTIAL DUTIES:

1. Overseeing daily operations and school activities of school personnel in admissions, education, student services and administration
2. Providing leadership through strong team structure and communication
3. Maintaining and improving student attendance and retention
4. Motivating campus associates through recognition and career development
5. Achieving school goals and establishing specific targets for budget
6. Monitoring student onboarding and job placements
7. Establishing partnerships within the community to facilitate job placement and alternative training opportunities
8. Excellent leadership and organizational abilities
9. Superior knowledge of industry regulations and operational guidelines
10. In-depth knowledge of data analysis software
11. Working knowledge of customer relationship management

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12. Proven knowledge of performance evaluation metrics in a business setting
13. Outstanding negotiation skills
14. Excellent interpersonal, written and oral communication skills
15. Demonstrated success in innovating solutions to increase productivity and profitability.
16. Overseeing daily financial operations, quarterly and yearly budgets, accounts payable/receivable.
17. Responsible for the financial standards for administering the FSA Programs
18. Has an individual capable of administering the FSA programs and coordinating federal and nonfederal financial aid.
19. Ensures schools have an adequate number of qualified staff to administer FSA programs.
20. Ensures that a procedure to report changes to ED about the school's current eligibility status, (for example, changes in ownership, address, name, officials, and third-party.
21. Must refer any suspected cases of FSA fraud, abuse, or mis-presentation to ED's Officer of Inspector General.
22. If the schools fail to meet the standards of financial responsibility the CEO must obtain a letter of credit.
23. The CEO must have an independent auditor perform an annual federal audit of the school's FSA financial operations.
24. The CEO must cooperate fully with any program reviews or audits and make available all necessary information to the reviewers or auditors, services, programs, and location.
25. Must have a procedure to ensure that FSA funds for new programs and locations are not disbursed until approval (when required) are received from ED.
26. Must establish clear lines of responsibility among pertinent school offices.
27. Has good communication and cooperation among personnel in the pertinent school offices.
28. Maintains effective record keeping systems for both student records and financial records.
29. Has an adequate system for checks and balances to ensure separation of award functions from disbursement functions.
30. Must have accurate information about student applicants for FSA aid and resolve any discrepancies or inconsistencies.
31. Provides adequate financial aid and loan debt management counseling to students.
32. Must ensure compliance with cybersecurity requirements.
33. Has no criminal or fraudulent activities occurred as it manages federal funds and administers FSA programs.
34. Must established reasonable standards of satisfactory academic progress (SAP) for students.
35. Has established a fair and equitable institutional refund policy (if required by the school's accrediting agency).
36. Has an operable drug-free workplace, as required by the Drug-Free Workplace Act.
37. Make available all published information required by the Student Right-to-Know Act, the Campus Security Act, and any other applicable laws and regulations.
38. Provides the services described in its publication.

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Business Center Liaison

Position Summary:

The school's business center liaison is responsible for most FSA-related fiscal operations within the school's business center. The business liaison provides critical services to the school in managing both federal and non-federal financial aid programs. Administering the accounting, record keeping, and reporting functions related to the school's use of federal and other funds requires many detailed, complex systems. The liaison is responsible for strong internal controls and sound business and financial management practices that are key to the success of these operations and properly delivering funds to students.

ESSENTIAL DUTIES:

1. Ensuring compliance with all state, local, federal, and accredited agencies which include financial audits, PSI testing schedules, CPL and Annual Report Reports and Data.
2. Responsible for paying all invoices and bills for the school.
3. Attending all mandatory meetings internal and external.
4. Able to multi-task
5. Maintain a system of internal controls that includes adequate checks and balances.
6. Coordinate activities and cooperate with the financial aid office in *projecting cash needed to cover disbursements*processing cancellations and institutional refunds*obtaining authorization to pay FSA funds*being aware of the changes in FSA laws and regulation*submitting accurate and timely reports*reconciling records to ensure financial aid and cash paying funds are adjusted properly and recorded.
7. Ensure that the functions of authorizing and disbursing FSA funds remain separate.
8. Maintain records consisted of Generally Accepted Accounting Principle, and government auditing standards.
9. Maintain records to ensure a clear audit paper trail.
10. Draw down and return FSA funds to program accounts.
11. Disburse funds to eligible students from FSA funds to program accounts.
12. Maintain a system of student accounts that records charges, credits, and due amounts.
13. Ensures compliance with cybersecurity requirements.
14. Calculate the return of *Title IV* funds, and if it applies, authorize post-withdrawal disbursements to students.
15. Establish and implement the institution's refund policy (if required by the school's accrediting agency or state agency).
16. Process returns of the *Title IV* funds to program accounts and post-withdrawal disbursements to students according to the applicable federal laws and regulations.
17. Assist in reporting FSA expenditures to the Department in a timely manner.
18. Reconcile accounts, including: *reconciling cash between school records and bank statement and reports*reconciling federal funds between bank statements and federally reported balances.
19. Assist in completing applications, fiscal reports and federal funds.
20. Maintain a cash management system to meet disbursement requirements and federal laws and regulations.
21. Provide general stewardship for federal funds, including maintaining bank accounts and investments as appropriate.

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22. Prepare for and participate in FSA program reviews and audits.
23. Before making a first disbursement of Direct Loan Funds, confirm that the borrowers have completed the entrance counseling.
24. Ensure that the Direct Loan Borrowers have completed exit counseling within the time permitted by the appropriate regulations and school policies.

Director of Financial Aid

Position Summary:

Responsible for administering the FSA programs and provides guidance to prospective loan applicants.

General Accountabilities:

1. Facilitate and implement policies and procedures of DDBS
2. Responsible for advising and counseling students and parents about financial aid.
3. Provides students with consumer information, as required by federal regulations
4. Attend all required DDBS staff meeting
5. Develop written policies and procedures about the way the school administers FSA programs.
6. Determines Student eligibility for financial aid assistance.
7. Adhere to the principle of separation of functions (no single office or individual may authorize payments and disburse FSA funds to students).
8. In administering financial aid programs, coordinate financial aid activities, with those of other school offices.
9. Monitor Student SAP (Satisfactory Academic Progress).
10. Maintain school records and student records that document the administration of the financial aid office.
11. Assist in reconciling loan records (for schools in the Direct Loan Program).
12. Reconcile student financial aid data provided to the business office to ensure all payments have been made, return of FSA funds have been accounted for, and expenditures have been reported.
13. Have a procedure to report any changes to ED about the school's current eligibility status (for example, change in ownership, address, name, officials, third-party servicers, etc.)
14. Perform limited fiscal operations, such as *authorizing payment of FSA funds to student accounts or to student directly*authorizing return of *Title IV* funds to program accounts and post-withdrawal disbursements to students. *Notifying a student who owes an overpayment because of the student's withdrawal from the school to recover the overpayment and provide data for reports.
15. Keep up-to-current on changes in laws and regulations to ensure that the school remains in compliance.
16. Assist in reporting program expenditures.
17. Manage and report on activities that involve financial aid.
18. Calculate the return of *Title IV* funds and, if it applies, authorize post-withdrawal

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disbursements to students.

19. Notify ED of the overpayments
20. Provide entrance and exit counseling to Direct Loan borrowers as part of the award and delivery process.
21. Implement and make sure Financial Aid Program is following federal guidelines
22. Communicates with Boston Educational Network, auditors, Director of Operations/CEO, and Business Office regarding *Title IV* funds.

Admissions Coordinator and Recruiter

Position Summary:

The Admission Coordinator & Recruiter is responsible for recruiting and admitting students to the school. This position is operated from the main branch location. The Admission Coordinator & recruiter actively seeks out potential students externally to seek out students to enroll by attending or presenting job/college fairs, open houses, visiting high schools, businesses, and any other form of external recruitment. For internal recruiting (develop and implement marketing materials and strategies, conducting tours, answering telephone and in-person questions about enrollment. Another primary responsibility is managing the student application process, acting as the primary point of contact for prospective students and their families by answering questions, conducting orientation after enrollment with another school admin. This position works closely with the following departments: Financial Aid, Business Center, and the Director of Operations and requires the individual to be enthusiastic, patient, a team player, friendly, and organized.

ESSENTIAL DUTIES:

1. Receive, read, route and/or file incoming mail, acknowledging where appropriate
2. Answer main telephone lines of Admission Office or school, to answer questions on admissions as well as general school information
3. Maintain online admission appointment calendar, coordinate applicant interviews and visits
4. Track progress of incoming application materials, following up on and requesting missing information
5. Attend meetings and training courses as required
6. Compose and manage correspondence; organize admission office mailings
7. Coordinate, organize, and prepare for admission office events with educators (open houses, exploration sessions, information sessions, job/college fairs etc.) including RSVP and confirmations
8. Assist and manage in the reenrollment process of current and returning students
9. Create statistical reports/trackers for daily and monthly updates, to monitor all recruitment and enrollment
10. Participate in activities related to the admission office
11. Receive, monitor, and report all registration enrollment payments
12. Perform other work-related duties assigned by the Director of Operations
13. Maintain relationships with spa/salon owners, counselors in high schools, and guidance offices
14. Review transcripts from other schools and transfer students to collab with director about next steps
15. Conduct Interviews
16. Verification of student transcripts
17. Notify the student if accepted or denied admissions
18. Prepare a monthly report due by the 5th of each month on the status of their department
19. Provide detailed information about the school's academic programs, admissions requirements,

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- financial aid options and student life
20. Follow up and assist students with the application process to ensure they complete the application process
 21. Create emails, brochures, and website content to attract potential applicants
 22. Maintain accurate records, positive student interaction, and status through email, phone, or text
 23. Knowledge of the school's admission and recruitment process which includes application requirements and financial options
 24. Weekly external tracker of the names of all external potential students that were spoken to, externally recruited and enrolled separate from internal recruitment

Student Digital Records Clerk

Position Summary:

Dymond Designs Beauty School seeks a full-time position for a Student Digital Records Clerk within the administrative offices. The responsibility of this position includes but is not limited to creating and developing all student digital records through the Rollcall Software System. This position also entails inputting data such as attendance, grades, exams, Minimum Practical Applications (MPA's), start/end date, student personal information, completed clock hours, and cumulative grades/attendance for students' official transcripts. The Student Digital Records Clerk will be responsible for training faculty on how to create and input data into a student digital file. The Digital Clerk will work closely with the Admissions Coordinator and Instructors to assure all student data is correct. The Student Digital Record Clerk will receive all student hard-copy files from the admissions coordinator, and Director of Operations **ONLY** so that an academic digital record of the student is created. All academic and attendance is recorded by Instructors then given to the Data Clerk for input into student academic digital file.

The ideal candidate will be enthusiastic, patient, a team player, friendly, excited to learn and willing to grow within the organization. Excellent communication skills and the ability to manage multiple details and tasks in a fast-paced environment are essential. Interested candidates should submit a cover letter and resume to the Chief Executive Officer of DDBS.

ESSENTIAL DUTIES:

The Student Digital Record Clerk daily task is:

1. To create an academic digital file for each student.
2. Input all student information needed to create an official transcript such as student information, grades, course descriptions, and other information in accordance with policies.
3. Must greet visitors in person or on the phone, providing customer service with guidance regarding the registration process; may refer customers to the appropriate department.
4. Processes name changes, any student updates, and all academic and demographic information in the digital files.
5. Maintains digital files in proper order; pulls records for processing and refiles.
6. Performs miscellaneous job-related duties as assigned.
7. Works with DDBS Rollcall or any SMS Software Representative in developing or changing the student digital records (If-needed) to remain in compliance with the State of Michigan Department of Licensing and Regulatory Affairs (LARA) Cosmetology Division and the Council of Occupational Education.
8. Responsible for training faculty to create student digital files if there are more opportunities to grow the records department.
9. Performs other work-related duties assigned by the Director of Operations.
10. Works directly with the admissions coordinator, business center, and financial aid office with multiple tasks needed throughout the day.
11. Attend meetings and training courses as required

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12. Responsible for all upkeep and disposal of all student records.
13. Must maintain organized files and assist with all federal, state, and local agencies regulations for proper compliance.
14. Must update all records for withdrawal students.
15. Must assist in any administrative duty when needed.

Separation of Duties

These various offices work independently as required by the regulatory agencies but in close coordination. All offices report to the CEO/Director of Operations at DDBS. The admissions coordinator is responsible for all recruitment and admissions activities performed by admissions representatives, registration, and orientation of new students. The Financial Aid Department is responsible for administering the FSA programs and provides guidance to prospective loan applicants. The Business Office Liaison and the Student Records Clerk maintains student records related to all payments including Title IV student financial assistance. The Business Office Liaison is also responsible for administering the accounting, record keeping, and reporting functions related to the school's use of federal and other funds, and internal controls and sound business and financial management practices. The Director of Operations is responsible for daily operations in all aspects and for the school's FSA programs, in addition to managing its resources, developing, and implementing an operational plan and ensuring that procedures are carried out properly.

Fiscal Requirements

Additional fiscal requirements are found throughout most sections of this manual. The fiscal requirements here are also *part* of the fiscal requirements in the rest of this manual.

Federal Bank Account Requirements Policy

Date of Last Revision: 3/8/2025

Dymond Designs Beauty School (DDBS), located in the state of Michigan, has federal aid accounts outside of the school's regular checking account. These accounts maintain federal funds, such as those from the Federal Student Aid (FSA) program. DDBS ensures that these funds are used only for eligible students receiving Pell Grants/Direct Loans and has:

- Identified that FSA funds are maintained in the account by including the phrase "Federal Funds" in the beginning of the name of the account,

ED has required DDBS to maintain Title IV funds in a separate depository account that contains no other funds if the DOE determines that the school failed to comply with the following:

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- Cash management regulations,
- Recordkeeping requirements,
- Reporting requirements, or
- Applicable program regulations.

Federal Bank Account Requirements Procedure

Director of Operations/CEO

- Ensures that all bank accounts that receive federal funds are identified as containing “Federal Funds” or Title IV, and
- Maintain copies of all relevant documentation.
- Confirm when transferring funds that the account name has not changed and is labeled “Federal Funds”

Business Center Liaison

- Maintaining copies of all relevant documentation
- Reconciliation for all bank accounts

Interest-Bearing or Investment Account

Dymond Designs Beauty does not hold an interest-bearing or investment account.

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

- The school drew down less than \$3 million from these funds in the prior award year and anticipates that it will not draw down more than \$3 million in the current award year,
- The school can demonstrate that it would not earn over \$250 in interest on the funds it will draw down during the award year, or
- The school requests these funds under the just-in-time payment method.

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

Cash Management Policy

Date of Last Revision: 3/8/2025

Dymond Designs Beauty School Cash Management Policy has an accounting system which provides effective control over and accountability for all funds received from the U.S. Department of Education’s (ED’s) Grant Administration and Payment System (G5).

Cash Management Procedure

Dymond Designs Beauty School has a payment method that is used to request funds for Pell Grant to the Department of Education prior to disbursing aid for eligible students. DDBS uses a third-party servicer, Boston Educational Network (BEN) for Verifications, Loan/Pell Processing and Disbursements. Any amount requested is only for what is immediately needed at that time. Once the amount has been requested and disbursed from the school’s federal account, the school

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must disburse within the 3-day time frame according to federal regulations, unless unusual circumstances can be documented. Student Satisfactory Academic Progress is confirmed prior to approving disbursement requests.

DDBS has separate federal bank accounts (Federal Funds Pell and Federal Funds Loan) is maintained for the Federal funds. ACH transfers from the Federal Reserve Bank are deposited into the School's Federal funds account. Disbursements are made from the account only for eligible students, and for administrative fees due to the school, if applicable.

Payments to students are made by crediting the students' accounts through the Business Center Liaison through an email notification within 3 days, which includes the expected or actual date of payment and the amount to be paid from each program. The Business Office and Financial Aid Office records all payments and disbursements to the students' accounts.

If Title IV funds that are credited to a student's account exceeds the school's charges and creates a credit balance, the credit balance is returned as follows:

- a. To the student within 30 days if a student has paid all charges, including known charges for hours clocked over contract, if authorized by the student.
 - b. If the student has withdrawn, the credit balance is returned to the Federal funds account within the 45-day time frame, according to the distribution requirements per the Return of Title IV Funds policy, or the refund calculations.
2. DDBS will not request from or charge any student a fee for processing or handling any application, form or data required to determine a student's eligibility for Title IV funds.
 3. To be eligible for FSA participation, the school may derive no more than 90% of its revenues from the FSA programs. The 90/10 percentage is disclosed as a footnote to the audited financial statement, which is submitted annually to the Department.

Fiscal Recordkeeping Process Policy

Date of Last Revision: 3/8/2025

DDBS is required to submit financial records audited by a CPA (**Nathan Ferguson, CPA LLC**) with annually updated credentials from GAAP, ED that keep all secure electronic fiscal data. To remain in good standing with both ED and COE, the audited financial report's outcome must fall within their guidelines.

DDBS must keep comprehensive, accurate program and fiscal records related to its use of FSA program funds. The importance of maintaining complete, accurate records cannot be overemphasized. Program and fiscal records must demonstrate DDBS can meet the administrative and fiscal requirements for participating in the FSA programs.

DDBS has a licensed firm that maintains documentation of all fiscal records. DDBS's third-party servicer, Boston Educational Network, also secures all DDBS's electronic fiscal data.

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Records must demonstrate proper administration of FSA program funds and show a clear audit trail for FSA program expenditures. For example, records for each FSA recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed in accordance with program regulations. In addition to the general, institutional record keeping requirements discussed here, DDBS must also comply with all program-specific record keeping requirements contained in the individual FSA regulations.

DDBS maintains all required records in a systematically organized manner. Unless a specific format is required, DDBS may keep the required records in hard copy, computer files, and other media formats.

All other record information, regardless of the format used, must be retrievable in a coherent hard-copy format or in a media format acceptable to ED. The requirement of providing for other media formats acceptable to the Department allows for the use of new technology as it is developed. The Department will notify DDBS of acceptable media formats; schools should not apply for approval of a media format.

DDBS complies with the following laws of record retention:

- The minimum Record Retention Periods for FSA funds is 3 years.
- Loans are retained UNTIL THE END of the award year in which the student last attended.
- The loan is satisfied, or the documents are needed to enforce the obligation.
- The date on which a loan is assigned to the DOE, cancelled, or repaid.
- End of the award year for which the aid was awarded; and
- End of the award year in which the report was submitted.

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

DDBS may maintain a record in an imaged media format only if the format can reproduce an accurate, legible, and complete copy of the original document. When printed, the copy must be approximately the same size as the original document. Please note that promissory notes that are signed electronically must be maintained electronically in accordance with the requirements of 34 CFR 668.24(d)(3)(i) through (iv).

Fiscal Recordkeeping Process Procedure

Financial Aid Director, Business Office Liaison & Records Clerk

The Financial Aid Office, Business Office and Records Clerk are responsible for maintaining the following documentation in student files:

- Satisfactory Academic Progress (SAP) status,
- Enrollment status,

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- Certification statements,
- Resolution of conflicting information,
- Professional Judgment decisions, and
- Financial Aid history information for transfer students.

Admissions Coordinator & Records Clerk

The Admissions Office and Records Clerk will maintain the following documentation in student files:

- Admission enrollment documentation,
- Proof of high school completion, and
- Admissions interview documentation.

Director of Operations & Business Center Liaison

The Director of Operations and Business Center Liaison will maintain the following documentation:

- State agency reports,
- Accreditation reports and approval,
- Self-evaluation reports, and
- DDBS financial records
- Program Participation Agreements
- Audits

Director of Financial Aid and Business Center Liaison

The Director of Financial Aid or Business Center Liaison will maintain the following documentation:

- Program Participation Agreement
- ECAR,
- Audits and program review reports,
- Pell grant statements,
- Direct Loan statements, and
- Reconciliation reports.

Responsibilities of the Director of Operations and Business Center Liaison

January 2 – Contact the CPA to request necessary audit documents

February 2 – Submit final audited financials to ED (no later than June 30)

Ongoing – make corrections suggested by ED

June 30 – Final submission of corrected audited financials to ED

Monthly – maintain monthly records

Ongoing – Keep books in compliance by communicating with auditing companies

Reconciling G5, the DDBS Federal Funds Account and the General Ledger Policy

Date of Last Revision: 3/8/2025

On a monthly basis BEN reconciles their records of Title IV activity between COD (student disbursements and student refunds) and G5 (cash disbursements and refunded cash). DDBS then completes the reconciliation process by reconciling the student accounts with the federal funds account and general ledger with documentation of disbursements and refunded money from COD and G5 provided by BEN.

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Reconciling G5, the DDBS Federal Funds Account and the General Ledger Procedure

Business Center Liaison

1. Log into the BEN financial aid portal
2. From the main menu scroll down to the bottom of the screen to the “Reporting” section and select the “Disbursement Request Report” link.
3. Use the calendar to select the monthly date range that you want to access (ex. 1/1/xx – 1/31/xx), choose the appropriate Award Year, and select the Pell or Loan option.
4. Once the date range and Title IV program are established select the magnifying glass button.
5. The results will produce a list of all Title IV disbursements and refunds for the specified period of time (monthly). Print this result.
 - a. The printed report will be titled BEN Disbursement Request Report.
 - b. Any refunds for the period selected will be titled REFUND under the Transaction Type column.
 - c. Refunds will be listed by student name, with the amount refunded appearing as an Adjustment Amount.
6. The Refund Ledger report on the portal will also provide any refund (and only refund) amounts for the chosen time period.
7. Run a report from DDBS (student ledger transactions) using the same criteria.
 - a. EX 1/1/xx – 1/31/xx
 - b. Title IV program (if available)
8. Compare the results of the two reports: the BEN Disbursement Journal Record Report (including disbursements and refunds) and DDBS report using the same date range.
 - a. The sum of disbursements and refunds on each report should match.
 - b. The results of the two reports are also cross-checked with the general operating account bank statement and the federal funds account bank statement.
9. Identify and resolve any discrepancies.
10. These figures should also match the activity with our Federal Funds account. If there are discrepancies within this comparison, they must be resolved as well.
11. To tie amounts directly to student ledger transactions, follow these steps:
 - a. Log into the BEN school portal
 - b. Click on the “Disbursements” link under Reporting on the left-hand side.
 - c. Select the chosen date range.
 - d. Select the Title IV program (DL or Pell, which includes SEOG)
 - e. Click the Retrieve button
 - f. This will provide all Disbursements in that Title IV program for the selected time period.
 - g. The report can be exported directly to Excel to aid in data analysis, combination, and organization.
 - h. Use the report from Step #6 above (Refund Ledger) to compare refunds for the time period.

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- i. Compare these results to DDBS internal student ledger transactions.
12. Return to the BEN FA portal and access DDBS “Downloads” folder. Each month BEN will place a spreadsheet in this folder with the COD and G5 data from the previous month for reconciliation purposes. This spreadsheet contains the institution’s Beginning Cash Balance (COD), Cash Receipts and Refunds of Cash (G5), drawdowns, disbursement and adjustment information and Ending Cash Balance. The data is compiled from the monthly SAS reports and allows DDBS to reconcile from the ledger transaction account all the way up through the COD and G5 systems. Any resolutions to a non \$0 Ending Cash Balance are documented here, including timing issues or other reconciling concerns.
13. Once DDBS has verified that all reports match (all disbursements, refunds, and adjustments on the BEN Disbursement Report and DDBS internal record system and the federal funds account has been balanced, the entire reconciliation process is complete for that Title IV program for the specified (monthly) period of time.
14. This process will be completed for each Title IV program DDBS offers.
 - a. Federal Pell and Direct Loans
15. Reconciliation must be completed for each month. For example, the next month to reconcile is 2/1/xx-2/28/xx, followed by 3/1/xx-3/31/xx, and so on.

Reconciling G5 and the school’s federal funds account and the general ledger

1. Log into the BEN school portal
2. From the main menu scroll down to the bottom of the screen to the “Reporting” section and select the “Reconciliation Report” link.
 - a. This is below where you access Pell and loan rosters.
3. Use the calendar to select the monthly date range that you want to access (ex. 1/1/xx – 1/31/xx), choose the appropriate Award Year, select the Pell, SEOG, Loan or All Program option, and choose the Detailed option.
 - a. Typically, “All Award Years” and “All Award Types” will be selected when reconciling the federal funds account as this will show all the Title IV activity for the period of time selected.
4. Once the criteria are established select the magnifying glass button.
5. The results will produce a list of Title IV disbursements and refunds for the specified period of time (monthly) and Title IV program(s). Print or export this result.
6. Compare the cash transactions from this report to the transactions in your Federal Funds account. If there are discrepancies within this comparison, they must be resolved.
7. Be sure to reconcile all Title IV activity for each award year and Title IV program for each month.

DDBS will maintain a record of the monthly reconciliation activities and any corrections that were made for future review.

Posting payments:

Pell – Federal Pell (description with year and period)

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DL- S – Direct Loan Subsidized (description with year and period)

DL – U – Direct Loan Unsubsidized (description with year and period)

DL – Plus - (description with year and period)

Tuition – Needs to say: Tuition – Personal Funds (check, cash, money order, credit card)

TFC needs to say – TFC alternative loan funds.

Scholarships or ACE grant need to say where the funds came from.

Posting refunds:

Refund to student

Refund to student from federal funds (check)

Refund to student from cash (check)

Refund to student from cash (cash)

Refund to Direct Lending

Refund to federal direct subsidized loan (EFT)

Refund to federal direct unsubsidized loan (EFT)

Refund to Pell

Refund to Federal Pell Grant (EFT)

Monthly and Annual Reconciliation Procedure

Business Center Liaison

- Determine the amount disbursed each month according to the third-party servicer, BEN, and the reconciliation report
- Compares the monthly reconciliation report so BEN can complete the COD and tracks all discrepancies in an excel sheet
- Works with (BEN) third-party servicers to assist in resolving any discrepancies and reconciling any reports
- Determine the amounts disbursed and cash collected daily according to the Business Office records, ledger, and bank statements

Third-Party Servicer

- Works with the business center liaison to resolve discrepancies
- Prepares monthly reconciliation reports

Procedures for Handling Overpayments Policy

Date of Last Revision: 3/8/2025

An overpayment exists when a student's aid package exceeds their need. DDBS must always take care not to overpay a student when packaging their aid. Circumstances may change after a student has been packaged and the student's aid that could result in overpayment. In some cases, R2T4 is a result of an overpayment that a student is required to return to a grant or loan program. Grants over payments of \$50.00 or less do not have to be returned.

A student who owes overpayment remains eligible for Title IV, HEA program funds during and beyond 45 days from the date that DDBS sends a notification to the student

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Procedures for Handling Overpayments

Responsibilities of the following parties:

Director of Financial Aid

- Update the student's ledger account with the disbursement amount,
- Alert the Business Center liaison department of the overpayment,
- Notify the student of the disbursement and the overpayment within 14 days of the disbursement,
- Issue the overpayment to the student and apply it to the ledger account, and
- Make a copy of the ledger transactions for the student's financial aid file.

Records Clerk

- Place copy of student ledger in the financial aid file.

Excess Cash Policy

Date of Last Revision: 3/8/2025

The Department of Education (the Department) considers excess cash to be any amount of Title IV, HEA program funds (other than Federal Perkins Loan Program funds) that a school does not disburse to students or parents by the end of the third business day after the date the school. DDBS has the following procedure for excess cash (1) receiving the funds from the Department, or (2) depositing or transferring to its federal account previously disbursed Title IV funds received from the Department. In some circumstances, cash may be held for up to 7 calendar days if a school meets the excess cash tolerance and can disburse the aid to students within that time frame. In no circumstance should cash balances remain beyond the 7-day period.

Upon finding that DDBS maintained an excess cash balance more than allowable tolerances, the actions ED may take include, but are not limited to:

- Requiring the school to reimburse ED for the costs incurred in providing that excess cash to the school, and
- Providing funds to the school under the reimbursement payment method or heightened cash monitoring payment method.

Excess Cash Procedure

Business Office Liaison

- Disburse FSA funds to the students,
- Monitor Excess Cash in accounts monthly,
- Return excess cash to ED no more than 3 days after receiving the funds, and
- Keep funds for an additional 7 days beyond the initial three-day limit if there are extenuating circumstances.

Credit Balance Authorization/Retention Procedures Policy

Date of Last Revision: 3/8/2025

A Credit Balance Authorization is issued to a student if they or their parent would like to place a hold on a credit balance for the purpose of paying tuition and fees. To place a hold on such

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funds, the student or parent must complete the **Authorization to Hold a Federal Student Aid Credit Balance** form (see Appendix).

Title IV Credit Balance

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

If FSA disbursements to a student's account at the school create an FSA credit balance, DDBS will pay the credit balance directly to the student or parent as soon as possible; no later than 14 days after the initial disbursement or in the following circumstances:

- If the credit balance occurred on or before the first day of class of that payment period, payment will occur on the first day of class for that payment period
- If the credit balance occurred after the first day of class of a payment period, payment will occur no later than 14 days after the initial disbursement.

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

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

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

Credit Balance Authorization/Retention Procedures Procedure

Business Office Liaison

- Determine if the student will have a credit balance,
- Offer the student or parent (in the event of a Parent Plus loan) the option to complete the Credit Balance Authorization form, and
- If a student or parent chooses not to complete the form, overpayment must be issued based on the parent or student information submitted to the Business Office.

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Compliance Audits and Audited Financial Statements

Date of Last Revision: 3/25/2025

Policy Reason

An institution that participates in any Title IV, HEA program must at least annually have an independent auditor conduct a compliance audit of its administration of that program and an audit of the institution's general purpose financial statements 668.23(a)(2).

Submission Deadline 668.23(a)(4)

Except as provided by the Single Audit Act, Chapter 75 of title 31, United States Code, an institution must submit annually to the Secretary its compliance audit and its audited financial statements no later than six months after the last day of the institution's fiscal year.

Audit Submission Requirements 668.23(a)(5)

In general, the Secretary considers the compliance audit and audited financial statement submission requirements of this section to be satisfied by an audit conducted in accordance with the Office of Management and Budget Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, or the audit guides developed by and available from the Department of Education's Inspector General, whichever is applicable to the entity, and provided that the Federal student aid functions performed by that entity are covered in the submission. (Both OMB circulars are available by calling OMB's Publication Office at (202) 395-7332, or they can be obtained in electronic form on the OMB Home Page (<http://www.whitehouse.gov>).

Compliance Audits for Institutions 668.23(b)

An institution's compliance audit must cover, on a fiscal year basis, all Title IV, HEA program transactions, and must cover all of those transactions that have occurred since the period covered by the institution's last compliance audit.

The compliance audit required under this section must be conducted in accordance with—the general standards and the standards for compliance audits contained in the U.S. General Accounting Office's (GAO's) Government Auditing Standards. (This publication is available from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402); and procedures for audits contained in audit guides developed by, and available from, the Department of Education's Office of Inspector General.

Audited Financial Statements 668.23(d)

An institution must also submit, to the extent requested by the Secretary, a set of financial statements for its latest complete fiscal year, as well as any other documentation the Secretary deems necessary to decide on financial responsibility.

Financial statements submitted to the Secretary are prepared on an accrual basis in accordance with Generally Accepted Accounting Principles, and are audited by an independent auditor in accordance with generally accepted government auditing standards, and other guidance contained in the Office of Management and Budget Circular A-133, Circular A-128, or in audit guides developed by, and available from, the Department of Education's Office of Inspector

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General, whichever is applicable. DDBS school includes, as part of these financial statements, a detailed description of related entities based on the definition of a related entity as set forth in the Statement of Financial Accounting Standards (SFAS).

As part of these financial statements, DDBS must include a detailed description of related entities based on the definition of a related entity as set forth in the Statement of Financial Accounting Standards (SFAS). The disclosure requirements under this provision extend beyond those of student financial aid to include all related parties and a level of detail that would enable to Secretary to readily identify the related party. Such information may include, but is not limited to, the name, location and a description of the related entity including the nature and amount of any transactions between the related party and the institution, financial or otherwise, regardless of when it occurred.

Compliance Audits & Audited Financial Statements Procedure

Director of Operations, Director of Financial Aid, Business Center Liaison and Records Clerk

January 2 – Contact the CPA to request necessary audit documents

February 2 – Submit final audited financials to ED (no later than June 30)

Ongoing – make corrections suggested by ED

January 30 – Final submission of corrected audited financials to ED

Financial Aid Counseling

The following topics are to be addressed during Financial Aid counseling of students:

- Identify the sources and the amount of each type of aid offered.
- Provide a method by which aid is determined and disbursed, delivered, or applied to a student's account.
- Make available the rights and responsibilities of the student with respect to enrollment at the institution and receipt of financial aid; and
- Provide information regarding the institution's refund policy, the requirements for the treatment of Title IV, HEA program funds when a student withdraws under 668.22, its standards of satisfactory progress, and other conditions that may alter the student's aid package.

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Sample of Forms Used by the School

Purpose

The purpose of providing samples of forms used by the school is to demonstrate and provide clear documentation of policies/procedures, and additional forms that are provided to the students, and/or student file.

Below is a sample of forms used by the school:

- **Refund Policy and Signature Form**
- **Student Enrollment and Application Agreement**


Location of Information

The above forms are located in the Appendix.

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Chapter 2 Institutional Eligibility

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Reference

Institutional Eligibility Regulation:

600.20, 600.21, 600.4(a)(2), 600.5(a)(3), 600.6(a)(2); 600.2; 600.4(a)(3);
600.5(a)(4); 600.6(a)(3); 600.9; 668.43(b)



General Institutional Requirements

Purpose

To provide application procedures for establishing, re-establishing, maintaining, or expanding institutional eligibility and certification and updating application information. Certification policy is created to ensure that a renewal of certification is completed at least 90 days prior to the expiration of the current period of participation.

Eligibility and Certification Approval Report (ECAR) Policy

Date of Last Revision: 2/28/2025

The Director of Financial Aid at DDBS is responsible for submitting a timely and complete Eligibility and Certification Approval Report (ECAR) to the U.S. Department of Education. The ECAR is a snapshot of the school's participation, programs, location, officials, etc. A current copy of the ECAR must be kept in file by the school.

Electronic Application for Approval to Participate in Federal Student Aid Programs (E-App)

DDBS keeps a copy of the Electronic Application for Approval to Participate in Federal Student Aid Programs (E-App) and supporting documentation in the Director of Financial Aid's filing cabinet, filed under, "E-App." The initial E-App was submitted on 1/12/2022.

The E-App is located on the FSA Partner Connect homepage at fsapartners.ed.gov/home/. The E-App is used for initial eligibility and recertification. All types of changes regarding school eligibility, including change of officials, additional locations, and educational program updates are submitted through the E-App.

Program Participation Agreement (PPA)

The Program Participation Agreement (PPA) is a contract between the school and ED which outlines the regulations that the school is required to follow. The PPA is a requirement for certified/participating schools. The PPA is signed by both the school and ED. The signed PPA is kept on file by the owner, along with a copy of the most recent ECAR. The signed PPA and the ECAR are in the Director of Financial Aid's and CEO's filing cabinets, under, "PPA" and "ECAR," respectively.

Recertification is the process through which a school that is presently certified to participate in the FSA programs applies to have its participation extended beyond the expiration date of its

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current Program Participation Agreement (PPA). The Department will notify a school six months prior to the expiration of its PPA. The school must submit a materially complete application before the expiration date in its PPA.

If a school that is currently certified submits its materially complete application to the eligibility to participate in the FSA programs continues until its application is either approved or not approved. This is true even if the Department does not complete its evaluation of the application before the PPA's expiration date.

Approval for Clock-hour Programs at Proprietary/Post-secondary Schools

If a proprietary/post-secondary school submitting an E-App is in provisional status, any new program needs to have been continuously provided for at least two (2) years prior to the application date, or it cannot be approved until the school reaches the two-year mark. Short-term programs at all institutions must have been continuously provided for twelve months to be considered for approval.

Provisional Certification (if applicable)

If DDBS receives a Provisional Certification, the Director of Financial Aid and the Director of Operations are responsible for coordinating the outlined provisions in compliance with the Provisional Certification.

Federal Student Aid Training Requirement and Procedure

Date of Last Revision: 2/28/2025

DDBS has met this requirement and continuously trains for any updates. In accordance with the Program Participation Agreement and the Electronic Code of Federal Regulations, 34 CFR 668.14, the following administrative personnel have completed the required Federal Student Aid training, Fundamentals Training Series Program 20-21 from the following

Marlene Brooks, Owner/Director of Operations
Rayna Karpuk, Director of Financial Aid

This information is required if an institution wishes to participate for the first time in Title IV, HEA programs, or has undergone a change in ownership that results in a change in control as described in 34 CFR 600.31. The institution must require individuals identified in 668.13 to attend Title IV, HEA training no later than 12 months after the institution executes its program participation agreement. All responsible parties must complete 20 online training within 30-45 days of the date of hire, register with the Boston Educational Network on-line training within 3 months of hire date, and obtain access to all systems such as Power Vista Roll Call and other training modules from the Director of Financial Aid or Owner.

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Updating Information Policy - ECAR

Date of Last Revision: 2/28/2025

Purpose

To outline the process for reporting changes on the ECAR, specifically changes outlined in 600.21(1) (1-9)

Responsible Party

The Director of Financial Aid and the Director of Operations/Owner are responsible for coordinating the response to ED regarding any reported changes that affect the institution's eligibility.

Updating Program

The Director of Financial aid and the Owner are responsible for the recertification application, DDBS will update information about its educational programs, Classification of Instructional Programs (CIP), program names, and program lengths. Within 10 days of making the change, DDBS will update its E-App with applicable changes no later than 90 calendar days before the PPA expires for re-certification.

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

Policy and Procedure for updating ECAR

Dymond Designs Beauty School will update the ECAR in the event of adding additional programs, change of ownership, recertification, closure of a location, changing from clock hours to credit hours, and adding additional locations.

The updated FSA Partners website is fsapartners.ed.gov/. The expanded features of FSA Partner Connect allow FSA professionals to now access almost all federal financial aid websites from this one website with log on.

To access ECAR:

1. Log on to fsapartners.ed.gov
2. Go to Title IV Program Eligibility
3. On the drop-down menu, select Title IV Participation Application
4. On the right-hand side, click on Application to Participate in the Federal Student Financial Aid Programs (E-App)
5. Click on Get Started

Changes Requiring Written Approval from ED

All institutions **must report and wait for written approval** from the U.S. Department of Education before disbursing funds when the following occur.

1. Change in accrediting agency (notify the Department when you begin making any change that deals with institution-wide accreditation).

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2. Change in state authorizing agency.
3. Change in institutional structure.
4. Increase in the level of educational programs (e.g., baccalaureate degree programs, graduate degree programs, etc.) beyond the scope of current approval.
5. Addition of short-term (300–599 clock-hour) programs.
6. Addition of direct assessment programs, comprehensive transition and postsecondary programs or non-degree programs.
7. Changes to the FSA programs (Pell Grants, Direct Loans, etc.) for which the institution is approved.
8. Change in the type of ownership.
9. Change in ownership.
10. Addition of an accredited and licensed location if the institution would be subject to a loss of eligibility under the cohort default rate regulations (34 CFR 668.188) if it adds that location.
11. Addition of an educational program or a location at which the institution offers or will offer 50 percent or more of an educational program if an institution:
 - a. Is provisionally certified; or
 - b. Is on the cash monitoring or reimbursement system of payment; or
 - c. Has acquired the assets of another institution that provided educational programs at that location during the preceding year, and the other institution participated in the FSA programs during that year; or
 - d. Has been advised by the Department that the Department must approve any new location or program before the institution may begin disbursing FSA funds.

Changes That Do Not Require ED's Written Approval

All institutions must report the following information to ED, although they need not wait for ED's approval before disbursing funds.

1. Change to the name of the school*.
2. Change to the name of a CEO, Director of Operations, or chancellor.
3. Change to the name of the chief fiscal officer or chief financial officer.
4. Change in the individual designated as the lead program administrator (financial aid administrator) for the FSA programs.
5. Change in the governance of a public institution.
6. Decrease in the level of programs offered (e.g., the institution drops all its graduate programs).
7. Change from or to clock hours or credit hours.
8. Change in the length of a program in credit/clock hours or weeks of instruction.
9. Address change for principal location*.
10. Name or address change for other locations*.
11. Closure of a branch campus or additional location that the institution was required to report.
12. Addition of an accredited and licensed location under certain conditions (34 CFR 600.20(c)(1)).
13. Change to the institution's third-party services that deal with the FSA program

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funds.

14. Changes related to GE programs, including:
 - a. Establishing the eligibility or reestablishing the eligibility of the program.
 - b. Discontinuing the program's eligibility as a result of debt-to-earning rates;
 - c. Ceasing to provide the program for at least 12 consecutive months.
 - d. Losing program eligibility.
 - e. Changing the program's name, CIP code, or credential level.
 - f. Updating the certification pursuant to 668.414(b).

*Reminder: As soon as it has received approvals for the change from its accrediting agency and state authorization agency, an institution must send to ED copies of the approvals for the change.

Other Changes Reported on the E-App

Institutions must also use the E-App to report any of these changes to ED within 10 calendar days of the date they occur.

1. Change address for FSA mailings to an address different than the legal street address.
2. Change address for FSA mailings to an additional location that is different than the legal street address.
3. Change of taxpayer identification number (TIN).
4. Change of DUNS number.
5. Change in board members.
6. Reporting foreign gifts.
7. Change to institution's website address.
8. Change of phone/fax/email of CEO, Director of Operations, or chancellor.
9. Change of phone/fax/email of CFO.
10. Change of phone/fax/email of financial aid administrator.

Change in Ownership

ED must be notified within 10 business days of a Change in Ownership, unless it is an Excluded Change in Ownership, which must be reported within 10 calendar days.

Excluded Changes in Ownership

- Owner transfers ownership and control to a family member, or
- Owner retires or dies and ownership/control transfers to:
 - Family member, or
 - Person with existing ownership interest.

Limitations for Schools Subject to "2-year Rule"

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

DDBS Student Admissions Policy & Procedure

Date of Last Revision: 3/6/2025

General Admission Requirements & Policy

Dymond Designs Beauty School (DDBS) is an equal opportunity employer and follows the same policies in accepting applications from potential students. DDBS is open to all students without regard to race, color, religion, age, sex, creed, disability, or marital status. The admissions policy is within compliance, with the U.S. Department of Education (Michigan), State of Michigan Department of Licensing and Regulatory Affairs, Council on Occupational Education Accrediting Agency guidelines, and the Veterans Administration. To be eligible for admissions, an applicant must:

- Must be 17 or older with a high school diploma, GED, or college degree.
- Fill out the application in-person or via on-line
- Submit a registration fee: \$100.00 (non-refundable/if applicable)

If we determine that your documents are not valid, you will be denied admission to the school. If DDBS has reason to believe that the high school documentation is not valid, the admissions coordinator must evaluate the validity of the student's high school completion. DDBS does not recruit students who are already enrolled in a similar program at another institution. DDBS requires that individuals who receive TITLE IV funds complete all the admissions requirements.

Applicant Must Complete the Following Steps

Step 1- Tour of the facility and advise applicants to visit the school's website

Step 2- Complete a personal interview with the admissions coordinator prior to registration.

Step 3- Write a 2-paragraph essay about the program of interest and why did they choose DDBS.

Applicant Documentation Required

- Driver's License/State Identification/Passport/Birth Certificate
- Proof of income, age,
- Copy of your high school diploma/GED/Degree or high school transcripts
- Complete Enrollment Contract & Enrollment Documentation
- Optional: FASFA if an applicant chooses to participate in Financial Aid, please see notable admissions information below for more details:
 - Discuss Financial Aid options and estimates
 - Explain Entrance Loan Counseling and Master Promissory Note
 - Discuss out of pocket options

Notable Admissions Information

Dymond Designs Beauty School will access the NSLDS as it has all the pertinent information about student loans and financial history.

Readmissions Policy

Date of Last Revision: 2/28/2025

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Students who have been terminated or withdrew from school may re-enroll (if determined eligible) within 180 days and will not incur additional charges; however, these students will be responsible for repaying remaining balances from the previous enrollment that can't be reinstated with reinstated federal funds. Students who have been terminated or withdrew from school and re-enrolled (if determined eligible), after more than 180 days will pay a \$100.00 registration fee and will be charged for contracted hours at the current tuition date. All re-enrolling students will be provided with the school's re-enrollment policy and will be evaluated by the school's administrator for placement in the curriculum and kit needs (if applicable). Re-enrolling students may be required to purchase the current school kit. Students applying for re-entry or transfer -in from other schools will be required, as a condition of enrollment, to bring delinquent prior student loans to a current status.is at the discretion of the school administration.

A determination of SAP will be made and documented at the time of withdrawal. Students re-entering after exiting the school will not be evaluated as new students and consideration will be given to the student's progress status at the time of previous withdrawal. Re-enrollment

Transfer Student Policy

Date of Last Revision: 2/28/2025

Students with previous training shall be evaluated by an instructor using practical applications and reviewing the transcripts. Appropriate credit will be given for comparable previous education and training. The training period will be shortened accordingly based on the shortened training period.

Note: The school only transfers hours not GPA's.

If a transfer student is admitted to the program, a notarized transcript from the sending school must be received prior to the student starting class at Dymond Designs Beauty School. If the sending school has closed, the transfer student must obtain a clock hour report from the State of Michigan Department of Licensing and Regulatory Affairs before starting class at DDDBS. Transfer students will be required to purchase a kit or kit items to meet DDDBS requirements. Transfer hours are recorded in student attendance under bulk hours in the student database. Decisions concerning the acceptance of transfer hours are at the discretion of the administrator. In addition, the student will be charged based on the current tuition rate and how many hours are needed for completion.

High School Diploma Verification Policy

Date of Last Revision: 3/6/2025

The DDDBS and the U.S. Department of Education recognize several equivalents to a high school diploma:

- General Educational Development (GED) certificate.
- Certificate or other official completion documentation demonstrating that the student has passed a state-authorized examination that the state recognizes as the equivalent of a high school diploma such as: Test Assessing Secondary Completion (TASC), the High School

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Equivalency Test (HiSET), or in California, the California High School Proficiency Exam. Certificates of attendance and/or completion are not included in this qualifying category).

- Prospect can have an associate degree.
- Successful completion of at least 60 semester or trimester credit hours or 72 quarter credit hours that does not result in the awarding of an associate degree, but that is acceptable for full credit toward a bachelor's degree at any institution: or
- Enrollment in a bachelor's degree program where at least 60 semester or trimester credit hours or 72 quarter credit hours have been successfully completed, including credit hours transferred into the bachelor's degree program.
- Foreign diplomas.
- For a student who enrolls without completing high school, a transcript must be provided indicating the student has excelled in high school.
 1. The student must no longer be enrolled in high school
 2. Must satisfy your school's written policy for admitting such students and must start a program that leads at least to an associate degree or its equivalent.
 3. Note that merely possessing a certificate of attendance and/or high school completion is not sufficient for a student to be Title IV aid eligible.
 4. Such a certificate may be issued without a student having to complete all the academic graduation requirements, including passing any required examinations.
 5. A state must consider a certificate or high-school-completion-equivalency test as equivalent to a high school diploma in that state for it to be considered equivalent to a high school diploma for Title IV aid eligibility purposes.

Veterans Benefit Policy

Dymond Designs Beauty School (DDBS) is approved by the State of Michigan Approving Agency (The Department of Veterans Affairs) to accept funding for all programs offered at DDBS. A Veteran, spouse or child of a Veteran are eligible to take advantage of these benefits. It is the student's responsibility to apply for the benefits online at www.gibill.va.gov or by completing the paper form VA 22-1990. Once applied, DDBS will need a copy of the student's Certificate of Eligibility (COE) and a copy of the DD-214 discharge paperwork. An Administrator will evaluate official transcripts and documentation of previous education and training, and if possible, apply appropriate credit. Evaluation periods for GI® bill benefits will be evaluated every 30 scheduled days. Students must receive 75% in both academics and attendance to be considered maintaining satisfactory progress. If at the end of the probation period he/she is not making satisfactory progress, their benefits will be terminated and to continue will pay on a cash basis

Chapter 30 Veterans Only

Students will be required to sign an acknowledgment of financial responsibility form.

Date of Last Revision: 2/28/2025

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Students Who Use 3rd Party Funding Sources Only

Students will be required to sign a private education loan disclosure statement.

Homeschool Verification Policy

Date of Last Revision: 2/28/2025

Homeschooled students are not considered to have a high school diploma or equivalent, they are eligible to enroll and potentially receive FSA funds if their secondary school education was in a homeschool that state law treats as a home or private school. Some states issue a secondary school completion credential to homeschoolers.

- If this is the case in the state where the student was homeschooled, he/she must obtain this credential to be eligible for FSA funds if the state requires it.
- The student can include in his/her homeschooling self-certification that he/she received this state credential.

An eligible institution is defined in part as one that admits as regular students only those who have a high school diploma or equivalent, are beyond the compulsory age of attendance for the school's state or are dually enrolled at the college and a secondary school. For students who finish homeschooling at a younger age, the Department considers them to be beyond the age of compulsory attendance if:

- Dymond Designs Beauty School (DDBS) follows our State of Michigan regulations that would not require homeschooled students to obtain a secondary completion credential as provided under state law; or the student has completed a secondary school education in a homeschool setting that qualifies as an exemption from compulsory attendance under state law.

Homeschool Verification Procedure

1. Admissions Coordinator/Business Center Liaison
2. Accept the diploma
3. Review for accuracy
4. Verify all High School Diploma's by confirming it lines with the policy
5. Diploma mills and Ability to Benefit are not accepted.

Foreign Diploma Policy

Date of Last Revision: 3/6/2025

Must have evidence that verification of a foreign high school diploma has been performed by an outside agency that is qualified to translate documents into English and confirm the academic equivalence to a U.S. high school diploma.

- 1) Note: High school diplomas/transcripts from other countries are acceptable toward the student eligibility general requirement if the diploma is equivalent to a U.S. high school diploma.
- 2) Documentation of proof of completion of secondary education from a foreign country must be officially translated into English and officially certified as the equivalent of high school completion in the United States, at your own expense.

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At student's expense the student can contact one of the Translation/Evaluation Companies (check with your state to see which ones meet their requirements) for an official certification and translation of the student's foreign high school diploma or transcript:

Fees vary by each organization and type of evaluation and translation requested. Students should contact both to determine which is best for their situation.

Foreign Diploma Procedure

Director/Admissions Coordinator Procedure:

- Don't accept Diploma if it is not translated
- If unsure, accept the diploma
- Review for accuracy
- If suspicions occur that it is from a Diploma Mill; Investigate
- May require student to provide another proof of Education

Diploma Mill Policy

Date of Last Revision: 3/6/2025

All students must provide evidence that they possess a high school diploma, GED, a home study certificate or transcript from a home-study program that is equivalent to high school level and is recognized by the state of issuance.

In the event the validity of the high school diploma is in question, Dymond Designs Beauty School (DDBS), will use any or all the following methods to determine validity.

1. We will cross check the diploma with a list of "diploma mills" that has been generated through the industry.
2. If the name of the school issuing the diploma appears on this list, the high school diploma will require further investigation including but not limited to determining accreditation status, viewing transcripts provided to the student and, viewing the subjects completed by the student.

Diploma Mill Procedure

Admissions Coordinator

1. Don't accept Diploma if it's known to be from a Diploma Mill
2. If unsure, Accept the diploma
3. Review for accuracy
4. If suspicions occur that it is from a Diploma Mill; Investigate
5. May require student to provide another proof of Education

Acceptance Policy

Date of Last Revision: 3/6/2025

After an applicant has completed the enrollment application process the admissions coordinator will review the applicant required admissions materials and access the personal interview to determine acceptance. Upon the decision of the enrollment, the applicant will receive notification of the acceptance or denial letter via email, telephone, or in-person. **Note: All applicants must**

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go through the entire enrollment application process (detailed in catalog, online publication, and enrollment application).

Secondary School Students

DDBS does not accept secondary school students.

Vaccination Policy

Date of Last Revision: 3/6/2025

Dymond Designs Beauty School nor does the State of Michigan require vaccinations for admission into this school or chosen field.

FERPA Policy & Procedure

This policy can be found in DDDBS's Title IV Manual in hard copy print and on digital print via website and throughout the campus

Enrollment Information

Enrollment periods: DDDBS is on a continuous enrollment schedule, thus placement will be depending upon space availability. Please contact DDDBS for exact start dates, holidays, and school closures: DDDBS allows the following holidays off: New Year's Day, Dr. Martin Luther King Jr., Memorial and Independence, Labor Day, Thanksgiving and December 24th and 25th.

Enrollment Contract

DDDBS clearly outlines the obligation of both the school and the student in the Enrollment Agreement Contract. A copy of the Enrollment Agreement Contract and information covering costs and payment plans will be furnished to students prior to the beginning of class attendance.

Orientation

All applicants accepted into the program **MUST** attend the school's orientation to complete signing necessary documents, review all schools' policies, procedures, and plans, receive the Student Handbook & Catalog, receive their syllabus/ course outline and curriculum, and orientate for user-groups after they have been accepted into the program of choice.

Alcohol and Drug Policy

The alcohol and drug policy can be found in DDDBS's Title IV Manual in hard copy print and on digital print via website and throughout the campus.

Students Convicted of Possession or Sale of Drugs Policy

Date of Last Revision: 3/6/2025

Students convicted of possession or sale of drugs alcohol and drug policy can be found in DDDBS's Title IV Manual in hard copy print and on digital print via website and throughout the campus.

Payment Schedule

DDDBS offers a of monthly financial payments schedules that includes a cash payment agreement

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upon enrollment. Please see the DDBS Admissions Coordinator /Business Center Administrator for details.

Admissions and Recruiting

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

DDBS Student Transfer Policy and Procedure

Revised: 2/28/2025

Transfer Student Policy

Students with previous training shall be evaluated by an instructor using practical applications and reviewing the transcripts. Appropriate credit will be given for comparable previous education and training. The training period will be shortened accordingly based on the shortened training period.

Note: The school only transfers hours not GPA's.

If a transfer student is admitted to the program, a notarized transcript from the sending school must be received prior to the student starting class at Dymond Designs Beauty School. If the sending school has closed, the transfer student must obtain a clock hour report from the State of Michigan Department of Licensing and Regulatory Affairs before starting class at DDBS. Transfer students will be required to purchase a kit or kit items to meet DDBS requirements. Transfer hours are recorded in student attendance under bulk hours in the student database. Decisions concerning the acceptance of transfer hours are at the discretion of the administrator. In addition, the student will be charged based on the current tuition rate and how many hours are needed for completion.

Admissions Procedure for Transfer Students

Admissions Coordinator

- Will greet the prospective student.
- Review the information packet documents.
- Tour the school with prospect
- Advise students to visit the school's website at www.dpbs.edu for access to Program Information, Catalog/Consumer Information and Links
- Give students a signed copy of enrollment agreement, school retains original agreement

Business Center Liaison

- Update the student database (BEN) to include all enrollment information such as: start date, schedule, social security number, birth date, family status, high school graduation date, tuition, books and supplies, academic chart

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Director of Financial Aid

- Discuss Financial Aid options and estimates
- Discuss self-payment options
- Discuss the process of FA or reviews the obtained ISIR
- Interacts with students about questions and items needed for Verification
- Reviews of the Award Letter

Transfer Student Procedure

Admissions Coordinator

- Reviews and confirms notarized transcript
- Keeping a copy of transcript in student file
- Meet with the student to discuss the outcome
- Credits student of the amount of clock hours approved by the Director

Financial Aid Transfer Monitoring Process

The Financial Aid Transfer Monitoring Process is designed to provide schools with the most current relevant data about the financial aid history of its transfer students – especially its mid-year transfers. The new regulations that became effective on July 1, 2001 (34 CFR 668.19) as published in the Federal Register on November 1, 2000, require the school to:

- Inform NSLDS of its mid-year transfer students.
- Wait at least 7 days after informing NSLDS before disbursing Title IV aid to those students so that NSLDS can perform its monitoring function.
- Access any alerts sent to the school by NSLDS because of the monitoring function
- Review the mid-year transfer student's revised financial aid history
- Make any necessary adjustments to scheduled disbursements
- Determine if the student is responsible for repaying any Title IV aid that was disbursed prior to the school's receipt of the revised history. Proceed to the listed procedures below

If you have any questions about the Transfer Monitoring Process, call the NSLDS Customer Service Center at 1-800-999-8219, from 8:00 A.M. to 8:00 P.M. Eastern Time.

Institutional Refund Policy

Date of Last Revision: 3/6/2025

Institutional Refund Policy

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

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

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

4. Refunds for Students Enrolled in Professional Development, Continuing Education, or Limited Contract Instruction. Institutions engaging in programs, which are short-term, must have a written policy or contract statement regarding whether fees and instructional charges are refundable.

5. Refunds for Withdrawal after Class Commences

Refunds policy for programs obligating students for periods of 12 Months or less the refund policy for Students attending non-public institutions who incur a financial obligation for a period of 12 months or less shall be as follows: (i) During the first 10% of the period of financial obligation, the institution shall refund at least 90% of the tuition; (ii) After the first 10% of the period of financial obligation and until the end of the first 25% of the period of obligation, the institution shall refund at least 50% of the tuition; (iii) After the first 25% of the period of financial obligation and until the end of the first 50% of the period of obligation, the institution shall refund at least 25% of the tuition; and, (iv) After the first 50% of the period of financial obligation, the institution may retain all of the tuition.

6. Refund Policy for programs obligating students for periods beyond twelve months

Programs longer than 12 months that financially obligate the student for any period beyond 12 months shall release the student of the obligation to pay beyond the 12 months if the student withdraws during the first 12 months. The calculation of the refund for the unused portion of the first 12 months shall be based on the section above. If the student withdraws during any subsequent period following the first 12 months, the student's refund for the unused portion of the tuition applicable to the period of withdrawal shall be based on the section above. Students agree to comply with the assigned schedule for applicable All Beauty

Programs, which may change from time to time at the discretion of the school. Students agree to attend theory class as scheduled for the duration of the course of study regardless of whether all required tests have been taken and passed.

REFUND POLICY-NOTICE OF CANCELLATION

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

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

1. Applicants are not accepted by the school: The applicant shall be entitled to a refund of all monies paid.
2. A student (or legal guardian) cancels his/her enrollment in writing within three business days of signing the enrollment agreement. In this case all monies collected by the school shall be refunded, regardless of whether or not the student has actually started classes.
3. A student cancels his/her enrollment after three business days of signing the contract but prior to starting classes. In these cases, he/she shall be entitled to a refund of all monies paid to the school less the registration fee in the amount of \$100.00
4. A student notifies the institution of his/her withdrawal in writing.

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5. A student on an approved leave of absence notifies the school that he/she will not be returning. The date of withdrawal shall be earlier than the date of expiration of the leave of absence or the date the student notifies the institution that the student will not be returning.
6. A student is expelled by the school: (Unofficial withdrawals will be determined by the institution by monitoring attendance at least every 30 days.)
7. In type 2, 3, 4 or 5, official cancellations or withdrawals, the cancellation date will be determined by the postmark on the written notification, or the date said notification is delivered to the school administrator or owner in person.
8. Any student who either officially or unofficially withdraws before six (6) calendar days after the beginning of school will be a “pre-registered” or never attended student.

For students who enroll and begin classes but withdraw prior to course completion (after three business days of signing the contract), the following schedule of tuition earned by the school applies. All refunds based on scheduled hours:

PERCENT SCHEDULED TIME TOTAL TUITION SCHOOL ENROLLED TO TOTAL COURSE/PROGRAM SHALL RECEIVE/RETAIN

0.01% to 04.9%	20%
5% to 09.9%	30%
10% to 14.9%	40%
15% to 24.9%	45%
25% to 49.9%	70%
50% and over	100%

All refunds will be calculated based on the student’s last date of attendance. Any funds due to a student who withdraws shall be refunded within 45 days of a determination that a student has withdrawn, whether officially or unofficially. In the case of disabling illness or injury, death in the student’s immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If permanently closed or no longer offering instruction after a student has enrolled, the school will either provide a full refund of all funds paid or completion of the course later. If the course is canceled after a student’s enrollment, the school will either provide a full refund of all funds paid or completion of the course later.

Institutional Refund Procedure

Director of Financial Aid/Business Center Liaison

- Completes DDBS Withdrawal Record Form;
- Processes the withdrawal according to guidelines;
- Completes Return to Title IV Funds (R2T4) process, when applicable;
- Retains student Exit Counseling documentation;
- Have student sign withdrawal form if available or emails if student is not available to sign;
- Sends R2T4 letter to student, if applicable.

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Records Clerk

- Updates the student's final grades in the internal system.
- Print and updated transcript for file.
- Completes final withdrawal file – scans and files paper file

Director of Operations

- Submits return of funds within 45 days of the date of determination of the withdrawal.

Timing of Disbursements

Date of Revision: 3/8/2025

Timing of Disbursements – General Rules

FSA disbursements are made on a payment period basis. Except when making retroactive disbursements for completed payment periods, you must disburse the Title IV funds during the payment period to which they apply. The timing of disbursements is especially important for Pell Grants and Direct Loan funds, because you must report disbursement dates to the Department through the Common Origination and Disbursement (COD) system.

Basic Rules for Early Disbursements

The regulations place limitations on the earliest date that a school may disburse FSA funds. With certain exceptions that are discussed below, the general rules for making early disbursements are as follows:

Clock-hour programs, the earliest a school may disburse FSA funds is the latter of:

- 10 days before the first day of classes of a payment period; or
- The date the student completed the previous payment period for which he or she received FSA funds.

Exceptions to Early Disbursement Rules

If a student is in the first year of undergraduate study and is a first-time borrower (a first-time borrower is someone who has not previously received a Direct Subsidized Loan, a Direct Unsubsidized Loan, a Subsidized or Unsubsidized Federal Stafford Loan, or a Federal Supplemental Loan for Students), your school may not make the first disbursement of a Direct Subsidized Loan or a Direct Unsubsidized Loan until 30 calendar days after the first day of the student's program of study. However, you are not required to delay disbursement for such students if your school has a cohort default rate of less than 15% for each of the three most recent years for which data are available, or if your school is a home institution originating a loan to cover the cost of attendance in a study-abroad program and has a cohort default rate of less than 5% for the single most recent year for which data are available.

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Late Disbursements

- Late disbursements can be made no later than 180 days after the student becomes ineligible.
- Intended for educational expenses were incurred while the student was enrolled and eligible.
- For Pell and Direct Loans, you must have processed SAR/ISIR with an official EFC, and the Direct Loan must have originated while the student was enrolled at least half-time.
- For Direct Loans you may not originate a new loan or increase an existing loan amount after the student becomes ineligible.
- First-time, first-year borrowers cannot have their loans disbursed unless the student completed the first 30 days of the program. This is required of all schools except those that meet the low cohort default rate exemption.
- Subsequent disbursements cannot be made unless the student graduated or completed the period for which the loan was made.

Retroactive Disbursements for Completed Payment Period

If your school did not make a disbursement of FSA funds to an enrolled student for a payment period that the student completed, you must pay the student retroactively for all prior completed payment periods within the current award year or loan period for which the student was eligible. For example, if you don't receive a valid SAR/ISIR for a student until the spring term, but the student was also enrolled and eligible for a disbursement in the previous fall term, that student must be paid retroactively for the fall term. A school can make retroactive disbursements in one lump sum.

If you are retroactively paying a Pell Grant for a completed payment period in the same award year in which no disbursement has been made, the grant must be based on the hours completed by the student for that payment period. For example, if the student had enrolled full time at the beginning of the fall term but dropped to half-time status by the end of the term, the retroactive disbursement must be based on half-time status.

Retroactive payments must be made if the institution was unable to disburse during a complete payment period and certain conditions are met:

- Payments must be made to enrolled students for a completed payment period in the same award year or loan period, as applicable
- Student enrollment status must only include hours completed in the payment period for which the retroactive payment is intended
- Hours completed includes earned F's
- Does not include hours for classes dropped during the payment period

The credit balance is paid when you mail the check, initiate an EFT, or notify the student within 14 days that funds are available for pickup at a specific location. You may hold a check for pickup for 21 days from the date of notification. If the student does not pick it up, you must mail it, initiate an EFT, or return the funds to ED.

The law requires that any excess PLUS Loan funds be returned to the parent. Therefore, if PLUS

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

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

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

COD/ G5 Policy

Date of Last Revision: 3/8/2025

A. Reporting to the Common Origination and Disbursement (COD) System

1. Reporting Loan Originations

- a. Once an enrolled student has received a valid Institutional Student Information Record (ISIR) and has met the Institution's enrollment requirements a financial aid profile is sent to BEN. The profile consists of the student's enrollment/registration information. (See Awarding and Student Packaging section).
- b. BEN then reviews the information, cross-references the ISIR for any conflicting data, and then awards the student the appropriate aid.
- c. The Award Letter is then retrieved by the Institution and provided to the ___ student. The student authorizes and accepts the amount of aid requested by signing the official award letter.
- d. A loan origination record is submitted to COD by BEN.
- e. The next business day BEN retrieves the student's loan origination acknowledgement from COD. If necessary, any errors or rejections are reviewed and/or corrected and resubmitted to COD.

2. Reporting Loan Disbursements and Adjustments

- a. Based on the processing of loan disbursements (See Disbursing Loan Funds below), at the end of the workday BEN creates a loan disbursement file for transmission to COD. The file consists of all loan disbursements processed that working day.
- b. A file acknowledgement is then retrieved by BEN from COD.
- c. This file is imported into BEN's internal student accounting system.
- d. All files are reviewed. All accepted and rejected student files are identified at that time.
- e. If there are any errors or rejected files BEN promptly corrects the affected file(s) and resubmits a new file to COD.

(1) BEN then retrieves the corrected file they submitted for corrections.

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f. BEN then reviews the corrected file and once again identifies any errors or rejections.

g. Once all the disbursement files have been accepted by COD, BEN creates a disbursement roster containing all the accepted student disbursement records.

B. Disbursing and Returning Loan Funds

1. Disbursing Loan Funds

a. DDBS and BEN coordinate the disbursing of loan funds. The primary focus is to ensure that students are eligible for Title IV aid at the time of disbursement. Both offices verify that all awarding issues have been satisfied (i.e., verification, C-Codes, loan origination, etc.). BEN will not disburse an “interim” disbursement to students before awarding issues have been resolved.

b. Prior to requesting the students’ first disbursement of student loans, the Financial Aid Administrator verifies that the student has completed Entrance Loan Counseling and a Master Promissory Note.

c. Once the Institution has confirmed that the student has met all eligibility requirements (e.g., Financial Aid Administrator Business Center Administrator, and teachers’ successful completion of a payment period, maintaining SAP, accepted award letter, COD accepted, ETC.) then the Business Center Administrator then logs into the secure BEN institutional portal and requests the student’s disbursement.

d. BEN reviews each student disbursement request with the goal of ensuring that the request is accurate and appropriate. If any question(s) arise, BEN will notify the Institution via a “compliance delay” notice before processing the student’s disbursement request. The student’s disbursement will be processed after the discrepancy has been resolved and no remaining eligibility issues exist.

e. BEN processes the loan disbursement request in their internal accounting system.

f. BEN creates and transmits a disbursement file to COD via the CPS (See Reporting Loan Disbursements and Adjustments above).

g. After all the transmitted loan disbursement records have been accepted by COD, BEN creates a “disbursement roster” which we download from our school portal. We then review the roster for appropriateness and accuracy.

(1) Business Center Administrator notifies BEN if there are any variations between our expected disbursements and the actual disbursement roster.

h. BEN then requests the funds using the G5 system. The funds are wired directly into our institutional Title IV (federal funds) account.

i. The next business day the Institution verifies that the funds have been transmitted from ED into our federal funds account. The Institution instructs BEN to find out if the funds have not arrived or are different than the total amount on our disbursement roster. Next, the Institution transfers those funds from the federal funds (Title IV) account to our operating account.

j. Financial Aid Administrator credits the student’s account with the amount of their disbursement(s). In addition, The Business Center Administrator notifies the student that day of the disbursement, as well as, informing them they have the right to rescind all or part of the loan disbursement.

(1) The Financial Aid Administrator posts the student’s account/ledger the

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date of the roster, which coincides with the date ED accepted the student disbursement. This system is developed to ensure that all reporting of disbursements is following the USDE's 15-day reporting, posting, and notification requirements.

2. Returning Loan Funds

- a. Once it has been determined that a student has ceased enrollment, the Institution immediately performs refund calculations. (Title IV and Institutional)
- b. If it has been determined that there is a Title IV refund due ED, the Institution notifies BEN of the refund amount that is deposited into the Institution's federal funds (Title IV) account for this student refund.
- c. This may take place by a transfer of funds from the Institutions operating account to the federal funds account, or if for some reason this is not available a physical check is written, and a deposit is completed.
- d. On the date that the refund was deposited/transferred into the federal funds account, the Institution notifies BEN of this transaction.
- e. Once the Institution completes the refund transaction, they immediately notify BEN with a Refund Request form via secure email or the school financial aid portal.
- f. The Institution posts the refund to the student's account/ledger.
- g. BEN reviews the Refund Report for accuracy and appropriateness (i.e., T4 program, award year, amount, etc.).
- h. BEN then posts the refund(s) in G5.
- i. Once G5 retrieves the funds from the Institution's account and acknowledge the deposit, BEN then notifies COD of the student's refund.
- J. COD is notified of the date G5 acknowledged the refund, the T4 program refunded, as well as the corresponding award year.

Making and Posting Student Title IV refunds must be a high priority of the Institution. Accuracy and timeliness are of utmost importance. A large amount of our Financial Aid training is dedicated to this issue. Ownership of the institution and BEN understands the importance of this subject and strives to be in complete compliance.

C. Disbursing the correct loan amount to the correct student

1. Disbursing the correct loan amount

- a. BEN and the Institution have a two-tier system of disbursing funds and adjustments.
- b. Before any disbursement can be initiated, an Official Award Letter must be generated by BEN. The Institution and students review this award letter for any changes to the aid requested by the students. Any discrepancies are explained and resolved prior to delivering the aid to the student.
- c. The student's scheduled award is created, and an estimated date of disbursement is generated.
- d. All student loan origination records are submitted to COD at the time the award letter is generated.
- e. All loan origination records contain the amount and expected date of all anticipated disbursements for a student.
- f. Prior to disbursing any loan funds an "accepted" loan originated record must be on file for each student loan.

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- g. The submission of the student loan disbursement record to COD must correspond identically with the student loan origination record, if not, COD rejects the record.
 - h. No student disbursement is initiated until all disbursement records are accepted and processed by COD.
2. Disbursing to the correct student
- a. After reviewing each student's enrollment and financial aid information the Institution submits a request for disbursement to BEN. When requesting this disbursement, the Institution reviews the expected/anticipated disbursement for this transaction.
 - b. BEN reviews the request for accuracy and appropriateness. If the request is not accurate or appropriate (i.e. too early), the request is suspended until the discrepancy is resolved.
 - c. BEN submits the disbursement to COD (the amount, award year, T4 program, etc.).
 - d. BEN retrieves the accepted disbursement record from COD.
 - e. The accepted disbursement record is then placed on a student disbursement roster and made available to the Institution.
 - f. The Institution then reviews the roster for appropriateness and accuracy.
 - g. If the Institution does not have any issues, BEN then requests the roster funds via the G5 system.
 - h. BEN notifies the Institution that the funds have been transmitted from ED to the federal funds account.
 - i. The Institution posts the roster details to each student account.
 - j. Once posted, the Institution prints all student account transactions for that day and cross-references this report with the disbursement roster from BEN.
 - (1) Any discrepancies are identified and resolved at this time.
 - (2) The Institution notifies the student that the disbursement has taken place and inform them of their right to rescind all or part of the loan disbursement.

In Summary, to ensure accuracy, BEN verifies that the funds transmitted from ED to the Institution's federal funds account equal the grand total of BEN's roster. The Institution posts the roster amount to each individual student account. The Institution verifies that the funds posted to the students' accounts equal the amount indicated on BEN's disbursement roster.

COD/ G5 Procedure

Director of Financial Aid

- After the interview and application is complete the Financial Aid Administrator will do a COD search on each student.
 - The COD search will give the FAA demographics along with details about the awards they hold.
 - The Financial Aid Administrator uses BEN to assist in COD.
-

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Prior Year Charges Policy

Date of Last Revision: 3/8/2025

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

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

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

Prior Year Charges Procedure

Director of Financial Aid

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

1098-T, 1098-E, IRS 1042, 1042s Policy

Date of Last Revision: 3/8/2025

IRS Form 1098-E

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

IRS Form 1098-T

DDBS must provide Form 1098-T, Tuition Statement, for each student enrolled for credit and for each student whom a reportable transaction is made. These forms will be sent via mail to the last known address provided to DDBS.

IRS Forms 1042 & 1042-s

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

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See IRS instructions for forms 1042 and 1042-S for filing requirements. DDBS does not enroll non-resident students so therefore this policy will not apply.

1098-T, 1098-E, IRS 1042, 1042s Procedure

Business Center Liaison

1. Complete 1098-T Tuition statement for each student enrolled for credit and for each student whom a reportable transaction was made.
2. Complete all 1098-E forms for all students who paid student interest in excess of \$600.00 or more.
3. Submit request through <https://www.efile4biz.com>
4. Will be Emailed and mailed all files to students no later than January 30th each year.
5. In the event of unforeseen circumstances, request for an extension

Over Contract Charges Policy

Date of Last Revision: 3/8/2025

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

Over Contract Charges Procedure

Director of Operations

- Overseas the attendance hours of all students.
- Conferences students on their time and half and absences
- Alerts the Business Center Liaison of students who are in need of additional time and possible fees.

Business Center Liaison

- Update charges to ledger card of fees due to additional time needed.
- Conferences with students on their time, absences and balances and payment options
- Issue invoices to students
- Collect payments for additional time.
- Payments must be made in Cash, Cashier's check, money order or credit card.

Student Ledger Postings Policy

Date of Last Revision: 3/8/2025

DDBS Business Center Liaison and the Director of Financial Aid are responsible for most financial accounting and recordkeeping. The Director of Financial Aid for posting all student ledger cards and maintaining accurate records with a detailed description (Sub, Unsub, Pell) of the type of payment posted to the student's account. The accounting records and systems for

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FSA funds must provide a clear audit trail that makes it possible to trace all federal cash from drawdown to its final destination. Any student who receives Title IV funds, the school must maintain a student ledger that clearly identifies the date and amount of each transaction, and the balance after each.

Student Ledger Postings Procedure

Director of Financial Aid

- As payments are submitted (FSA) payments are posted to the student ledger within 24 hours of making the payment
- Issue out recipes via email or printed copies as requested.
- As disbursements are made, it is posted to student ledger cards.
- Notification is issued to Business Center Liaison and students via email/ text or print out.
- Copies of student ledger cards are found online.

Business Center Liaison

- As payments are submitted (cash) payments are posted to the student ledger within 24 hours of making the payment
- Issue out recipes via email or printed copies as requested.
- As disbursements are made, it is posted to student ledger cards.
- Copies of student ledger cards are found online.

Misrepresentation Policy

Date of Last Revision: 3/26/2025

DDBS and its' employees are prohibited under federal regulations from making any false, erroneous, or misleading statement directly or indirectly to a student, prospective student, member of the public, accrediting agency, state agency, or to the Department of Education.

Misleading statement includes any statement that has the likelihood or tendency to deceive or confuse. A statement is any communication made in writing, visually, orally, or through other means. This includes student testimonials given under duress or because such testimonial was required to participate in a program.

Federal regulations further provide that substantial misrepresentation is any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment. The regulations regarding misrepresentation describe misrepresentation with respect to:

- Nature of the education program
- Nature of financial charges
- Employability of graduates

DDBS provides information to faculty, staff, and students about the educational program, financial charges, and employability of graduates through the Institution's website, the rules, and regulations, and in-person trainings to guard against the release of false, erroneous, or misleading information about the school. DDBS takes violations of this policy seriously. Employees who

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fail to adhere to this policy will receive disciplinary action appropriate to the nature and extent of the violation up to and including termination to ensure that violations are not repeated. Violations of this policy could jeopardize DDBS's eligibility to participate in Title IV Programs.

Misrepresentation Policy Procedure

Designated reporting channels for employees to report suspected misrepresentations.

Timeframe for reporting potential issues. Protection against retaliation for reporting concerns.

- Steps to investigate reported misrepresentation, including gathering evidence, interviewing relevant parties, and reviewing documentation.
- Designation of individuals responsible for conducting investigations.
- Potential disciplinary actions for violating the misrepresentation policy, which may include verbal warnings, written reprimands, suspension, or termination depending on the severity of the violation.
- Mandatory training for all employees to educate them on the misrepresentation policy, ethical communication practices, and relevant legal requirements.
- Fact-Checking Procedures:
- Guidelines for verifying information before communicating it to external parties, including reliance on credible sources and data.
- Procedures for documenting all misrepresentation reports, investigations, and corrective actions taken.

State Authorization

State Authorization Policy

Date of Last Revision: 3/28/2025

Dymond Designs Beauty School (DDBS) is licensed through the State of Michigan Department of Licensing and Regulatory Affairs Bureau of Professional Licensing. DDBS adheres to the rules and regulations of the State of Michigan Board of Cosmetology. Renewal takes place every year on November 1st for the State of Michigan Licensing based on the date listed on the current license.

State Approval Procedure

Director of Operations/Owner

- Pays applicable fees
- Completes application

School Accreditation Policy

Date of Last Revision: 3/28/2025

Dymond Designs Beauty School was awarded its National Accreditation from the Council on Occupational Education Agency (COE), and adheres to the rules, regulations, and standards of quality of the Commission.

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School Accreditation Procedure

Director of Operations/Owner

- Pays applicable fees
- Completes application
- Confirms program approval is kept current
- Renews accreditation when needed
- Remain in compliance with all standards and conditions
- Attend workshops, as necessary

Consumer Information

Date of Last Revision: 3/25/2025

Student Right-to-Know Policy

Procedures outlining the requirements for Consumer Information related to specific institutional information, graduation rates, annual security report, and athletic reporting are required by the Program Participation Agreement (PPA).

These disclosures were designed to inform current and prospective students and their families about their rights and responsibilities as well as and the policies of DDBS. The disclosures include:

Completion/Graduation Rates
Licensure Rates
Placement Rates
Student Body Diversity Data

Information related to these required disclosures is made available to all current and prospective students by July 1 each year via the DDBS website. Paper copies of this information are available upon request from the Director of Financial Aid. This information is also located on the College Navigation website.

Consumer Information Disclosures

The Consumer Information Disclosures web page is intended to supplement the information provided in DDBS Program Catalog and Student Handbook and other publications. The website indicates where additional information relating to the subject may be located: in one of the schools' publications, on the school website, or on a third-party website e.g., the College Navigator website maintained by the National Center for Education Statistics. This website also serves to notify current and prospective students regarding the availability and location of consumer information in accordance with certain state and federal laws applicable to our schools.

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For assistance with any of the consumer information discussed herein, prospective and current students may contact the Director of Financial Aid during normal business hours. A paper copy of consumer information disclosures is available on request.

Student Right-to-Know Procedure

Responsibilities of the following parties:

Admissions Coordinator

- Informs prospective students of their rights and provides appropriate handouts during the enrollment process.
- Shares the consumer information and student's right to know information with new students during orientation;
- Alerts students to the school website with the proper information.
- Ensures a hard copy is available in the financial aid office if the student should request a copy of any of the following:
 - Drug and Alcohol Abuse Prevention Policy
 - Security Fire Safety Report,
 - FERPA, and
 - Consumer Information.

Director of Financial Aid

- Emails FERPA form and information yearly in January to all current students;
- Reviews and updates the website's Consumer information every December;
- Review and updates Clery information every year by October 1 and updates the report with the three most current award years;
- Emails the annual Security Fire Safety survey to students and staff each year by October 1;
- Ensures the annual Security Fire Safety survey is completed and submitted by October 1;
- Reviews and updates the DDBS Drug and Alcohol Policy and the Drug and Alcohol Abuse Prevention Program yearly, in December

Business Center Liaison

- Reviews and updates policies in the Student Handbook every year in December and as needed;
- Updates the ddbbs.edu website, as needed.

Drug and Alcohol Abuse Prevention (DAAP) Policy

Date of Last Revision: 3/28/2025

Reference

- 34 CFR Part 86.1-86.7, 34 CFR Subpart B 86.100
- [Complying with the Drug-Free School and Campuses Regulations](#)

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Purpose

The Part 86 regulations require that, as a condition of receiving funds or any other form of financial assistance under any federal program, an institution of higher education (IHE) must certify that it has adopted and implemented a program “to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees” both on the institution’s premises and as part of any of its activities, in order to comply with the Drug-Free Schools and Campuses Regulations (EDGAR Part 86.100, Subpart B).

DDBS’s Drug and Alcohol Abuse Prevention (DAAP) Policy is outlined in the Annual Security & Fire Safety Report and in the Appendix chapter, in accordance with the Clery Act and ED requirements.

Drug and Alcohol Abuse Policy (DAAP) Policy

DDBS makes available upon request to ED and to the public, the information distributed to students and employees and the results of the annual review of the Drug and Alcohol Abuse Prevention Policy.

Drug and Alcohol Prevention Program

DDBS distributes the DAAP to all staff members at the start of employment and to all students during orientation. The policy is available via the school website at dubs.edu.

DDBS prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and staff on the property or as part of any school activities. The school will immediately contact law enforcement officials to report all unlawful activities.

The health risks of the use of illicit drugs and alcohol abuse require providing education and referral for students and staff. DDBS provides education annually in the spring and refers students and staff to local services. Area drug abuse information, counseling, referral and treatment centers information is made available to students or staff members upon request.

DDBS will expel students and terminate staff involved in unlawful possession, use or distribution of illicit drugs and alcohol. DDBS will refer such cases to the proper authorities for prosecution. Students and staff may be reinstated upon completion of an appropriate rehabilitation program. As a condition of employment, employees must notify DDBS of any criminal drug statute conviction for a violation occurring in the workplace not later than five days after such conviction. There are serious legal sanctions for illegal use of drugs and/or alcohol. All students and staff must understand DDBS policies as stated above and recognize the impact if the law is broken in relation to drug and/or alcohol use.

DDBS Drug and Alcohol Policy

DDBS provides a drug-free and alcohol-free environment for its faculty, staff and students. The unlawful possession, use, distribution, dispensation, sale, or manufacture of drugs or alcohol is prohibited on DDBS campus premises and at any DDBS school activity/function. No employee or student is to report or return to school, work, or any company activity while

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under the influence of drugs or alcohol.

Drug and Alcohol Abuse Prevention (DAAP) Policy Procedure

Director of Financial Aid

- Distributes the DAAP to all staff members at the start of employment;
- Introduces the DAAP) Policy to all students during orientation;
- Annually distributes to all staff and students:
 - Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on campus property or as part of any school-sponsored activities;
 - A description of the applicable legal sanctions under local, State, and Federal laws for the unlawful possession or distribution of illicit drugs and alcohol;
 - A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
 - A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
 - A clear statement that DDBS will impose disciplinary sanctions on students and employees (consistent with local, State, and Federal laws), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct. For the purpose of this section, a disciplinary sanction may include the completion of an appropriate rehabilitation program.
- Publish a written certification that DDBS has adopted and implemented the drug prevention program.

State of Michigan Alcohol Laws

Under Michigan law, it is illegal for anyone under the age of 21 to purchase, consume, possess or have any bodily content of alcohol. The following summarizes some of the potential legal consequences for violating state law:

- A first-time conviction may result in a fine, substance abuse education and treatment, community service and court-ordered drug screenings.
- There also is a provision for possible imprisonment or probation for a second or subsequent offense.
- The use of false identification by minors in obtaining alcohol is punishable with a fine, loss of driver's license, probation and community service.

Individuals can be arrested and/or convicted of operating a vehicle while intoxicated with a blood alcohol concentration (BAC) level at .08 or higher. If a student is under 21, there is a “zero tolerance” law in the state of Michigan, and any blood alcohol level of .01 or higher can lead to a minor in possession (MIP) citation as well as being cited for operating a vehicle while intoxicated, if applicable. This is in addition to suspension of driving privileges in the state of Michigan.

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State of Michigan Medical Marijuana Laws

The Michigan Medical Marijuana Act of 2008 and the Michigan Regulation and Taxation of Marijuana Act of 2018 permit qualified persons 21 years of age or older, patients and their primary caregivers to use, possess and grow limited amounts of marijuana for personal use and treatment of certain debilitating medical conditions. However, these laws conflict with federal criminal laws governing controlled substances, as well as federal laws requiring institutions receiving federal funds, by grant or contract, to maintain drug-free campuses and workplaces. DDBS receives federal funding that would be in jeopardy if those federal laws did not take precedence over state law. Thus, the use, possession or cultivation of marijuana in any form and for any purpose constitutes a violation of school policy and the student code of conduct.

DDBS's Policy on Consumption of Alcoholic Beverages on Campus

The use or possession of alcohol is expressly prohibited in classrooms, conference rooms, the student media center, within the building, or any area where events, lectures, or meetings are held. The use of alcohol is expressly prohibited in all public areas of the campus building.

For employees only, social activities held off-premises and paid for on a personal basis are not affected by this policy. If management considers it appropriate and approves of such use in writing, alcoholic beverages may be served at company-sponsored events held off-premises.

Federal Drug Laws

Possession, use, or distribution of illicit drugs is prohibited by federal law. Strict penalties are provided for drug convictions, including mandatory prison terms for many offenses. Penalties increase significantly where use of the illicit drugs results in death or serious bodily injury. The following information, although not complete, is an overview of federal penalties for first convictions.

Federal Drug Possession Penalties (21 USC §844)

www.deadiversion.usdoj.gov/21cfr/21usc/844.htm

Persons convicted of illegally possessing any controlled substance face penalties of up to 1 year in prison and a minimum fine of \$1,000, or both. Second convictions are punishable by not less than 15 days but not more than 2 years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than 3 years in prison and a minimum fine of \$5,000.

Special sentencing provisions for possession of Flunitrazepam (Rohypnol, "roofies" or "roaches") impose a prison term of up to 3 years, a fine, or both.

Civil penalties of up to \$10,000 may also be imposed for possession of controlled substances, whether or not criminal prosecution is pursued. Persons convicted of possession may also be fined for the reasonable costs of the investigation and prosecution of the offense. Penalties for possession with intent to distribute are potentially even more severe.

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Disclaimer

A. This information is provided as a general summary of the major applicable laws. Laws are frequently amended and reinterpreted, and the application of law to specific situations generally requires an analysis of all of the facts and circumstances. This information should not be substituted for specific legal advice.

B. If you are charged with a crime, it is a good idea to seek advice of an attorney. Updates to these laws are generally reflected on the websites mentioned here, but individuals are ultimately responsible for knowing the laws. This information should not be substituted for specific legal advice.

C. Michigan's Code of Student Conduct and DDBS policies and rules are campus behavior and safety standards that may result in sanctions, educational outcomes or penalties that are independent of any criminal considerations. It should also be noted that the DDBS' expectations for appropriate behavior are higher than those under the law.

DDBS's Policy on Consumption and Possession of Marijuana

DDBS does not allow the use, possession, or cultivation of marijuana or marijuana paraphernalia on its property or on any DDBS controlled premises. DDBS recognizes that federal laws take precedence over state laws. ***Therefore, all students, employees, and visitors must be aware that the Michigan Medical Marijuana Act (MMMA) and the Michigan Regulation and Taxation of Marijuana Act (MRTMA) conflict with Federal, criminal laws governing controlled substances as well as Federal laws requiring institutions receiving Federal funds, by grant or contract, to maintain drug-free campuses and workplaces.***

Because DDBS participates in such federal grant programs that would be jeopardized, the use, possession, or cultivation of marijuana in any form, for any purpose, on DDBS's property or premises, violates the DDBS Drug and Alcohol Policy even if a student, employee, or visitor has been properly certified as a medical marijuana user.

Students, employees, and visitors are asked to remove or dispose of their marijuana from DDBS's property and premises immediately. Furthermore, the MMMA and MRTMA state that employers are not required to accommodate employees who use medical marijuana. Therefore, employers have the right to refuse employment to anyone who fails a drug test. Additionally, the State of Michigan prohibits a person from undertaking any task under the influence of marijuana, when doing so would constitute negligence or professional malpractice, as in many areas of the medical field. As a result, drug testing may be required at any time by a prospective employer consistent with the laws of the State of Michigan and the requirements of potential employers.

Alcohol and Drug Testing Policy

If DDBS believes that a student or employee has been observed possessing or using a prohibited substance while on campus, random drug or alcohol testing may be conducted. Drug or alcohol testing may also occur if DDBS reasonably believes that any student or employee may be under the influence of drugs or alcohol during school/work hours, while engaged in school business or a sponsored activity and that this may adversely affect their

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performance or the campus environment. Any student or employee who has a positive drug or alcohol impairment test may be subjected to periodic, random testing for a period of up to one year.

Testing Methods and Conditions

Testing will ordinarily be conducted during, immediately before, or immediately after regularly scheduled school/work hours. For current employees, time spent in testing and in traveling to and from the regular work site to the place of testing is considered work time.

Testing shall be conducted under the following conditions:

- Sample collection shall be performed under reasonable and sanitary conditions.
- Sample collection shall be labeled in such a way as to reasonably preclude the possibility of misidentification of test results.
- Prior to testing, the individual shall be provided with an opportunity to notify DDBS of any information relevant to the test.
- Sample collection, storage, and transportation shall be performed in a manner prudently designed to preclude the possibility of sample contamination or misidentification.
- Sample testing will be done in compliance with scientifically accepted analytical methods and procedures by a laboratory approved or certified by at least one of the following:
 - United States Department of Health and Human Services,
 - College of American Pathologists, or
 - Michigan Department of Health and Human Services.

Upon written request, a positive drug test result shall be confirmed by a subsequent test using a different but comparably reliable chemical process than used in the initial drug screen. For instance, chromatographic spectroscopy could be conducted to confirm results.

Employee and Student Testing Rights

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

Refusal of Testing

Refusal to participate in drug or alcohol testing or refusal to accept the terms and conditions of testing as specified in this policy may result in disciplinary action up to and including termination from DDBS. Any prospective employee or student who refuses to undergo drug or alcohol testing is not eligible for hire or admission (respectively).

Please direct any questions, concerns, or reports regarding this policy to the Director of Operations.

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Drug-Free Workplace with Drug & Alcohol Policies and Abuse Prevention Program

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

DDBS has established this program to inform employees and students about:

- DDBS's policy of maintaining a drug-free environment,
- Drug and alcohol counseling and rehabilitation,
- Penalties that may be imposed upon students and employees for drug abuse violations, and
- The dangers of drug abuse in the workplace.

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

- Employees shall notify their supervisor or other appropriate management personnel, and students shall notify the Director of Operations of any criminal conviction for a substance-related violation occurring in the workplace no later than five (5) days after such conviction.
- Within ten (10) days of having received notice, DDBS shall notify any federal contracting agency that a student or employee engaged in the performance of a federal contract or grant has had a criminal drug statute conviction for a violation in the workplace.
- Any student or employee who is convicted for a violation occurring in the workplace is required to satisfactorily participate in a drug abuse assistance or rehabilitation program.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of, disciplinary action may request approval to take unpaid time off to participate in a rehabilitation or treatment program.

Disciplinary Action upon Conviction

Any violation of or unsatisfactory conduct related to DDBS's drug-free campus policy may result in discipline including (but not limited to):

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

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Title IV Federal Financial Aid Drug Policies

Disciplinary action by DDBS does not preclude the possibility of criminal charges being filed. Similarly, the filing of criminal charges does not preclude action by DDBS.

Any student or employee who is convicted of a criminal drug offense at the workplace shall be subject to discipline consistent with applicable DDBS policies and contracts. Offenders may be required to participate in an appropriate drug or alcohol treatment program as a condition of further enrollment or employment.

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

All students and employees must comply with federal, state, and local laws regarding the possession and consumption of alcohol and controlled substances. Legal sanctions for failure to comply with local, state, and federal laws may include:

- Suspension, revocation, or denial of a driver's license;
 - Loss of eligibility for federal financial aid or other federal benefits;
 - Disqualification from employment;
 - Property seizure;
 - Community service;
 - Imprisonment; and
 - Monetary fines.
-
- Target population is the student body and high-risk groups
 - Increase awareness of drug and alcohol use and addiction
 - Increase awareness of prevention and treatment programs
 - Annually distribute in writing to each employee, and to each student:
 - Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities;
 - A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol;
 - A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
 - A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
 - A clear statement that DDBS will impose disciplinary sanctions on students and employees (consistent with local, State, and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct required by [paragraph \(a\)\(1\)](#) of this section. For the purpose of this section, a disciplinary sanction may include the completion of an appropriate rehabilitation program.

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- Publish a written certification that DDBS has adopted and implemented the drug prevention program.
- Review every two years the effectiveness of DDBS's Drug and Alcohol Abuse and Prevention Program.
- Evaluate the consistency of sanctions imposed for violations of disciplinary standards and codes of conduct related to drugs and alcohol
- Identify areas requiring improvement or modification
- Describe the research methods and data analysis tools that were used to determine the effectiveness of the program.

Drug and Alcohol Abuse Prevention Policy Biennial Review Policy

Date of Last Revision: 3/28/2025

DDBS reviews its Drug and Alcohol Abuse Prevention Policy and the effectiveness of sanctions imposed every two years, which includes:

- Dismissal may occur following a final determination of proceedings regarding the school's drug policy, which prohibits the possession, use, and sale of alcoholic beverages to anyone on our property or as part of any of our activities.
- DDBS policy also prohibits the possession, use, and sale of illegal drugs.
- DDBS policy supports and enforces state underage drinking laws. Students caught in any of the above situations will be dismissed from the program and will be reported to the authorities.
- In some cases, conviction of drug-related offenses could result in the student's ineligibility of Title IV funding or other forms of financial assistance.

Upon request, DDBS will make available to the Department of Education and to the public, all information distributed to students and employees and the results of the biennial review of DDBS's Drug and Alcohol Program.

Drug and Alcohol Abuse Prevention Policy Biennial Review Procedure

Director of Financial Aid

- Conducts a review of the DAAP Policy in even-numbered years starting in 2026;
- Posts the review of the DAAP Policy on the school's website and in the Financial Aid office;
- Posts the updated DAAP Policy on the school's website;
- Determines the effectiveness of the program;
- The first review is scheduled in 2026;
- Publishes a written certification that DDBS has adopted and implemented the drug prevention program.
- Posts the results on the DDBS website and in the Financial Aid office;
- An updated copy will be made available to all current employees and students
- Provides, upon request, to the U.S. Department of Education and to any interested parties, all information distributed to students and employees regarding the results of a biennial review of the school's program;

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Director of Operations

- Determines the effectiveness of the program and what changes need to be implemented;
- Identifies areas requiring improvement or modification;
- Tallies the number of drug and alcohol-related violations that occurred on campus or as part of the school's activities and that are reported to school officials;
- Determines the number and type of sanctions that were imposed by the school as a result of drug and alcohol-related violations and fatalities on the school's campus or as part of any DDBS activities;
- Evaluates the consistency of sanctions imposed for violations of disciplinary standards and codes of conduct related to drugs and alcohol
- Describes the research methods and data analysis tools that were used to determine the effectiveness of the program; and
- Presents findings to DDBS administrative staff.

DDBS Drug and Alcohol Abuse Prevention Program Review Committee

DDBS Drug and Alcohol Abuse Prevention Program (DAAPP) will be reviewed biennially. DDBS is committed to monitoring and assessing the effectiveness of the policies, program and what changes need to be made. DDBS ensures the uniform application of sanctions to employees and students. DDBS has created and maintains a Drug and Alcohol Prevention Committee. The Committee determines the effectiveness of this program and ensures the standards of conduct are fair and consistently enforced. Future reviews are scheduled to take place in even-numbered years.

Reviewers

Marlene Brooks – Director of Operations

Roxy Dunlap – Business Center Representative

Rayna Karpuk – Director of Financial Aid

Biennial Review Objectives

1. To determine the effectiveness of, and to implement any needed changes to, the DSDT prevention program.
2. To ensure that the school is enforcing the disciplinary sanctions for violating standards of conduct and policies consistently.

Procedures for Distributing Annual Notification to Students and Employees

The biennial review must be completed and on file by December 31st of each even-numbered year. The results of the biennial review are made public and available upon request to the Secretary of the Department of Education for three years after the fiscal year in which it was created.

Abuse Prevention Program

DDBS encourages employees and students who may have substance abuse problems to seek professional advice and treatment. DDBS has adopted and implemented prevention programs within our institution to train all faculty and staff on our Drug and Alcohol abuse

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policy. In the event one of our staff or faculty should witness or report abuse on campus, DDBS will provide the resources necessary in order to prevent further, similar unlawful possession, use, or distribution of illicit drugs and alcohol by all students and employees on school premises or as part of any of its activities.

DDBS employees and students may obtain confidential assistance through Michigan's "Get Help Now" map at www.michigan.gov/bhrecovery or by calling 1-800-622-HELP for a referral to a treatment center or support group in your area.

If a student or employee witnesses a violation of this policy by their peers, they are required to report as much to the Director of Operations or a member of the administration. If you need additional resources such as crisis intervention, treatment and recovery support, counseling, prevention information, or local contact information, please see the drug and alcohol awareness bulletin board located at the School. These are confidential resources.

For a complete list of the federal penalties due to a conviction for possession or distribution of drugs, please see the on-campus drug and alcohol awareness bulletin board or Appendices A and B.

Help, Information, & Resources

Drugs and alcohol can be highly addictive and injurious to the body. Consumption of drugs or alcohol cause a number of marked changes in behavior and serious health threats. Impairment of employees while on the job or students while in school is likely to result in injury to others or third parties and affects the morale & productivity of everyone.

DDBS does not offer Drug and Alcohol treatment programs.

Employees or students seeking confidential substance abuse treatment and counseling can contact United Way of Southeastern Michigan by dialing 2-1-1, or the National Helpline – 1-800-662-HELP (4357). SAMHSA's National Helpline is a free, confidential, 24/7, 365-day-a-year treatment referral and information service (in English and Spanish) for individuals and families facing mental and/or substance use disorders. A list of resources is also available online at www.mi211, which offers information about local health services, including substance abuse support.

How the Use of Drugs and/or Alcohol Affects Health

Abuse of alcohol and drugs can present significant health risks and medical consequences including, but not limited to, the following:

- Abusing alcohol or other drugs can be fatal.
- Alcohol abuse can result in liver damage & disease, gastrointestinal problems, and brain damage.
- Abuse of alcohol and marijuana during puberty can cause an imbalance of sex hormones, resulting in reduced muscle mass & shrinkage of testicles in males and menstrual difficulties & infertility in females.
- Long-term use of stimulants ("uppers," including speed, crack, meth,

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amphetamines, etc.) may cause permanent damage to the brain, heart, lungs, and other organs.

- The use of cocaine and amphetamines can result in heart attacks. People who lack an enzyme called Pseudo cholinesterase in their bodies can die from a single, minute dose of cocaine.
- Inhalants (poppers, rush, nitrous oxide, sniffing glue or paint thinner, etc.) may cause mental confusion, mood swings, delusions, or hallucinations.
- The use of hallucinogens — especially PCP (angel dust) — can result in an irreversible, drug-induced psychotic state and/or delusions, that can trigger life-threatening behavior.
- Depressants (“downers,” including ludes, reds, 714s, barbs, etc.) greatly increase the risk of automobile accidents because they affect vision, judgment, coordination, and other physical skills.
- Intravenous (IV) drug users (users of heroin and other opiates) risk infection by diseases such as hepatitis & Acquired Immune Deficiency Syndrome (AIDS) from sharing needles.

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

FEDERAL TRAFFICKING PENALTIES—

DRUG/SCHEDULE	QUANTITY	PENALTIES	QUANTITY	PENALTIES
Cocaine (Schedule II)	500–4999 grams mixture	First Offense: Not less than 5 yrs,	5 kgs or more mixture	First Offense: Not less than 10 yrs, and not more than life.
Cocaine Base (Schedule II)	28–279 grams mixture		280 grams or more	
PENALTIES				
Other Schedule I & II drugs (and any drug product containing Gamma Hydroxybutyric Acid)	Any amount	First Offense: Not more than 20 yrs. If death or serious injury, not less than 20 yrs, or more than life. Fine \$1 million if an individual, \$5 million if not an individual.		
Flunitrazepam (Schedule IV)	1 gram	Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.		
Other Schedule III drugs	Any amount	First Offense: Not more than 10 years. If death or serious injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual.		
		Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.		
All other Schedule IV drugs	Any amount	First Offense: Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual.		
Flunitrazepam (Schedule IV)	Other than 1 gram or more	Second Offense: Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.		
All Schedule V drugs	Any amount	First Offense: Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.		
		Second Offense: Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.		

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FEDERAL TRAFFICKING PENALTIES—MARIJUANA—

DRUG	QUANTITY	1st OFFENSE	2nd OFFENSE *
Marijuana (Schedule I)	1,000 kg or more marijuana mixture; or 1,000 or more marijuana plants	Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.	Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	100 kg to 999 kg marijuana mixture; or 100 to 999 marijuana plants	Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.	Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	More than 10 kgs hashish; 50 to 99 kg marijuana mixture More than 1 kg of hashish oil; 50 to 99 marijuana plants	Not less than 20 yrs. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.	Not less than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana (Schedule I)	Less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight) marijuana plants; 1 to 49 marijuana plants;	Not less than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual	Not less than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual
Hashish (Schedule I)	10 kg or less		
Hashish Oil (Schedule I)	1 kg or less		

*The minimum sentence for a violation after two or more prior convictions for a felony drug offense have become final is a mandatory term of life imprisonment without release and a fine up to \$20 million if an individual and \$75 million if other than an individual.

Security Safety Report – Cleary Reporting

Date of Last Revision: 3/26/2025

Cleary Updating Policy

DDBS will provide students, faculty, and staff with a copy of this crime report from the previous calendar year by October 1st of the following year. Statistics will be gathered from the local police and compiled in the annual report.

The report will show the number of incidents on campus, including the parking lots and adjacent streets. At any time, statistics can be obtained from the Director of Financial aid. DDDBS employs

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one part-time security person for evening safety. DDBS has a working relationship with the local police who are able to support and provide services promptly in the event of an incident. We encourage accurate and prompt reporting of all crimes to the local police.

Campus safety and security are important issues at DDBS. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual misconduct under this Policy. Each year DDBS prepares this report to comply with the Clery Act. This report is prepared in cooperation with the local law enforcement agencies around our campus.

Information pertaining to Clery will be reviewed annually and new statistics will be obtained from the police department. Campus Crime Stats are included in Clery which is distributed annually through email or a hard copy is available in the Director of Financial Aid's office.

Clery Updating Procedure

Director of Operations

- Appoints an Emergency Decision Team (EDT);
- Oversees the EDT Team;
- Evaluates all incidents with a need-to-know basis;
- May turn over criminal incidents to the local authorities for further investigation;
- May implement sanctions on the accused or the accuser
- Annually hold a one (1) hour presentation in the spring to address dating violence, domestic abuse, sexual assault, and stalking.

Director of Financial Aid

- Contacts Detroit Police Department with a formal request via email or postal mail service requesting a crime report for the geographical location of DDBS for the previous year. This is completed in June of each year. (Example: if we are in a current year, we should request information for the previous completed calendar year).
- Based on the information retrieved, compiles a report with the most 3 completed years updated.
- Sends out report to all employees and students of the updated report via email.
- Makes report available in Admissions Office.
- Distributes the report by October 1st of each calendar year.

Violence against Women Act (VAWA) Policy

Date of Last Revision: 3/26/2025

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

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

- A current or former spouse or intimate partner of the victim,

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

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

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

Violence against Women Act (VAWA) Procedure

All Staff

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

Date of Last Revision: 3/25/2025

VAWA Disciplinary Hearings Policy

Date of Last Revision: 3/26/2025

School disciplinary action in cases of alleged sexual assault will be based on the findings of the law enforcement agency investigating the facts pertaining to the crime and other mitigating circumstances. These records are available upon request through the administrative offices.

VAWA Disciplinary Hearings Procedure

Student

- Files a formal complaint via writing, video, or verbally
- Accuser will be notified in writing or verbally of alleged crime.

Director of Operations

- Reports allegation to law enforcement if the student has chosen this option.
- DDDBS and/or law enforcement conducts a full investigation of allegations along with collection of evidence.

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- Possible sanctions during investigation may include suspensions until investigation is complete.
- Victim may have the option of utilizing Victim Rights.
- Based on the findings made by law enforcement and DDBS, a written notice will be issued to the accuser and the victim of the outcome.

VAWA Collecting Data Policy

Date of Last Revision: 3/26/2025

School Emergency Decision Team (EDT) members are defined as an individual or individuals who have responsibility for campus security but who do not constitute a campus police department or campus security department. The EDT Coordinator and/or team members are responsible for documenting all crimes on official log. These individuals collect data throughout the year on activities that fall under the VAWA and Campus Crime Reports. They are assigned by the Director of Operations.

VAWA Collecting Data Procedure

Emergency Decision Team

- Collects data via crime logs.
- Submits crime logs to Director of Operations monthly.

Director of Operations

- Reviews the crime logs.
- Ensures that all incidents have been reported to local officials (if that option was chosen).

Director of Financial Aid

- Contacts local law enforcement by June each year via email to request information for the annual report.
- Compiles the information for the annual report.
- Updates the information.
- Submits by October 1 to Clery department, current students, and employees.

VAWA Prevention and Awareness Policy

Date of Last Revision: 3/26/2025

DDBS will conduct annual school-wide lessons in the spring where guest speakers will be invited to talk about Sexual Violence and Violence against Women. The intent is to offer resources and information on how to protect and protect others who may be a victim of criminal activity.

VAWA Prevention and Awareness Procedure

Director of Operations

- Prepares annual lesson plans to incorporate Sexual Violence and Violence against Women
- Contacts the local battered women's shelter or qualified counselor to schedule a presentation to address the students and staff
- Oversees the guest speaker and planned event.

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- Keeps copies of sign in sheets and documents of presentation in the files in the Director of Operations' office.

Information for Crime Victims about Disciplinary Proceedings

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

DDBS will provide a prompt, fair, and impartial disciplinary proceeding in which:

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

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

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

Timely Warning Emergency Policy

Date of Last Revision: 3/26/2025

Immediate notification of an unforeseen combination of circumstances that calls for immediate action.

Emergency Notification will be in written form, posted on the front door of the school as well as distributed by SMS to staff members and students. The verbal/written communication will include:

- Type of emergency

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- Steps to be taken for the emergency.

Timely Warning Emergency Procedure

Director of Operations

- At the time of an urgent unanticipated event, staff members present will assess the situation to determine the significance of the emergency.
- Takes a count for all students, staff, and guests as soon as reasonably possible to ensure that all are accounted for at the time of the emergency.
- Tests emergency procedures **twice a year**.
- Evaluates the testing results;
- Implements improvements needed to secure the safety of all concerned.

Emergency Decision Team

Date of Last Revision: 3/26/2025

The Emergency Decision Team consists of:

- (1) Director of Operations
- (2) Business Center Representative

Emergency Response & Evacuation Policy

Date of Last Revision: 3/26/2025

Emergency Response & Evacuation Policy

Tornado Warning Policy

Date of Last Revision: 3/26/2025

When a tornado warning is issued:

- A tornado has actually been sighted.
- Or has been indicated by radar.
- Public warning will come over the radio.

Tornado Policy

Date of Last Revision: 3/26/2025

- DO NOT leave the building.
- All students, guests and staff will report to the lower level of the building which is a fallout shelter.
- Make every effort to remain calm and encourage those around you to do likewise.
- Remain in the shelter location until instructed to return to your previous activities.

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Fire Drills Policy

Date of Last Revision: 3/26/2025

Fire evacuation plans will be practiced with each class start and require your most serious cooperation and consideration. All exits must be in working condition and unobstructed.

Fire Policy

Date of Last Revision: 3/26/2025

- If you smell smoke or see fire, report it immediately to staff.
- Do not continue with a salon service.
- The students and staff should evacuate the building in an orderly fashion to a safe place. (to the “the grass area directly in front of the school”)
- Students and staff may move cars if it is safe.
- If it is safe to return after the fire department inspect the building for safety, then the students will return on the Fire Marshal’s approval.
- If it is unsafe, then the students and staff members will be sent home until further notice via email and/or text.

Extreme Weather Conditions Policy

Date of Last Revision: 3/26/2025

- Check local listings if extreme weather conditions are present.
- DDBS may call, change the greeting on the school voicemail or text students if time is permitted.
- If at school when extreme weather conditions arise, student may choose to leave at own discretion. Student will not receive hours for time missed.

In Case of Serious Accident or Illness Policy

Date of Last Revision: 3/26/2025

- Call 9-1-1.
- Do not move sick or injured person(s).
- Be careful to avoid personal contact with any body fluids such as blood, vomit, or saliva.
- Stay with the victim and reassure her/him that help is on the way.

Power Failure Policy

Date of Last Revision: 3/26/2025

- Administration investigates issue in a timely manner.
- Do not continue with a salon service.
- Student and staff await instructions from administration.
- DDBS may call or text students if failure happens prior to scheduled school day.
- If at school when power failure arises, student may choose to leave at own discretion. Student will not receive hours for time missed.

Water Failure Policy

Date of Last Revision: 3/26/2025

- Administration is notified if present at the time of failure.
- Administration investigates issue in a timely manner.
- Do not continue with a salon service.

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- Student and staff await instructions from administration.
- DDBS may call or text students if failure happens prior to scheduled school day.
- If at school when water failure arises, student may choose to leave at own discretion. Student will not receive hours for time missed.

Emergency Response & Evacuation Procedure

Director of Operations

- Oversees At the time of an urgent unanticipated event, staff members will assess the situation to determine the significance of an emergency.
 - A count for all staff, students and guests will be taken as soon as reasonably possible to ensure all are accounted for at the time of the emergency.
 - A decision will be made depending on each instance and communicated too students through Text Message, E-Mail or verbally
 - Update student’s Contract if necessary and have student sign.

Copyright Infringement Policy

Date of Last Revision: 3/26/2025

Copyright Infringement Policy

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

Penalties for copyright infringement include civil and criminal penalties. In general, anyone found liable for civil copyright infringement may be ordered to pay either actual damages or “statutory” damages affixed at not less than **\$750** and not more than **\$30,000** per work infringed. A court can, in its discretion, also assess costs and attorneys’ fees. For details, see Title17, United States Code, Sections 504, 505.

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

The DDBS Code of Conduct prohibits illegal copyright infringement. Downloading and/or distributing copyrighted material, including through peer-to peer file sharing, without the permission of the copyright owner, is against the law. The use of DDBS network or other technology for unauthorized distribution of copyrighted material is forbidden. This can result in prosecution in criminal court and/or liability for damages in civil court. DDBS will accept and respond to any notice regarding the Digital Millennium Copyright ACT (DMCA).

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THE HIGHER EDUCATION OPPORTUNITY ACT

The Act requires institutions of higher education to offer legal alternatives to unauthorized downloading. The link below is from Educasue and includes all of the legitimate online services that they are currently aware of. No endorsement or evaluation is intended.

<http://educasue.edu/legalcontent>

Copyright Infringement Procedure

All Staff

1. Instructors must use the textbooks and workbooks provided to each student.
2. There shall be no copying from workbooks, exercises, standardized test booklets answer sheets, or a similar material intended to be consumed in the course of study or teaching.
3. In the event of obtaining permission to copy, the following steps must be taken:
 - Obtain Name and Address of Owner/Controller
 - Determine who holds the copyright to the material. The page containing a notice of copyright can help you determine who holds the copyright, the year of publication and the publisher's address. The acknowledgement page may also contain information regarding copyright ownership or control.
 - Request Permission to Duplicate. A request containing the information listed below should be sent to the permission department of the publisher in question. Provide complete and accurate information regarding the work to be duplicated such as:
 - Title, author and/or editor; copyright or publication date and edition of the book in which the materials to be duplicated appear.
 - Exact material to be used, giving amount, page numbers, chapters and, if possible, a photocopy of the material and title and copyright page
 - Number of copies to be made
 - Use to be made of duplicated materials and form of distribution (e.g., as course material and whether collected with other excerpts or materials, whether bound or unbound).
 - Whether the material is to be sold,
 - Type of reprint (ditto, photocopy, offset, typeset)
4. Prior to making the copies, the information above must be submitted to the President's office. After verification, only then can copies be made.
5. In order to monitor this policy and procedures, all printing and copying are limited to under 500 copies for each instructor per month.

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Personally Identifiable Information (PII)

Date of Last Revision: 2/28/2025

PII Policy

Dymond Designs Beauty School (DDBS) will follow all ED security regulations regarding Personally Identifiable Information when transmitting student information. DDBS secures student PII when dealing with third-party servicers. DDBS requires the Director of Financial Aid to use the BEN secure portal upload function made available by the servicer when possible. If this option is unavailable, PII is protected by using password protected e-mail sent to BEN. The password is then provided to BEN using a separate e-mail to maintain the integrity of PII. DDBS administrators will always use password protected e-mail when sending any authorized third-party student information containing PII. The password must be sent in a separate e-mail. If a third-party is requesting student information that contains PII, the administrator must first make sure that it is authorized to release the information to the third-party. DDBS must receive an authorization to release student's information in the case of third parties that are not approved by the institution. DDBS permits Financial Aid administrators to use BEN's secure portal system to upload documents with PII or to use WinZip to encrypt and password protect the documents and e-mail them to BEN and sending a separate e-mail with the password.

Safeguarding Consumer Information (PII) Procedure

Director of Operations/Business Center Liaison/Records Clerk

- Oversees the management of information systems including storage and transmittal of confidential information;
- Stores confidential files in an administrator's office where the door is locked if not occupied.

All Staff

- Will ensure that all documents containing student grades, social security number, or personal information are shredded – shredder located in the Records office;
- Sends encrypted or password protected emails containing confidential information or breaks one email into multiple emails;
- Ensure that all passwords are secure and does not share password codes with other members of the team or outside of the team;
- Always logs out of all computers and programs that allows access to confidential information, exams and grades.

Protecting Student Information Policy

Date of Last Revision: 2/28/2025

Dymond Designs Beauty School (DDBS) views PII (Personally Indemnifiable Information) as a high priority. All employees are required to understand the importance of PII, and students are required to sign media permission forms. DDBS monitors the controls and protects students' information and ensures that system users are trained properly. Student files are kept in a location that can be locked.

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Protecting Student Information Procedure

Director of Operations/Business Center Liaison/Admissions Coordinator

- Identifies and authenticates users by issuing passwords throughout portal system to gain access to modules.
- Limits individuals to access certain modules by only allowing access to modules needed.
- Have all students signed a media release form accepting or denying photographs and posting photographs.

Cyber Security/ Data Security Breach Policy

Date of Last Revision: 2/28/2025

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

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

- DDBS shall establish an appropriate standard for the institution relating to administrative, technical, and physical safeguards
- Program Objectives:
 - (1) To ensure the security and confidentiality of students and employees records and information
 - (2) To protect against any anticipated threats or hazards to the security or integrity of such records; and
 - (3) To protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any student or employee.
- Purpose
For purposes of DDBS Security Program, "**student information**" means any information about a student's and/or employees, or information the institution receives about the student of another financial institution, that can be directly or indirectly attributed to the student. This Security Program, in and of itself, does not create a contract between the student and any person or entity.

Responsibilities:

Director of Operations

- Maintain the GLBA safeguards
- Designs, implements and maintains new safeguards as she deems necessary. The Director of Operations may delegate or outsource the performance of any function under the Information Security Program as he or she deems necessary.

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The Federal Trade Commission (FTC) has defined financial institutions to include institutions of higher education (IHEs) based on the financial relationships the IHEs have with students, donors, and others. For further information, please reference the FTC's guidance for Financial Institutions and Customer Information - Complying with the Safeguards Rule located at <https://www.ftc.gov/tips-advice/business-center/guidance/financial-institutions-customer-information-complying>.

Consequently, IHEs are subject to the provisions of the GLB Act and must adopt an information security program, draft detailed policies for handling financial data covered by the law and take steps to protect the data from unauthorized personnel.

The Safeguards Rule (16 CFR part 314 also referred to as the Standards for Safeguarding Customer Information) requires IHEs, as financial institutions, to develop, implement, and maintain a comprehensive information security program that includes reasonable measures to secure customer information and to regularly test or otherwise monitor the effectiveness of the safeguards' key controls, systems, and procedures. The Safeguards Rule requires financial institutions to:

- a. Designate an employee or employees to coordinate the institution's information security program.
 - b. Identify reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of customer information that could result in unauthorized disclosure, misuse, alteration, destruction or other compromise of such information, and assess the sufficiency of any safeguards in place to control these risks. At a minimum, such a risk assessment should include consideration of risks in each relevant area of the institution's operations, including:
 - (1) Employee training and management
 - (2) Information systems, including network and software design, as well as information processing, storage, transmission, and disposal; and
 - (3) Detecting, preventing, and responding to attacks, intrusions, or other systems failures.
 - c. Design and implement information safeguards to control the risks the institution identified through risk assessment and regularly test or otherwise monitor the effectiveness of the safeguards' key controls, systems, and procedures.
 - d. Oversee service providers, by:
 - (1) Taking reasonable steps to select and retain service providers that can maintain appropriate safeguards for the customer information at issue; and
 - (2) Requiring the institution's service providers by contract to implement and maintain such safeguards.
 - e. Evaluate and adjust the institution's information security program considering the results of the testing and monitoring required by paragraph c above; any material changes to the institution's operations or business arrangements; or any other circumstances that the institution's managers know or have reason to know that may have a material impact on the institution's information security program (16 CFR section 314.4).
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Cyber Security/ Data Security Breach Procedure

All Staff

- All records containing customer information shall be stored and maintained in a secure area.
 - Paper records shall be stored in a room, cabinet, or other container that is locked when unattended. The President shall control access to such areas.
 - All storage areas shall be protected against destruction or potential damage from physical hazards, like fire or floods.
 - Electronic customer information should be stored on secure servers. Access to such information shall be password controlled, and the President shall control access to such servers.
 - Student and employee information consisting of financial or other similar information (e.g., social security numbers, etc.) shall not be stored on any computer system with a direct Internet connection.
 - All customer information shall be backed up on a [daily] basis. Such back up data shall be stored in a secure location as determined by the President.
- All electronic transmissions of student and employee information, whether inbound or outbound, shall be performed on a secure basis.
 - Social Security, IRS information, or other sensitive financial data transmitted to the Institution directly from students shall use a secure connection, such as a Secure Sockets Layer (SSL) or other currently accepted standard, so that the security of such information is protected in transit. Such secure transmissions shall be automatic. Students shall be advised against transmitting sensitive data, like social security, via electronic mail.
 - The Institution shall require by contract that inbound transmissions of student information delivered to the Institution via other sources be encrypted or otherwise secured.
 - All outbound transmissions of student information shall be secured in a manner acceptable to the President.
 - To the extent sensitive data must be transmitted to the Institution by electronic mail, such transmissions shall be password controlled or otherwise protected from theft or unauthorized access at the discretion of the President.
 - The President and third-party service shall review all students' applications to ensure an appropriate level of security both within the Institution and with the Institution's business third party server and IRS.
- All paper transmissions of customer information by the Institution shall be performed on a secure basis.
 - Sensitive student information shall be properly always secured.
 - Student information delivered by the Institution to third parties shall be kept always sealed. • Paper-based student information shall not be left unattended at any time it is in an unsecured area.
- All student information shall be disposed of in a secure manner.
 - The President shall supervise the disposal of all records containing student information.
 - Paper-based student information shall be shredded and stored in a secure area until a disposal or recycling service picks it up.

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- All hard drives, diskettes, magnetic tapes, or any other electronic media containing student information shall be erased and/or destroyed prior to disposing of computers or other hardware.
- All hardware shall be effectively destroyed.
- All student information shall be disposed of in a secure manner after any applicable retention period.
- The President shall maintain an inventory of Institution computers, including any handheld devices or PDAs, on or through which student information may be stored, accessed or transmitted.
- The President shall develop and maintain appropriate oversight or audit procedures to detect the improper disclosure or theft of student information.

Information Security Policies and Procedures

Director of Operations/Business Center Liaison

- Detecting, preventing and responding to attacks, intrusions or other systems failures; In keeping with the objectives of the program DDBS shall implement, maintain and enforce the following attack and intrusion safeguards:
 - DDBS uses Western Digital /Secure Socket Layer/Huntress/ Webroot/Canari/RMM Monitoring/Pen Testing Scanning for anti-virus and data protection
- Ensures that DDBS has adequate procedures to address any breaches of the information safeguards that would materially impact the confidentiality and security of customer information. The procedures address the appropriate response to specific types of breaches, including hackers, general security compromises, denial of access to databases and computer systems, etc.
- Utilizes and maintains a working knowledge of the widely available technology for the protection of student information.
- Communicate with the computer vendors from time to time to ensure that that DDBS has installed the most recent patches that resolve software vulnerabilities.
- Utilizes anti-virus software that updates automatically.
- Maintains up-to-date firewalls.
- Manage information security tools for employees and passes along updates about any security risks or breaches.
- Establishes procedures to preserve the security, confidentiality, and integrity of student information in the event of a computer or other technological failure.
- Ensures that access to student information is granted only to legitimate and valid users.
- Notifies students promptly if their student information is subject to loss, damage, or unauthorized access.

Reporting a Breach

Please include the following points:

- Date of breach (suspected or known)
- Impact of breach (of records, etc.)
- Method of breach (hack, accidental disclosure, etc.)

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- Information Security Program Point of Contact - Email and phone details
- Remediation Status (complete, in process - with detail)
- Next steps (as needed)

GLBA Required Information Security Program

Date of Last Revision: 1/25/2025

Created: 1/1/2023

Effective Date: 1/1/2023, 3/31/2024

Reviewed: 1/2/2024, 1/25/2025

Revised: 3/21/2024, 1/25/2025

GLBA Required Information Security Program

Overview

In accordance to the Department of Education implementing regulations at 34 C.F.R., Standards for Safeguarding Customer Information, 16 C.F.R. Part 314, issued by the Federal Trade Commission (FTC), compliance with the Family Educational Rights and Privacy Act (FERPA), as required by the Gramm-Leach-Bliley Act (GLBA) Act, P.L. 106-102, and upon signing a Program Participation Agreement (PPA) that requires financial institutions to explain their information-sharing practices to their customers and to safeguard sensitive data. Colleges participating in the Federal Student Aid (FSA) programs are subject to the information security requirements established by the FTC for financial institutions. DDBS is responsible for complying with the limitations on the disclosure of PII in students' education records under FERPA and is subject to Sections 501 and 505 (b) (2) of the GLB Act.

Financial Services Modernization Act of 1999 (Public Law 106-102, 113 Statue 1338) also known as the GLB Act regulates the protection, collection, and disclosure of consumers nonpublic personal information or personal identifiable information (PII) by financial institutions.

As a financial institution covered under these information security requirements, Dymond Designs Beauty School (DDBS) has developed, implemented, and maintains a comprehensive data and information security program that is designed to create and implement the following: the written incident response, safeguards to control identified risk, monitor and test regularly/daily the effectiveness of our safeguards, train staff, and monitor our service providers by keeping this information security program current. DDBS has annual risk/technology assessments provided by Electronic Brain Solution which includes a perform control analysis, assess risk analysis, recommended control measures, and a threat vulnerability statement. DDBS has qualified staff members that oversee, implement, and report to our board annually any changes, deletions, additions, and suggestions for this program.

Designated Qualified Employees & Personnel Responsible

Marlene Brooks-Director of Operations

Roxy Dunlap- Business Center Administrator

Third-Party Contractual IT Company

Doug Pettigrew -Electronic Brain Solutions

Hartford Insurance

Plan Evaluation, Revision, and Training

The Data Privacy, Cyber Incident & Information Security Response Plan is in the Title IV Manuel in hard copy print throughout the school and on digital print on the school website www.dpbs.edu. This plan is reviewed annually by school committees and employees. Training for this plan is conducted annually with the personnel responsible for this plan and the third-party contractor who is over all our IT on-site and off-site.

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The Safeguards Rule

- An information security program is defined as the administrative, technical, or physical safeguards used to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information.
- Customer information is defined as any record containing nonpublic personal information as defined in 16 CFR 313.3(n), about a customer of a financial institution, whether in paper, electronic, or other form, that is handled or maintained by or on behalf of the financial institution or its affiliates.
- A service provider is defined as any person or entity that receives, maintains, processes, or otherwise is permitted access to customer information through its provision of services directly to a financial institution that is subject to the Safeguards Rule.
- In the PPA signed by each IHE to participate in the Title IV federal student aid programs, the IHE agrees to comply with the FTC's regulations for implementing the GLB Act, 16 CFR part 314, Standards for Safeguarding Customer Information (also referred to as the Safeguards Rule). Since the GLB Act is intended to ensure the security and confidentiality of customer information, ED considers any breach of the security of student records and information as a demonstration of a potential lack of administrative capability as stated in 34 CFR section 668.16(c). ED has mandated IHE's must notify ED of any known or suspected breaches (See Volume 2, Chapter 7 of the 2017-2018 Federal Student Aid Handbook, page 2-201) and strongly encouraged IHEs to inform their students, in compliance with applicable state regulation.
- In addition, an institution that participates in any Title IV, Higher Education Act (HEA) program is subject to the requirements of the FTC Identity Theft Red Flags Rule (72 Fed. Reg. 63718) issued on November 9, 2007. The "Red Flags Rule" requires an institution to develop and implement a written Identify Theft Prevention Program to detect, prevent, and respond to patterns, practices, or specific activities that may indicate identity theft.
- If your response contains PII that information must be protected. PII is any information about a student which can be used to distinguish or trace the student's identity (some examples are name, social security number, date and place of birth).
- PII being submitted electronically or on media (e.g., CD, disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip, however, files created with encryption software are also acceptable, if they are compatible with WinZip and are encrypted with AES encryption.
- The Department must receive an access password to view the encrypted information. The password must be e-mailed or otherwise communicated separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).
- Hard copy files and media containing PII must be:
 - Sent via a shipping method that can be tracked with signature required upon delivery.
 - Double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
 - Labeled with both the "To" and "From" addresses on both the inner and outer packages.
 - Identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender)."

Information Security Plan

This Information Security Plan ("Plan") describes safeguards implemented by DDBS to protect covered data and information in compliance with the FTC's Safeguards Rule promulgated under the Gramm Leach Bliley Act (GLBA). With the use of the following updated firewall configuration, protection, and security software called Huntress, Datto EDR/Xdr with Datto Anti-virus, Canari, RMM Monitoring, and Pen Testing Scanning. These safeguards are provided to:

- Ensure the security and confidentiality of covered data, student, and information.
- Protect against anticipated threats or hazards to the security or integrity of such information; and
- Protect unauthorized access to or use of covered data and information that could result in substantial harm or inconvenience to any customer.

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Information Security Plan

This Information Security Plan ("Plan") describes safeguards implemented by DDBS to protect covered data and information in compliance with the FTC's Safeguards Rule promulgated under the Gramm Leach Bliley Act (GLBA). With the use of the following updated firewall configuration, protection, and security software called Huntress, Datto EDR/Xdr with Datto Anti-Virus, Canari, RMM Monitoring, and Pen Testing Scanning. These safeguards are provided to:

- Ensure the security and confidentiality of covered data, student, and information.
- Protect against anticipated threats or hazards to the security or integrity of such information; and
- Protect unauthorized access to or use of covered data and information that could result in substantial harm or inconvenience to any customer.

Information Security Program

DDBS has developed written policies and procedures to manage control information such as identity and assess the risks that may threaten covered data and information maintained by DDBS. Directories have been created and controlled to allow for the sharing of data in one centralized controlled location. There are adjustments for the future of this program which includes annual and daily meetings and discussions around technology with Staff, Board Members, and IT Contractors which will allow DDBS to reflect on any changes in technology, the sensitivity of covered data/information, and internal or external threats to information security.

Risk Management & Compliance Assessment of Risks to Student/Customer Information

Risk assessments are conducted to identify, quantify, prioritize, and manage risks. Controls which are applicable to each situation have been applied to avoid violations of any legal obligation (e.g., statutory, regulatory, or contractual) which is also assessed through Electronic Brain Solutions (EBS). DDBS recognizes that it is exposed to both internal and external risks, including but not limited to the following:

Unauthorized Access: For unauthorized access of covered data and information by someone other than the owner of the covered data and information access control is done by specific sharing with only one person having access to specific data. In addition, DDBS has implemented a policy for risk management & compliance by locking doors, locking computer screens when not in use and not leaving data on screen when not in use, and the use of strong computer passwords. This plan will assist with making sure that data/information is not compromised as result of system access by any unauthorized person.

Interception of Data: The business center at DDBS is responsible for the set-up and management of all email systems through Microsoft. Every message that is sent from the Microsoft account is encrypted. Employees do not use Gmail accounts to send anything with PII. Offsite data backup is encrypted at transit and at rest.

Privacy Settings: The privacy settings on each device can be changed to limit the amount of personal data shared.

Lockdowns: Electronic Brain Solutions has locked DDBS internal port of 3389 for the firewall and doesn't allow public access to that port

Data Back-up

Western Digital Backup is used along with an image backup to the cloud to ensure that data/information is protected offsite with encryption. It is also used for detecting and remediating errors in the system, corruption of data, unauthorized access of covered data and information, unauthorized request for covered data and information/pretext calling which is followed by DDBS policy and procedure that states that no one will be allowed access to PII of another person, unauthorized access through hardcopy files/reports(files are kept in a fire proof locked cabinet in the padlocked data room) and unauthorized transfer of covered data and information through third party(third parties are vetted and not allowed access to data without an escort of DDBS personnel).

Recognizing that this may not represent a complete list of the risks associated with the protection of covered data and information, and that new risks are created regularly, the DDBS Information Security Program Coordinator along with the third-party contractor Electronic Brain Solutions, will actively participate and monitor appropriate cybersecurity advisory groups for identification of risks. There is also an annual 3rd party penetration testing and remediation assessment that is conducted.

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Current safeguards are implemented, monitored, and maintained by the DDBS Information Security Program Coordinator and Electronic Brain Solution (third-party contractor) are reasonable, and considering current risk assessments are sufficient to provide security and confidentiality to covered data and information maintained by the school. Additionally, these safeguards reasonably protect against currently anticipated threats or hazards to the integrity of such information.

Personnel Security Policy and Procedure

References and/or background checks (as appropriate, depending on position) of new employees working in areas that regularly work with covered data and information, financial, and financial aid are checked. DDBS has contractual agreements in place that target to keep client information secure.

Training & Awareness Policy and Procedure

Employees are trained annually to understand this plan and about all the changes and revisions to this plan. Employees are taught what is acceptable regarding client data, which allows staff to become educated on the secure use of all applications and technology solutions. During employee orientation, each new employee in these departments receives proper training on the importance of confidentiality of student hard-copy and digital records, user-groups, student financial information, and all other covered data and information. Each new employee is also trained in the proper use of computer information and passwords. Training includes controls and procedures to prevent employees from providing confidential information to an unauthorized individual, as well as how to properly dispose of documents that contain covered data and information. These training efforts should help minimize risk and safeguard covered data and information. Refresher training is required on an annual basis.

Physical Security Plan/ Policy

DDBS has addressed the physical security of covered data and information that will allow unauthorized parties the inability to access sensitive data by limiting access to only those employees who have a legitimate business reason to handle such information. For example, financial aid applications, income and credit histories, accounts, balances, and transactional information are available only to DDBS employees with an appropriate business need for such information. Furthermore, each department is responsible for maintaining covered data and information and is instructed to take steps to protect the information from destruction, loss, or damage due to environmental hazards such as fire and water damage or technical failures. This Plan/Policy has been implemented, this plan is implemented for permitting and enabling physical access to alternate authorized individuals (e.g., in the event primary authorized individuals are sick or not available).

Information Systems Network Security Plan/Policy

Access to covered data and information via DDBS computer information system is limited to those employees and faculty who have a legitimate business reason to access such information. DDBS has policies and procedures in place including but not limited to access controls list for any data stored on the server to complement the physical and technical safeguards to provide security to DDBS information systems. Social security numbers are considered protected information under both GLBA and the Family Educational Rights and Privacy Act (FERPA). The following are existing controls:

- Authorized individuals only.
- Workstations with passwords.
- Information sent electronically is encrypted and sent by authorized individuals only.
- Vulnerabilities on both network and systems are constantly monitored and addressed.
- All systems must be managed on a managed services platform to ensure systems are patched when needed.
- Unauthorized access to third parties is not permitted.

Logical Access

Processes are in place to ensure unauthorized access to systems does not take place, users set up using permissions and groups based on job function by doing the following:

- All users must have unique ID's not only for windows but for 3rd party software as well.
- Email's systems have unique user ID's/Passwords in place.
- User rights must be adjusted as needed for employees' current job function.

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Operations Management Policy and Procedure

Operating systems are established to protect documents, computer media, tapes, removable media, disks, input/output data and system documentation to protect sensitive information from unauthorized disclosure, modification, removal, and destruction by doing the following:

- All sensitive data is handled appropriately by the authorized person.
- Equipment containing data that has been decommissioned or repaired must have any data wiped to DOD standards provided the hardware contains any data.
- IT providers will test as needed at their facility.
- Employees will have other employees with different job functions check and double check that data has been entered correctly and is not mistakenly modified.
- Any changes must be discussed with the designated employee(s) that are trained in how to appropriately use equipment/software that was modified to prevent errors and/or risks.

Management of System Failures

DDBS Information Security Program Coordinator has developed procedures to detect any actual or attempted attacks on DDBS systems and has detailed instructions for responding to actual or attempted unauthorized access to covered data and information. In the event of a system failure The Program Coordinator/Contractual IT Company must first discover the cause of failure (If the failure was due to corrupt files or a hardware failure, addressing/fixing the issue and then restoring backup), if the cause of the failure is determined to be a third-party attack or something malicious, each machine effected should be disconnected from the network but kept running. It is important to contact the cybersecurity insurance provider first for guidance as to how to proceed within the parameters of policy.

Oversight of Service Providers

Electronic Brain Solutions and DDBS will oversee the oversight of service providers by the requirements of the GLBA. DDBS has taken reasonable steps to select and retain service providers who maintain appropriate safeguards for covered data and information. This Information Security Program ensures that such steps are taken by contractually requiring service providers to implement and maintain such safeguards.

Procedure for Reporting Security Breaches to Students and the Department

The Department considers any breach in the security of student records and information to be a demonstration of a potential lack of administrative capability.

Schools' SAIG Agreements include a provision that schools must notify Washington D.C. at the Department at CPSSAIG@ed.gov the same day of actual breaches as well as suspected breaches of the security of student records and information, and ED strongly encourages schools to notify their students of the breach at the same time.

- In their reports to the Department, schools should include the following:
- Date of breach (suspected or known)
- Impact of breach (of records, etc.)
- Method of breach (hack, accidental disclosure, etc.)
- Information Security Program Point of Contact - Email and phone details
- Remediation Status (complete, in process - with detail)
- Next steps (as needed)

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

Procedures to Maintain Compliance with the GLB Act Re: Personally Identifiable Information (PII)

1. All records containing PII are stored and maintained in a secure location.
 - a. Paper records and files are always stored in a locked fireproof cabinet in a locked room that is locked when unattended. The School Director of Operations controls access to these areas.
 - b. All stored data are protected against destruction or potential damage such as floods, fire, etc. by employing fire-proof cabinets.

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- c. Paper records and electronic customer information are also stored on a secure server whose access is controlled by the Information Security Program Coordinator, Electronic Brain Solutions. Access to this information is password protected and not available to students.
 - d. Staff computers are password protected, and students do not have access to them.
 - e. Student and employee PII are not stored on any computer system with a direct internet connection.
 - f. All student information is backed up daily through Electronic Brain Solution. Backup is stored in a secure location as determined by the Director of operations. All credit card information is processed through QuickBooks.
 2. All electronic transmissions of student and employee PII are secured.
 - a. Social Security information, IRS information, and other sensitive financial data transmitted to DDBS directly from students shall use a secure connection such as a Secure Sockets Layer (SSL) or other currently accepted standard. This is so that the security of such information is protected in transit. Such secure transmissions are automatic. Students are advised against transmitting sensitive data via electronic mail.
 - b. DDBS contractually requires that inbound transmissions of PII, delivered to DDBS via other means, be encrypted or otherwise secured.
 - c. All outbound transmissions of PII are secured in a manner acceptable to the Information Security Program Coordinator. If PII must be transmitted to DDBS by e-mail, such transmissions are password protected or otherwise secured against compromise at the discretion of the Information Security Program Coordinator.
 - d. The Information Security Program Coordinator and third-party services review all student applications to ensure an appropriate level of security both within DDBS and within the third-party server and the IRS.
 - e. Sensitive data must be transmitted to DDBS by electronic mail, such transmissions are passwords controlled or otherwise protected from theft or unauthorized access at the discretion of the Director of Operations.
 3. All paper transmissions of student and employee information by DDBS are secure.
 - a. Any PII delivered by DDBS to third parties are always kept sealed.
 - b. Paper-based student/employee information is never left unattended in an unsecured area.
 - c. All paper transmission of student and employee information is stored in a fireproof locked cabinet inside a padlocked records room.
 4. All PII is disposed of in a secure manner.
 - a. The Information Security Program Coordinator (Director of Operations/Business Center Administrator) will supervise the disposal of all records containing PII.
 - b. Paper-based PII is shredded and stored in a secure area until a disposal or recycling service picks it up.
 - c. All hard drives, diskettes, magnetic tapes, or any other electronic media containing PII shall be erased and/or destroyed prior to disposal. All hardware is recycled.
 - d. All PII is disposed of in a secure manner after any applicable retention period.
 5. The Information Security Program Coordinator (Director of Operations/Business Center Administrator) maintains an inventory of the school computers and handheld devices on or through which PII may be stored, accessed, or transmitted.
 6. The Information Security Program Coordinator (Director of Operations/Business Center Administrator) develops and maintains appropriate oversight and audit procedures to detect the improper disclosure or theft of student information.
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Definitions

- As used in the Gramm-Leach-Bliley Act, “customers” (those to whom DDBS provides services of any kind for).
- For the purposes of this Safeguarding Program, “customer information” is defined as any record containing non-public, personally identifiable financial information regarding any of the school’s customers, whether records are maintained on paper, electronically, or by any other means, this security program does not create contractual agreements between the student and any other entity or person.

Applicability

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

Information Security Program Policies and Procedures

By using an updated firewall configuration, protection, and security software (Huntress, Datto EDR/Xdr with Datto Anti-Virus, canari, RMM Monitoring, and Pen testing Scanning) DDBS continues to keep the objectives of the Information Security Program. DDBS implements, maintains, and enforces the following attack and intrusion safeguards to detect, prevent, and respond to attacks, intrusions, or other system failures.

DDBS employs Rollcall educational management software and Boston Educational Network, a fully encrypted school interface. Participating in school administrators must be secured with a unique logon ID and password for access.

The Information Security Program Coordinator(s):

DDBS Information Security Program Coordinator is Marlene Brooks (Director of Operations), and Roxy Dunlap (Business Center Liaison). They are responsible for ensuring DDBS has adequate procedures in place to address any compromise of DDBS’s information safeguards. The procedures include appropriate responses to specific types of attacks, i.e., hackers, general security failure, denial of access to databases and computer systems, etc.

Based on the information contained in the questions below, there is a mix of hardware and software solutions to help protect and defend DDBS’s infrastructure. The coordinators are responsible for the following:

1. Maintaining a working knowledge of appropriate technology for the protection of student PII.
1. EBS trains Spec Ops on a weekly basis along with other training throughout the year.
2. Ensuring that DDBS has installed the most recent updates needed to resolve software vulnerabilities, the Information Security Program Coordinator periodically communicates with DDBS’s computer vendor.
3. Making sure updates are installed automatically 4-5 days after they are released. They are monitored for any issues or failures. Third party patching occurs as updates are released.
4. Ensuring DDBS utilization of anti-virus and EDR software that updates automatically. Currently using Datto EDR/Xdr with Datto Anti-Virus monitored Anti-virus along with Canauri for ransomware protection and huntress for IDS and EDR.
5. Ensuring that DDBS maintains up-to-date firewalls. Firewall is updated according to the schedule of releases from the firewall company.

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6. Managing DDBS's information security tools for employees and passing along updates about any security risks or breaches. Updates provided related to DDBS's specific infrastructure.
7. In the event of a computer or other technological failure, the Information Security Program Coordinator's will implement previously established procedures to preserve the security, confidentiality, and integrity of student PII. Electronic Brain Solutions will be managing or making repairs so they will know where the data is located and who is accessing it. Once the computer dies, Electronic Brain Solutions will destroy (physically) the hard drive and recycle the computer.
8. Ensures that access to student information is granted only to legitimate and valid users. The student information that resides on the server is access controlled by active directory logins.
9. Notifies students promptly if their PII is compromised.

DDBS has established a way for a person whose “personal identification information” was the subject of a “data breach” in compliance with the mandatory “data breach” notification statutes or regulations to contact students if PII is found to be compromised and a monitoring service that provides “data breach” victims with credit, fraud, public records or other monitoring alerts through Electronic Brain solutions as well as services that are covered under The Hartford.

Cyber Incident Response Procedure

In the event of a cyber-incident (ransomware, breach, successful phishing attack etc....) the qualified coordinators or IT provider must do the following:

1. Disconnect the computer from the network but keep the system powered on. This may be done with huntress software but if not, it will require someone to physically disconnect the machine.
2. After the qualified individual has been alerted, they will reach out to Electronic Brain Solutions if that has not already been done.
3. The designated personnel must login to FSA in Washington D.C. (U.S. Department of Education) to report a security breach through the Cybersecurity Intake Page with 24 hours of the data breach or call the Education Security Center (EDSOC) at 202-245-6550.
4. The coordinator of Electronic Brain solutions will contact The Hartford, which provides the cyber liability policy for instructions on how to proceed.
5. The Hartford will indicate the next steps and if a 3rd party investigator or response unit will be needed.

Physical Incident Procedure

In the event of a physical disaster (fire, flood, etc.) the following must be done:

1. The coordinator must have access to the school to assess the damage to physical storage as well as technology.
2. After the assessment The Hartford insurance company will be notified.
3. An onsite evaluation of all IT equipment will be performed by qualified coordinators and Electronic Brain Solutions.
4. After the assessment of any damage by the IT coordinator and Electronic Brain Solutions is performed and if a new server or solution is needed to restore the backup files and get the business applications up and running must be functioning as soon as possible.
5. Physical media will also be evaluated for damage and restoration possibilities.
6. If physical IT equipment is rendered useless, a virtual machine will be created in the cloud and all data, and all data and information temporarily migrated to that server.

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Incident Management Strategy Policy and Procedure

A consistent approach to managing information security incidents, consistent with applicable law, is in place to handle information security events and weaknesses once they are reported by doing the following:

- reporting any security incidents by documenting the incident completely. Logs and any other evidence of a “security breach” are saved for review.
- Measures to correct any breaches are taken immediately to stop ongoing attacks if found.
- Communicate information security events and vulnerabilities associated with information systems effectively, allowing for appropriate and timely corrective actions.
 - **Incident Response:** This formalized plan outlines detailed procedures for incident prevention, detection, assessment, forensics, containment, and recovery activities. This plan aims to mitigate computer security risks through comprehensive, structured responses to incidents.
 - **Designated Incident Response Personnel:** Designated personnel are responsible for responding to incidents. The personnel responsible are responsible for executing the procedures detailed in the Incident Response Plan. These responsibilities include initial response, investigation, mitigation actions, and coordination with external experts if necessary.

Business Continuity Management Policy/System failure

Backup and recovery plans are documented, distributed, through the organization and easily obtained by office personnel if an event occurs by doing the following:

- Any Backup and recovery options that are presented to DDBS are reviewed and tested regularly to ensure that the best plan is in place per DDBS needs.
- Currently all data is backed up offsite and tested for recoverability in the event of data loss.
- Physical security analysis of both electronic and hardcopy records regularly.

Threat Assessment Policy

This policy is in place to detect and prevent malware, phishing, compromised credentials or passwords along with sabotage and or fire by doing the following:

- The use of the anti-virus with Datto EDR/Xdr with Datto Anti-Virus and Huntress.
- Constant monitoring with Huntress and anti-ransomware with Canauri.
- Monitoring via RMM.
- Firewall logs and updates.
- Backups both onsite and offsite are performed for disaster recovery.

Records Policy

This policy explains how records are protected including stored information such as:

financial records school (restricted), financial records student(private), tax information(restricted), loan applications(restricted),employee HR information(restricted), employee contact information(private), student contact information(private), student account balances(private), website content(public), student personal information(private), parent personal information(private), client personal medical information(private), student financial aid information(private), student grades and attendance(private), emergency contact(private), student paper files(private), student digital files(private). These are the procedures as follows:

- Working with Galactic Scan.
- Penetration testing is done annually.
- All information transferred to DDBS.
- Huntress 24/7
- SOC reviews possible incidents and removes nodes from the network if necessary.
- Traditional anti-virus by Webroot
- Monitoring by RMM.
- Canauri is staffed 24/7 and has alerts for any attempts to remove ransomware.
- Data housed on a specific drive or specific program named Rollcall which doesn't have encrypted database but relies on the security of the server where it resides.

Disposal

DDBS requires the shredding of all paper containing any customer information prior to disposal. In the event of any

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recycling of personal computers containing customer information, all memory components of such computers will be completely reformatted or otherwise erased for any new use as determined by the department.

Monitoring and Detection

All institutional data and computing resources must be continuously monitored to detect any events that may compromise their security. This includes system, security, and operational events. This is to ensure that DDBS identifies potential security incidents promptly and effectively.

Commitment to Continuous Improvement

DDBS commits to continually improving its response capabilities. This includes regular reviews and updates to the Data Privacy, Cyber Incident & Information Security Response Plan and training programs for the Incident Response Personnel to ensure they are prepared to manage new and evolving threats.

Audits and Monitoring

DDBS reserves the right to perform periodic and random audits. This continuous monitoring of its networks and systems will ensure compliance with this cybersecurity policy.

Handling Non-Compliance

Non-compliance with this policy must be reported to the Director of Operations. An assessment of the non-compliance, potential risks involved, and the corrective actions to require preventing future occurrences will be reviewed and if necessary, escalated review and action of the individual (s) involved.

Incident Reporting and Investigation

All breaches of information security, whether actual or suspected, must be immediately reported to the designated personnel. Designated personnel are responsible for initiating an investigation and working with relevant parties to address the breach. A standard procedure for reporting and managing breaches will be outlined in the Incident Response Plan.

Disciplinary Actions

Individuals found in violation of this policy are subject to disciplinary action, which may include, but not limited to, loss of computer and network access and privileges, reprimands, suspension, termination of employment, or legal action, depending on the severity of the breach. Disciplinary measures will be applied consistently and in accordance with DDBS policies.

Compliance Training

To support compliance with this policy, DDBS will provide regular training and awareness programs to all members of the DDBS staff. These programs will cover the importance of information security, the specific requirements of this policy, and the roles and responsibilities of individuals in maintaining security.

INSURANCE to COVER DATA and INFORMATION POLICY

The Hartford Data Breach Response Expense Policy and Procedure

The Hartford will pay for “data breach expenses” that DDBS incurs because of a “data breach” of personally identifiable information. The following is the procedure in the event of a loss you must:

- The designated personal responsible on the campus site must report the data breach to Washington within 24 hours of breach by logging into FSA (U.S. Department of Education) and report the breach through the Cybersecurity Intake page or call the Education Security Center (EDSOC) at 202-245-6550.
- Report the “data breach” to The Hartford within 30 days of the discovery of the “data breach.”
- Immediately record the specifics of the “data breach” and the date discovered.
- Cooperate with the investigation of the “data breach.”
- Assist The Hartford, upon request in the enforcement of any right against any person or organization which may have accessed, stolen or disclosed the information or data giving rise to a “data breach.”
- DDBS may not, except at your own cost, voluntarily make a payment, assume any obligation, or incur any expense without prior written consent.

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- DDBS has 1 year from the date of reporting a “data breach” to initiate services provided to the school.
- As soon as possible, give The Hartford should be told the description of how, when and where the “data breach” occurred, including but not limited to all the following, information as it becomes known to you:
 1. The method of “data Breach”
 2. The approximate date and time of the “data breach”
 3. The approximate number of files compromised because of the “data breach.”
 4. A detailed description of the type and nature of the information that was compromised.
 5. Whether or not the information was encrypted, and if so, the level of encryption.
 6. Whether or not law enforcement has been notified
 7. If available, the place of domicile for all persons whose “personally identifiable information” was the subject of a “data breach.”
 8. If available, who received the information contained in the “data breach.”
 9. Any other access, information or documentation were reasonably required to investigate or adjust the loss.
 10. Take all reasonable steps to protect “personally identifiable information” remaining in your care, custody, or control.
 11. Preserve, and permit us to inspect, all evidence of the “data breach.”
 12. If requested, permit The Hartford to question DDBS under oath, orally or in writing, at times as may be reasonably required about any matter relating to the insurance or loss, including copies of DDBS books and records. In answering questions in writing DDBS answers must be signed.

The Hartford Data Breach Defense Policy and Procedure

The Hartford will pay for “loss” on behalf of DDBS resulting from a “data breach claim” if the following conditions are met:

- The ‘data breach claim’ was first made against DDBS during the policy period. A “data breach claim” will be deemed to have been made when notice of such “data breach claim” is received by you or by The Hartford, whichever comes first.
- DDBS had no knowledge of the “data breach” out of which the “data breach” arises.
- The “data breach claim” is reported to The Hartford within 30 days after you receive notice of the claim, but in no event later than 30 days after the end of the “policy period.”
- The “data breach” must involve “personally identifiable information” that was held by DDBS or on behalf in the “coverage territory.”
- DDBS must cooperate with The Hartford in any investigation, settlement, or defense of the “data breach claim”, and assist The Hartford, upon their request in the enforcement of any right of recovery regarding any payment of “loss” under DDBS Data Breach Policy. DDBS must execute all papers required and do everything necessary to secure and preserve such rights, including the execution of any documents needed to enable The Hartford to bring suit in DDBS’s name.
- DDBS may not, except at our own cost, voluntarily make a payment, assume any obligation, or incur any expense without prior written consent.
- DDBS must take all reasonable steps to protect “personally identifiable information” remaining in the care of DDBS.
- DDBS must preserve all evidence of the “data breach”.

DDBS has established crises management services through Electronic Brain Solution that will be able to perform services a way for a person whose “personal identification information” was the subject of a” data breach” in compliance with the mandatory “data breach” notification statutes or regulations to contact students if PII is found to be compromised.

Continuing Evaluation and Adjustment

The Information Security Program will be reviewed annually by the schools’ boards, staff, and 3rd party IT company, and will be subject to periodic review and adjustment. Continued administration of the development, implementation and maintenance of the program will be the responsibility of the designated Information Security Program Coordinators, who will assign specific responsibility for technical (IT), logical, physical, and administrative safeguards implementation and administration as appropriate.

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Additional Definitions

Covered data and information - for the purpose of this program includes student financial information (defined below) that is protected under the GLBA. In addition to this coverage, which is required under federal law, DDBS chooses as a matter of policy to include in this definition all sensitive data, including credit card information and checking/banking account information received during business hours by the school, whether such information is covered by GLBA. The covered data and information will include both paper and electronic records.

Pretext calling - occurs when an individual attempts to improperly obtain personal information of DDBS customers to be able to commit identity theft. It is accomplished by contacting the school, posing as a customer or someone authorized to have the customer's information, and using trickery and deceit, convincing an employee of the school to release customer-identifying information.

Student financial information - is that information that DDBS has obtained from a student or customer in the process of offering a financial product or service, or such information provided to the school by another financial institution. Offering a financial product or service includes offering student loans to students, receiving income tax information from a student's parent when offering a financial aid package, and other miscellaneous financial services. Examples of student financial information include addresses, phone numbers, bank and credit card account numbers, income and credit histories and Social Security numbers, in both paper and electronic format.

Data Breach- means loss, theft, accidental release, or accidental publication of “personally identifiable information”, or circumstances objectively giving rise to a substantial risk that such a loss, theft release, or publication has occurred.

Data Breach Expense- Notification expenses to notify a person whose “personally identifiable information” was a subject of a “data breach” notification statutes or regulations.

Loss- meaning civil awards, settlements, and judgments (including any award or prejudgment interest), expenses incurred in the defense of a “regulatory proceeding.”

Regulatory Proceeding- meaning an investigation, demand or proceeding, including a request for information, brought by, or on behalf of, the Federal Trade Commission, Federal Communications Commission or other administrative or regulatory agency, or any federal, state, local or foreign governmental entity in such entity's regulatory or official capacity seeking relief based upon a “data breach.

FTC regulations: 16 CFR 313.3(n) and 16 CFR 314.1–5 Gramm-Leach-Bliley Act: Sections 501 and 505(b)(2) U.S. Code: 15 USC 6801(b), 6805(b)(2)

NSLDS Procedure

Date of Last Revision: 2/28/2025

Policy and Procedure to Determine Program Length and Loan Period Dates

Our published program lengths are based on required program length, student schedules and the school calendar. Loan period dates are provided to BEN when a student profile is created based on program length and student schedule.

It is DDBS's responsibility to update the students' profile and to notify BEN when any information listed on the profile needs to be updated. This includes but is not limited to a change

Chapter 2 Institutional Capability

in the students' program, change in schedule, a change in the student's start date, change in enrollment schedule, etc. BEN will review this updated information, re-award the student, and update the student's information in BEN's internal system. BEN will also report any necessary changes to the USDE systems (COD). This will ensure that the students' financial aid is accurately reported to COD and NSLDS.

DDBS provides BEN with the most current and accurately published program length for each of DDBS's program schedules to ensure the accuracy of the data that BEN is reporting to COD with origination of each loan record. DDBS also notifies BEN of any changes to the program length and/or program schedule. DDBS will notify BEN by completing BEN's Notice of Change in Direct Student Costs form (located under the Compliance section of the Downloadable Resources of the school portal) which collects the published program length for each schedule of the program. This will ensure accurate information is being reported to COD and NSLDS to satisfy this ED reporting requirement.

DDBS will notify BEN when it believes that the information being reported to COD and/or NSLDS is not accurate. BEN and DDBS will work together to resolve any discrepancies to provide accurate information to COD and NSLDS.

Each year in July, start dates, end dates and scheduled breaks are created for the upcoming calendar year. This is then used when creating a profile in BEN to determine the loan period dates. A start and end date chart are then created.

For additional information on reporting requirements, see chapter 8, "Reporting Requirements" in the *NSLDS Enrollment Reporting Guide*.

Excused Absences

Date of Last Revision: 2/26/2025

Excused Absences in Clock-Hour Programs Policy

34 CFR 668.4(e)

In a clock-hour program, DDBS is allowed to count a limited number of excused absences when deciding whether the student has completed the hours in a payment period. An excused absence may only be counted if the student is excused from hours that were scheduled, were missed, and does not have to be made up for the student to receive the certificate for the program.

Excused Absence Policy

Date of Last Revision: 2/26/2025

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

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1. It is expected that a student who is absent will make up hours at the next available make-up session. The dates and times for make-up sessions will be up to the instructor's discretion.
2. Students can only make up for hours previously missed and the total hours attended cannot exceed total scheduled course hours.
3. A grade percentage of "0" will be posted if the student does not complete the required course hours.
4. Students attending make-up hours must meet the dress code and other DDBS policies.

Make-Up Time Policy

Date of Last Revision: 2/26/2025

Students are expected to make up for missed days and exams. Students may utilize the various school schedules and classes to complete makeup time and exams. All attendance make-up time will be done during normal school hours but in the student's non-scheduled class time.

Student Leave of Absence Policy

Date of Last Revision: 2/26/2025

Once the student has requested a leave of absence, the entire staff and pertinent faculty are notified. Once notified, the student database is updated by the Financial Aid Director. If the Financial Aid Director is not available in a timely manner, the Business Center Liaison or Director of Operations will do the student database update. The student database provides the information needed to accurately update NSLDS. NSLDS is updated by the Financial Aid Director. Should the Financial Aid Director not be available in a timely manner, the Director of Operations/Owner will make the update in NSLDS. In NSLDS, an effective date is entered, A is selected showing the LOA status, and a new expected completion date is also entered prior to confirming the new information. Once it has been confirmed and saved, a printout showing the change is filed with the student file. This is all completed within 30 days of the schedule change request.

Student Graduates Policy

Date of Last Revision: 2/26/2025

Once the student has graduated the student database is updated by the Business Center Liaison. If the Business Center Liaison should not be available in a timely manner, or Financial Aid Director will do the student database update and the update to the NSLDS. Should the Financial Aid Director not be available in a timely manner, the Director of Operations or Business Center Liaison will make the update in NSLDS. In NSLDS, the effective date is entered, G is selected showing graduate status. The expected completion previously entered NSLDS and is reviewed. If it is accurate, no change is made. If it is not accurate as can happen with a clock hour program, the accurate graduation date is entered prior to confirming the information. Once it has been confirmed and saved, a printout showing the change is filed with the student file. This is all completed within 30 days of the schedule change request.

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Program Changes Policy

Date of Last Revision: 2/26/2025

Should Dymond Designs Beauty School find the need to change programs or schedules for any program offered, the Director of Financial Aid will make the necessary additions or changes in NSLDS. The Director of Financial Aid will also inform BEN, in writing, so BEN can make the necessary additions or changes in COD. Should the Director of Financial not be available in a timely manner, the Director of Operations or Business Center Liaison will make the updates in NSLDS.

Family Education Rights and Privacy Act



FERPA (34 CFR, Part 99)

FERPA Policy

Date of Last Revision: 3/26/2025

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

FERPA affords parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students." (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution at any age.)

Student/Parent Rights under FERPA

- 1. Inspecting student records.** The right to inspect and review the student's education records within 45 days after the day DDBS receives a request for access. A student or parent should submit to the Director of Operations a written request that identifies the record(s) the student wishes to inspect. DDBS will plan for access and notify the student of the time and place where the records may be inspected. DDBS is not required to provide copies of materials in education records unless, for reasons such as great distance, it is impossible for parents or eligible students to inspect the records. DDBS may charge a fee for copies.
- 2. Amending student records.** Parents or eligible students have the right to request that DDBS correct the student's education records that they believe to be inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA. A student who wishes to ask DDBS to amend a record should write to the Director of

Chapter 2 Institutional Capability

Operations and clearly identify the part of the record the student wants changed and specify why it should be changed.

If DDBS decides not to amend the record as requested, DDBS will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. After the hearing, if DDBS still decides not to amend the record, the parent or eligible student has the right to place a statement within the record setting forth his or her comments about the contested information.

3. **Releasing and disclosing student records.** The right to provide written consent before DDBS discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. Generally, DDBS must have written permission from the parent or eligible student before releasing any information from a student's record. However, the law allows DDBS to disclose education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests to the following parties or under the following conditions (34 CFR § 99.31):
 - a. a person serving on the DDBS Institutional Advisory Board who has a need to know
 - b. Certain government officials, to carry out lawful functions
 - c. To comply with a judicial order or lawfully issued subpoena
 - d. Appropriate parties in connection with financial aid for which a student has applied or which the student has received aid
 - e. Contractors outside of DDBS who perform an institutional service of function for which DDBS would otherwise use its own employees and who are under the direct control of the school with respect to the use and maintenance of PII from education records
 - f. Organizations conducting certain studies for, or on behalf of, DDBS
 - g. Accrediting organizations
 - h. Specified officials for audit or evaluation purposes
 - i. Individuals who have obtained court orders or subpoenas
 - j. People who need to know in cases of health and safety emergencies, and
 - k. State and local authorities, within a juvenile justice system, under specific State law.

Upon request, DDBS also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

4. **Notification of disclosure.** DDBS may disclose, without consent, "directory" type information, such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, DDBS must tell parents and eligible students about directory information requests and allow parents and eligible students a reasonable amount of time to request that DDBS not disclose directory information about them. DDBS must notify parents and eligible students annually of their

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rights under FERPA. The actual means of notification (special letter, student handbook, or newspaper article) is left to the discretion of DDBS.

- 5. Faculty responsibilities regarding FERPA.** DDBS faculty must understand that once a student reaches 18 years of age, they, not the parents or guardians, hold legal privacy rights regarding grades, academic records, classroom performance, attendance, and behavior or discipline matters. In other words, if a parent, guardian, spouse, or other claimant contacts a faculty member with questions—academic, disciplinary, social, etc.—about any DDBS student, the faculty member must not divulge any information to protect the rights of the eligible student. If the parent/guardian/spouse/other claims that the student in question has signed a release that allows the claimant access to protected information, the faculty member must verify with DDBS administration that such a document is on file before divulging any information or answering any questions. Failure to follow these guidelines could result in legal action against both the institution and the faculty member.
- 6. Right to file a complaint.** The right to file a complaint with the U.S. Department of Education concerning alleged failures by DDBS to comply with the requirements of FERPA. For additional information, you may call 1-800-USA-LEARN (1-800-872-5327). The name and address of the office that administers FERPA is:

**Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202**

FERPA Procedure

Director of Financial Aid

- Ensures that all students understand the FERPA form and policy during orientation;
- Provides the opportunity for students to complete a FERPA form during the orientation process;
- Posts the FERPA form to all current students notifying them of the option to change or update their FERPA information. During this time, students are also updated on their FERPA rights;
- Provides all employees with FERPA information regarding student rights, confidentiality, and the FERPA policy.

Consumer Information Policy and Procedure

Date of Last Revision: 3/26/2025

Consumer information is provided to all students during the orientation process. Provided information includes notification of the following:

1. A signed authorization will be required in every instance before information is released from a student file.

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2. Requests must be made in writing by the student/parent to review educational records and/or to make an amendment to records. Records will be made available on an appointment basis.
3. All parents and students will be notified of their rights through annual publication of the Student Handbook.
4. FERPA provides that students and parents of dependent students have the right to review a student's educational records, to request amendment to a student's educational records, to provide consent prior to disclosure of personal identifiable information and to file a complaint with the U. S. Department of Education regarding the failure of an institution to comply with FERPA. Students or parents are also advised that a hearing can be requested to challenge the contents of a student's record, and the student will be given the opportunity to place a statement regarding contested information in the record describing the nature of the disagreement.
5. Record will be made available within 45 days of the day the school receives request.
6. No personal identifiable information will be released to a third party without the written consent of parent or student unless it is:
7. the law allows DDDBS to disclose education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests to the following parties or under the following conditions (34 CFR § 99.31):
 - a. School officials with a legitimate educational interest;
 - b. Other schools to which a student is transferring;
 - c. Specified officials for audit or evaluation purposes;
 - d. Appropriate parties in connection with financial aid to a student;
 - e. Organizations conducting certain studies for or on behalf of the school;
 - f. Accrediting organizations;
 - g. To comply with a judicial order or lawfully issued subpoena;
 - h. Appropriate officials in cases of health and safety emergencies; and
 - i. State and local authorities, within a juvenile justice system, pursuant to specific State law.
8. All disclosure of information will be recorded in the file and will include parties receiving information and the legitimate interests of the parties for inspection of the records.
9. Personally identifiable information which is designated as directory information includes student's name, addresses, telephone listing, date and place of birth, major field of study, participation in officially recognized activities, degrees and awards received and the most recent previous educational agency or institution attended.

Frequently Asked Questions by Parents

Q. Why do I have limited access to my student's college records?

A. Under FERPA, the access rights that parents and legal guardians had in the elementary and secondary school setting are transferred to students once they attend a post-secondary educational institution like DDDBS OR turn 18. Parents can be given access to records if the student grants the parent permission to access his or her records by submitting such information in writing to DDDBS administrative staff.

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Q. What records does FERPA cover?

A. The privacy protection FERPA gives to students is very broad. With limited exceptions, the FERPA regulations give privacy protection to the student's "education records." These are defined as records that are "directly related to a student and are maintained by an educational agency or institution or by a party acting for the agency or institution." Examples of student records covered by FERPA are grade reports, transcripts, and most disciplinary files. FERPA does not cover counseling or medical records, but other policies do.

Q. How can I find out my student's grades?

A. The best approach is to ask your student directly. Parents cannot have access to a student's grades unless they have written consent from the student.

Q. Will I be notified if my student is placed on academic or disciplinary probation or suspension?

A. No. Information about grades and academic standing is sent directly to students. You can, of course, ask your student to keep you informed about his or her academic performance.

Q. In addition to the student, who has access to the education record?

A. Generally, schools must have written permission from the student to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions:

- School officials with legitimate educational interest
- Other schools to which a student is transferring
- Specified officials for audit or evaluation purposes
- Appropriate parties in connection with financial aid to a student
- Organizations conducting certain studies for or on behalf of the school
- Accrediting organizations
- To comply with a judicial order or lawfully issued subpoena
- Appropriate officials in cases of health and safety emergencies; and
- State and local authorities pursuant to specific state law.

Q. Will I be notified if my son or daughter is hurt or in danger?

A. If we learn of an emergency involving one of our students, we will attempt to notify the students' parents in accordance with our emergency notification policy and procedures. Hospitals and police agencies will also follow their own notification protocols.

Q. Will I be notified if my student is not attending classes?

A. No. DDBS requires faculty to take attendance, however, parents are not notified.

Q. I've seen press reports about a new FERPA provision allowing notice to parents when a student violates alcohol or drug laws. What position has DDBS taken on this new rule?

A. FERPA regulations authorize - but do not require - disclosure to parents of "the student's violation of any federal, state, or local law, or of any rule or policy of the institution, governing the use or possession of alcohol or a controlled substance." DDBS does not disclose violations to parents, except in health and safety situations.

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Directory Information

The only public information available is “directory information.” DDBS may disclose this information for any purpose without the student's written consent. However, students may choose to restrict disclosure of directory information by contacting DDBS administrative staff. DDBS defines “Directory Information” as:

- Student name
- Address
- Telephone number(s)
- E-mail address
- Date and place of birth
- Field of study/program
- Enrollment status (i.e., enrolled full-time, half-time or not enrolled)
- Dates of attendance/enrollment
- Certificate(s) received
- Honors/awards received



GALACTIC
ADVISORS

REPORT OF FINDINGS

RESULTS FOR:

DDBS

 BACKUPS	 ACCOUNTS	 M365
 PATCHES	 ANTIVIRUS	 FIREWALLS
 EDUCATION	 ENCRYPTION	 SURVEILLANCE

CONFIDENTIAL

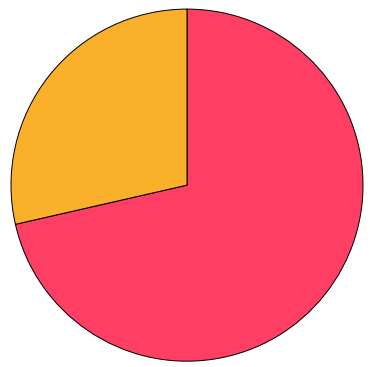
ANALYSIS DATE: April 4, 2025

FINDINGS: SCORE CARD

RESULTS FOR:
DDBS

 BACKUPS	 ACCOUNTS	 M365
 PATCHES	 ANTIVIRUS	 FIREWALLS
 EDUCATION	 ENCRYPTION	 SURVEILLANCE

RISK BREAKDOWN



HIGH
10
MODERATE
4



METHODS

PENETRATION TEST - REASONING / METHODOLOGY

Do you know WHY users are your biggest cybersecurity threat? Because studies show that 91% of ALL cyberattacks start with a phishing email. This puts the hacker right inside your organization. Our team uses a proprietary (patent pending) process to go beyond phishing training and find out what a hacker can gain access to when someone in your organization is phished.

Internal Testing - Considering over 90% of cyberattacks begin with a phishing email and over 19.8% of employees click phishing email links, our team focuses on what the attacker will gain access to if a normal user were to click a link. We target employees who are the most likely to be phished. These employees also happen to be the ones who have the most to lose: CEOs, CFOs, Directors, HR and sales team members. Why are they more likely to be phished in the first place? They are often communicating with people outside your organization AND they process many more emails than others.

External Testing - What about the other 9% of attacks, how do they get started? Hackers build sophisticated automation that is constantly scanning the internet looking for vulnerabilities. They use these vulnerabilities to get into networks. Galactic Advisors uses some of the same tactics to outline the perimeter of your organization, look for exposed services, find vulnerabilities, and attempt to exploit them.

The following report contains evidence of our findings, remediation steps, as well as descriptions of the risks associated with them.

Hackers are constantly coming up with new attack chains and vulnerabilities. These new methods need to be evaluated and remediated often. Best practice includes regular ongoing security assessments to identify and respond to these new threats.



ACCOUNTS HIGH RISK ISSUES

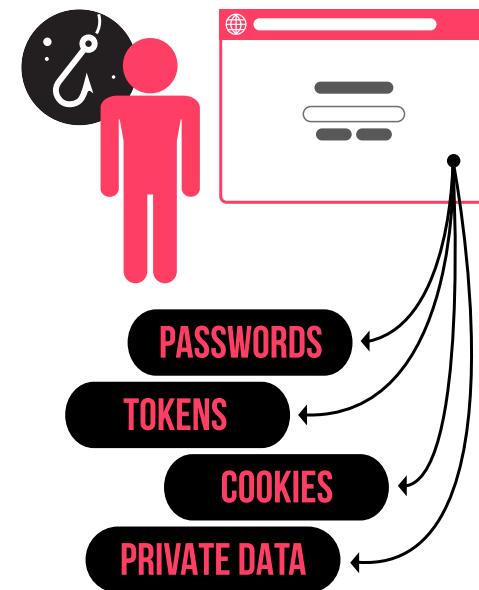
PASSWORDS CRACKED SUMMARY

Total passwords cracked: 26

Passwords were cracked on computers within the environment. Hackers use tools like memory abuse, abusing user privilege, and ripping to obtain access to your passwords when you are phished. When this happens, these passwords are used to break into systems inside and even outside of the victim's environment. Below is a small sample of the passwords that were cracked. For a complete listing of passwords our team cracked by abusing user privilege refer to the detail report.

COMPUTER NAME	BROWSER	LOGIN NAME	PASSWORD	URL
DDBS-DET-TOW3	ChrEdge	britt1twin2013@gmail	Brai****	(empty)
DDBS-DET-TOW3	ChrEdge	brittanyhughes.ddbs@	Brai****	https://www.miladytraining.com/users/sig...
DDBS-DET-TOW3	ChrEdge	brittanyhughes.ddbs@	Brai****	https://account.cengage.com/login
DDBS-DET-TOW3	ChrEdge	Elia5369#	Kath****	https://www.miladycima.com/
DDBS-DET-TOW3	IE/Edge	Elia5369#	Kath****	https://www.miladycima.com/

Remediation: Work with users and train them to never store their passwords inside browsers or other memory on the device. Review the passwords that were uncovered during this evaluation, consider additional training around password complexity. Implement password manager with multifactor authentication capabilities to make it difficult for the attacker to get to the memory storing the password set. In addition, consider implementing web browser policies to enforce private browsing.



When a user is phished and clicks a link, there is one thing running EVERY SINGLE TIME: their web browser. Hackers quickly abuse the user's privileges, identify the cypher for the browser, and then use that cypher to access all passwords, tokens, cookies and private data that web browser has access to. The attacker takes this data set and uses it to access additional accounts to find out more about their victim or to identify a list of people who trust the victim. They use this list to then infect other unsuspecting organizations.

ACCOUNTS HIGH RISK ISSUES

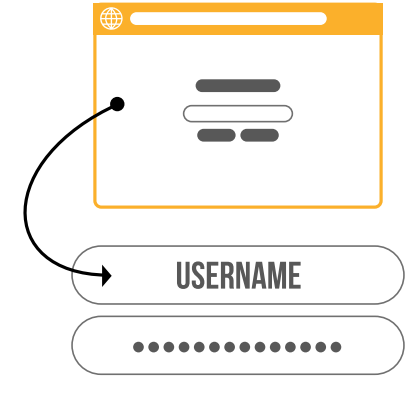
PASSWORD REUSE DETECTED - SUMMARY

The same password appears to be used for multiple accounts or multiple cloud services. Attackers are constantly trying to break into networks using passwords they harvest by breaching external sites and cloud services. Because of this, reusing passwords in this way increases your risk for identity theft, spear phishing and data breach.

COMPUTER NAME	USERNAME	LOGIN NAME	PASSWORD	SITES
DDBS-DET-TOW3	cosmetology	brittanyhughes.ddbs@	Brai****	3 sites
DDBS-DET-TOW3	cosmetology	gloriagainesddbs@gma	Rola****	2 sites
DDBS-DET-TOW3	cosmetology	information.ddbs@gma	Pass****	2 sites
DDBS-DET-TOW3	cosmetology	kenyaphelps@ddbs.edu	Sept****	2 sites

Remediation: On average each user in a typical organization accesses 30 different accounts and cloud services. Consider a password manager to help your team manage all these passwords while avoiding password reuse. Based on these findings we also recommend training your team on managing and proper methods for creating passwords.

**OVER
300 BILLION
COMPROMISED PASSWORDS ARE
AVAILABLE ON THE DARK WEB**



With over 300,000,000,000 compromised passwords available on the dark web, it is obvious that hackers know how to get their hands on passwords. How do they do this? One way is to steal them from websites. Breaches like Dunkin Donuts, Netflix, Gmail, Yahoo, Facebook, and LinkedIn produced billions of active username / password combinations. Currently hackers are crawling the internet, using these passwords to try to get into networks like yours.

ACCOUNTS HIGH RISK ISSUES

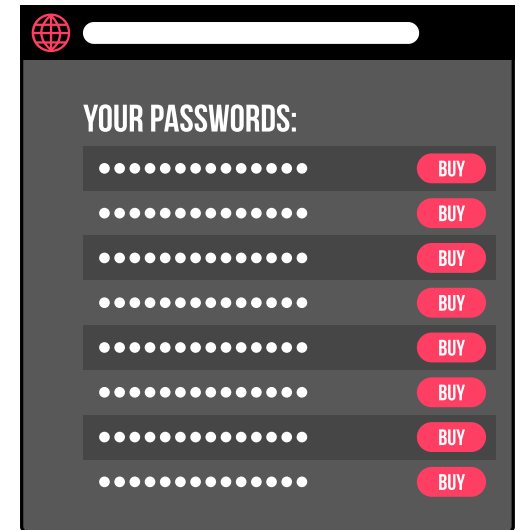
CRACKED PASSWORDS FOUND ON THE DARK WEB

Our team was able to crack a number of passwords. The passwords identified here should be addressed immediately. We were able to locate these within lists of passwords that are currently being shared on the dark web. This means that any account using this password may already be compromised.

COMPUTER NAME	BROWSER LOGIN NAME	PASSWORD URL	NUMBER OF BREACHES
DDBS-DET-TOW3	ChrEdge Gloriag1	Rola**** https://milogin.michigan.gov/eai/login/a...	172
DDBS-DET-TOW3	ChrEdge gloriagaines.ddbs@gm	Rola**** https://account.cengage.com/login	6181
DDBS-DET-TOW3	ChrEdge gloriagaines.ddbs@gm	Rola**** https://www.miladytraining.com/users/sig...	6181
DDBS-DET-TOW3	ChrEdge gloriagainesddbs@gma	Rola**** https://account.cengage.com/login	6181
DDBS-DET-TOW3	ChrEdge glory4749@gmail.com	rola**** https://www.miladytraining.com/users/che...	7206
DDBS-DET-TOW3	ChrEdge information.ddbs@gma	Pass**** https://www.cengage.com/dashboard/	86
DDBS-DET-TOW3	ChrEdge information.ddbs@gma	Pass**** https://account.cengage.com/login	86

Remediation: Change these passwords immediately and look for indicators of compromise. A few indicators of compromise include logins from locations you do not expect, a large uptick in spam or phishing, or changes to your password you didn't make. Do not use these passwords again as they are already compromised.

CRACKED PASSWORDS FOUND ON DARK WEB



ACCOUNTS MEDIUM RISK ISSUES

ACTIVE USERS WITHOUT EXPIRING PASSWORDS

Attackers exploit leaked passwords to gain network access. Stale passwords jeopardize the network to breaches and attacks, and are completely preventable through an enforced password change policy.

COMPUTER NAME	USERNAME
DDBS-DET-TOW3	Cosmetology
DDBS-DET-TOW3	LocalAdmin
DDBS-DET-TOW3	marle
Active Directory	Administrator
Active Directory	admissions
Active Directory	cosmetology
Active Directory	Esthetics
Active Directory	esthetics2
Active Directory	harmon
Active Directory	manicuring
Active Directory	marlene
Active Directory	Rayna

Remediation: Enforce a password policy for all organization-related accounts. Monitor for non-compliance and remediate user password hygiene when necessary.

ACCOUNTS MEDIUM RISK ISSUES

ADMIN USER PASSWORD DOES NOT EXPIRE

Administrative user accounts have unrestricted access to critical infrastructure on the network. Hackers aggressively hunt for administrative credentials as a means to access your network. Stale administrator passwords open organization-wide risk to data breaches and attacks.

USERNAME	GROUP	DOMAIN
Administrator	Administrators	DDBS
esthetics2	Administrators	DDBS
harmon	Administrators	DDBS
LocalAdmin	Administrators	DDBS-DET-TOW3
marle	Administrators	DDBS-DET-TOW3

Remediation: Create a policy in Active Directory to force Administrative users to change their passwords periodically. Also consider enforcing password complexity, length and reuse rules. Also, create guidelines when use of an Administrative account is acceptable.

PATCHES

REMOTE ACCESS SOFTWARE DETECTED

Remote Access Software Detected

COMPUTER

REMOTE ACCESS SOFTWARE

DDBS-DET-TOW3

Service: TeamViewer

Remediation: Make sure that this remote access software is up to date or uninstall it if it should not be present.

ANTIVIRUS HIGH RISK ISSUES

MALWAREBYTES NOT INSTALLED ON ALL COMPUTERS WITHIN THE ENVIRONMENT

Malwarebytes was not installed on a subset of computers within the environment. In order to have an effective antivirus solution, the same antivirus needs to be installed on all computers within the secured environment.

COMPUTER NAME	USERNAME
DDBSSVR1	administrator

Remediation: Install Malwarebytes on computers where it is missing.

ANTIVIRUS HIGH RISK ISSUES

DEVICES WITH OUTDATED VERSIONS OF MALWAREBYTES FOUND IN THE ENVIRONMENT

Attackers target security flaws in older versions of security products because these programs have high privileges (read, write, and access to all files, processes and memory on the computer). Outdated antivirus software may contain security flaws allowing attackers access to the entire network infrastructure. Listed below are all computers with antivirus software installed whether they are up-to-date or not.

COMPUTER NAME	PROGRAM NAME	VERSION	LATEST VERSION
DDBS-DET-TOW3	Malwarebytes Anti-Malware version 1.80.2.1012	1.80.2.1012	5.9.0

Remediation: Review the following computers and identify any computers that do not have the latest version of Malwarebytes installed. Please upgrade those computers and investigate why software is not being updated consistently across your environment.

ANTIVIRUS HIGH RISK ISSUES

WEBROOT SVC NOT INSTALLED ON ALL COMPUTERS WITHIN THE ENVIRONMENT

Webroot SVC was not installed on a subset of computers within the environment. In order to have an effective antivirus solution, the same antivirus needs to be installed on all computers within the secured environment.

COMPUTER NAME	USERNAME
DDBSSVR1	administrator

Remediation: Install Webroot SVC on computers where it is missing.



FIREWALLS MEDIUM RISK ISSUES

REMOTE DESKTOP PORT OPEN

Devices in your network were found have the port for Remote Desktop open and are accessible by user workstations. An attacker that compromises a users workstation can move laterally inside networks via Remote Desktop. Currently big game hunters like Ryuk are using this approach to deploy ransomware.

ADDRESS	PORT	DEVICE
10.10.10.241	3389	DDBSSVR1

Remediation: Reduce your risk by disabling Remote Desktop ports in networks that are exposed to users.



BACKUPS



ACCOUNTS



M365



PATCHES



ANTIVIRUS



FIREWALLS



EDUCATION



ENCRYPTION



SURVEILLANCE

FIREWALLS MEDIUM RISK ISSUES

Page 2/2

MICROSOFT SQL SERVER PORT OPEN

Devices in your network were found have the port for Microsoft SQL Server open and are accessible by user workstations. Hackers use access to resources like Microsoft SQL Server to bypass multifactor authentication and exfiltrate data.

ADDRESS	PORT	DEVICE
10.10.10.241	1433	DDBSSVR1

Remediation: Close Microsoft SQL Server ports or limit them only to computers that require access.

EDUCATION HIGH RISK ISSUES

INSUFFICIENT EVIDENCE COLLECTION AND RISK MITIGATION FRAMEWORK

Without documented evidence of cybersecurity practices, your organization is at significant risk. It's not enough to have security measures; you must also show they are consistently applied and effective. Proper documentation reduces legal liability and helps defend against regulatory scrutiny during incidents.

Risks:

- **Legal and Regulatory Exposure:** Lack of evidence can increase liability during a breach.
- **Financial and Operational Impact:** Legal defense and settlement costs can be significant.
- **Reputational Damage:** Inadequate documentation can harm trust and credibility.

Remediation:

- **Document Policies:** Establish clear, accessible cybersecurity policies.
- **Evidence of Policy Acceptance and Training:** Ensure staff participation in security training is documented.
- **Test and Document Incident Response:** Regularly conduct drills to validate the effectiveness of response.

THE ABSENCE OF EVIDENCE LEAVES YOU



VULNERABLE TO LAWSUITS

ENCRYPTION HIGH RISK ISSUES

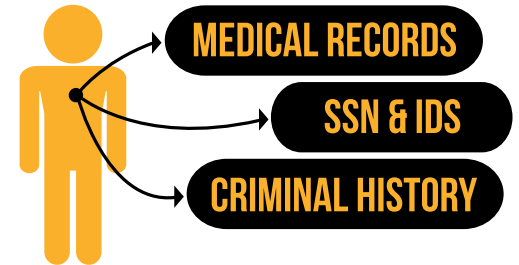
PERSONALLY IDENTIFIABLE INFORMATION ACCESSED

Attackers access and secretly withdraw personally identifiable information like Social Security numbers to steal identities and leverage them for activities like 2-factor authentication bypass.

COMPUTER NAME	USERNAME	SECRET	INSTANCES	FILEPATH
DDBSSVR1	administrator	***-**-****	1 counts	C:\Share\Marlene\ITS TIME TO PAY FAMILY FEUD.docx
DDBSSVR1	administrator	***-**-****	1 counts	C:\Share\Marlene\LARA - Corporations Division, payment confirmation.pdf
DDBSSVR1	administrator	***-**-****	7 counts	C:\Share\Marlene\Marlene Flashdrive as of 9-17-2020\marlene flash drive 9-17-2020\Nazay Files\DOWNLOADS\JW2019 Tax Return.pdf

Remediation: Store personal information inside encrypted vaults that are only mounted when in use. Transfer information found in this report to a secured vault. Make sure to remove sensitive information completely from non-protected areas of hard drives.

PERSONALLY IDENTIFIABLE INFORMATION ACCESSED





ENCRYPTION HIGH RISK ISSUES

UNENCRYPTED HARD DRIVES

The following lists all unencrypted drives found in the network.

COMPUTER NAME	USERNAME	DRIVE NAME	DRIVE FORMAT	DRIVE TYPE	ENCRYPTION STATUS
DDBS-DET-TOW3	cosmetology	C:\	NTFS	Fixed	FullyDecrypted

Remediation: Make sure drives are encrypted.



SURVEILLANCE HIGH RISK ISSUES

DEVICES WITH OUTDATED VERSIONS OF DATTO RMM FOUND IN THE ENVIRONMENT

Outdated versions of Datto RMM were identified inside the environment. Older versions of security products can have stability problems or may themselves have security flaws. Listed below are all computers with Datto RMM software installed whether they are up-to-date or not.

COMPUTER NAME	PROGRAM NAME	VERSION	LATEST VERSION
DDBS-DET-TOW3	Datto RMM	4.4.2244.2244	4.4.2246.2246
DDBSSVR1	Datto RMM	4.4.2244.2244	4.4.2246.2246

Remediation: Review the following computers and identify any computers that do not have the latest version of Datto RMM installed. Please upgrade those computers and investigate why software is not being updated consistently across your environment.

Chapter 3 Student Eligibility

Chapter 3 Student Eligibility

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Chapter 3 Student Eligibility

Non-Discrimination Policy

Date of Last Revision: 3/26/2025

DDBS admission, financing options, instruction, graduation, and general policies do not discriminate on the basis of race, sex, religion, creed, ethnic origin, color, financial status, disability, sexual orientation, age or otherwise, given all requirements are met through the State of Michigan Department of Licensing and Regulatory Affairs Bureau of Professional Licensing regulations, State of Michigan Board of Cosmetology regulations, statutes and other regulatory requirements.

Citizen or Eligible Noncitizen

Date of Last Revision: 8/8/2024

Reference

General-24-100

Policy Reason

To be eligible to receive federal, state, or institutional financial assistance, you must be a U.S. citizen or eligible non-citizen. You may be required to submit proof of your citizenship status before your financial aid application can be considered complete.

Federal Student Aid Eligibility Requirements

For a student to be eligible to receive aid from Federal financial aid programs they:

1. Must be enrolled or accepted for enrollment as a **regular student** in an eligible program of study and pursuing a degree/certificate/other credential.
2. Must have a valid social security number unless you are from the Republic of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau.
3. Must have the recognized equivalent of a high school diploma, either by having a High School Diploma or General Educational Development (GED) certificate, or by completing a high school education in a homeschool setting approved under state law. For additional information please review the High School Completion Verification Policy/Procedure.
4. Be registered with Selective Service, if they are a male (men must register between the ages of 18 and 25). Men exempted from the requirement to register include:
 - Males currently in the armed services and on active duty (this exception does not apply to members of the Reserve and National Guard who are not on active duty)
 - Males who are not yet 18 at the time that they complete their application (an update is not required during the year, even if a student turns 18 after completing the application)
 - Males born before 1960

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- Citizens of the Republic of Palau, the Republic of the Marshall Islands, or the Federated States of Micronesia
 - Noncitizens that first entered the U.S. as lawful non-immigrants on a valid visa and remained in the U.S. on the terms of that visa until after they turned 26.
 - Students who have questions about Selective Service registration may contact the Selective Service at 1-847-688-6888
5. Must have completed a FAFSA and DDBS must have a current ISIR to start the initial eligibility process.
 6. Must sign certifying statements on the FAFSA stating that they:
 - Are not in default on a federal student loan,
 - Do not owe a refund on a federal grant and
 - Will use federal student aid only for educational purposes.
 7. Must maintain Satisfactory Academic Progress (SAP) while they are attending college or a career school.
 8. Must be enrolled at least halftime to receive assistance from the Direct Loan Program.
 9. The Pell Grant program does not require half time enrollment, but the student enrollment status does affect the amount of Pell a student may receive. A student may receive Pell for a total of 12 payment periods or 600%. Once the student has reached this limit, no further Pell may be received.
 10. Completed a FAFSA and DDBS must have a current ISIR to start the initial eligibility process.
 11. Sign certifying statements on the FAFSA stating that:
 - The student is not in default on a federal student loan
 - They do not owe a refund on a federal grant
 - They will use federal student aid only for educational purposes.
 12. Incarcerated students who are serving a criminal sentence in a federal, state, or local penitentiary, prison, jail, reformatory, work farm, or similar correctional institution have limited financial aid eligibility depending on the type of institution they are incarcerated in, as students are not considered to be incarcerated if in a halfway house or home detention or is sentenced to serve only weekends. Incarcerated students are not eligible for FSA loans but are eligible for Federal Pell Grants if not incarcerated in a federal or state penal institution.

Legal Name Information

Enter your full legal name on your financial aid application. Do not use a preferred name or nickname on your financial aid, admission, or other enrollment applications.

Your legal name is typically found on your Social Security Card. If you are a U.S. citizen, you must answer “U. S. Citizen” to the FAFSA question “Are you a U.S. citizen?” If you are a U.S. Permanent Resident or other eligible non-citizen, you must answer “Eligible Non-citizen” and then enter your 9-digit USCIS/ Alien Registration Number on the FAFSA.

Citizenship

In addition to the above requirements, for a student to be eligible to receive aid from Federal financial aid programs they must either be a U.S. citizen or national, or an eligible non-citizen.

Chapter 3 Student Eligibility

The ISIR serves as documentation to prove the student's eligible non-citizenship status. If the ISIR shows there was not an INS match, the Financial Aid Office sends copies of the documents the student provides to the INS, along with a G-845 (for Secondary Confirmation). The Financial Aid Office also sends notification to the student to provide eligibility documentation within 30 days. DDBS may approve the disbursement of funds based on the determination that the student has submitted documents to support the student's claim to be a citizen or eligible non-citizen, and has no other documentation that conflicts with the immigration status documentation submitted.

If after the funds are disbursed, the Financial Aid Office learns that the student is NOT a citizen, or eligible non-citizen, the funds must be returned as follows:

1. If the Financial Aid Office followed all required procedures, and had no reason to believe that the documents submitted to DDBS did not support the student's claim to be an eligible noncitizen, the student is liable.
2. The Financial Aid Office must make a reasonable effort to contact the students, and to collect the amount that was disbursed in error.
3. If the Financial Aid Office makes an error in determining that a student is an eligible non-citizen, DDBS is liable.
4. Citizenship or eligible non-citizen documents may be used in later award years if the documents have not expired.

Acceptable Citizen and Non-citizen Statuses

1. Be a U.S. citizen or U.S. national - You are a U.S. citizen if you were born in the United States or certain U.S. territories, if you were born abroad to parents who are U.S. citizens, or if you have obtained citizenship status through naturalization. If you were born in American Samoa or Swains Island, then you are a U.S. national.
2. Have a green card - You are eligible if you have a Form I-551, I-151, or I-551C, also known as a green card, showing you are a U.S. permanent resident.
3. Have an Arrival-Departure Record - Your Arrival-Departure Record (I-94) from U.S. Citizenship and Immigration Services must show one of the following:
 - a. Refugee
 - b. Asylum Granted
 - c. Cuban Haitian Entrant (Status Pending)
 - d. Conditional Entrant (valid only if issued before April 1, 1980)
 - e. Parolee
4. Have battered immigrant status - You are designated as a "battered immigrant-qualified alien" if you are a victim of abuse by your citizen or permanent resident spouse, or you are the child of a person designated as such under the Violence Against Women Act.
5. Have a "T-Visa" - You are eligible if you have a T-visa or a parent with a T-1 visa.
6. "U-Visa" holders are not designated as qualified aliens under the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), and are therefore not eligible for Title IV, HEA program funds. However, U-Visa holders may convert to lawful permanent resident (LPR) status after they have physically been present in the United States for a continuous period of at least three years after

Chapter 3 Student Eligibility

the date of admission given on their U-Visa.

- a. Once LPR status has been granted, the holder of LPR status becomes a qualified alien under the PRWORA (see above), and thus potentially eligible for Title IV, HEA funds (assuming they meet all other eligibility requirements, for example, being enrolled as a regular student in an eligible program, having a high-school diploma or its recognized equivalent, having a Social Security number.

Immigration Status Documentation

When the ISIR indicates that the student must submit proof of U.S. citizenship or eligible non-citizenship documentation, the student must submit acceptable documentation of U.S. citizenship or eligible non-citizenship status (such as a Lawful Permanent Resident card) to the financial aid office at DDBS.

For descriptions of documentation and their statuses, see the Federal Student Aid Handbook, Volume 1–Student Eligibility, Chapter 2–Citizenship. Driver’s licenses or voter registration cards are not adequate proof of U.S. citizenship, since many localities do not require proof of U.S. citizenship for these documents.

Acceptable Documentation for U.S. Citizens

- A copy of your U.S. Passport, signed on the line which reads “Signature of Bearer;”
- A copy of your U.S. Certificate of Citizenship or U.S. Certificate of Naturalization. This must be signed in two places: on the photo itself and on the line which reads “True and Complete Signature of Holder;”
- A copy of your U.S. Passport card
- If you are a U.S. Citizen who was born *in the U.S.*, you may provide a copy of your Birth Certificate
- If you were born abroad and at least one parent (adoptive or biological, with legal custody of you) became a U.S. Citizen before you reached the age of 18, you are probably a naturalized citizen under the Child Citizenship Act of 2000. Nevertheless, to establish eligibility for federal financial aid you must provide a signed U.S. Passport, a U.S. passport card, or a signed U.S. Certificate of Citizenship.
- If you have applied for but have not yet been issued a U.S. Passport or U.S. Certificate of Citizenship, you must provide a statement attesting to that fact. In that case, you must also submit ALL the following documents: a written explanation of your status, a copy of your legal parent’s signed U.S. Passport or signed Certificate of Citizenship, and a copy of the front/back of your U.S. Permanent Resident Card, if in your possession. You will be required to present **in person** your recently obtained signed U.S. Passport or U.S. Certificate of Citizenship.

Acceptable Documentation for U.S. Permanent Residents

- A clear copy of the front and back of your U.S. Permanent Resident Card (not expired);
- A copy of your Machine-Readable Immigrant Visa (MRIV), which serves as temporary I-551.

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Acceptable Documentation for Other Non-citizens

If you are not a U.S. Citizen or US Permanent Resident, **but believe you may still be eligible for federal aid**, please provide **clear copies** of as many of the following documents as possible:

- All letters received from the Department of Homeland Security (often labeled I-797, I-797A, or I-797C). You may also provide any emails received from the Department of Homeland Security
- The photo page of your current and previous foreign passport
- All visa stamps for the U.S. in your current and previous passports
- All I-94's and I-94A's (both current and previous). In addition to providing copies of the paper I-94 in your passport, it is also advised that you retrieve and print an electronic copy of your I-94 from the U.S. Department of Homeland Security
- U.S. Employment Authorization Card
- Your Form I-485 Application to Register Permanent Resident Status

Once received, the above documents will then be matched with DHS records to verify that you hold a status that makes you eligible for the receipt of federal financial aid. Information on non-U.S. Citizens who qualify for federal student aid may be found on the U.S. Department of Education website.

Deferred Action for Childhood Arrivals (DACA), Temporary Protected Status (TPS), and Undocumented Students

Undocumented students, and those in DACA or TPS status are not eligible for federal financial aid.

International Students

Eligibility for federal need-based aid is limited to U.S. citizens and eligible non-citizens.

Citizen and Immigration Status Procedure

Director of Financial Aid

- Proof of U.S. citizenship - obtain from the student one (1) of the following:
 - A copy of the student's birth certificate showing that the student was born in the United States, which includes Puerto Rico (on or after January 13, 1941), Guam, the U.S. Virgin Islands (on or after January 17, 1917), American Samoa, Swains Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats residing in the U.S. If a student has a birth certificate from a U.S. jurisdiction showing that the student was born abroad (i.e., not in the U.S. or its territories), that birth certificate is not acceptable documentation.
 - A U.S. passport, current or expired, (except "limited" passports, which are typically issued for short periods such as a year and which don't receive as much scrutiny as a regular passport when applying). In the case of nationals who are not citizens, the passport will be stamped "Noncitizen National." Five-year-duration U.S. passports (commonly issued to younger students) are

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considered acceptable documentation and are not considered “limited”. Passport cards are also acceptable; however, one-year-duration U.S. passports are NOT acceptable documentation.

- The State Department issues a wallet-sized passport card that can only be used for land and sea travel between the United States and Canada, Mexico, the Caribbean, and Bermuda. It is adjudicated to the same standards as the passport book and is therefore a fully valid attestation of the U.S. citizenship and identity of the bearer.
 - A copy of Form FS-240 (Consular Report of Birth Abroad), FS-545 (Certificate of birth issued by a Foreign Service post), or DS-1350 (Certification of Report of Birth). These are State Department documents.
 - A Certificate of Citizenship (N-560 or N-561) issued by USCIS to individuals who derive U.S. citizenship through a parent.
 - A Certificate of Naturalization (N-550 or N-570) issued by USCIS (or, prior to 1991, a federal or state court), or through administrative naturalization after December 1990 to those who are individually naturalized.
- ISIR serves as documentation to prove the student’s eligible non-citizenship status. Review ISIR for determination of non-citizenship status;
 - Request appropriate documentation from student;
 - Review documentation submitted by student;
 - Provide copies of these procedures to the student;
 - Within 10 business days after the student submits immigration status documentation, complete the request portion of the Immigration and Naturalization Service (INS) Document Verification Request Form G-845, initiating Secondary Confirmation.

Secondary Confirmation

Date of Last Revision: 8/8/2024

Policy Reason

To establish school procedures for completing secondary citizenship confirmation.

Update 8/8/2024, GENERAL-24-100

The secondary match process with the DHS is not currently available. Students who fail the primary DHS match are indicated as pending in the “DHS Secondary Match Status” field of DDBS Student Information Record (ISIR).

Schools that attempt to resolve DHS match flags related to an applicant’s eligible noncitizen status on the ISIR by searching for the applicant’s case in the SAVE system currently receive a “No Cases Found” message, preventing schools from submitting a third-step verification request

Chapter 3 Student Eligibility

to DHS. This effectively prevents schools from being able to make *Title IV* eligibility determinations for a portion of noncitizen students who may meet the eligible noncitizen criteria.

Interim Solution

The Department has collaborated with the DHS to implement a temporary change that will allow schools to access pending DHS secondary match cases. DHS has updated SAVE permission levels for third-step users and third-step supervisors, making these cases viewable when you search for them in the SAVE system.

As a result, if the DHS Primary Match Status (Field 557) is “N” (Not confirmed eligible noncitizen) and the DHS Secondary Match Status (Field 558) is “P” (Pending), schools should search for the case in the SAVE system and proceed with the third-step verification process as outlined below. Please be aware that you will not receive an updated ISIR for the student and the DHS Secondary Match Status will remain in the pending status. However, if (in addition to the outcomes of the third-step verification process outlined in the FSA Handbook) DDBS determines that the student meets all other eligibility requirements for federal student aid, DDBS may proceed with awarding and disbursing aid to the student.

The Department reminds schools that if a response is not received from the U.S. Citizenship and Immigration Services (USCIS) after *at least 15 business days* from the date the third-step verification request was sent, DDBS may award and disbursed eligible title IV aid if DDBS has sufficient documentation to make a decision, and DDBS has no information that conflicts with the student’s documents or claimed status/category. DDBS must also document in the students’ file that the 15-day timeframe has elapsed and that DDBS is deciding based upon the immigration documentation presented (which should also be kept in the student's file). Schools should note, as previously stated, that the student must continue to meet all other student eligibility criteria as well.

If the formal third-step verification response from USCIS later indicates a discrepancy, DDBS must ask the student to correct the discrepancy with the USCIS. As long as DDBS has followed the Department’s third-step verification procedures as outlined in the FSA Handbook, including notifying the student of the discrepancy and withholding further payments and loan certifications as soon as a discrepancy is found, a school will not be liable for aid disbursed prior to third-step verification. If the discrepancy is not reconciled, the student must repay all aid.

There is also an issue which resulted in some cases ending up in a closed status, even though the student received an “N” for the DHS Primary Match Status. If you find an applicant in this situation, please navigate to FAFSA Partner Portal (FPP) to use the “Resend to Matches” functionality and submit a correction. The field is located at the top of the form in the “FAA Information” section of the correction form in FPP. Select “Yes” from the dropdown next to the “Resend to Matches” field; you do not need to change any other fields.

Chapter 3 Student Eligibility

As a reminder, this workaround is based on a *temporary* change to DHS' SAVE system. Once the appropriate FAFSA Processing System (FPS) updates are in place, the Department will notify schools when to resume following normal system procedures.

Secondary Confirmation Procedure

Director of Financial Aid

- Provide copies of these procedures to the student;
- Review copies of the documentation submitted by the student
- Within 10 business days after DDBS receives the documentary evidence of immigration status submitted by a student that is required to undergo secondary confirmation, completes the request portion of the Immigration and Naturalization Service (INS) Document Verification Request Form G-845,
- Copy front and back sides of all immigration-status documents received from the student
- Attach copies to the Form G-845; and submit Form G-845 and attachments to the U.S. Citizenship and Immigration Services (USCIS) Status Verification Office;
- Keep copies of all documents in student's financial aid file.
- When available, complete the secondary match process with DHS (not currently available);
- If the DHS Primary Match Status (Field 557) is "N" (Not confirmed eligible noncitizen) and the DHS Secondary Match Status (Field 558) is "P" (Pending), search for the case in the SAVE system and proceed with third-step verification process.
- If a response is not received from the U.S. Citizenship and Immigration Services (USCIS) after at least 15 business days from the date the third-step verification request was sent, and there is sufficient documentation to show that the student meets all other eligibility requirements for federal student aid, the student may be awarded aid;
- Document that the 15-day timeframe has elapsed;
- Document that DDBS is making a determination based upon the immigration documentation presented.

Business Center Liaison

- If a response is not received from the U.S. Citizenship and Immigration Services (USCIS) after at least 15 business days from the date the third-step verification request was sent, and there is sufficient documentation to show that the student meets all other eligibility requirements for federal student aid, the student's financial aid may be disbursed.

All students who indicate eligible status but whose eligible status is not confirmed by the Central Processing System Output document will be given a copy of these procedures.

1. Students have thirty (30) days from the date DDBS receives the output document or thirty (30) days from the student's receipt of this document (whichever is later) to submit documentation for consideration of eligible non-citizen status.

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2. Failure to submit the information by the deadline prevents DDBS from disbursing any Title IV funds or certifying the student as eligible for any Title IV funds.
3. DDBS will not make the decision regarding “eligible non-citizen” status without the student having the opportunity to submit documentation supporting a claim of eligibility.
4. Students must submit documentation of their current immigration status to the Financial Aid Office. This documentation must be an official document from the Immigration and Naturalization Service (INS). In order to initiate the required process, students must submit INS documents which are legible, and which demonstrate the latest status with INS.

In the instance that FSA funds are disbursed but the financial aid office later determines (using secondary confirmation) that the student is not an eligible noncitizen, the student must be notified of his or her ineligibility and given an opportunity to contest the decision by submitting to DDBS any additional documents that support their claim to be an eligible noncitizen. If the documents appear to support the student’s claim, DDBS will submit them to U.S. Citizenship and Immigration Services (USCIS) using paper secondary confirmation. The students will be notified of the final decision, based on the secondary confirmation results.

Third Step Verification

Date of Last Revision: 8/8/2024

Policy Reason

To establish institutional procedures for completing the third step citizenship verification

Third Step Verification Process

If the student doesn’t pass the primary or secondary citizenship matches with DHS or if you have conflicting information about his immigration status after receiving a match result, you must review the record for third step verification.

- Request the student’s most current, unexpired immigration document(s).
- Carefully review the students’ immigration documentation and determine if it supports eligibility for federal student aid.
- If it does not support eligible status, you can tell the student that he is not eligible now but may be eligible if/when he provides eligible noncitizen documentation.

If student appears eligible, school users will then submit the documentation and student information for review by the United States Citizenship and Immigration Services (USCIS) through the Systematic Alien Verification for Entitlements (SAVE) system.

Chapter 3 Student Eligibility

Third Step Verification Procedure

Director of Financial Aid

- When a student doesn't pass the primary or secondary citizenship matches, or there is conflicting information, reviews the student's immigration documentation
- Determine if documentation supports eligibility for federal student aid.
- If no, tell the student that they are not eligible now but may be eligible if/when they provide eligible noncitizen documentation.
- If the student appears eligible, then submit the documentation and student information for review by the United States Citizenship and Immigration Services (USCIS) through the Systematic Alien Verification for Entitlements (SAVE) system.
- Keep copies of all documents in student's financial aid file.



Ability to Benefit

DDBS does not accept the ability to benefit (ATB) students currently.

High School Completion Verification Policy

Date of Last Revision 2/28/2025

Policy Reason

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

- Have a high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma)
- Have the recognized equivalent of a high school diploma, such as a General Educational Development (GED) certificate or other state certificate
- Have completed homeschooling at the secondary level; or

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- Have the ‘ability to benefit’ from the education (ATB). (ATB is not accepted at DDBS.)

High School Completion Required for Admission at DDBS

If a student indicates on the FAFSA that they have a diploma or high school equivalency certificate, DDBS isn’t required to ask for a copy. However, DDBS requires a diploma for admission, therefore, the Financial Aid Office must rely on that copy of the diploma or high school equivalency certificate and not on the student’s certification alone. By having such an admission requirement, it is assumed that all admitted students’ high school completion, or its equivalent has been confirmed. If DDBS has reason to believe that the high school documentation is not valid, the financial aid administrator must evaluate the validity of the student’s high school completion.

Students who indicate on their FAFSA that they graduated high school must give the name, city, and state of the high school. The online FAFSAs will not allow students to skip these items and will have a drop-down list of both public and private high schools populated by the National Center for Education Statistics (NCES).

Snippet of FAFSA high school completion question:

27. What is the name of the high school where you received or will receive your high school diploma?
Enter the complete high school name, and the city and state where the high school is located.

High School Name	<input type="text"/>	STATE <input type="text"/>
High School City	<input type="text"/>	

If student indicates, “none of the above” to the FAFSA question, “What will your high school completion status be when you begin college...,” the financial aid administrator will contact the student for further clarification.

High School Diploma Verification Policy

Date of Last Revision 2/28/2025

The DDBS and the U.S. Department of Education recognize several equivalents to a high school diploma:

High School Diploma Equivalency Documents

- General Educational Development (GED) certificate.
- Certificate or other official completion documentation demonstrating that the student has passed a state-authorized examination that the state recognizes as the equivalent of a high school diploma such as: Test Assessing Secondary Completion (TASC), the High School Equivalency Test (HiSET), or in California, the California High School Proficiency Exam. Certificates of attendance and/or completion are not included in this qualifying category).
- Prospect can have an associate degree.

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- Successful completion of at least 60 semester or trimester credit hours or 72 quarter credit hours that does not result in the awarding of an associate degree, but that is acceptable for full credit toward a bachelor's degree at any institution: or
- Enrollment in a bachelor's degree program where at least 60 semester or trimester credit hours or 72 quarter credit hours have been successfully completed, including credit hours transferred into the bachelor's degree program.
- Foreign diplomas.
- For a student who enrolls without completing high school, a transcript must be provided indicating the student has excelled in high school.
 - The student must no longer be enrolled in high school
 - Must satisfy your school's written policy for admitting such students and must start a program that leads at least to an associate degree or its equivalent.
 - Note that merely possessing a certificate of attendance and/or high school completion is not sufficient for a student to be Title IV aid eligible.
 - Such a certificate may be issued without a student having to complete all the academic graduation requirements, including passing any required examinations.
 - A state must consider a certificate or high-school-completion-equivalency test as equivalent to a high school diploma in that state for it to be considered equivalent to a high school diploma for Title IV aid eligibility purposes.

High School Diploma Verification Procedure

Financial Aid Representative/Admissions Coordinator

- Accept the diploma or transcript,
- Review to ensure it is legible and for accuracy,
- Verify all high school diplomas with policy,
- Diploma mills and Ability to Benefit are not accepted, and
- Send to Third Party Servicer for their approval, if there is doubt of the validity of document.

As part of the Admissions process, potential students provide proof of high school or its equivalent completion. The proof of high school completion document is to be kept in the student's permanent record.

Procedure for Verifying High School Completion:

1. Enter student information on the Diploma Verification spreadsheet
2. Look up high school phone numbers and enter on spreadsheet
3. Attempt to contact personnel at the high school to confirm
4. Upon confirmation, enter date and time verified on spreadsheet
5. Public high school graduation and graduation date can be verified by contacting DDBS district when DDBS itself is not in session.
6. Parchment is a third-party company that provides transcripts and other credentials online. Student requests transcript and pay fee. Parchment transcript received is considered "verified."

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Procedure for Verifying GED

1. Student is responsible for obtaining documentation from DiplomaSender.com, a third-party company providing confirmation of GED certification. Email or printout from DiplomaSender.com is considered verified.
2. If GED was taken at a MI Works office, student must obtain the phone number of the center and name of the case worker. This is then considered “verified.”

Foreign Diploma Policy

Date of Last Revision: 3/6/2025

A school must have evidence that verification of a foreign high school diploma has been performed by an outside agency that is qualified to translate documents into English and confirm the academic equivalence to a U.S. high school diploma.

- 1) Note: High school diplomas/transcripts from other countries are acceptable toward the student eligibility general requirement if the diploma is equivalent to a U.S. high school diploma.
- 2) Documentation of proof of completion of secondary education from a foreign country must be officially translated into English and officially certified as the equivalent of high school completion in the United States, at your own expense.

At student’s expense the student can contact one of the Translation/Evaluation Companies (check with your state to see which ones meet their requirements) for an official certification and translation of the student’s foreign high school diploma or transcript:

Fees vary by each organization and type of evaluation and translation requested. Students should contact both to determine which is best for their situation.

Foreign Diploma Procedure

Financial Aid Administration/Admissions Coordinator

- Don’t accept diploma if it is not translated
- If unsure, accept the diploma
- Review for accuracy
- If there is a concern that a diploma is from a diploma mill; Investigate
- May require student to provide another proof of Education

Diploma Mill Policy

Date of Last Revision: 3/6/2025

All students must provide evidence that they possess a high school diploma, GED, a home study certificate or transcript from a home-study program that is equivalent to high school level and is recognized by the state of issuance.

In the event the validity of the high school diploma is in question, Dymond Designs Beauty School (DDBS), will use any or all the following methods to determine validity.

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Diploma Mill Procedure

Director of Financial Aid/Admissions Coordinator

- Don't accept diploma if it's known to be from a "diploma mill." Check list that has been circulated through the industry.
- If the name of DDBS issuing the diploma appears on this list, the high school diploma will require further investigation including but not limited to determining accreditation status, viewing transcripts provided to the student and, viewing the subjects completed by the student.
- If unsure, accept the diploma;
- Review for accuracy;
- If there is concern that diploma is from a diploma mill, investigate;
- Student may be required to provide another proof of education.

Acceptance Policy

Date of Last Revision: 3/6/2025

After an applicant has completed the enrollment application process the admissions coordinator will review the applicant required admissions materials and access the personal interview to determine acceptance. Upon the decision of the enrollment, the applicant will receive notification of the acceptance or denial letter via email, telephone, or in-person.

Note: All applicants must go through the entire enrollment application process (detailed in catalog, online publication, and enrollment application).

Secondary School Students

DDBS does not accept secondary school students.

Homeschool Verification Policy

Date of Last Revision: 3/6/2025

Homeschooled students are not considered to have a high school diploma or equivalent, they are eligible to enroll and potentially receive FSA funds if their secondary school education was in a homeschool that state law treats as a home or private school. Some states issue a secondary school completion credential to homeschoolers.

- If this is the case in the state where the student was homeschooled, he/she must obtain this credential to be eligible for FSA funds if the state requires it.
- The student can include in his/her homeschooling self-certification that he/she received this state credential.

An eligible institution is defined in part as one that admits as regular students only those who have a high school diploma or equivalent, are beyond the compulsory age of attendance for DDBS's state or are dually enrolled at the college and a secondary school. For students who finish homeschooling at a younger age, the Department considers them to be beyond the age of compulsory attendance if:

- Dymond Designs Beauty School (DDBS) follows our State of Michigan regulations that would not require homeschooled students to obtain a secondary completion credential as provided under state law; or the student has completed a secondary school education in a

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homeschool setting that qualifies as an exemption from compulsory attendance under state law.

Homeschool Verification Procedure

Date of Last Revision: 3/6/2025

Director of Financial Aid/Admissions Coordinator:

- Accept the certificate of completion or transcript
- Review for accuracy
- If there is concern that diploma is from a diploma mill, investigate
- Students may be required to provide another proof of education.

Comment Codes and Procedures

Date of Revision: 2/28/2025

Comment Codes Policy

DDBS will follow the regulations set forth by ED to resolve student eligibility issues identified on the student's ISIR as C-Codes, citizenship or permanent resident, Selective Service registration, student's default status on FSA loans, etc. DDBS will work closely with BEN to ensure C-Codes are resolved according to the rules and regulations set forth by ED.

DDBS will collect and review the documents related to C-Codes and provide BEN with the documents required for review as well. The student will be notified of the documentation required and will have 14 days to provide the information to DDBS or they will be responsible for making out-of-pocket payment arrangements with DDBS.

DDBS will inform the student prior to enrollment of C-Code information that will be needed to be eligible for Title IV Funds. If DDBS finds that the student will be unable to clear C-Codes that deem the student ineligible for Title IV Funds, DDBS will inform the student that if they meet other admissions requirements, they may enroll on a cash payment basis.

DDBS will review ISIR items that require C-Code resolution as identified in the annual ED publication of the SAR Comment Codes and Text and work with BEN to ensure the ability to identify all the C-Codes that require resolution.

Comment Codes Procedure

Director of Financial Aid

- Review student applicable ISIR for information on comment code ;
- Request required documentation for student and/or parent from student using email, phone and text;
- Require that any relevant documents be submitted within 14 days;
- Create student's profile information in the BEN system;
- Upload via the secure BEN portal the required documents for review;
- Use a password-protected email if portal upload is unavailable.

Third-Party Servicer, BEN

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- Reviews documents;
- Places file in an “approved” or “rejected” status
- Upon approval, BEN will review the documents again and move the file into a "final review" status.
- During this time, if no further information is needed and the C-Code has been resolved, the student will be ready for awarding and packaging Title IV Funds.
- If the student is placed in a "rejected" status BEN will notify DDBS of what else is needed and DDBS will inform the student.
- This process will continue until both BEN and DDBS have reviewed and determined that the documentation has cleared any C-Code generated.

If the student receives a subsequent ISIR, after Title IV aid has been awarded by BEN, that generates a C-Code, BEN will place the student's file from "resolved" to "on hold" until C-Code has been resolved and finalized by BEN. The student's Title IV aid will remain on hold and no Title IV aid disbursements will be processed until the C-Code is considered resolved. If the student requires a revised award, BEN will process. DDBS and BEN will review. BEN will inform DDBS of any C-Code resolution deficiency that exists upon the completion of the review.

Unusual Enrollment History (UEH) – Comment Code Procedure

Date of Last Revision: 2/28/2025

Should a student receive a C-Code Verification of 359 or 360, DDBS will check NSLDS to obtain a list of all schools attended by the student during the applicable years. DDBS will inform the students that they must provide a transcript from all schools on the list before financial aid processing can continue.

Director of Financial Aid

- Request from the student any documents relevant to the Comment Code and give them 14 days to provide the information
- Obtain a printout from NSLDS of all schools attended by the student
- Request from student a transcript from all schools student attended
- Review all transcripts for evidence of credit earned at each school attended
- Allow student the option to write a letter of explanation for any schools for which there was no credit earned
- If the transcripts show compliance, notify BEN
- Create the student’s profile in the BEN system
- Follow the “Compliance Delay” instructions
- If the student is unable to clear the Comment Code, notify student that they may be enrolled on a cash payment basis.

Third Party Servicer – BEN

- Reviews the documents submitted by DDBS to see if the information is sufficient to resolve the Comment Code
- Places the file in an "approved" or "rejected" status.

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- Upon approval, BEN will review the documents again and move the file into a "final review" status, during this time, if no further information is needed and the C-Code has been resolved, the student will be ready for awarding/packaging of Title IV Funds.
- If the student is placed in a "rejected" status BEN will notify DDBS of what else is needed and DDBS will inform the student.

This process will continue until both BEN and DDBS have reviewed and determined that the documentations has cleared any C-Code generated. If the student receives a subsequent ISIR, after Title IV aid has been awarded by BEN, that generates a C-Code, BEN will place the student's file from "resolved" to "on hold" until C-Code has been resolved and finalized by BEN. The student's Title IV aid will remain on hold and no Title IV aid disbursements will be processed until the C-Code is considered resolved. If the student requires a re-award BEN will process. DDBS and BEN will review, it is C-Code Policy and Procedure practices during their Student File and institutional Policy Review to ensure accuracy of C-Code resolutions. BEN will inform DDBS of any C-Code resolution deficiency that exist upon the completion of the review.

DDBS will inform the student prior to enrollment of C-Code information that will be needed to be eligible for Title IV Funds. If DDBS finds that the student will be unable to clear C-Codes that deem the student ineligible for Title IV Funds, DDBS will inform the student that if they meet other admissions requirements, they may enroll on a cash payment basis. DDBS will review ISIR items that require C-Code resolution as identified in the annual USDE publication of the SAR Comment Codes and Text and work with BEN to ensure the ability to identify all the C-Codes that require resolution.

Resolving Conflicting Data

Date of Last Revision: 3/8/2025

Resolving Conflicting Data Policy

Schools must have an adequate system to identify and resolve discrepancies in the information that DDBS receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs.

DDBS's procedures ensure that conflicting data is resolved for our applicants as follows:

Conflicting Information Policy (Verification)

Date of Last Revision: 3/8/2025

Applications are selected for verification either by the CPS or by DDBS. The student's ISIR shows an asterisk next to the EFC, in the upper right-hand section of the ISIR. Comments are found in the student section of page 1. The asterisk indicates to applicants that they will be required to provide certain financial documents and family information. Beginning with the 2019-20 Award Year, the student/parent may ask the IRS to update information on the FAFSA

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with IRS tax information which eliminates the need to collect tax returns. If the student has not asked the IRS to update the information on the ISIR, the student/parent will be asked to provide tax transcripts. On page 3 of the ISIR, below the dotted line on the right side there will be a Verification Tracking Flag, V-1 through V-6 which indicates the verification information which must be collected.

The Dymond Designs Beauty School Financial Aid Administrator must verify any application information that it has reason to believe is incorrect or discrepancy. These applications are selected for verification by DDDBS even though it may not be verifying the same data as for the CPS selected applicants.

Conflicting Information Procedure (Verification)

Director of Financial Aid

- Verify information provided on the students' ISIR and on the Taxes.
- Notify students of conflicting information and allow them 5-7 business days to provide documentation correction or proving the information provided (except for extenuating circumstances with the approval of President and/or financial aid administrator)
- Ask students to make any corrections that is conflicting such as number of dependents on taxes and number of dependents on ISIR or marital status.
- Correct errors or inconsistencies and once ISIR is received with all changes, aid may be disbursed.
- Notify students of changes due to corrected ISIR.
- Submit/ Communicate with BEN about Conflicting Info.

Applicants Selected for Verification

We require the applicant to provide adequate documentation to determine if the applicant's FAFSA includes discrepancies for the items that have been identified as subject to verification by the Department of Education. In addition to FAFSA data items identified by the Department of Education as subject to verification, we may also request additional documentation if we have reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate) to resolve the conflicting information.

Applicants Not Selected for Verification

We resolve conflicting information regardless of whether or not the applicant was selected for verification. As required, the Financial Aid Office will review all tax returns/transcripts provided to DDDBS even if they were not requested. All Comment Codes on the ISIR will be reviewed and resolved by the Financial Aid Office.

Other Applicant Information Received by DDDBS

We have an adequate internal system to identify conflicting information that we may receive, regardless of the source. For example, information that could impact the financial aid status of each student applicant is reported promptly to the Financial Aid Office for clarification and resolution. Listed below are some possible sources of conflicting data and the department working together with the Financial Aid Office for a resolution:

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Conflicting Information Procedure (Verification)

Admissions Coordinator

- High School Diploma

Business Center

- Report Outside Awards

Admissions & Business Offices

- Report on all changes in enrollment

Director of Financial Aid

- Verify information provided on the students' ISIR and on taxes
- Notify students of conflicting information and allow them 5-7 days to provide documentation correction or proving the information provided (except for extenuating circumstances with the approval of the CEO/ Director of operations and/or Financial Aid Administrator
- Ask students to make any corrections that are conflicting such as number of dependents on taxes and number of dependents on ISIR or marital status.
- Correct errors or inconsistencies and once ISIR is received with all changes, aid may be disbursed.
- Notify students of changes due to corrected ISIR.
- Submit/ Communicate with BEN about Conflicting Info.

Conflicting Information Policy (ISIR)

Date of Last Revision: 3/8/2025

The Boston Educational Network will review the documents submitted by DDBS and verify the information for accuracy and determine if conflicting information needs to be resolved. BEN will provide the reason(s) to DDBS if verification cannot be completed according to USDE regulations. BEN will consider the verification process to be complete when all requested documents have been reviewed and accepted by BEN and no conflicting information exists. The Boston Educational Network will not award or disburse any Title IV Funds subject to the verification process until the verification process is complete and all conflicting information has been resolved.

If the student cannot provide all required documentation, DDBS cannot complete the verification process. DDBS may then advise applicants that they may not be eligible for Financial Aid funds. DDBS then gives the applicants the following options:

- The student may continue training on a cash payment basis.
- Promptly submit needed items within 48 hours

Conflicting Information Procedure (ISIR)

DDBS has the responsibility to ensure that information in a student's file (that BEN may or may not have access to) does not contain conflicting information. If it is determined by either DDBS or BEN that conflicting information exists, the conflicting information must be resolved before any Title IV Funds can be awarded or disbursed. BEN will work with DDBS to resolve conflicting information before any Title IV Funds are awarded or disbursed.

Chapter 3 Student Eligibility

Prior to the awarding of Title IV aid, BEN will review the students' most current ISIR and resolve any questionable data (regardless of whether the file was selected for USDE verification). Per 34 CFR 668.54(a)(2), "If an institution has reason to believe that an applicant's FAFSA information is inaccurate, it must verify the accuracy of that information." This includes, but is not limited to:

- discrepant tax data, including knowing:
- if a person was required to file a tax return,
- the appropriate tax filing status was used, and
- that an individual cannot be claimed as an exemption by more than one person
 - ISIR indicates that the student was recently married but the tax data on the ISIR does not appear to reflect the combined tax data for both the student and spouse on the ISIR.
 - If the tax return shows significant interest and dividends income and/or capital gains but assets on ISIR are \$0
 - If the tax return shows business income
 - If the tax return shows farm income
 - If the students only claim to independent status is:
 - active duty
 - foster care or a ward of the court
 - emancipated minor
 - legal guardianship
 - unaccompanied youth who were homeless or at risk of being homeless
- BEN may require additional IRS tax forms, W-2's, signed statements from the student, spouse and/or parent, school documented explanation(s) and/or any other pertinent documents that BEN deems necessary to complete the verification process and to resolve conflicting information. Conflicting information, whether discovered by BEN or DDBS and regardless of when it is discovered, must be resolved.

BEN reserves the right to request additional documentation if BEN has determined that conflicting information exists, regardless of USDE verification selection.

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Chart A provides examples of conflicting information and provides common examples of conflicting information.

Chart A: Examples of Issues Considered Conflicting Data

- A student is not selected for verification, but a tax return or IRS transcript is on file and information conflicts with items on the FAFSA.
- An IRS 1040 transcript shows a single head of household and on the FAFSA/ISIR shows the same person as married.
- A parent or student reports on their FAFSA and signs a verification worksheet that will not file an IRS tax return. You have reason to believe that they would have been required to file a U.S. Income Tax Return, as the amount of reported income on the FAFSA is greater than or equal to the minimum amount required to file as indicated in the instructions provided by the IRS.
- A school received statements or information that suggest that the copy of the IRS Income Tax Return received is not the IRS Income Tax Return filed with the IRS.
- A school receives a “Profile” from CSS where the student reports a specific amount of untaxed income; FAFSA reports a different amount. (If DDBS receives the CSS Profile, it must ensure that information contained there does not conflict with other documents received by DDBS). The information on the FAFSA must be correct and must not conflict with the CSS Profile if a school collects it).
- Veterans Affairs (VA) benefits verified by the certifying official don’t match the FAFSA. (To resolve conflicting information, DDBS can rely on the certifying official).
- Admissions information received impacts student eligibility (i.e., student accepted into a certificate program has not yet graduated from high school, student received scholarship from high school, etc.).
- The student’s Academic Progress or enrollment status on file in the Financial Aid Office doesn’t agree with the information from the Admissions Office.

Fraud and Abuse

Should fraud or abuse be detected or suspected, report it to the Director of Financial Aid. The Director will consult with DDBS’s legal counsel prior to referring it for investigation to the Office of the Inspector General of the Department of Education or any agency outside DDBS.

All credible information indicating that an applicant for Title IV may have been engaged in fraud or other criminal conduct will be provided. Fraud is an intent to deceive as opposed to a mistake.

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In addition, we will refer to any third-party servicer who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving the FSA Programs.

OIG Address and Phone Numbers

Office of Inspector General
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1510
1-800-MIS-USED

Email: oig.hotline@ed.gov

Web: <https://tips.hhs.gov>

Regional Offices Telephone No. National Hotline

Boston, MA (617) 289-0174
New York, NY (646) 428-3861
Philadelphia, PA (215) 656-6900
Atlanta, GA (404) 562-6460
Chicago, IL (312) 730-1620
Dallas, TX (214) 661-9530
Denver, CO (303) 844-0058
Kansas City, MO (816) 268-0530
Long Beach, CA (562) 980-4141
San Juan, PR (787) 766-6278
Washington, DC (202) 245-6911

OIG Referrals Reference

34 CFR 668.16(g)
IRS Publication 17

Professional Judgment and Dependency Override Policy

Date of Last Revision: 3/26/2025

Professional Judgement & Dependency Override Policy

USDE regulation provides the authority for an aid administrator to use Professional Judgment (PJ) on a case-by-case basis only to adjust the student's cost of attendance or the data used to calculate their EFC (Section 479A of the HEA, as amended). This adjustment is valid only at DDBS processing the PJ. The reason for the adjustment must be documented and it must relate to the special circumstances that differentiate the student/parent—not to conditions that exist for a whole class of students. The Boston Educational Network annually develops and maintains PJ forms to assist institutions in collecting and documenting professional judgments. A key component of validating a PJ is to ensure that DDBS has supplied sufficient documentation to support the special circumstance, ideally from a third-party source. While BEN strongly encourages DDBS to strive to obtain a 3rd party source, this is not always possible. BEN will review and analyze the PJ documentation submitted by DDBS to validate that the PJ documentation sufficiently satisfies USDE requirements.

The USDE expects financial aid administrators must make “reasonable” decisions that support the intent of the PJ provision and BEN will refer to this USDE guidance when validating the PJ documents. Institutions are ultimately held accountable for all professional judgment decisions, for fully documenting each decision and maintaining the PJ documents in the student's file for each award year. BEN will make the ISIR correction after BEN has validated the PJ documentation. All other student eligibility requirements must be satisfied prior to BEN processing the ISIR correction for a PJ. Student eligibility requirements include, but are not limited to, USDE verification, C-Code resolution and resolution of conflicting information.

Examples:

- Reduction in household income due to layoff, furlough, job placement
- Private school tuition payment
- Deduction of one-time payments such as a 401k withdrawal
- Dependency adjustment due to parental abandonment, human trafficking, abusive household

Professional Judgment Procedure

Professional judgement can only be done after verification is complete if the student was chosen for verification. Professional judgment is used to take into consideration factors which have not been reflected on the FAFSA. The professional judgment may either increase or decrease data elements used to calculate a student's SAI.

Professional judgment cannot be exercised for the following:

- to circumvent the law or regulations
- to waive general student eligibility requirements
- to change a student's status from independent to dependent

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- to adjust the SAI directly
- to alter the need analysis formula or change table values; or
- to create a new category in the cost of attendance

The Financial Aid Administrator is expected and required to make reasonable decisions that support the intent of the provision. DDBS is held accountable for all professional judgment decisions made and for fully documenting each decision.

Student

- Must express in writing reasons to be considered for Professional Judgment
- Utilize forms from BEN

Director of Financial Aid

- Obtains and maintain documentation of the changed circumstances supporting the Professional Judgment (PJ) decision
- Exercises PJ where appropriate, only the cases of special circumstances
- Seeks the assistance of DDBS/BEN when necessary
- Meets with the Director of Operations to review
- Makes the final decision based on adequate documentation
- Obtains the PJ documentation from the student and/or parent and provides the documents to BEN. BEN strongly encourages DDBS to use the PJ forms developed by BEN (available under the Downloadable Resources section of the BEN school portal) to document the case for the PJ for a specific award year. DDBS is required, according to ED regulations, to obtain supporting documentation to validate the special circumstance (preferably from a third-party source). Supporting documents are a key element in determining if a PJ meets ED requirements as they provide evidence of the special circumstance. Examples of supporting documentation are:
 - unemployment benefit statement
 - Statement from an employer
 - W-2's
 - Recent paystubs
 - Tax returns
 - Medical payments
 - Signed and dated statements from the student/parent.
- Emails and communicates with Compliance at BEN and waits to hear next step.

Note: All decisions are final; there is no appeal process to the U.S. Department of Education.

DDBS Financial Aid Office Will:

- Post public notification of professional judgment policies, procedures and information on the DDBS website at ddbs.edu
- Consider all professional judgment requests
- Retain all documentation, including documented interviews that are related to the adjustment for at least 5-7 years after the student's last term of enrollment; and

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- Presume that any student who has obtained an adjustment for unusual circumstances and a final determination of independence to be independent for each subsequent award year at the same institution unless the student informs DDBS that their circumstances have changed, or DDBS has conflicting information about the student independence.
- Make and document professional judgment determinations on a case-by-case basis, without regard to how broadly an event may affect its student population in making case-by-case determinations, must substantiate the student's circumstances with supporting documentation.

DDBS Financial Aid Office May:

- Consider documented interviews for the professional judgement process.
- Use a dependency override determination made by a financial aid administrator at another institution in the same or prior award year.

DDBS Financial Aid Office Recognizes:

- Previous reasons for exercising professional judgment (e.g., unemployment, dislocated workers, and school tuition expenses) are still allowable.
- A dependency override for unusual circumstances is considered unique from a determination of independence for homeless youth or at-risk homeless youth.
- Appeals specific to the determination of independence will be reviewed as quickly as possible, but no later than 2 weeks after a student enrolls

Changing Dependency Status Policy

Date of Last Revision: 3/8/2025

Students whose parents refuse to support them are not eligible for a dependency override, but they may be able to receive Federal Direct Unsubsidized Loans only. For a student to be eligible for this provision DDBS must provide BEN the following signed and dated statements from the parent:

- (1) They (parents) refuse to complete their FAFSA and
- (2) They (parents) do not and will not provide any financial support to the student and
- (3) The date parental support ended to the student.

When DDBS determines that a student is eligible for Title IV aid under this provision, the FAA decision must be documented and the statements from the parents must be uploaded to BEN. This will require BEN to create a special compliance delay so DDBS can upload the parent signed and dated statements.

Note: These statements will need to be obtained for each award year as applicable.

Qualified BEN staff will analyze and evaluate each uploaded document and determine whether the document is approved, needs additional clarification or that updates are required. Documents that are approved by BEN staff will be identified in the BEN system as “approved” and documents that are not approved will be identified in the BEN system as “rejected.”

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When the submitted document is placed under the rejected status, the BEN reviewer will provide an explanation and/or comment documenting why the document was rejected to assist DDBS. This process may be repeated multiple times if incorrect (or conflicting) information is provided. After all the required documents have been approved by BEN staff, BEN will award the student despite the fact that the ISIR will be a rejected application with no EFC (assuming there are no outstanding eligibility issues). BEN will award the student Federal Direct Unsubsidized Loans up to the maximum the student would normally be eligible for depending on their grade level (but not the amount a student can get when his parent is unable to get a PLUS loan). *See DCL GEN-08-12 for additional information.*

Changing Dependency Status Procedure

Students who wish to apply for a Dependency Override must submit the following documentation:

- A letter of explanation, written by the student, explaining the extraordinary family circumstances that led to the student leaving the parent household. The letter must include information on the student's means of support since leaving the parent household.
- Letters (on letterhead) from three professionals detailing their first-hand knowledge verifying the family circumstances as described by the student. Professionals may include guidance counselors, clergy members, teachers, doctors, family counselors, mental health professionals and law enforcement personnel. The letters must include the professional's name, job title and contact information. In most cases, court documents will be requested.
- Copies of the student's federal income tax return transcripts for the current and preceding year.
- The letter of explanation requesting a Dependency Override along with all required documentation should be sent to the Director of Financial Aid.

*If the Director of Financial Aid determines homelessness, it must be on a case-by-case basis and documented, but is *not* a professional judgment or dependency override. However, it is processed as a dependency override in FAA Access.

Director of Financial Aid

- Contacts BEN to enter a compliance delay;
- Provides compliance paperwork forms to student;
- Uploads completed compliance delay paperwork to secure BEN portal;
- Waits to hear from BEN

Student

- Completes compliance delay paperwork forms and gathers supporting documentation;
- Submits to Financial Aid office

Burden of Proof

The burden of proof is on the student to show why a special circumstance is appropriate to more accurately reflect the family's ability to pay.

Professional Judgment- FAFSA Simplification Act per U.S. Department of Education

The FAFSA Simplification Act distinguishes between different categories of professional judgment by amending section 479A of the HEA.

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- ***Special Circumstances***- refer to the financial situation (loss of a job etc.) that justify an administrator adjusting data elements in the COA or in the SAI calculation.
- ***Unusual Circumstances***- refer to the conditions that justify an aid administrator making an adjustment to a student's dependency status based on a unique situation (e.g., human trafficking refugees or asylee status, parental abandonment, incarceration), more commonly referred to as a dependency override.

A student may have both a special circumstance and an unusual circumstance. Financial Aid Administrators (FAAs) may make adjustments that are appropriate to each student's situation with appropriate documentation.

What has changed?

- Institutions may not maintain a policy of denying all professional judgement requests but must consider all such requests. Therefore, institutions must develop policies and processes for reviewing those requests.
- Institutions must disclose publicly that students may pursue an adjustment based on special or unusual circumstances.
- Institutions may use a dependency override determination made by a financial aid administrator at another institution in the same or a prior award year.

What remains the same?

- Institutions must make and document professional judgment determination on a case-by-case basis without regard to how broadly an event may affect its student population.
- In making case-by-case determinations, the FAA must substantiate the student's circumstance with supporting documentation.
- Previous reasons for exercising professional judgment (e.g., unemployment, dislocated workers, and school tuition expenses) are still allowable.
- A dependency override for unusual circumstances is considered unique from a determination of independence for homeless youth or at-risk homeless youth.

Additional Flexibility for Assisting Students with Unusual Circumstances

The FAFSA Simplification Act provides a clearer directive for FAAs to assist applicants with unusual circumstances to adjust dependency status on the FAFSA form to reflect students' situations more accurately. Like other types of professional judgment, institutions must make students aware of their ability to request an adjustment for unusual circumstances by publicly posting the option on their website. For the award years, applicants must still indicate an unusual circumstance and request a determination of independence with DDDBS to allow the Financial Aid Administrator to process their FAFSA form.

Starting with the 2024-2025 Award Year, both initial and renewal applicants who indicate they have an unusual circumstance on their FAFSA form will submit their application under a provisional independent status. This will allow such applicants to receive a Student Aid Index (SAI) with an estimate of their federal student aid eligibility, subject to a final determination by their school.

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Additionally, the act introduces new requirements for processing and communicating with students who request an adjustment for unusual circumstances. For aid applications for the 2023-24 award year and thereafter, schools and financial aid administrators must:

- Notify students about DDBS's process, requirements, and reasonable timeline to review adjustment requests after their FAFSA form is submitted.
- Provide students with a final determination of their dependency status and financial aid offer as soon as possible after reviewing all requested documentation.
- Retain all documentation, including documented interviews, related to the adjustment for at least 5 years after the students' last date of enrollment; and
- Presume that any student who has obtained an adjustment for unusual circumstances and a final determination of independence to be independent for each subsequent award year at the same institution unless the student informs DDBS that their circumstances have changed, or DDBS has conflicting information about the student's independence.

****As previously provided by law, if a student pursues an adjustment for unusual circumstances and the financial aid administrator does not determine that the student should be considered independent, the student will only be eligible for dependent-level Direct Unsubsidized Loans unless they subsequently complete the FAFSA form as a dependent student by providing parent information.**

Timing and Determination of Independence

DDBS and other institutions now have additional guidance on the timing of determination of independence for certain student populations. These include unaccompanied homeless youth or at-risk homeless youth, foster care youth, orphans, wards of the court, and students with unusual circumstances.

- DDBS must review all requests for a determination of independence as quickly as possible as but no later than 2 weeks after the student enrolls.
- Renewal applicants with eligible homeless youth, foster care youth, orphan, ward of the court, emancipated minor, or legal guardianship flag on their FAFSA form will have their answers to these questions carried over and pre-populated into the next year's FAFSA form. Other answers to dependency questions (e.g. age, dependent children, and veteran status) continue to carry over to the subsequent FAFSA form.
- Renewal applicants must still affirm that their previous answers to the dependency questions are correct and applicable prior to submitting their FAFSA form.

Acceptable Documentation

In general, when determining a student's special or unusual circumstance, or in verifying homeless or foster youth statuses, schools must ensure that any supporting documentation they collect is adequate to substantiate the student's and, as applicable, the parent's or spouses' circumstances. The act updates, but does not limit, the types of adequate documentation that a school may request from the student.

Chapter 3 Student Eligibility

Special Circumstances

Acceptable documentation may include:

- A documented interview between the student and the financial aid administrator or
- Supplementary information, as necessary, about the financial status or personal circumstances of eligible applicants as it relates to the special circumstances.

Unusual Circumstances

Acceptable documentation may include:

- A documented interview between the student and the financial aid administrator.
- A documented phone call or written statement from an attorney, guardian ad litem, a court-appointed special advocate (or similar), or a representative of a TRIO or GEAR UP that confirms the circumstance and the person's relationship with the student.
- A documented determination of independence made by a financial aid administrator at another institution in the same or a prior award year; or
- Utility bills, health insurance, or other documents that demonstrate a separation from parents or legal guardians.

Acceptable documentation may also include a documented phone call or written statement, which confirms the unusual circumstances with:

- A state, county, or tribal welfare agency.
- An independent living worker who supports current and former foster youth with the transition to adulthood; or
- A public or private agency, facility, or program servicing the victim's abuse, neglect, assault, or violence.

Unaccompanied Homeless Youth Policy

Date of Last Revision: 3/8/2025

If a student does not have and cannot get documentation from authorities, the financial aid administrator must determine if she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless. It is important to make homeless youth determinations on a case-by-case basis.

Unaccompanied Homeless Youth Procedure

Student

- Completes a written statement and gathers supporting documentation;
- Supporting documentation can include a letter from the following:
 - A local educational agency homeless liaison, or a designee of the liaison
 - The director of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other programs serving individuals who are experiencing homelessness, or a designee;
 - The director of a federal trio program or a gaining early awareness and readiness for undergraduate program (Gear Up) grant, or a designee
- Submits to Financial Aid office

Chapter 3 Student Eligibility

Director of Financial Aid

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

In the absence of documentation from any of the individuals described above, FAAs must make a case-by-case determination:

- Based upon a written statement from, or a documented interview with, the student that confirms that they are unaccompanied or homeless youth, or unaccompanied, at risk of homelessness, and self-supporting; and
- Made without regard to the reasons that the student is unaccompanied and/or homeless.

Foster Care Youth Policy

Date of Last Revision: 3/8/2025

DDBS requires that a student provide documentation that they were in foster care at the age of 17 or older. DDBS must consider any of the following documentation to be adequate in the absence of conflicting information:

- Submission of a court order or official state documentation that the student received federal or state support in foster care;
- A documented phone call or a written statement from an attorney, guardian ad litem, or court appointed special advocate;
- Verification of the student's eligibility for an education and training voucher under the John H. Chafee Foster Care Program under section 477 of the Social Security Act (42 U.S.C. 677); or
- A documented phone call or written statement from a financial aid administrator who documented the student circumstance in the same or prior award year.

DDBS must also consider a phone call, written statement, or verifiable electronic data match from one of the following sources to be adequate documentation:

- A state, county, or tribal agency administering a program under part B or E of title IV of the social security act (42 U.S.C. 621 et seq. and 670 et seq).
- A state Medicaid agency; or
- A public or private foster care placing agency or foster care facility or placement.

Foster Youth Procedure

Student

- Answers "Yes" on the FAFSA to the foster youth question;
- Completes a written statement and gathers supporting documentation;
- Submits to Financial Aid office

Chapter 3 Student Eligibility

Director of Financial Aid

- Uses discretion when gathering information and respect the student's privacy. Some information, such as that protected by doctor-patient privilege, is confidential.
- Determines eligibility in the absence of conflicting information;
- Uses third party servicer in determination.

Professional Judgment during a Disaster, Emergency, or Economic Downturn

Date of Last Revision: 3/8/2025

The act codifies previous guidance from the department (as issued in earlier Dear Colleague Letters) to use statutory authority to exercise professional judgment during a disaster, emergency, or economic downturn.

Financial Aid administrators may, during a qualifying emergency:

- Determine that the income earned for work from an applicant is zero, if the applicant can provide paper or electronic documentation of receipt of unemployment benefits or confirmation that an application for unemployment benefits was submitted; and
- Make additional appropriate adjustments to the income earned from work from a student, parent, or spouse, as applicable, based on the totality of the family's situation, including consideration of unemployment benefits.

Acceptable documentation about unemployment should be submitted not more than 90 days from the date it was issued. However, institutions may use discretion to accept documentation older than 90 days under an institution's general professional judgment authority if they do not have reason to believe there is conflicting information.

Further, the department will adjust the program review selection model to account for an increase in the use of professional judgment by schools during the award years applicable to the qualifying emergency.

Complete GEN-22-15 Department of Education (DOE) Publication Directive can be reviewed here: <http://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-11-04/fafsar-simplification-act-changes-implementation-2023-24>

Attendance Policy

Date of Last Revision: 3/26/2025

Attendance Policy

Students must attend a minimum of 67% of the cumulative scheduled hours to maintain SAP and complete the course within the maximum allowed period. The attendance percentage is determined by dividing the total hours by the total number of hours scheduled.

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Students are expected to attend classes as per their enrollment agreement. Our school is approved for hybrid training with attendance either in-person or online, as required. Each student is scheduled prior to orientation and given paperwork acknowledging their assigned schedule.

Students are required to utilize the punch card system to clock in and out every in-person class session and in and out for lunch breaks. Instructors also take physical attendance at the beginning of class and end of class each day. The time in and time out are noted on the attendance tracking sheet.

Students who persist in repeating patterns of absenteeism will be advised and will be subject to appropriate disciplinary action. Students with excessive absences may be terminated. Re-enrollment is at the discretion of DDBS. Students who miss 14 consecutive school days without communicating with the Administration may be terminated on the 15th consecutive school day as an unofficial withdrawal.

Attendance Procedure

Students

- Arrive on-time for in-person scheduled classes;
- Punch in and out on the time clock located in the front of the building; including punching in and out for lunch breaks;
- Sign in on the daily attendance log in the classroom

Instructors

- Record student arrival and departure times
- Have student initial attendance upon their departure each day;
- Collect student punch cards at the end of week and file in student file
- Turn in daily attendance logs (MPAs) to administration on a weekly basis

Business Center Liaison

- Monitors daily attendance;
- Attempts to contact student during absences;
- Attempts to contact students who has continuous absences.
- Meet with students who are continuously tardy;
- Processes Leave of Absence paperwork upon LOA approval by the Director of Operations;
- Notifies the Director of Operations of excessive absences by student

Director of Operations

- Monitors SAP performance;
- Reviews Leave of Absence requests and either approves or denies request;
- Unofficially withdraws student who has not attended in 14 days.

Director of Financial Aid

- Perform withdrawal process, including R2T4 where appropriate.

Date of Last Revision: 3/26/2025

Chapter 3 Student Eligibility

Satisfactory Academic Progress Standards and Policy

Date of Revision: 3/8/2025

Policy Reason

An institution must establish a reasonable Satisfactory Academic Progress (SAP) policy for determining whether an otherwise eligible student is making satisfactory academic progress in their educational program and may receive assistance under Title IV, *Higher Education Act of 1965* (HEA) federal assistance programs.

SAP Policy

The SAP policy is applied consistently to all students enrolled at DDBS (full-time or part-time). It is printed in the DDBS Program Catalog & Student Handbook to ensure that all students receive a copy before enrollment. The policy complies with the guidelines established by the Council on Occupational Education (COE) and federal regulations established by the United States Department of Education (ED).

Students must maintain satisfactory academic progress throughout their training to comply with DDBS policy and to remain eligible for Title IV student financial assistance. Also, students who do not receive financial aid and are paying out-of-pocket must maintain SAP progress throughout their training. The academic and attendance requirements apply to every student enrolled in DDBS, whether they receive financial aid or pay cash—all periods of enrollment count towards SAP, including periods when a student does not receive financial assistance. DDBS's policy is to apply SAP consistently to all students enrolled in all offered programs, whether full-time or part-time.

Both qualitative (academics/grades) and quantitative (attendance, pace of progression, and time frame) standards are used to evaluate Standard Academic Progress. Students must meet DDBS's academic and attendance standards on a **cumulative basis** (start date to evaluation date) to maintain SAP and for Title IV eligibility.

Minimum Qualitative Requirement

Academic Standard

The qualitative element used to determine Satisfactory Academic Progress is a reasonable grading system defined by assigned academic learning. Students receive an academic education and a minimum number of practical experiences. Academic knowledge is evaluated after each unit of study. Practical assignments are evaluated as completed and count toward course completion only when rated as satisfactory. If the performance does not meet satisfactory requirements, it is not counted, and the student must repeat the performance. Each student is given at least two (2) comprehensive practical skills evaluations during the course. Practical skills are evaluated according to text procedures and outlined in DDBS's practical skills evaluation criteria.

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Students must maintain a written grade of **75%** and pass the final theory and practical exams before graduation. Students must make up for failed or missed tests and incomplete assignments. Numerical grades are recorded according to the following scale:

Interpretation: Excellent, Good, Satisfactory and Failing

Grading system Used for All Test/Exams:

100-90%.....	Excellent
89-80%.....	Good
79-75%.....	Satisfactory
Below 74%.....	Failing

Cosmetology, Advanced Esthetics, and Esthetics students must maintain an academic average of at least 75% or higher on a cumulative basis as of the evaluation date to meet the academic standards of this policy to be considered making progress (satisfactory).

DDBS rounds percentage calculations using normal rounding methods.

Only courses for which the student receives a passing grade are acceptable for the unit requirement in calculating the SAP status. Incomplete courses and withdrawals are not counted as completed units. Students are required to verify attendance for terms in which they receive unsatisfactory grades.

Minimum Quantitative Requirements

Attendance Standard

Students must attend a minimum of **67%** of the hours they are scheduled to attend based on the students' enrollment agreement. A student's attendance is determined by dividing the total hours attended by the total clock hours scheduled as of the evaluation date.

Note: Regardless of the average level of attendance, students who have more than 30 days of consecutive absences will be dismissed. When calculating attendance, a leave of absence will extend a student's contract end period and maximum time frame by the same number of days taken in the leave of absence. The frequency of evaluations ensures that students have ample opportunity to meet academic progress and the attendance requirements of at least one evaluation by midpoint in the course.

Pace of Progression

At least 67% of all coursework attempted must have successfully passed grades. The pace of progression progress is calculated by dividing **cumulative** hours that have been completed by the **cumulative** hours attempted by the student. The 67% completion rate maintains a pace of progress toward the degree or certificate that ensures completion of the academic credential within the maximum time frame allowed. DDBS rounds pace to the nearest whole number using normal rounding methods.

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Maximum Time Frame

Students must complete their program and certificate in no more than 150% of the program's average published length in clock hours. For an *undergraduate program measured in clock hours*, the maximum timeframe cannot be longer than 150 percent of the educational program's published length, as measured by the cumulative number of clock hours the student is required to complete and expressed in calendar time. Students may use their total program clock hours required multiplied by 1.5 to determine the clock hour limit, as shown below. DDBS rounds percentage calculations using normal rounding methods.

A full-time student, by definition, is scheduled to complete 35 clock hours per week, and the number of weeks varies by program. A part-time student, by definition, is scheduled to complete 20 clock hours per week, and the number of weeks varies by program.

The maximum time allowed for students to complete each program within Satisfactory Academic Progress is listed below:

Cosmetology – 2,250 clock hours and 68 weeks (full-time)
Advanced Esthetics (750 clock hours) – 1,125 clock hours and 35 weeks (full-time)
Esthetics (750 clock hours) – 1,125 clock hours and 35 weeks (full-time)
Cosmetology – 2,250 clock hours and 99 weeks (part-time)
Advanced Esthetics (750 clock hours) – 1,125 clock hours and 53 weeks (part-time)
Esthetics (750 clock hours) – 1,125 clock hours and 53 weeks (part-time)

All accepted transfer hours from another institution are counted as both attempted and completed hours to determine when the maximum allowable timeframe has been exhausted.

Note: Federal financial aid regulations require DDBS to discontinue federal financial aid if an SAP review indicates that the student cannot complete their program within 150% of the program's average published length.

A leave of absence will extend the student's contract period and maximum time frame by the same number of days in the absence.

Students who do not complete within the maximum of the required timeframe will be permitted to continue to graduation. However, any student not completing the course within their contracted time will be charged the hourly fee as stated in their enrollment agreement for each hour needed to complete the course.

Evaluation Periods

Evaluations will determine if the student has met the minimum requirements for Satisfactory Academic Progress. The frequency of assessments ensures that students have had at least one (1) evaluation by the midpoint of their respective courses. Evaluation periods are determined by the length of the program and the student's enrollment date.

The policy provides that a student's academic progress is evaluated at the end of each payment period if the educational program is either one academic year in length or shorter than an

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academic year: or for all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period.

Students are evaluated for Satisfactory Academic Progress based on actual clock hours completed at the end of each period as follows:

Cosmetology:	450, 900, and 1200 clock hours
Advanced Esthetics:	375 clock hours
Esthetics:	375 clock hours

Transfers

If the hours needed at DDBS are less than 900 hours (for cosmetology), then the first evaluation period will occur at the midpoint of the hours required rather than at 450 or 375, based on the program.

For all students receiving Title IV funds, students will be evaluated when they reach both the clock hours and the number of weeks for disbursements of funds.

Students who meet both the quantitative and qualitative requirements described herein will be deemed to be making progress until the subsequent scheduled evaluation.

Determination of Progress Status

New students will be considered making **progress** from their actual starting date until their first evaluation period. Students who meet the minimum requirements for academics and attendance at the evaluation point for the following: (Cosmetology 450-900-1200 or Esthetics/Advanced Esthetics 375 actual clock hours) to ensure that students continue to make progress until the subsequent scheduled evaluation.

Students who fail to meet minimum requirements for academics and attendance at the evaluation point each payment period are placed on "**Warning Status**" and are considered making Satisfactory Academic Progress during the warning period until the subsequent scheduled evaluation.

Students who fail to meet minimum requirements for academics and attendance at the next evaluation point after the "Warning" period will be placed on "**Probation Status**" and considered to be making satisfactory academic progress while during the probationary period if the student successfully appeals the decision. Additionally, students who cannot meet satisfactory standards may be placed on probation. Students placed on an academic plan must be able to meet requirements. Students who are progressing will be considered satisfactory. After a student has been placed on "Warning" or "Probation" status, students not meeting the minimum requirements for academics and attendance at the next evaluation point are placed on "**Suspension**," and the student will be determined as NOT making Satisfactory Academic Progress. If applicable, students will not be deemed eligible to receive Title IV funds during that period.

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Students will receive a copy of their Satisfactory Academic Progress determination ("Progress," "Warning," "Probation," or "Suspension") at the time of each evaluation. The administration will advise the students in writing on the actions required to attain Satisfactory Academic Progress. Students will be notified via email of any changes to their Title IV eligibility (positive or negative) because of an SAP issue. Students deemed not maintaining Satisfactory Academic Progress may have their Title IV funding interrupted unless the student is on Warning, has received approval from an appeal resulting in a probation status, or meets minimum academic and attendance requirements on the subsequent scheduled evaluation.

Warning Policy

Students who fail to meet minimum requirements for academics and attendance are placed on warning status and must meet SAP requirements by the next evaluation period. The student will be advised in writing on the actions required to attain Satisfactory Academic Progress by the subsequent evaluation. The student must meet both the academic and attendance requirements or be placed on probation in the following review.

Warning Procedure

An academic warning status will be for one academic period and will be determined based on:

- (1) Failure to meet the minimum qualitative 75% GPA requirement for academics and the quantitative 67% attendance or
- (2) Failure to progress at a pace to ensure completion within the maximum timeframe

The student will be advised by the Director of Operations. Satisfactory Academic Progress policy specific to "Warning" below:

- (1) Students may not appeal an Academic Warning.
- (2) Students on Academic Warning are eligible to receive Federal Title IV funds for one additional academic period.
- (3) DDBS will review the student's attendance and academic status, and the student will be counseled as necessary to determine if the student can reasonably meet the SAP requirements. This may include a recommendation for termination.
- (4) Students may not be placed on Academic Warning for consecutive academic periods.
- (5) A student failing to meet the SAP requirements at the end of the academic warning period will be sent a Probationary letter detailing their option to appeal the decision.

Probation Procedure

Probation status is assigned to a student who fails to make Satisfactory Academic Progress on the second SAP evaluation. Aid eligibility may be reinstated for one payment period, and the student is required to fulfill specific conditions as stipulated in a Probation Plan. See below.

If it is determined, based on the appeal, that the student should be able to meet the SAP standards by the end of the subsequent payment period, they may be placed on probation without an academic plan. Probation is for one payment period only.

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Probation Plan

Students placed on an academic Probation Plan must meet the academic plan's requirements by the end of the next evaluation period. The student will be advised in writing of the actions required to attain Satisfactory Academic Progress by the subsequent evaluation. Students who are progressing according to their specific academic plan will be considered making Satisfactory Academic Progress.

Suppose at the end of the probationary period the student has still not met both the academic and attendance requirements required for Satisfactory Academic Progress or as specified by the academic plan. In that case, the determination goes into NOT making Satisfactory Academic Progress and, if applicable, the student will not be deemed eligible to receive Title IV funds. Students will not be placed on academic probation for consecutive academic periods.

Notification

Students will be notified in-person/ via email/ if there are any changes to their Title IV eligibility (positive or negative) because of an SAP issue. Notifications include warning status, probation status, appeal decisions, loss of eligibility, or regaining of eligibility.

The SAP Process



Re-establishing SAP

Students may re-establish Satisfactory Academic Progress and Title IV aid, as applicable, by meeting minimum academic and attendance requirements by the end of the warning or probationary period.

Suppose the student begins a payment period not making Satisfactory Academic Progress but reverses that designation before the end of that payment period. In that case, the student will be eligible for federal aid for the next payment period.

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Make-up Time Policy

Students are expected to make up for missed days and exams. Students may utilize the various school schedules and classes to complete make-up time and exams. All attendance make-up time will be completed during normal school hours but in the student's non-scheduled class time.

Interruptions, Course Incompletes, Repetitions, and Withdrawals

If enrollment is temporarily interrupted due to a Leave of Absence, the student will return to school in the same progress status as prior to the leave of absence. Hours elapsed during a leave of absence will extend the student's contract period and maximum time frame by the same number of days taken in the leave of absence and will not be included in the student's cumulative attendance percentage calculation. Students who withdraw prior to completion of the course and wish to re-enroll will return to the same satisfactory academic progress status as at the time of withdrawal if the student returns within 180 days.

Course incompletes, repetitions, and non-credit courses have no effect on the satisfactory academic progress policy.

A grade of incomplete (F) may be changed to a passing grade within the program length from the date of receiving the grade if the student satisfactorily completes all the requirements set forth by the course instructor.

A student is given 14 days from the end of the term to decide with their instructor if they have an "F" grade because of excused absences. To change the "F" grade, the student must make up the missing coursework within 14 days. Once the 14-day mark has passed, the failing (F) grade will become permanent if the work remains incomplete, and the student must retake the coursework for SAP re-calculation.

Because of the generous make-up time policy at DDBS, students are expected to make up for missed days and exams. Therefore, course repetition does not apply to this institution.

When a student withdraws from a class, those hours are counted as attempted and not completed.

Non-credit, Remedial Courses, and Repetitions

Non-credit, remedial courses, and repetitions do not apply to this institution. Therefore, these items have no effect upon DDBS's satisfactory academic progress standards.

Official Withdrawal Policy and Procedure

A student will be considered withdrawn once the student has informed the teacher or Business Center Liaison of the withdrawal then the Director Operations will be notified.

A student will be considered withdrawn if the following occurs:

1. The student notifies the Director or administration of his/her intent to withdraw
2. DDBS will notify the students of the dismissal from the program.

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The Director of Operations or Business Center Liaison

- Will collect the students' academic records from instructors
- Will ensure any monies returned are in the proper account for retrieval

Records Clerk

- Will update the students' academic grades and attendance to the student's file
- Will file withdrawal documents into digital and hardcopy student file

Director of Financial Aid

- Will complete an exit form and notify the Director of Financial Aid of the withdrawal.
- Will process the withdrawal according to the guidelines of DDDBS and Title IV
- Will notify the third-party server (BEN) of the termination or withdrawal.

Director of Financial Aid and Business Center Liaison

- DDDBS will calculate the R2T4 and compare it with BEN (third-party) calculations
- Will submit to BEN the servicer a request to return monies based on the R2T4 written calculations.

Business Center Liaison

- Will update the student ledger of the R2T4 for the Department of Education
- Supply the student with a final student ledger sheet. All documents will be filed by DDDBS's clerk.

Note: Any returns that will be made to Title IV on the students from the results of the student exiting the program. If a student schedule attendance is more than 60% of the payment period, he/she is considered to have earned 100% of federal funds received for the pay period. In this case no funds need to be returned to the federal funds account.

Submissions are returned within 45 days of the withdrawal. Financial Aid will submit notification to the student about the amount of return monies based on R2T4 calculations in writing, perform the financial aid exit interview, and place updated copies in the financial aid records. The Business Center Liaison will update the student ledger of the R2T4 for the Department of Education and supply the student with a final student ledger sheet.

Unofficial Withdrawal Policy and Procedure

- A formal termination (unofficial withdrawal) by the student shall occur more than 14 days from the last day of physical attendance.
- DDDBS officially notifies the student of dismissal from the program.

Changes in Majors or Degrees

DDDBS does not allow students to transfer programs. No clock hours can be transferred to any other programs. If a student requests to change a program after the fifth day, he/she must receive approvals from DDDBS's Director of Operations, the Financial Aid department, and wait until the next program's availability date.

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Pursuit of a Second Degree

Students choosing to pursue a second program or certificate at DDBS after completion of a first program or certificate will have their satisfactory academic progress calculated starting with the second program or certificate. Any coursework from the initial program or certificate that also applies to the second program will be included in the SAP calculations.

Semesters /Terms

DDBS recognizes the use of semesters and terms, however program enrollment is not determined by academic terms.

Transfer Hours

Students with previous training shall be evaluated by an instructor using practical applications and reviewing the transcripts. Appropriate credit will be given for comparable previous education and training. The training period will be shortened accordingly based on the shortened training period.

Note: DDBS only transfers hours not GPA's.

If a transfer student is admitted to the program, a notarized transcript from the sending school must be received prior to the student starting class at Dymond Designs Beauty School. If the sending school has closed, the transfer student must obtain a clock hour report from the State of Michigan Department of Licensing and Regulatory Affairs before starting class at DDBS. Transfer students will be required to purchase a kit or kit items to meet DDBS requirements. Transfer hours are recorded in student attendance under bulk hours in the student database. Decisions concerning the acceptance of transfer hours are at the discretion of the administrator. In addition, the student will be charged based on the current tuition rate and how many hours are needed for completion

Suspension and Termination Policy

Suppose at the end of the probationary period, the student has still not met both the academic and attendance requirements required for Satisfactory Academic Progress or by the academic plan. In that case, they will be determined to NOT make Satisfactory Academic Progress, and, if applicable, the student be deemed NOT eligible to receive Title IV funds.

Suspension or termination from DDBS may happen if the student is found in violation of the student code of conduct, but particularly if he/she participates in any of the following but not limited to:

1. Possession of illegal drugs or alcohol on school premises, grounds, or parking lot,
2. Theft from students, or of School property, or supplies,
3. Willful destruction of School property,
4. Insubordination,
5. Loud, boisterous behavior or foul language, or

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6. Failure to pass Satisfactory Academic Program probation.

Academic Review Procedures and Appeal Process

If a student is determined to be in probationary or suspended status, the student may appeal the determination within ten (10) calendar days of notification. Appeals submitted outside of this deadline will be accepted and considered but may be applied for a subsequent academic period.

Reasons for which students may appeal a negative progress determination include:

- the death of a relative,
- injury or illness of the student, or
- other special or mitigating circumstances.

The student must submit a written appeal to DDBS describing why they failed to meet SAP **with** supporting documentation of why the determination should be reversed.

Note: This information should include what has changed about the student's situation to allow them to achieve SAP by the next evaluation point.

The Satisfactory Academic Progress Appeals Committee will review the appeal documents, and a decision will be made and reported to the student within thirty (30) calendar days. The appeal and decision documents will be retained in the student file. If the appeal is approved, the Satisfactory Academic Progress determination will be updated, and federal financial aid will be reinstated, if applicable. The committee's decision is final.

Certificates of Completion

Once a student has completed all the required course hours and course requirements, a certificate of completion will be issued to the student or program funder. DDBS may withhold official academic transcripts and certificate of completion if the student has not met all financial obligations. Once all school obligations are met each student must take state board exams within 30 days of course completion. They must complete the Practical and Theory Test and achieve a 75% on each test to receive a Michigan State license.

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SAP Appeal Form



Satisfactory Academic Progress Appeal Form

(Please print neatly – illegible forms will not be processed)

Name: _____

Address: _____

Email/phone: _____

Meeting financial aid satisfactory academic progress (SAP) standards is a requirement for financial aid eligibility. If you do not meet SAP standards, you may submit an appeal requesting financial aid reinstatement consideration.

Reasons for Appeal	Required Documentation
<input type="checkbox"/> Personal illness or injury <input type="checkbox"/> Personal crisis <input type="checkbox"/> Illness of a family member <input type="checkbox"/> Death in the family <input type="checkbox"/> Second degree <input type="checkbox"/> Other NOTICE: Lack of awareness of withdrawal policies and/or requirements for SAP and lack of preparation for college coursework are not acceptable reasons for an appeal.	<p>ATTACH a <u>one-page explanation</u> of what happened and what has changed AND supporting documentation of your situation</p> <p style="text-align: center;">NOTE: Include your <i>name</i> and <i>student ID</i> number at the top of each document.</p> <p>The explanation must include:</p> <ul style="list-style-type: none"> ▪ What happened and why the event(s) caused you to be unable to maintain satisfactory progress ▪ What has changed and what steps you have taken or will take to achieve and maintain satisfactory academic progress <p>Note: If this not your first SAP appeal, you MUST submit the Student Improvement Plan-SAP Part 2 Form.</p>

SAP review components are:

- (1) **Cumulative Grade Point Average (GPA):** 75% is required for academics and 68% is required for attendance
- (2) **Pace of Progression (completion percentage):** At least 67% of all coursework attempted must have successfully passing grades.
- (3) **Maximum Time Frame:** Students must complete their program in no more than 150% of the program’s average published length.

Incomplete appeals will be denied. We may request additional documentation.

Signature _____

Email complete appeal to raynakarpuk@ddbbs.edu.

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Student Grievance Policy and Procedures

Date of Last Revision: 3/8/2025

DDBS STUDENT GRIEVANCE POLICY AND PROCEDURES

PURPOSE OF THE PROCEDURE/INTRODUCTION:

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

POLICY

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

PURPOSE

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

GUIDELINES

Stage 1: Statement of Grievance: If the student feels that the matter has not been resolved through informal discussions with the instructor/student meeting, the student should put their grievance in writing to the Director of Operations to further resolve the said issue.

Stage 2: The Grievance Meeting: The Director of Operations must schedule the Grievance meeting within three (3) days receipt of the grievance. If the grievance includes the Director of Operations, the Director of Operations or assigned personnel may coordinate the meeting.

Stage 3: The response: The Director of Operations will respond, in writing, and the response shall be issued to the student within five (5) days following the grievance meeting.

PROCEDURE:

Students must take all reasonable steps to attend the meeting, but for any unforeseen reason the student or the Director of Operations cannot attend, the meeting must be rearranged. Should a student companion and/or parent/guardian be unable to attend then the student must make contact within 3 days of the date of the letter to arrange an alternative date within five (5) days of the original date provided. These time limits may be extended by mutual agreement.

APPEAL:

If the matter is not resolved to the students' satisfaction, they must state their grounds of appeal in writing within five (5) business days of receipt of the decision letter. Within ten (10) business days of receiving an appeal letter, the student should receive a written invitation to attend an appeal meeting. A member of DDBS's Advisory Committee will take part in the appeal meeting. After the appeal meeting with the advisory committee member, the Director of Operations must inform the students in writing of their decision within three (3) business days of the meeting. No further action can be taken.

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

Or
State of Michigan Bureau of Professional Licensing
PO Box 30670 Lansing, MI 48909
Telephone: (517) 241-9288
Website: www.michigan.gov
Email: BPLHelp@michigan.gov

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STUDENT GRIEVANCE APPEAL FORM

Name of Complaint: _____

Student Name: _____

Phone Number: _____

Address: _____

1. Please provide a one or two sentence description of your complaint.

2. Please describe the nature of your complaint in full detail indicating what happened, when the event occurred and who was involved. If additional space is needed, use the reverse side.

3. Indicate when and with whom you have already spoken regarding this grievance and what attempts have been made toward resolution.

4. Indicate what specific resolution you are seeking or recommending.

***I hereby certify that the statements made pertaining to my complaint are truthful and accurate.**

Signature of Complainant

Date _____ Student

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Date of Last Revision: 2/28/2025

Veterans Addendum to the Catalog

Veterans Benefits

Dymond Designs Beauty School (DDBS) is approved by the State Approving Agency of Michigan to accept funding for all programs offered at DDBS. A Veteran, spouse or child of a Veteran are eligible to take advantage of these benefits. It is the student's responsibility to apply for the benefits online at www.gibill.va.gov or by completing the paper form VA 22-1990. Once applied, DDBS will need a copy of the student's Certificate of Eligibility (COE) and a copy of the DD-214 discharge paperwork.

An Administrator will evaluate official transcripts and documentation of previous education and training, and if possible, apply appropriate credit. Evaluation periods for GI® bill benefits will be evaluated every 30 scheduled days. Students must receive 75% in both academics and attendance to be considered maintaining satisfactory progress. If at the end of the probation period he/she is not making satisfactory progress, their benefits will be terminated and to continue will pay on a cash basis.

DDBS will permit any covered individual to attend or participate during education during the period beginning on the date on which the individual provides the educational institution with a certificate of eligibility for entitlement to educational assistance under Chapter 31 or 33 and ending on the earlier of the following dates:

- The date on which the Department of Veterans Affairs provides payment for such courses of education to said institution.
- The date that is 90 days after the date on which the educational institution certifies for tuition and fees following receipt from the student such certificate of eligibility.

DDBS will not impose any penalty, including the assessment of late fees, the denial of access to classes, libraries, or other institutional facilities, or the requirement that a covered individual borrow additional funds, on any covered individual because of the individual's inability to meet their financial obligations to DDBS due to the delayed disbursement of funding from the Department of Veterans Affairs.

Leave of Absence Policy and Procedure

Date of Revision 3/8/2025

LEAVE OF ABSENCE POLICY AND PROCEDURE

Purpose

DDBS recognizes that it is sometimes necessary for students to interrupt their enrollment for a short period of time and take a leave of absence. The policy and procedure will guide the student through the processes needed to grant request.

An authorized leave of absence (LOA) is a temporary interruption in a student's program of study. LOA refers to the specific time during a program when a student is not in attendance. A LOA is not required if a student is not in attendance only for an institutionally scheduled break. However, a scheduled break may occur during LOA. A LOA must meet certain conditions to be counted as a withdrawal requiring an institution to perform a refund calculation. For a student at DDBS to be approved for a Leave of Absence for medical or personal reasons, the following conditions must be met:

Leave of Absence Procedures

- DDBS's policy for Leave of Absence (LOA) requires a student to submit a request in writing.
- The written request must contain dates for the leave and the reason for the request and include the student's signature.
- The LOA together with any additional Leaves of Absence must not exceed a total of 180 days in any 12- month period.
- DDBS's policy requires a student to apply in advance for a LOA unless unforeseen circumstances (emergency) prevent the student from doing so. For example, if a student were injured in a car accident and needed a few weeks to recover before returning to school, the student would not have been able to request the LOA in advance.
- The Director of Operations may grant an LOA to a student who did not provide the request prior to the LOA due to unforeseen circumstances if DDBS documents the reason for its decision and collects the request from the student later either via mail, email, fax, an authorized individual or in person. In this example, the beginning date of the approved LOA would be determined by DDBS Director/Administrator to be the date the student was unable to attend school because of the accident.
- The request for Leave of Absence Form is made available in the Student Handbook & Catalog.
- A student granted a LOA that meets these criteria is not considered to have withdrawn, and no refund calculation is required at that time. For the Leave of Absence to be approved, there must be a firm and clear reasonable expectation that the student will return from the LOA. If it is determined that the student has no intention of returning, refer to the Withdrawal Policy. The students' contract will be extended by the same number of days taken in the LOA. Changes to the contract period to the enrollment agreement must be initiated by all parties. If the student does not return by the withdrawal

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date for the purpose of calculating a refund, it is always the student's last day of attendance.

- When the student returns from LOA, the student's education will continue from the actual hours earned. The start and end date will be adjusted accordingly.
- Please note that any student who fails to return to school at the end of an approved Leave of Absence is considered to have withdrawn from DDBS.
- Students who do not follow the procedure for obtaining an approved Leave of Absence will be subject to DDBS's stated policies on attendance for all absences recorded, regardless of circumstances.

Responsible Parties

Director of Operations/Business Center Liaison

- Receive a request in advance in writing from the instructor which will include the reason for the student's request and include the student's signature within two weeks.
- Approve the leave
- Make sure the leave of absence does not exceed 30 days with any additional leaves with a twelve-month period (only 1 leave will occur within 12-month period).
- The Business Center Liaison will make an addendum on the original contract to make sure it is the same number of days taken in the LOA then report it to the Digital Records Clerk for file update.
- The Director of Operations along with the instructor assures the education of the student continues upon his return

Student

- Request in advance in writing a request for leave of absence
- Get approval following the policy of DDBS
- Make sure it does not exceed 30 days with any additional leave within a 12-month period.
- Make sure an addendum is made to student contract
- Return with request days of actual leave of absence

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Leave of Absence Form



LEAVE OF ABSENCE FORM

Student Name:

 First

 Last

Course: _____

Instructor Name: _____

LOA Begins:

___/___/___

LOA Ends:

___/___/___

Original Contract End Date:

___/___/___

Revised Contract End Date:

___/___/___

Changed Weeks: _____

Student Signature: _____

Date: ___/___/___

Parent /Guardian Signature: _____

Date: ___/___/___

(If Applicable)

Accepted by School Official _____

Date: ___/___/___

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Verification Policy and Procedure

Date of Revision 3/28/2025

VERIFICATION POLICY AND PROCEDURE

References

Federal Register September 4, 2024 (Free Application for Federal Student Aid (FAFSA) Information to Be Verified for the 2025-2026 Award Year

Federal Register September 19, 2023 (Free Application for Federal Student Aid (FAFSA) Information to Be Verified for the 2024-2025 Award Year

34 CFR 668 Subpart E (668.51 – 668.61)

<https://www.federalregister.gov/documents/2023/09/19/2023-20211/free-application-for-federal-student-aid-fafsa-information-to-be-verified-for-the-2024-2025-award>

<https://www.federalregister.gov/documents/2024/09/04/2024-19786/free-application-for-federal-student-aid-fafsa-information-to-be-verified-for-the-2025-2026-award>

DCL-GEN-24-100

DCL-GEN-24-108

EA-APP-25-07

Purpose

Because students sometimes make errors on their FAFSA application, there is a process for verifying applications and making corrections. The FAFSA Processing System (FPS) selects which applications are to be verified, but DDBS also has the authority to verify additional students.

All applications selected by the FPS of students who will receive or have received subsidized Title IV aid must be verified. Verification is not required for students who are only eligible for unsubsidized Title IV. Students who are eligible for both subsidized and unsubsidized Title IV aid may not avoid verification by accepting only unsubsidized aid; they must complete the verification process to receive any Title IV aid. DDBS must verify applications selected by the CPS students who will receive (or have received) student financial assistance. These include the Pell Grant and Direct Loan programs.

DDBS performs verification on all applicants selected by the CPS and on any application that DDBS has reason to believe there is incorrect or conflicting documentation.

Procedure

- The Financial Aid Office at DDBS reviews each FAFSA to determine if the student has been selected for the process of notification;

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- The Financial Aid Office notifies the student that their FAFSA has been selected for verification by the federal government, OR
- The Financial Aid Office notifies the student that DDBS has selected their FAFSA for the verification process;
- The Financial Aid Office will provide the student with written information on what documentation the student is required to submit;
- It is recommended that the student submit all verification documents as quickly as possible for review;
- The student will be required to complete the Verification Worksheet for Dependent or Independent Student if selected for verification tracking groups 1 and 5;
- Documentation may include tax returns, tax transcripts identification cards, signed statements or worksheets;
- All documentation submitted by student must include the student's name, social security number and original "wet" signature;
- Digital signatures are not accepted;
- The Financial Aid Office promptly reviews all documentation submitted by the student for completeness and signatures;
- The Financial Aid Office completes the verification process and notifies the student of the results;
- It is DDBS policy that students are not permitted to start school prior to the completion of the verification process.

Phase 1 – The BEN compliance engine

When a student Financial Aid Profile is submitted by DDBS using the secure Boston Educational Network (BEN) software system and a student ISIR exists, the ISIR is evaluated by the automated BEN compliance engine. The BEN compliance engine reviews the most current ISIR for the award year and will generate a "compliance delay" when the compliance engine determines that the ISIR has been selected for verification by the USDE. The compliance delay will inform both DDBS and BEN of the specific documents required from the student and/or parent to complete the verification process.

It is DDBS's responsibility to obtain the required documents from the student and/or parent and provide the information to BEN. DDBS submits the required documents directly to the student record via the electronically secure BEN school portal website. BEN highly encourages institutions to use the direct upload option available in the BEN school portal software to upload the verification documents as this offers the best means to provide the documents in a secure manner. Schools are reminded to password protect any documents that are not directly uploaded via BEN's secure website to protect PII. The student file will remain in Phase 1 until DDBS submits documents to BEN for review.

Phase 2 – The BEN compliance reviewer

Phase 2 begins after DDBS has submitted verification documents through the secure portal for to BEN for review. The initial BEN reviewer will analyze and evaluate each uploaded document and determine whether the document is approved or needs additional clarification. Documents that are approved by BEN staff will be identified in the BEN system as "approved" and documents that are not approved will be identified in the BEN system as

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“rejected”. When the submitted document is placed under the rejected status, the BEN reviewer will provide an explanation and/or comment detailing why the document was rejected to assist DDBS in resolving the issue. This process may be repeated multiple times if incorrect, insufficient, or conflicting information is provided in the submitted verification documents. Typically, if there are repeated reviews by BEN staff, they are not completed by the same person who did the initial (or previous) review.

Each time a student compliance file is reviewed by BEN, the BEN reviewer will review all documents, including documents that were previously approved by a BEN reviewer to confirm that each document is acceptable. Documents that have not been submitted by DDBS will remain in “not set” status (Phase 1) until DDBS submits the required document. Once BEN has approved all the documents submitted by DDBS, the BEN reviewer places the student file in “final review” status. Phase 2 of the verification process will not be considered complete until all required documents have been submitted by DDBS and set to the approved status by BEN staff. Final approval of the verification documents is required prior to the student being awarded or disbursed Title IV funds (see the Phase 3 Final Verification Approval section below).

Phase 3- Final Verification Approval

The Boston Educational Network requires two different qualified staff (at minimum) to review and approve the documents submitted for verification by DDBS. This two-person review system minimizes the risk of human error in the verification process in an effort to obtain the highest level of accuracy in the awarding of Title IV aid.

After the student file has been moved to “Final Review” status by a BEN reviewer, a different BEN reviewer is tasked with reviewing all the previously accepted documents for final review and approval. It is only after the approval of all documents at this final Phase 3 review level of verification, and if there are no other outstanding eligibility issues, that the student is ready for awarding/packaging of Title IV Funds. If the BEN reviewer determines that any of the documents are not accepted, additional documents are required, or if they determine that conflicting information exists, then the compliance delay is updated appropriately, and the student file is placed back in (Phase 2) compliance delay. Once back in (Phase 2) compliance delay, the process will begin over again with DDBS required to provide additional documentation/information to resolve the remaining discrepancies.

Conflicting Information Policy (ISIR)

The Boston Educational Network will review the documents submitted by DDBS and verify the information for accuracy and determine if conflicting information needs to be resolved. BEN will provide the reason(s) to DDBS if verification cannot be completed per USDE regulations. BEN will consider the verification process to be complete when all requested documents have been reviewed and accepted by BEN and no conflicting information exists. The Boston Educational Network will not award or disburse any Title IV Funds subject to the verification process until the verification process is complete and all conflicting information has been resolved.

If the student cannot provide all required documentation, DDBS cannot complete the verification

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process. DDBS may then advise applicants that they may not be eligible for Financial Aid funds. DDBS then gives the applicants the following options:

- The student may continue training on a cash payment basis.
- Promptly submit needed items within 48 hours

Conflicting Information Procedure (ISIR)

DDBS has the responsibility to ensure that information in a student's file (that BEN may or may not have access to) does not contain conflicting information. If it is determined by either DDBS or BEN that conflicting information exists, the conflicting information must be resolved before any Title IV Funds can be awarded or disbursed. BEN will work with DDBS to resolve conflicting information before any Title IV Funds are awarded or disbursed.

Prior to the awarding of Title IV aid, BEN will review the student's most current ISIR and resolve any questionable data (regardless of whether the file was selected for USDE verification). Per 34 CFR 668.54(a)(2), "If an institution has reason to believe that an applicant's FAFSA information is inaccurate, it must verify the accuracy of that information." This includes, but is not limited to:

- discrepant tax data, including knowing:
- if a person was required to file a tax return,
- the appropriate tax filing status was used, and
- that an individual cannot be claimed as an exemption by more than one person
 - the ISIR indicates that the student was recently married but the tax data on the ISIR does not appear to reflect the combined tax data for both the student and spouse on the ISIR.
 - if the tax return shows significant interest and dividends income and/or capital gains but assets on the ISIR are \$0
 - if the tax return shows a business income
 - if the tax return shows farm income
 - if the students only claim to independent status is:
 - active duty
 - foster care or ward of the court
 - emancipated minor.
 - legal guardianship
 - unaccompanied youth who was homeless or at risk of being homeless
- BEN may require additional IRS tax forms, W-2's, signed statements from the student, spouse and/or parent, school documented explanation(s) and/or any other pertinent documents that BEN deems necessary to complete the verification process and to resolve conflicting information. Conflicting information, whether discovered by BEN or DDBS and regardless of when it is discovered, must be resolved.

BEN reserves the right to request additional documentation if BEN has determined that conflicting information exists, regardless of USDE verification selection.

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Exclusions from Verification Requirements

Under certain circumstances a CPS selected application may be excluded from some or all of the federal verification requirements due to the following unusual circumstances including: death of the student, not an aid recipient, applicant is eligible to receive only unsubsidized student financial assistance, applicant was verified by another school, or post enrollment (the student was selected for verification after ceasing to be enrolled). With the exception of the death of the student, however, none of these exemptions excuse DDBS from the requirement to resolve conflicting information.

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

- Both parents are mentally incapacitated,
- Both parents, or the custodial parent, has died,
- The parents are residing in a country other than the United States and can't be contacted by normal means, or
- The parents can't be located because the student does not have and cannot get their contact information.

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

- The spouse has died,
- The spouse is mentally incapacitated,
- The spouse is residing in a country other than the United States and can't be contacted by normal means, or
- The spouse can't be located because the student does not have and cannot get their contact information.

Deadlines and Failure to Submit Documentation

The federally mandated deadline for completing the entire verification process is the earlier of 120 days from the applicant's last date of enrollment or, or before the U.S. Department of Education's deadline of **September 20, 2025 (2024-2025 academic year) or September 10, 2026 (2025-2026 academic year)**, whichever comes first. Verification must always be completed before any funds are disbursed. If the student provides documentation after the deadline, DDBS will reevaluate the student's eligibility for subsidized aid and will award aid based on the availability of federal funds at the time of documentation submission.

For Pell grants, the student must have corrected any errors or shown that the information is correct, and the DDBS must have his or her valid, corrected Student Aid Report (SAR) or ISIR.

The verification process is complete when DDBS has received all requested documentation and a valid processed FAFSA report is on file, including any necessary corrections to the report. If the student does not provide the verification documentation or if DDBS does not receive the valid processed FAFSA report by the deadline, the student forfeits his/her Pell grant for the award year.

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If a student is selected for ED verification after Title IV aid has been awarded, the student must complete the verification process within the same time frame as outlined above in order to remain eligible for federal funds. Until verification (or re-verification) is finalized by BEN, the student's Title IV aid will be placed on hold and no Title IV disbursements will be processed until the process has been finalized.

Federal verification must typically be completed prior to the end of the academic year or before the student ceases enrollment, whichever occurs first. Students who fail to comply with verification requirements, including submitting documentation within required timelines, will not have Federal Title IV funds disbursed and may have Federal Title IV funds cancelled. DDBS considers the student to be the responsible party for providing information and completing the verification process.

Verification Selection

DDBS identifies the students selected for verification during the financial aid application process by viewing the FAFSA output document called the Student Information Record (ISIR). A review of the student's financial aid application occurs after ISIR data is received and data entry of required information is complete. The ISIR will provide information about the student and family including a calculated SAI, document codes identifying specific federal verification policy, information about applicant data submitted and written comments. The written messages provide additional information for the applicant to follow. The federal verification message for the student reads:

“Your FAFSA has been selected for a review process called verification. Your school has the authority to request copies of certain financial documents from you and your parent(s).”

How to Identify When a Student is Selected for Verification

In order to identify if a student is selected for the verification process, the Financial Aid Office at DDBS reviews the student's ISIR for one of the following:

- An asterisk (*) after the SAI;
- Verification tracking flag marked “Y” for yes on the ISIR;
- Verification tracking group V1, V4, or V5 on the ISIR;
- Comment Code 170 or 171 (Dependent/Independent) will appear in the “Application Status” section of the FAFSA/ISIR.

Students originally selected in V1 or V4 tracking group may be re-selected to the V5 group in a later transaction. DDBS must complete the additional applicable verification before any future disbursements are made. DDBS will not be liable for prior disbursements based on data available at that time. Verification tracking group changes will be designated with a “C” code in the Verification Selection Flag data field on the ISIR.

Verification Tracking Groups

Students selected for verification are placed into one of the verification tracking groups. Each group has its own verification requirements, as detailed on the verification worksheets.

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- V1 Standard Verification Group
- V2 Reserved
- V3 Reserved
- V4 Custom Verification Group
- V5 Aggregate Verification Group
- V6 Reserved

Identity Verification Flags

The U.S. Department of Education (Department) flags applicants that meet defined criteria for potentially fraudulent activity, including applicants suspected to be assuming another individual's identity when submitting a 2024–25 and 2025–26 Free Application for Federal Student Aid (FAFSA) form. In these cases, schools will receive newly generated ISIRs with applicable Verification Tracking flags. These flags will require schools to complete the V4 or V5 verification process to verify the student's identity and determine their eligibility for Title IV funds.

Schools must complete verification for these students before disbursing Title IV funds and may not make subsequent disbursements of Title IV funds for students that are selected for verification after a disbursement has occurred. If the student does not complete verification, DDBS is not liable for any Title IV aid it disbursed prior to receiving the subsequent ISIR transaction (group V4 or V5). The student is liable for the full amount because, without completing verification, there is no evidence they were eligible for that aid. As schools work with students to complete verification, they should report suspected cases of identity theft to the Department's Office of the Inspector General (OIG).

2024-2025 INFORMATION TO BE VERIFIED

Standard Verification Group V1 - Verifiable Items

The verification activity will initially compare applicant data for accuracy and completeness and continue to resolve conflicting information. In this process DDBS requires verification of the following items:

For all applicants:

Family size

For non-tax filers:

Income earned from work

For tax filers:

Adjusted Gross Income (AGI)

U.S. income tax paid

Income earned from work

Education tax credits (American Opportunity Tax Credit and Lifetime Learning Tax Credit)

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Other untaxed income reported on tax return, for example: untaxed portions of Individual Retirement Account (IRA) distributions, untaxed portions of pensions, IRA deductions and payments, tax-exempt interest income
Foreign Income Exempt from Federal Taxation

Groups V2, V3, and V6

Reserved for future use by ED

Custom Verification Group V4

Students must complete the Identity/Statement of Educational Purpose

Aggregate Verification Group V5

Students selected for this verification tracking group must satisfy both V1 and V4 requirements.

Reporting Results for Verification Tracking Flags V4 and V5

Important: DDBS is required to report the outcome of completion of the Identity/Statement of Educational Purpose for applications with tracking flag V4 and V5. Boston Educational Network (BEN) is the third-party servicer for DDBS. BEN reports this information through FAA access to CPS Online under the “Identity Verification Results” section.

How to Complete the Verification Process

DDBS will provide the student selected for verification with a DDBS Verification Worksheet. DDBS will send the worksheet through email to the email address on file for the student, and will follow-up with mailing a worksheet in the U.S. mail, if necessary. It is the student’s responsibility to submit the verification worksheet along with required documentation and applicable signature(s) promptly to the Financial Aid Office.

Financial Aid Direct Data Exchange (FA-DDX)

All students and contributors must provide consent and approval to have their federal tax information transferred directly into the FAFSA form via direct data exchange (FA-DDX) with the IRS. This federal tax information will be used to determine the student’s eligibility for federal student aid. If a student or required contributor doesn’t provide consent and approval, the student will not be eligible for federal student aid.

The IRS is the required source of tax information for the FAFSA form. When Federal Tax Information (FTI) is received from the IRS via the FA-DDX, the FTI is considered verified and no additional documentation is required. Other tax documentation, such as applicant-provided tax returns or transcripts, is secondary to the FTI received from the IRS via the FA-DDX, except when an applicant or contributor filed an amended return.

Tax Data Received from the FA-DDX and Manually Entered Information

Note: There will be instances where manual entry of tax information will still be required, even if a federal tax return was filed with the IRS. Foreign earned income exclusion amounts, for example, will not be transferred via the FA-DDX and will need to be entered manually. In addition, individuals who were married and filed jointly with the IRS and are no longer married to that spouse on the applicable tax return, or who have married a different spouse, will also be

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required to manually enter their income and tax information. Individuals who only file foreign tax returns will also be unable to use the FA-DDX since it does not link to foreign tax authorities. They will instead need to manually input their income and tax data by converting foreign currency to U.S. dollars and entering the resulting amounts in the comparable fields from U.S. tax returns, such as adjusted gross income, income tax paid, and any untaxed income.

Acceptable Documentation

The FAFSA Simplification Act requires that, wherever possible, the Department use data received directly from the IRS to calculate a student's SAI and Pell Grant award. The Fostering Undergraduate Talent by Unlocking Resources for Education Act (FUTURE Act) requires the Department of Education to access tax information held by the IRS pertaining to FAFSA applicants and, where applicable, their parents and spouses through a secure method: the FUTURE Act Direct Data Exchange (FA-DDX). The FUTURE Act amended the Internal Revenue Code (IRC) to mandate the disclosure of FTI directly from the IRS to the Department with an individual's consent and approval. The FUTURE Act also made providing consent and approval for the exchange of FTI a requirement for receiving federal student aid.

Applicants and contributors will be required to provide consent and approval to retrieve FTI directly from the IRS. When FTI is received from the IRS via the FA-DDX, the FTI received is considered verified and no additional documentation is necessary. As a result, the FA-DDX is the fastest, easiest, and most secure method of meeting income and tax verification requirements. The September 19, 2023, Federal Register Notice gives the documentation required for verifying 2024-25 application data, which depends on the item verified, as explained in this section.

In addition, the Department has developed suggested text that schools may use to create a verification document and to verify non-tax items, such as family size. To review the suggested text for 2024-25, please see Appendix A.

Income Information for Tax Filers

If an applicant is a **tax filer** selected to verify any of the following information, DDDBS must obtain the specified documentation:

Adjusted Gross Income (AGI), income earned from work, or U.S. income tax paid, untaxed portions of IRA distributions, untaxed portions of pensions, IRA deductions and payments, tax exempt income, education credits, and foreign income exempt from federal taxation

If transferred directly from the IRS and unchanged, these items do not need to be verified.

If information is not transferred from the IRS, the following documentation is sufficient for verification:

- (1) A transcript obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or
- (2) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign

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government that lists 2022 tax account information of the tax filer.

(3) If the tax transcript or tax return contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution.

For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return— A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or a copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and a copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document.

For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022— (a) A signed statement listing the sources of any 2022 income and the amount of income from each source; (b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022; (c) A copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document; and (d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.

Note: An school may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When a school receives such information, it must be used to re-verify the income and tax information reported on the FAFSA.

Qualified rollovers from one retirement account to another are not taxable, and they should not be counted as untaxed income (Untaxed portions of IRA distributions or Pensions). Since neither a tax transcript nor FTI transferred via the FA-DDX identifies rollovers, you must get documentation from the tax filer. This could be a signed statement with the rollover amount or a notation by the filer on the tax transcript or return that includes the word “rollover” beside any applicable item, like the instruction the IRS gives for Form 1040. The annotation must be signed and dated by the filer.

Income Information for Non-Tax Filers

If an applicant is a **non-tax filer** selected to verify income earned from work, DDBS must obtain the specified documentation.

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Income earned from work

The following documentation is sufficient for verification:

- (1) A signed and dated statement certifying— (a) That the individual is not required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year;
- (2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN;
- (3) A copy of IRS Form W-2 for each source of 2022 employment income received or an equivalent document; and
- (4) Except for dependent students, verification of non-filing for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023.

Note: The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.

For non-tax filers you must request a W-2 form for each source of 2022 employment income and a signed statement certifying that the person has not filed and is not required to file a 2022 tax return. You must also get a signed statement giving the sources and amounts of the person's income earned from work not found on W-2s. Students may sign on a nonfiling spouse's behalf.

For residents of the Freely Associated States (the Republic of the Marshall Islands, the Republic of Palau, or the Federated States of Micronesia), a copy of the wage and tax statement from each employer (substitute for W-2s) and a signed statement identifying any other employment income for the year not identified on the wage and tax statement is acceptable. Persons from a U.S. territory, commonwealth, or a foreign country who are not required to file a tax return can provide a signed statement, as well as any supporting documentation they might have (e.g., a form comparable to a U.S. W-2), certifying their income.

The collection of documentation to verify income earned from work is used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return (or a return with a relevant tax authority) for the 2022 tax year. If the individual should have filed but failed to do so, that is conflicting information that you must resolve.

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If a W-2 is not Available

If an individual who is required to submit an IRS Form W-2 did not save a copy, they should request a replacement W-2 from the employer who issued the original. A W-2 transcript from the IRS is also acceptable though it generally is not available until the year after the W-2 information is filed with the IRS (e.g., 2024 for 2022 information filed in 2023). If they are unable to obtain one in a timely manner, you may permit them to provide a signed statement that includes the amount of income earned from work, the source of that income, and the reason why the W-2 is not available in a timely manner.

Family size

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024–2025 award year and the relationship of that family member to the applicant.

Note: Verification of family size is not required if—

For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or

For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.

Other Information

If an applicant is selected to verify other information specified in the annual Federal Register notice, the applicant must provide the documentation specified for that information in the Federal Register notice.

Identity/Statement of Educational Purpose

Students should appear in person and present a valid, unexpired, government-issued photo identification (ID) such as a U.S. passport, a driver's license, or other state-issued ID.

“Unexpired” means the ID has not expired at the time it is checked, even if it will expire before the end of the award year. A valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto

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Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

DDBS must maintain an annotated copy of that ID that includes the date it was received and the name of the person authorized to receive it. At this time, the Director of Financial Aid is the only authorized school personnel approved to review an applicant's identity.

The following **are not sufficient** for identity verification:

- An ID issued by a state university or college, or
- A military ID (18 U.S. Code § 701 prohibits it from being photocopied).

Students must also sign (it must be a “wet” signature) a statement of educational purpose that certifies who they are and that the federal student aid they may receive will only be used for educational purposes and for the cost of attending DDBS for the 2024-25 year. The text for the “Statement of Educational Purpose” is not suggested--**the exact language must be used and is provided on the next page**. The student's identification number is optional if it is collected elsewhere on the same page as the statement. After examining the statement, it may be converted into an electronic record. The electronic record or the original must be kept for at least the required Title IV record retention period.

A student who is unable to appear at DDBS must go to a notary public and sign the statement of educational purpose. They must then submit to DDBS that statement (again, with the “wet” signature), a certification from the notary that they appeared before the notary and presented a government-issued photo ID confirming their identity, and a copy of the same ID. Currently the Department does not authorize the use of online notary services as an alternative to traditional, in-person notary services.

The **REAL ID Act** affects people entering certain restricted areas where identification is required: federal facilities, nuclear power plants, and federally regulated commercial airplanes. Because there are currently no restrictions under the act on agencies accepting an ID that is not compliant with the act (typically one marked “not for federal identification”) for other purposes, such an ID is acceptable for verification of identity/statement of educational purpose. It must be a government-issued ID that has not expired and includes the student's photo and name.

Identity/Statement of Educational Purpose Statement

In addition to appearing in person and presenting identity documentation, the student must sign the Statement of Educational Purpose, using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

Statement of Educational Purpose

I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive

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will only be used for educational purposes and to pay the cost of attending for 2024–2025. (Name of Postsecondary Educational School) _____

(Student's Signature)

(Date) _____

(Student's ID Number)

2025-2026 INFORMATION TO BE VERIFIED

Standard Verification Group V1 - Verifiable Items

The verification activity will initially compare applicant data for accuracy and completeness and continue to resolve conflicting information. In this process DDBS requires verification of the following items:

For all applicants:

Family size

For non-tax filers:

Income earned from work

For tax filers:

Adjusted Gross Income (AGI)

U.S. income tax paid

Income earned from work

Education tax credits (American Opportunity Tax Credit and Lifetime Learning Tax Credit)

Other untaxed income reported on tax return, for example: untaxed portions of Individual Retirement Account (IRA) distributions, untaxed portions of pensions, IRA deductions and payments, tax-exempt interest income

Foreign Income Exempt from Federal Taxation

Groups V2, V3, and V6

Reserved for future use by ED

Custom Verification Group V4

Students must complete the Identity/Statement of Educational Purpose

Aggregate Verification Group V5

Students selected for this verification tracking group must satisfy both V1 and V4 requirements.

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Reporting Results for Verification Tracking Flags V4 and V5

Important: DDBS is required to report the outcome of completion of the Identity/Statement of Educational Purpose for applications with tracking flag V4 and V5. Boston Educational Network (BEN) is the third-party servicer for DDBS. BEN reports this information through FAA access to CPS Online (faaaccess.ed.gov) under the “Identity Verification Results” section.

How to Complete the Verification Process

DDBS will provide the student selected for verification with a DDBS Verification Worksheet. DDBS will send the worksheet through email to the email address on file for the student, and will follow-up with mailing a worksheet in the U.S. mail, if necessary. It is the student’s responsibility to submit the verification worksheet along with required documentation and applicable signature(s) promptly to the Financial Aid Office.

Financial Aid Direct Data Exchange (FA-DDX)

All students and contributors must provide consent and approval to have their federal tax information transferred directly into the FAFSA form via direct data exchange with the IRS. This federal tax information will be used to determine the student’s eligibility for federal student aid. If a student or required contributor doesn’t provide consent and approval, the student will not be eligible for federal student aid.

Tax Data Received from the FA-DDX and Manually Entered Information

Note: There will be instances where manual entry of tax information will still be required, even if a federal tax return was filed with the IRS. Foreign earned income exclusion amounts, for example, will not be transferred via the FA-DDX and will need to be entered manually. In addition, individuals who were married and filed jointly with the IRS and are no longer married to that spouse on the applicable tax return, or who have married a different spouse, will also be required to manually enter their income and tax information. Individuals who only file foreign tax returns will also be unable to use the FA-DDX since it does not link to foreign tax authorities. They will instead need to manually input their income and tax data by converting foreign currency to U.S. dollars and entering the resulting amounts in the comparable fields from U.S. tax returns, such as adjusted gross income, income tax paid, and any untaxed income.

Acceptable Documentation

If an applicant is a **tax filer** selected to verify any of the following information, DDBS must obtain the specified documentation:

Adjusted Gross Income (AGI), income earned from work, or U.S. income tax paid, untaxed portions of IRA distributions, untaxed portions of pensions, IRA deductions and payments, tax exempt income, education credits, and foreign income exempt from federal taxation
If transferred directly from the IRS and unchanged, these items do not need to be verified.
If information is not transferred from the IRS, the following documentation is sufficient for verification:

- (1) A transcript obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or

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commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or

(2) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.

(3) If the tax transcript or tax return contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution.

For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return— A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or a copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and a copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document.

For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022— (a) A signed statement listing the sources of any 2022 income and the amount of income from each source; (b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022; (c) A copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document; and (d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.

Note: An school may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When a school receives such information, it must be used to re-verify the income and tax information reported on the FAFSA.

If an applicant is a **non-tax filer** selected to verify income earned from work, DDDBS must obtain the specified documentation.

Income earned from work

The following documentation is sufficient for verification:

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(1) A signed and dated statement certifying— (a) That the individual is not required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year;

(2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN;

(3) A copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document; and

(4) Except for dependent students, verification of non-filing for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023.

Note: The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.

Family size

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024–2025 award year and the relationship of that family member to the applicant.

Note: Verification of family size is not required if—

For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or

For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.

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Other Information

If an applicant is selected to verify other information specified in the annual Federal Register notice, the applicant must provide the documentation specified for that information in the Federal Register notice.

Identity/Statement of Educational Purpose

An applicant must appear in person and present the following documentation to an institution authorized individual to verify the applicant's identity:

- (a) An unexpired valid government-issued photo identification such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport. DDBS must maintain an annotated copy of the unexpired valid government-issued photo identification that includes the date the identification was presented; and the name of DDBS authorized individual who reviewed the identification; and
- (b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

Statement of Educational Purpose

I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2024–2025. (Name of Postsecondary Educational School)

(Student's Signature)
(Date) _____
(Student's ID Number)

If an school determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide DDBS with— (a) A copy of an unexpired valid government-issued photo identification, such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and (b) An original notarized statement signed by the applicant using the exact language in the Statement of Educational Purpose, except that the student's identification number is optional if collected elsewhere on the same page as the statement.

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Updating FAFSA Information

Generally, a student cannot update FAFSA information that was correct as of the date the application was signed because the FAFSA is considered to be a “snapshot” of the family’s financial situation as of that date. For example, if a student’s family sold some stock after signing the FAFSA and spent the proceeds on an automobile or home improvement, the student cannot update the FAFSA to reflect a change in assets. After the FAFSA is signed, only certain items can be updated under the conditions listed below:

- (1) **Dependency Status Change:** If a student’s dependency status changes at any time during the award year, the student must update their FAFSA information. Students that are married after completing the FAFSA should contact the Financial Aid Office for further information.
- (2) **Verification of Household Size or Number in College:** An applicant whose FAFSA information is selected for verification of household size or number in college must update those items to be correct as of the date of verification.
- (3) **Marital Status Change:** DDBS may require a student to update FAFSA information under paragraph (1) or (2) of this section for a change in the student’s marital status if DDBS determines that the update is necessary to address an inequity or to reflect more accurately the student’s ability to pay. This update is reviewed on a case-by-case basis.

Note that in order to update the marital status for an already independent student during the award year, the student must be selected for verification (by ED or DDBS).

Correcting Errors on FAFSA Information

Although a student cannot update FAFSA information that was filed correctly, except under limited conditions as listed above, errors made on the original FAFSA must be corrected. As stated previously, to apply for federal student aid, a student submits a Free Application for Federal Student Aid (FAFSA) to the Central Processing System (CPS). Generally, the FAFSA is submitted through the online process and the student receives from the CPS an electronic summary of their processed FAFSA, known as the Student Aid Report (SAR). Upon receipt of the SAR, the student should review all information listed on the SAR and submit for processing any errors reported on the original FAFSA to the CPS.

A student must be notified if their Title IV eligibility has changed as a result of the completion of verification.

After Documentation is Complete

When all necessary verification documents have been obtained from the student, they should be compared to the Student Information Record (ISIR) that is being reviewed for payment.

Chapter 3 Student Eligibility

If all the student's information is correct and there are no outstanding issues or conflicting information, DDBS may award and disburse aid for which the student is eligible. If verification reveals errors or inconsistencies, the student may have to make corrections or update information.

The Director of Financial Aid must inform the prospect or student to do corrections on the fafsa.ed.gov website and eligibility must be re-calculated for Title IV funds. If the re-calculation does not change eligibility, no further action is required. If the corrections result in a change to the ISIR that will change the amount of Title IV funds, a corrected ISIR must be obtained. This can be done electronically through DDBS. All corrections due to verification requirements must be accomplished before an actual Financial Aid Offer is made. If the change to the award is made due to verification, the student will be notified by a revised Financial Aid Offer. No funds will be disbursed until corrections have been made. When the corrected ISIR is received, the student will be notified in person if their SAI and Title IV amounts change.

Threshold for Submitting Changes

After completing verification, DDBS may determine that certain data elements need to be corrected or updated. Changes to data resulting from verification must be submitted for reprocessing if they were to a non-dollar item or a single dollar item of \$25 or more. A non-dollar data item would be any field not presented in dollar values, such as household size or number in college.

If just one item meets the threshold for a required change, then all inaccurate items must be changed, including those that do not meet the threshold for required changes.

Federal Title IV Funds Disbursements

DDBS completes federal verification for CPS- or school-selected applicants as a requirement of completing a student's financial aid application. Federal Title IV funds will not be disbursed until verification is completed. In some instances, DDBS can make an interim disbursement of funds if it has no reason to believe that the application information is inaccurate. If DDBS makes an interim disbursement, the verification process must be completed prior to the disbursement of any additional funds. In all instances DDBS is liable for an interim disbursement if verification identifies an overpayment or the student fails to complete verification. DDBS does not make interim disbursements.

Student Responsibility

If the verification results do not justify aid already disbursed, the student is responsible for repaying all aid for which they are not eligible. Failure to meet the repayment obligation will result in the student being referred by DDBS to the U.S. Department of Education.

Completing the Process

A student selected for verification must complete it. DDBS has the authority, and in some instances is required, to withhold disbursement of any FSA funds until she does. Adopting this policy substantially reduces the incidence of overpayments.

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Notification to Students

DDBS will notify students in person and prior to enrollment, of the required verification documents they must submit within 30 days prior to enrollment. They will be given a verification worksheet that details which documents to submit. In the case of a current student, they must also be informed that disbursements of any FSA funds will be withheld until all documentation is submitted.

An applicant whose FAFSA information is selected for verification is required to complete verification before DDBS exercises any authority under section 479A(a) of the HEA to make changes to the applicant's cost of attendance or to the values of the data items required to calculate the SAI.

Chapter 3 Student Eligibility

Appendix A - Acceptable Documentation for Verification **2024-2025**

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FAFSA Information	Acceptable documentation
<p><i>Income information for tax filers</i></p> <p>(a) Adjusted Gross Income (AGI) (b) Income Earned From Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>Items a through h, if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for Item i, the following documentation is sufficient for verification:</p> <p>(1) A transcript¹ obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or</p> <p>(2) A copy of the income tax return¹ and the applicable schedules¹ that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.</p> <p>(3) If item d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p>
<p><i>Income information for tax filers with special circumstances</i></p> <p>(a) Adjusted Gross Income (AGI) (b) Income Earned from Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>(1) For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return—</p> <p>(a) A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or</p> <p>(b) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and</p> <p>(c) A copy of IRS Form W-2² for each source of 2022 employment income received or an equivalent document.²</p> <p>(2) For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022—</p> <p>(a) A signed statement listing the sources of any 2022 income and the amount of income from each source;</p> <p>(b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022;³</p> <p>(c) A copy of IRS Form W-2² for each source of 2022 employment income received or an equivalent document;² and</p> <p>(d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.</p> <p>(3) If d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p> <p><i>Note:</i> An institution may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When an institution receives such information, it must be used to reverify the income and tax information reported on the FAFSA.</p> <p>(4) For an individual who was the victim of IRS tax-related identity theft—</p> <ul style="list-style-type: none"> • A Tax Return DataBase View (TRDBV) transcript¹ obtained from the IRS; and • A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS has been made aware of the tax-related identity theft.

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FAFSA Information	Acceptable documentation
<p><i>Income information for non-tax filers</i> Income Earned from Work</p>	<p><i>Note:</i> Tax filers may inform the IRS of the tax-related identity theft and obtain a TRDBV transcript by calling the IRS's Identity Protection Specialized Unit (IPSU) at 1-800-908-4490. Unless the institution has reason to suspect the authenticity of the TRDBV transcript provided by the IRS, a signature or stamp or any other validation from the IRS is not needed.</p> <p>(5) For an individual who filed an amended income tax return with the IRS, a signed copy of the IRS Form 1040X that was filed with the IRS for tax year 2022 or documentation from the IRS that include the change(s) made to the tax filer's 2022 tax information, in addition to one of the following—</p> <ul style="list-style-type: none"> (a) Updated income and tax information from the IRS on an ISIR record with all tax information from the original tax return; (b) A transcript obtained from the IRS that lists 2022 tax account information of the tax filer(s); or (c) A signed copy of the 2022 IRS Form 1040 and the applicable schedules that were filed with the IRS. <p>For an individual who has not filed and, under IRS or other relevant tax authority rules (e.g., the Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia, a U.S. territory or commonwealth or a foreign government), is not required to file a 2022 income tax return—</p> <ul style="list-style-type: none"> (1) A signed and dated statement certifying— <ul style="list-style-type: none"> (a) That the individual is not required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year; (2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN; (3) A copy of IRS Form W-2² for each source of 2022 employment income received or an equivalent document²; and (4) Except for dependent students, verification of non-filing⁴ for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023. <p><i>Note:</i> The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.</p>
<p>Family Size</p>	<p>Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:</p> <p>A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024–2025 award year and the relationship of that family member to the applicant.</p> <p><i>Note:</i> Verification of family size is not required if—</p> <ul style="list-style-type: none"> • For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or • For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.
<p>Identity/Statement of Educational Purpose</p>	<p>(1) An applicant must appear in person and present the following documentation to an institutionally authorized individual to verify the applicant's identity:</p> <ul style="list-style-type: none"> (a) An unexpired valid government-issued photo identification⁵ such as, but not limited to, a driver's license, non-driver's identification card, other state-issued identification, or U.S. passport. The institution must maintain an annotated copy of the unexpired valid government-issued photo identification that includes— <ul style="list-style-type: none"> I. The date the identification was presented; and II. The name of the institutionally authorized individual who reviewed the identification; and

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FAFSA Information	Acceptable documentation
	<p>(b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:</p> <p><i>Statement of Educational Purpose</i> I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2024–2025. _____ (Name of Postsecondary Educational Institution)</p> <p>_____ (Student's Signature) (Date)</p> <p>_____ (Student's ID Number)</p> <p>(2) If an Institution determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide the institution with—</p> <p>(a) A copy of an unexpired valid government-issued photo identification,⁵ such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and</p> <p>(b) An original notarized statement signed by the applicant using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:</p> <p><i>Statement of Educational Purpose</i> I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending _____ for 2024–2025. _____ (Name of Postsecondary Educational Institution)</p> <p>_____ (Student's Signature) (Date)</p> <p>_____ (Student's ID Number)</p>

¹ This footnote applies, where applicable, whenever an income tax return, the applicable schedules, or transcript is mentioned in the above chart.

The copy of the 2022 income tax return must include the signature of the tax filer, or one of the filers of a joint income tax return, or the signed, stamped, typed, or printed name and address of the preparer of the income tax return and the preparer's Social Security number, Employer Identification Number, or Preparer Tax Identification Number.

For a tax filer who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, the institution must use the income information (converted to U.S. dollars) from the lines of that form that correspond most closely to the income information reported on a U.S. income tax return.

An individual who did not retain a copy of his or her 2022 tax account information, and for whom that information cannot be located by the IRS or other relevant tax authority, must submit to the institution—

- a. Copies of all IRS Form W-2s for each source of 2022 employment income or equivalent documents; or
- b. If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2022; and
- c. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2022 tax account information cannot be located; and
- d. A signed statement that indicates that the individual did not retain a copy of his or her 2022 tax account information.

If an individual who was the victim of IRS tax-related identity theft is unable to obtain a TRDBV, the institution may accept an equivalent document provided by the IRS or a copy of the signed 2022 income tax return the individual filed with the IRS.

² An individual who is required to submit an IRS Form W-2 or an equivalent document but did not maintain a copy should request a duplicate from the employer who issued the original or from the government agency that issued the equivalent document. If the individual is unable to obtain a duplicate W-2 or an equivalent document in a timely manner, the institution may permit that individual to provide a signed statement, in accordance with 34 CFR 668.57(a)(6), that includes—

- (a) The amount of income earned from work;
- (b) The source of that income; and
- (c) The reason why the IRS Form W-2, or an equivalent document, is not available in a timely manner.

³ For an individual who was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, an institution must accept a statement from the individual certifying that he or she has not filed an income tax return or a request for a filing extension because of that service.

⁴ If an individual is unable to obtain verification of non-filing from a relevant tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a signed statement certifying that the individual attempted to obtain the verification of non-filing from the relevant tax authority and was unable to obtain the required documentation.

⁵ An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

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The individual FAFSA items that an applicant must verify are based upon the Verification Tracking Group to which the applicant is assigned as outlined in the following chart.

Verification tracking flag	Verification tracking group name	FAFSA Information required to be verified
V1	Standard Verification Group	<p><i>Tax Filers</i></p> <ul style="list-style-type: none"> • Adjusted Gross Income. • Income Earned From Work. • U.S. Income Tax Paid. • Untaxed Portions of IRA Distributions. • Untaxed Portions of Pensions. • IRA Deductions and Payments. • Tax Exempt Interest Income. • Education Tax Credits. • Foreign Income Exempt from Federal Taxation. <p><i>Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Income Earned from Work. <p><i>Tax Filers and Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Family Size.
V2	Reserved	N/A.
V3	Reserved	N/A.
V4	Custom Verification Group	<ul style="list-style-type: none"> • Identity/Statement of Educational Purpose.
V5	Aggregate Verification Group	<p><i>Tax Filers</i></p> <ul style="list-style-type: none"> • Adjusted Gross Income. • Income Earned From Work. • U.S. Income Tax Paid. • Untaxed Portions of IRA Distributions. • Untaxed Portions of Pensions. • IRA Deductions and Payments. • Tax Exempt Interest Income. • Education Tax Credits. • Foreign Income Exempt from Federal Taxation. <p><i>Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Income Earned from Work. <p><i>Tax Filers and Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Family Size. • Identity/Statement of Educational Purpose.
V6	Reserved	N/A.

Other Sources for Detailed Information

We provide a more detailed discussion on the verification process in the following resources that will be available on the Knowledge Center web page at <https://fsapartners.ed.gov/knowledge-center>:

- *2024–2025 Application and Verification Guide.*
- *2024–2025 FAFSA Specifications Guide: Volume 6- ISIR Guide, Volume 7—Comment Codes.*
- *2024–2025 COD Technical Reference.*

• Program Integrity Information—Questions and Answers on Verification at www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html.

Accessible Format: On request to the program contact person listed under **FOR FURTHER INFORMATION CONTACT**, individuals with disabilities can obtain this document in an accessible format. The Department will provide the requestor with an accessible format that may include Rich Text Format (RTF) or text format (txt), a thumb drive, an MP3 file, braille, large print, audiotope, or compact disc or other accessible format.

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You may also access documents of the Department published in the **Federal Register** by using the article search feature at www.federalregister.gov. Specifically, through the advanced search feature at this site, you can limit your search to documents published by the Department.

Program Authority: 20 U.S.C. 1070a, 1070b–1070b–4, 1087a–1087j, and 20 U.S.C. 1087–51—1087–58.

Nasser H. Paydar,
Assistant Secretary for Postsecondary Education.
 [FR Doc. 2023–20211 Filed 9–18–23; 8:45 am]

BILLING CODE 4000–01–P

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

Combined Notice of Filings #1

Take notice that the Commission received the following exempt wholesale generator filings:

Docket Numbers: EG23–286–000.
Applicants: Earp Solar, LLC.
Description: Earp Solar, LLC submits Notice of Self-Certification of Exempt Wholesale Generator Status.
Filed Date: 9/13/23.
Accession Number: 20230913–5047.
Comment Date: 5 p.m. ET 10/4/23.
Docket Numbers: EG23–287–000.

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Appendix B - Acceptable Documentation for Verification **2025-2026**

FAFSA information	Acceptable documentation
<p><i>Income information for tax filers</i></p> <p>(a) Adjusted Gross Income (AGI)</p> <p>(b) Income Earned From Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions</p> <p>(f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits</p> <p>(i) Foreign Income Exempt from Federal Taxation</p> <p><i>Income information for tax filers with special circumstances.</i></p> <p>(a) Adjusted Gross Income (AGI)</p> <p>(b) Income Earned from Work (c) U.S. Income Tax Paid</p> <p>(d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments</p> <p>(g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>Items a through h, if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for item i, the following documentation is sufficient for verification:</p> <p>(1) A transcript¹ obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2023 tax account information of the tax filer; or</p> <p>(2) A copy of the income tax return¹ and the applicable schedules¹ that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2023 tax account information of the tax filer.</p> <p>(3) If item d or e contains a rollover, a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p> <p>(1) For a student, or the parent(s) of a dependent student, who filed a 2023 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2023 joint income tax return—</p> <p>(a) A transcript¹ obtained from the IRS or other relevant tax authority that lists 2023 tax account information of the tax filer(s); or</p> <p>(b) A copy of the income tax return¹ and the applicable schedules¹ that were filed with the IRS or other relevant tax authority that lists 2023 tax account information of the tax filer(s); and</p> <p>(c) A copy of IRS Form W-2² for each source of 2023 employment income received or an equivalent document.²</p> <p>(2) For an individual who is required to file a 2023 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2023—</p> <p>(a) A signed statement listing the sources of any 2023 income and the amount of income from each source;</p> <p>(b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2023;³</p> <p>(c) A copy of IRS Form W-2² for each source of 2023 employment income received or an equivalent document;² and</p>
FAFSA information	Acceptable documentation
	<p>(d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2023.</p> <p>(3) If d or e contains a rollover, a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p> <p><i>Note:</i> An institution may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript¹ from the IRS, or by submitting a copy of the income tax return¹ and the applicable schedules¹ that were filed with the IRS that lists 2023 tax account information. When an institution receives such information, it must be used to reverify the income and tax information reported on the FAFSA.</p>

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<p style="margin: 0;"><i>Income information for non-tax filers</i></p> <p style="margin: 0;">Income Earned from Work</p> <p style="margin: 0;">Family Size</p>	<p>(4) For an individual who was the victim of IRS tax-related identity theft—</p> <ul style="list-style-type: none"> • A copy of the signed 2023 income tax return¹ and applicable schedules¹ the individual filed with the IRS; and • An IRS 4674C letter (a letter from the IRS acknowledging the identity theft) or a statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and the IRS is aware of it. <p>(5) For an individual who filed an amended income tax return with the IRS, a signed copy of the IRS Form 1040X that was filed with the IRS for tax year 2023 or documentation from the IRS that include the change(s) made to the tax filer's 2023 tax information, in addition to one of the following—</p> <ul style="list-style-type: none"> (a) Income and tax information from the IRS on an ISIR record with all tax information from the original tax return; (b) A transcript obtained from the IRS that lists 2023 tax account information of the tax filer(s); or (c) A signed copy of the 2023 IRS Form 1040 and the applicable schedules that were filed with the IRS. <p>For an individual who has not filed and, under IRS or other relevant tax authority rules (e.g., the Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia, a U.S. territory or commonwealth or a foreign government), is not required to file a 2023 income tax return—</p> <ul style="list-style-type: none"> (1) A signed and dated statement certifying— <ul style="list-style-type: none"> (a) That the individual is not required to file a 2023 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2023 tax year; (2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), a signed and dated statement certifying that they do not have an SSN, ITIN, or EIN; (3) A copy of IRS Form W-2² for each source of 2023 employment income received or an equivalent document;² and (4) Except for dependent students, verification of non-filing⁴ for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2024. <p><i>Note:</i> The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2023 tax year.</p> <p>Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:</p> <p>A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2025–2026 award year and the relationship of that family member to the applicant.</p> <p><i>Note:</i> Verification of family size is not required if—</p> <ul style="list-style-type: none"> • For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three and the parents are married, remarried or unmarried and living together; or • For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two and the applicant is married or remarried; or • The applicant manually updated their family size and the number is the same as the family size derived from data transferred directly from the IRS.
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Chapter 3 Student Eligibility

Identity/Statement of Educational Purpose	<p>(1) An applicant must appear in person and present the following documentation to an institutionally authorized individual to verify the applicant's identity:</p> <ul style="list-style-type: none"> (a) An unexpired, valid, government-issued photo identification⁵ such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport. The institution must maintain an annotated copy of the unexpired valid government-issued photo identification that includes— <ul style="list-style-type: none"> i. The date the identification was presented; and ii. The name of the institutionally authorized individual who reviewed the identification; and (b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement: <p style="margin-left: 20px;">Statement of Educational Purpose I certify that I ___ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2025–2026. (Name of Postsecondary Educational Institution) (Student's Signature)___ (Date)___ (Student's ID Number)</p> <p>(2) If an institution determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide the institution with—</p> <ul style="list-style-type: none"> (a) A copy of an unexpired valid government-issued photo identification,⁵ such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and (b) An original notarized statement signed by the applicant using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement: <p style="margin-left: 20px;">Statement of Educational Purpose I certify that I ___ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending ___ for 2025–2026. (Name of Postsecondary Educational Institution) (Student's Signature)___ (Date)___ (Student's ID Number)</p>
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¹ This footnote is applicable whenever an income tax return, the related schedules, or transcript is mentioned in the above chart. The copy of the 2023 income tax return must include the signature of the tax filer, or one of the filers of a joint income tax return, or the signed, stamped, typed, or printed name and address of the preparer of the income tax return and the preparer's Social Security number, Employer Identification Number, or Preparer Tax Identification Number.

For a tax filer who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, the institution must use the income information (converted to U.S. dollars) from the lines of that form that correspond most closely to the income information reported on a U.S. income tax return.

An individual who did not retain a copy of his or her 2023 tax account information, and for whom that information cannot be located by the IRS or other relevant tax authority, must submit to the institution—

- a. Copies of all IRS Form W-2s for each source of 2023 employment income or equivalent documents; or
- b. If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2023; and
- c. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2023 tax account information cannot be located; and
- d. A signed statement that indicates that the individual did not retain a copy of his or her 2023 tax account information.

² An individual who is required to submit an IRS Form W-2 or an equivalent document but did not maintain a copy should request a duplicate from the employer who issued the original or from the government agency that issued the equivalent document. If the individual is unable to obtain a duplicate W-2 or an equivalent document in a timely manner, the institution may permit that individual to provide a signed statement, in accordance with 34 CFR 668.57(a)(6), that includes—

- (a) The amount of income earned from work;
- (b) The source of that income; and
- (c) The reason why the IRS Form W-2, or an equivalent document, is not available in a timely manner.

³ For an individual who was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, an institution must accept a statement from the individual certifying that he or she has not filed an income tax return or a request for a filing extension because of that service.

⁴ If an individual is unable to obtain verification of non-filing from a relevant tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a signed statement certifying that the individual attempted to obtain the verification of non-filing from the relevant tax authority and was unable to obtain the required documentation.

⁵ An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

Chapter 3 Student Eligibility

The individual FAFSA items that an applicant must verify are based upon the Verification Tracking Group to which the applicant is assigned as outlined in the following chart.

Verification tracking flag	Verification tracking group name	FAFSA information required to be verified
V1	Standard Verification Group	<p><i>Tax Filers</i></p> <ul style="list-style-type: none"> • Adjusted Gross Income. • Income Earned From Work. • U.S. Income Tax Paid. • Untaxed Portions of IRA Distributions. • Untaxed Portions of Pensions. • IRA Deductions and Payments. • Tax Exempt Interest Income. • Education Tax Credits. • Foreign Income Exempt from Federal Taxation. <p><i>Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Income Earned from Work. <p><i>Tax Filers and Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Family Size.
V2	Reserved	N/A.
V3	Reserved	N/A.
V4	Custom Verification Group	<ul style="list-style-type: none"> • Identity/Statement of Educational Purpose.
V5	Aggregate Verification Group	<p><i>Tax Filers</i></p> <ul style="list-style-type: none"> • Adjusted Gross Income. • Income Earned From Work. • U.S. Income Tax Paid. • Untaxed Portions of IRA Distributions. • Untaxed Portions of Pensions. • IRA Deductions and Payments. • Tax Exempt Interest Income. • Education Tax Credits. • Foreign Income Exempt from Federal Taxation. <p><i>Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Income Earned from Work. <p><i>Tax Filers and Non-Tax Filers</i></p> <ul style="list-style-type: none"> • Family Size. • Identity/Statement of Educational Purpose.
V6	Reserved	N/A.

Other Sources for Detailed Information

We provide a more detailed discussion on the verification process in the following resources that will be available on the Knowledge Center web page at <https://fsapartners.ed.gov/knowledge-center>:

- 2025–2026 Application and Verification Guide.
- 2025–2026 FAFSA Specifications Guide: Volume 6—ISIR Guide, Volume 7—Comment Codes.

- 2025–2026 COD Technical Reference.

- Program Integrity Information—Questions and Answers on Verification at www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html.

Accessible Format: On request to the program contact person listed under **FOR FURTHER INFORMATION CONTACT**, individuals with disabilities can obtain this document in an accessible format. The Department will provide the requestor with an accessible format that

may include Rich Text Format (RTF) or text format (txt), a thumb drive, an MP3 file, braille, large print, audiotape, or compact disc or other accessible format.

Electronic Access to This Document: The official version of this document is the document published in the **Federal Register**. You may access the official edition of the **Federal Register** and the Code of Federal Regulations at www.govinfo.gov. At this site you can view this document, as well as all other documents of this Department

Chapter 3 Student Eligibility

published in the **Federal Register**, in text or Portable Document Format (PDF). To use PDF, you must have Adobe Acrobat Reader, which is available free at the site.

You may also access documents of the Department published in the **Federal Register** by using the article search feature at www.federalregister.gov. Specifically, through the advanced search feature at this site, you can limit your search to documents published by the Department.

Program Authority: 20 U.S.C. 1070a, 1070b-1070b-4, 1087a-1087j, and 1087-51 through 1087-58.

Nasser H. Paydar,

Assistant Secretary, Office of Postsecondary Education.

[FR Doc. 2024-19786 Filed 9-3-24; 8:45 am]

BILLING CODE 4000-01-P

FOR FURTHER INFORMATION CONTACT: For specific questions related to collection activities, please contact Marcos Cerdeira, 202-453-5819.

SUPPLEMENTARY INFORMATION: The Department is especially interested in public comment addressing the following issues: (1) is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. Please note that written comments received in response to this notice will be considered public records.

Title of Collection: Rural, Insular, and

Dated: August 29, 2024.

Kun Mullan,

PRA Coordinator, Strategic Collections and Clearance, Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.

[FR Doc. 2024-19799 Filed 9-3-24; 8:45 am]

BILLING CODE 4000-01-P

DEPARTMENT OF ENERGY

Advanced Scientific Computing Advisory Committee

AGENCY: Office of Science, Department of Energy (DOE).

ACTION: Notice of open meeting.

SUMMARY: This notice announces an open meeting of the DOE Advanced Scientific Computing Advisory Committee (ASCAC). The Federal

Chapter 3 Student Eligibility

2024-2025 Suggested Verification Text

APPENDIX A 2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Student Tax Filers

Important Note: The instructions below apply to the student and spouse (if the student is married). Notify the financial aid office if the student or spouse filed separate IRS income tax returns for 2022 or had a change in marital status after December 31, 2022.

Instructions: Complete this section if the student and spouse filed or will file a 2022 IRS income tax return(s). As part of federal student aid eligibility, students, and spouses (as appropriate), will be required to consent and approve sharing and importing income and tax information from the IRS to the FAFSA form, even if the attempt to obtain or use such data is ineffective. In other words, if the student and spouse filed separate 2022 IRS income tax returns, both must provide consent and approval to share and import income and tax information from the IRS. In most cases, no further documentation is needed to verify 2022 income information that was transferred into the student's FAFSA using income and tax information directly from the IRS.

If 2022 income tax return information for the student (or spouse, if applicable) was not available or could not be used, the student should provide the institution with a **2022 IRS Tax Return Transcript(s)** or a **signed copy of the 2022 income tax return and applicable schedules**.

A **2022 IRS Tax Return Transcript** may be obtained through:

- **Get Transcript by Mail** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request.
- **Get Transcript Online** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication.
- **Automated Telephone Request** – 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request.
- **Paper Request Form** – IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Parent Tax Filers

Important Note: The instructions below apply to each parent included in the household. Notify the financial aid office if the parents filed separate IRS income tax returns for 2022 or had a change in marital status after December 31, 2022.

Instructions: Complete this section if the parents filed or will file a 2022 IRS income tax return(s). As part of federal student aid eligibility, parents will be required to consent and approve sharing and importing income and tax information from the IRS to the FAFSA form, even if the attempt to obtain or use such data is ineffective. In other words, if the parents filed separate 2022 IRS income tax returns, both must provide consent and approval to share and import income and tax information from the IRS. In most cases, no further documentation is needed to verify 2022 income information that was transferred into the student's FAFSA using income and tax information directly from the IRS.

If 2022 income tax return information for the parents was not available or could not be used, the parents should provide the institution with a **2022 IRS Tax Return Transcript(s)** or a **signed copy of the 2022 income tax return and applicable schedules**.

A 2022 IRS Tax Return Transcript may be obtained through:

- **Get Transcript by Mail** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request.
- **Get Transcript Online** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication.
- **Automated Telephone Request** – 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request.
- **Paper Request Form** – IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Individuals Granted a Filing Extension by the IRS

An individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022, must provide:

- A signed statement listing the sources of any 2022 income and the amount of income from each source;
- A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022;
- A copy of IRS Form W-2 for each source of employment income received or an equivalent document for tax year 2022; and
- If self-employed, a signed statement certifying the amount of the individual's Adjusted Gross Income (AGI) and the U.S. income tax paid for tax year 2022.

Individuals Who Filed an Amended IRS Income Tax Return

An individual who filed an amended IRS income tax return for tax year 2022 must provide a signed copy of the 2022 IRS Form 1040X, "Amended U.S. Individual Income Tax Return," that was filed with the IRS or documentation from the IRS that include the change(s) made by the IRS, in addition to one of the following:

- Updated income and tax information from the IRS on an ISIR record with all tax information from the original tax return;
- A **2022 IRS Tax Return Transcript** (that will only include information from the original tax return and does not have to be signed), or any other IRS tax transcript(s) that includes all of the income and tax information required to be verified; or
- A signed copy of the 2022 IRS Form 1040 and the applicable schedules that were filed with the IRS.

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Individuals Who Were Victims of IRS Tax-Related Identity Theft

An individual who was the victim of IRS tax-related identity theft must provide:

- A Tax Return DataBase View (TRDBV) transcript obtained from the IRS or, if unable to obtain a TRDBV, an equivalent document provided by the IRS or a copy of the signed 2022 income tax return and applicable schedules the individual filed with the IRS; **and**
- A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS is aware of the tax-related identity theft.

Individuals Who Filed Non-IRS Income Tax Returns

- A tax filer who filed an income tax return with a tax authority other than the IRS may provide a signed copy of his or her income tax return that was filed with the relevant tax authority. However, if we question the accuracy of the information on the signed copy of the income tax return, the tax filer must provide us with a copy of the tax account information issued by the relevant tax authority before verification can be completed.

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Student Non-tax Filers

The instructions and certifications below apply to the student and spouse (if the student is married.) Complete this section if the student and spouse will not file and are not required to file a 2022 income tax return with the IRS.

Check the boxes that apply:

- The student and spouse were not employed and had no income earned from work in 2022.
- The student and/or spouse were employed in 2022 and have listed below the names of all employers, the amount earned from each employer in 2022, and whether an IRS W-2 form or an equivalent document is provided. [Provide copies of all 2022 IRS W-2 forms issued to the student and spouse by their employers]. List every employer even if the employer did not issue an IRS W-2 form.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Employer's Name	IRS W-2 or an Equivalent Document Provided?	Annual Amount Earned in 2022
<i>(Example) ABC's Auto Body Shop</i>	Yes	\$4,500.00
Total Amount of Income Earned From Work		\$

Provide a signed and dated statement certifying that the individual has not filed and is not required to file a 2022 income tax return, as well as the sources of 2022 income earned from work and the amount of income from each source.

- ___ Check here if non-filing statement is signed and dated.
___ Check here if non-filing statement will be provided later.

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Parent Non-tax Filers

The instructions and certifications below apply to each parent included in the household. Complete this section if the parents will not file and are not required to file a 2022 income tax return with the IRS.

Check the box that applies:

- Neither parent was employed, and neither had income earned from work in 2022.
- One or both parents were employed in 2022 and have listed below the names of all employers, the amount earned from each employer in 2022, and whether an IRS W-2 form or an equivalent document is provided. [Provide copies of all 2022 IRS W-2 forms issued to the parents by their employers]. List every employer even if the employer did not issue an IRS W-2 form.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Employer's Name	IRS W-2 or an Equivalent Document Provided?	Annual Amount Earned in 2022
<i>(Example) ABC's Auto Body Shop</i>	Yes	\$4,500.00
Total Amount of Income Earned From Work		\$

Provide a signed and dated statement certifying that the individual has not filed and is not required to file a 2022 income tax return, as well as the sources of 2022 income earned from work and the amount of income from each source.

- Check here if non-filing statement is signed and dated.
 Check here if non-filing statement will be provided later.

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Family Size (Independent Student)

Family Size - Includes the following:

- The student.
- The student's spouse, if applicable.
- The student's dependent children if the following are true:
 - They live with the student (or live apart because of college enrollment);
 - They receive more than half of their support from the student; and
 - They will continue to receive more than half their support from the student during the award year.
- Other persons if the following are true:
 - They live with the student;
 - They receive more than half of their support from the student; and
 - They will continue to receive more than half their support from the student during the award year.

The provided criteria for "dependent children" or "other persons" align with the requirement that family size align with whom the student could claim as a dependent on a U.S. tax return if the student were to file a U.S tax return at the time of completing the 2024-2025 FAFSA. As a result, the student should not include any unborn children in the family size.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Full Name	Age	Relationship
		<i>Self</i>

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Family Size (Dependent Student)

Family Size - Includes the following:

- The student.
- The student's parents, even if the student is not living with them. Exclude a parent who has died or is not living in the household because of separation or divorce. Include a parent who is on active duty in the U.S. Armed Forces apart from the family.
- The student's siblings if the following are true:
 - They live with the student's parents (or live apart because of college enrollment),
 - They receive more than half of their support from the student's parents, and
 - They will continue to receive more than half their support from the student's parents during the award year.
- Other persons if the following are true:
 - They live with the student's parents,
 - They receive more than half of their support from the student's parents, and
 - They will continue to receive more than half their support from the student's parents during the award year.

The provided criteria for "dependent children" or "other persons" align with the requirement that family size align with whom the parent could claim as a dependent on a U.S. tax return if the parent were to file a U.S tax return at the time of completing the 2024-2025 FAFSA. As a result, the parent should not include any unborn children in the family size.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Full Name	Age	Relationship
		<i>Self</i>

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Identity and Statement of Educational Purpose (To Be Signed at the Institution)

The student must appear in person at _____ to
(Name of Postsecondary Educational Institution)

verify his or her identity by presenting an unexpired valid government-issued photo identification (ID), such as, but not limited to, a driver's license, other state-issued ID, or passport. The institution will maintain a copy of the student's photo ID that is annotated by the institution with the date it was received and reviewed, and the name of the official at the institution authorized to receive and review the student's ID.

In addition, the student must sign, in the presence of the institutional official, the Statement of Educational Purpose provided below.

Identity and Statement of Educational Purpose (To Be Signed in the Presence of a Notary)

If the student is unable to appear in person at _____
(Name of Postsecondary Educational Institution)

to verify his or her identity, the student must provide to the institution:

- (a) A copy of the unexpired valid government-issued photo identification (ID) that is acknowledged in the notary statement below, or that is presented to a notary, such as, but not limited to, a driver's license, other state-issued ID, or passport; and
- (b) The original Statement of Educational Purpose provided below, which must be notarized. If the notary statement appears on a separate page than the Statement of Educational Purpose, there must be a clear indication that the Statement of Educational Purpose was the document notarized.

Statement of Educational Purpose

I certify that I _____ am the individual signing
(Print Student's Name)

this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending _____ for 2024–2025.
(Name of Postsecondary Educational Institution)

(Student's Signature) (Date)

(Student's ID Number)

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Sample of a Notary's Certificate of Acknowledgement

Notary's certification may vary by State

State of _____

City/County of _____

On _____, before me, _____,

(Date)

(Notary's name)

personally appeared, _____, and proved to me

(Printed name of signer)

because of satisfactory evidence of identification _____

(Type of unexpired government-issued photo
ID provided)

to be the above-named person who signed the foregoing instrument.

WITNESS my hand and official seal

(seal)

(Notary signature)

My commission expires on _____

(Date)

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Certification and Signature (Independent Student)

Certification and Signature

Each person signing below certifies that all of the information reported is complete and correct.

WARNING: If you purposely give false or misleading information, you may be fined, sent to prison, or both.

Print Student's Name

Student's ID Number

Student's Signature (Required)

Date

Spouse's Signature (Optional)

Date

Chapter 3 Student Eligibility

APPENDIX A 2024–2025 Suggested Verification Text

Certifications and Signatures (Dependent Student)

Certifications and Signatures

Each person signing below certifies that all of the information reported is complete and correct. The student and one parent whose information was reported on the FAFSA must sign and date.

WARNING: If you purposely give false or misleading information, you may be fined, sent to prison, or both.

Print Student's Name

Student's ID Number

Student's Signature (Required)


Date

Parent's Signature (Required)

Date

Chapter 4 Packaging

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FINANCIAL AID OVERVIEW

Financial Aid Objective

Our Financial Aid objective is to provide every student with the opportunity to apply for all financial assistance available to successfully complete their training at our School.

Financial Aid Interview

The Financial Aid Office performs the following functions during the interview:

1. Provides information regarding the application process and eligibility criteria for all of the programs which are available,
2. Assists with the completion of the application forms, if needed,
3. Documents that the student meets the general eligibility criteria for participating in the programs, and
4. Assists in the estimation of the amounts of financial aid and determines sources of financial aid that will comprise the total award package.

Student Eligibility

In order for a student to be eligible to receive aid from Federal financial aid programs they:

1. Must be enrolled or accepted for enrollment as a *regular student* in an eligible program of study and pursuing a degree/certificate/other credential;
2. Must have a valid social security number unless you are from the Republic of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau.
3. Must have the recognized equivalent of a high school diploma, either by having a High School Diploma or General Educational Development (GED) certificate, or by completing a high school education in a homeschool setting approved under state law. For additional information please review the High School Completion Verification Policy/Procedure.

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4. Be registered with Selective Service, if they are a male (men must register between the ages of 18 and 25). Men exempted from the requirement to register include:
 - Males currently in the armed services and on active duty (this exception does not apply to members of the Reserve and National Guard who are not on active duty);
 - Males who are not yet 18 at the time that they complete their application (an update is not required during the year, even if a student turns 18 after completing the application);
 - Males born before 1960;
 - Citizens of the Republic of Palau, the Republic of the Marshall Islands, or the Federated States of Micronesia;
 - Noncitizens that first entered the U.S. as lawful non-immigrants on a valid visa and remained in the U.S. on the terms of that visa until after they turned 26.
 - Students who have questions about Selective Service registration may contact the Selective Service at 1-847-688-6888.
5. Must have completed a FAFSA and DDBS must have a current ISIR to start the initial eligibility process.
6. Must sign certifying statements on the FAFSA stating that they:
 - Are not in **default** on a federal student loan,
 - Do not owe a refund on a federal grant and
 - Will use federal student aid only for educational purposes.
7. Must maintain Satisfactory Academic Progress (SAP) while they are attending college or a career school.
8. Must be enrolled at least half-time to receive assistance from the Direct Loan Program.
9. The Pell Grant program does not require half time enrollment, but the student enrollment status does affect the amount of Pell a student may receive. A student may receive Pell for a total of 12 payment periods or 600%. Once the student has reached this limit, no further Pell may be received.
10. Incarcerated students who are serving a criminal sentence in a federal, state, or local penitentiary, prison, jail, reformatory, work farm, or similar correctional institution have limited financial aid eligibility depending on the type of institution they are incarcerated in, as students are not considered to be incarcerated if in a halfway house or home detention or is sentenced to serve only weekends. Incarcerated students are not eligible for FSA loans but are eligible for Federal Pell Grants if not incarcerated in a federal or state penal institution.

Citizenship

In addition to the above requirements, in order for a student to be eligible to receive aid from Federal financial aid programs they must either be a U.S. citizen or national, or an eligible non-citizen.

The ISIR serves as documentation to prove the student's eligible non-citizenship status. If the ISIR shows there was not an INS match, the Financial Aid Office sends copies of the documents the student provides to the INS, along with a G-845 (for Secondary Confirmation). The Financial Aid Office also sends notification to the student to provide eligibility documentation within 30 days. DDBS may approve the disbursement of funds

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based on the determination that the student has submitted documents to support the student's claim to be a citizen or eligible non-citizen, and has no other documentation that conflicts with the immigration status documentation submitted.

If after the funds are disbursed, the Financial Aid Office learns that the student is NOT a citizen, or eligible non-citizen, the funds must be returned as follows:

1. If the Financial Aid Office followed all required procedures, and had no reason to believe that the documents submitted to DDBS did not support the student's claim to be an eligible noncitizen, the student is liable.
2. The Financial Aid Office must make a reasonable effort to contact the student, and to collect the amount that was disbursed in error.
3. If the Financial Aid Office makes an error in determining that a student is an eligible non-citizen, then DDBS is liable.
4. Citizenship or eligible non-citizen documents may be used in later award years if the documents have not expired.

For information on secondary and third-step confirmation verification of citizenship, see chapter 3 under "Documentation."

Acceptable Citizen and Non-citizen Statuses

1. Be a U.S. citizen or U.S. national - You are a U.S. citizen if you were born in the United States or certain U.S. territories, if you were born abroad to parents who are U.S. citizens, or if you have obtained citizenship status through naturalization. If you were born in American Samoa or Swains Island, then you are a U.S. national.
2. Have a green card - You are eligible if you have a Form I-551, I-151, or I-551C, also known as a green card, showing you are a U.S. permanent resident.
3. Have an Arrival-Departure Record - Your Arrival-Departure Record (I-94) from U.S. Citizenship and Immigration Services must show one of the following:
 - Refugee
 - Asylum Granted
 - Cuban-Haitian Entrant (Status Pending)
 - Conditional Entrant (valid only if issued before April 1, 1980)
 - Parolee
4. Have battered immigrant status - You are designated as a "battered immigrant-qualified alien" if you are a victim of abuse by your citizen or permanent resident spouse, or you are the child of a person designated as such under the Violence Against Women Act.
5. Have a "T-Visa" - You are eligible if you have a T-visa or a parent with a T-1 visa.
6. "U-Visa" holders are not designated as qualified aliens under the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), and are therefore not eligible for Title IV, HEA program funds. However, U-Visa holders may convert to lawful permanent resident (LPR) status after they have physically been present in the United States for a continuous period of at least three years after the date of admission given on their U-Visa.
 - Once LPR status has been granted, the holder of LPR status becomes a qualified

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alien under the PRWORA (see above), and thus potentially eligible for Title IV, HEA funds (assuming they meet all other eligibility requirements, for example, being enrolled as a regular student in an eligible program, having a high-school diploma or its recognized equivalent, having a Social Security number.)

Student Ineligibility

A student is not eligible for Federal financial aid if they:

1. Are enrolled in an elementary or secondary school,
2. Are in default on a student loan, or owe a refund on a student grant from the Title IV programs,
3. Have borrowed in excess of the annual or aggregate loan limits for the financial aid loan programs, or
4. Are enrolled in a remedial program.

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Citizenship and Immigration Status Procedure

Director of Financial Aid

(1) Obtain from the student one (1) of the following:

- A copy of the student's birth certificate showing that the student was born in the United States, which includes Puerto Rico (on or after January 13, 1941), Guam, the U.S. Virgin Islands (on or after January 17, 1917), American Samoa, Swains Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats residing in the U.S. If a student has a birth certificate from a U.S. jurisdiction showing that the student was born abroad (i.e., not in the U.S. or its territories), that birth certificate is not acceptable documentation.
- A U.S. passport, current or expired, (except "limited" passports, which are typically issued for short periods such as a year and which don't receive as much scrutiny as a regular passport when applying). In the case of nationals who are not citizens, the passport will be stamped "Noncitizen National." Five-year-duration U.S. passports (commonly issued to younger students) are considered acceptable documentation and are not considered "limited". Passport cards are also acceptable; however, one-year-duration U.S. passports are NOT acceptable documentation.
- The State Department issues a wallet-sized passport card that can only be used for land and sea travel between the United States and Canada, Mexico, the Caribbean, and Bermuda. It is adjudicated to the same standards as the passport book and is therefore a fully valid attestation of the U.S. citizenship and identity of the bearer.
- A copy of Form FS-240 (Consular Report of Birth Abroad), FS-545 (Certificate of birth issued by a Foreign Service post), or DS-1350 (Certification of Report of Birth). These are State Department documents.
- A Certificate of Citizenship (N-560 or N-561) issued by USCIS to individuals who derive U.S. citizenship through a parent.
- A Certificate of Naturalization (N-550 or N-570) issued by USCIS (or, prior to 1991, a federal or state court), or through administrative naturalization after December 1990 to those who are individually naturalized.

(2) ISIR serves as documentation to prove the student's eligible non-citizenship status. Review ISIR for determination of non-citizenship status;

(3) Request appropriate documentation from student;

(4) Review documentation submitted by student;

(5) Provide copies of these procedures to the student;

Within 10 business days after the student submits immigration status documentation, complete the request portion of the Immigration and Naturalization Service (INS) Document Verification Request Form G-845, initiating Secondary Confirmation

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If after the funds are disbursed, the Financial Aid Office learns that the student is NOT a citizen, or eligible non-citizen, the funds must be returned as follows:

- If the Financial Aid Office followed all required procedures, and had no reason to believe that the documents submitted to DDBS did not support the student's claim to be an eligible noncitizen, the student is liable.
- The Financial Aid Office must make a reasonable effort to contact the student, and to collect the amount that was disbursed in error.
- If the Financial Aid Office makes an error in determining that a student is an eligible non-citizen, DDBS is liable.
- Citizenship or eligible non-citizen documents may be used in later award years if the documents have not expired.

For information on secondary and third-step confirmation verification of citizenship, see Chapter 3 under "Documentation."

BASIC PACKAGING CONCEPTS

Policy Reason

"Packaging" is the term used to describe the process of determining a student's eligibility for federal student aid without exceeding the student's financial need or the cost of attendance (COA). How this is achieved depends on several variables:

- The student's cost of attendance, EFC, and financial need;
- The federal student aid programs offered at your school and the regulatory limits on those programs;
- The amount of any aid the student is receiving from DDBS and/or other sources;
- The student's enrollment status;
- Institutional policies.

Estimated Financial Assistance

Estimated Financial Assistance (EFA) is the amount of federal, state, institutional, and private financial assistance a school estimates a student will receive.

As part of a packaging calculation, it is the aid received, or expected to receive, during a payment period of enrollment.

EFA includes sources of support that a student receives as a result of being a student. Some examples include:

- Pell Grants
- Educational loans
- Grants and scholarships
- Tuition and fee waivers

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- Net earnings from need-based employment
- Fellowships and assistantships
- Employer tuition reimbursement

Treatment of VA Educational Benefits

VA educational benefits are not treated as estimated financial assistance (EFA). Veterans' educational benefits are also not to be counted as income, and therefore are not reported as income on the FAFSA.

Packaging and Awarding Procedure

Date of Last Revision: 3/26/2025

Admissions Coordinator/Business Center Liaison

- Interviews prospective student;
- Informs the student of all Title IV financial aid programs, including the maximum loan eligibility available for the student's program of study.

Director of Financial Aid

- Meets with prospective student and family
- Informs the student of all Title IV financial aid programs, including the maximum loan eligibility available for the student's program of study.
- Explains student (and parent) loan obligations;
- Reviews student's ISIR;
- Resolves all Title IV eligibility requirements including, but not limited to:
 - Comment Codes ("C-codes) have been satisfactorily resolved;
 - Verification process has been completed, as required;
 - Any conflicting information has been resolved.
- With the consent of the student, forwards the request for aid to the Boston Educational Network;
- Submits a student aid profile into the BEN software system;
- Enters correct Title IV financial aid awards into the student aid profile;
- Informs student of their rights, requirements and responsibilities in accepting the aid package;
- Provides student enrollment data to the National Student Loan Data System (NSLDS) and
- Reports students who transfer to DDBS during the same award year in which they have received aid from another institution to the NSLDS transfer student monitoring list.

Third-Party Servicer (BEN)

- Based on the information submitted by DDBS, the student ISIR and following ED awarding regulations, BEN develops a financial aid notification for each student.
- Does not award or disburse any Title IV aid for an award year until the student has satisfied all other eligibility requirements

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- Evaluates a numerous specific factors when determining the Title IV aid that the student qualifies for. Some of the main factors include the student's:
 - Program of study;
 - Dependency status;
 - Student Aid Index (SAI);
 - Prior Title IV aid received (from NSLDS).



ACADEMIC YEAR AND PAYMENT PERIOD

Academic Year Definition Policy

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

Academic Year Procedure

Business Center Liaison/Admissions Coordinator

- Communicates to students what an academic year is in clock hours and weeks.

Director of Financial Aid

- Communicates to students what an academic year is in clock hours and weeks;
- Updates student profile when appropriate;
- Notifies BEN when any information listed on the student profile needs to be updated. This includes but is not limited to:
 - Change in the student's program;
 - Change in schedule;
 - Change in the student's start date;
 - Change in enrollment schedule.
- Provides BEN with the most current and accurate published program length for each program's schedules to ensure the accuracy of the data that BEN is reporting to COD upon origination of each loan record;
- Notifies BEN of any changes to the program length and/or program schedule
- Completes BEN's Notice of Change in Direct Student Costs form (located under the Compliance section of the Downloadable Resources of DDBS portal) which collects the published program length for each schedule of the program. This will ensure accurate information is being reported to COD and NSLDS to satisfy this ED reporting requirement.
- Works with BEN to resolve any discrepancies in reporting in an effort to provide accurate information to COD and NSLDS.
- Annually creates the Class Schedule list with start and end dates, scheduled breaks, etc. for the upcoming calendar year

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Third-Party Servicer (BEN)

- Reviews all updates to student profiles and
- Re-awards the student and
- Updates the student's information in BEN's internal system
- Reports any necessary changes to the ED systems (COD). This will ensure that the student's financial aid is accurately reported to COD and NSLDS.

DDBS has published program lengths based on required program length, student schedules and DDBS calendar. Loan period dates are provided to BEN when a student profile is created based on program length and student schedule.

It is DDBS' responsibility to update the students' profile to notify BEN when any information listed on the profile needs to be updated. This includes but is not limited to a change in the students' program, change in schedule, a change in the student's start date, change in enrollment schedule, etc. BEN will review this updated information and re-award the student and update the student's information in BEN's internal system and report any necessary changes to the USDE systems (COD). This will ensure that the student's financial aid is accurately reported to COD and NSLDS.

It is DDBS' responsibility to provide BEN with the most current and accurate published program length for each of DDBS' program schedules to ensure the accuracy of the data that BEN is reporting to COD upon origination of each loan record. It is also DDBS' responsibility to notify BEN of any changes to the program length and/or program schedule. DDBS will notify BEN by completing BEN's Notice of Change in Direct Student Costs form (located under the Compliance section of the Downloadable Resources of DDBS portal) which collects the published program length for each schedule of the program. This will ensure accurate information is being reported to COD and NSLDS to satisfy this USDE reporting requirement.

DDBS will notify BEN when DDBS believes that the information being reported to COD and/or NSLDS is not accurate. BEN and DDBS will work together to resolve any discrepancies in an effort to provide accurate information to COD and NSLDS.

Each year in July, start dates, end dates and scheduled breaks are created for the upcoming calendar year. This is then used when creating a profile in BEN to determine the loan period dates. A start and end date chart are then created. See chapter 1 for the most up-to-date Class Schedule.

The definition of the Academic Year for this institution is 900 clock hours and 26 weeks.

An academic year is 900 clock hours and 26 weeks long for the Cosmetology program.

An academic year is 750 clock hours and 23 weeks long for the Esthetics and Advanced Esthetics programs.

The Cosmetology program is 1500 clock hours and 45 calendar weeks long for full-time students and 66 weeks long for part-time students.

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The Esthetics and Advanced Esthetics programs are 750 clock hours and 23 calendar weeks long for full-time students and 35 weeks long for part-time students.

Academic Year Requirements

Every eligible program must have a defined academic year. The academic year is one component used in determining a student's eligibility for Title IV aid. A school may have different academic years for different academic programs. In some cases, the definition *must* be different, such as in the case of a clock-hour program and a credit-hour program. For FSA purposes, the academic year is defined in weeks of instructional time and for undergraduate programs in credit or clock-hours. The program's academic year does not have to coincide with DDBS's academic calendar.

Weeks of Instructional Time in an Academic Year

The minimum standard for weeks of instructional time:

- For a program offered in clock hours, the academic year must include at least 26 weeks of instructional time.

The minimum standards for weeks of instructional time described above apply to both undergraduate and graduate or professional programs.

The number of weeks of instructional time is based on the period that generally begins on the first day of classes in the academic year and ends on the last day of classes or the last day of examinations, whichever is later.

Clock-hours in an Academic Year

For *undergraduate* educational programs, the law and regulations set the following minimum standards for coursework earned by a full-time student in an academic year:

- 900 clock-hours for a program measured in clock-hours.

For *graduate and professional* programs, there is no minimum hour component to the definition of an academic year.

Academic Calendars & Non-terms

If a program measures progress in clock-hours, it is always treated as a non-term program.

Payment Periods

The payment period is applicable to all FSA programs except FWS. For example, FSA program disbursements (except FWS payments) must be made on a payment period basis. Another example is that a student's satisfactory academic progress (SAP) evaluation must correspond with the end of a payment period.

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Clock-hour and Non-term Programs

For all clock-hour programs and for credit-hour programs that do not have academic terms, payment periods are defined as described below. As noted earlier, these same payment period requirements also apply when disbursing Direct Loans to students enrolled in programs with nonstandard terms that are not substantially equal in length.

If you are determining the payment periods for a program for which one of the measures (either clock or credit-hours or length of instructional time) is less than an academic year and the other measurement is not, the program is considered less than an academic year in length, and you follow the payment period rules below for a program that is one academic year or less in length.

If the program is one academic year or less in length:

- The first payment period is the period in which the student successfully completes half of the credit or clock-hours AND half of the weeks of instructional time in the program.
- The second payment period is the period in which the student completes the remainder of the program.

If the program is more than one academic year in length:

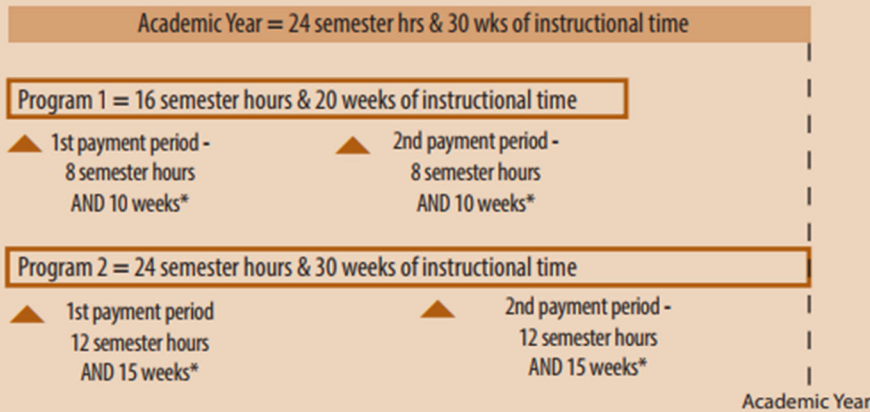
- For the first academic year of the program and for any subsequent full academic year, follow the payment period rules above for a program that is one academic year or less in length, substituting “academic year” for “program.”
- For any remaining portion of a program that is more than half of an academic year (as measured in both clock or credit hours and weeks of instructional time), but less than a full academic year—
 - The first payment period is the period in which the student successfully completes half of the credit or clock-hours AND half of the weeks of instructional time in the remaining portion of the program; and
 - The second payment period is the period of time in which the student successfully completes the remainder of the program.
 - For any remaining portion of a program that is half of an academic year or less, the payment period is the remainder of the program.
- For any remaining portion of a program that is half of an academic year or less, the payment period is the remainder of the program.

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Examples

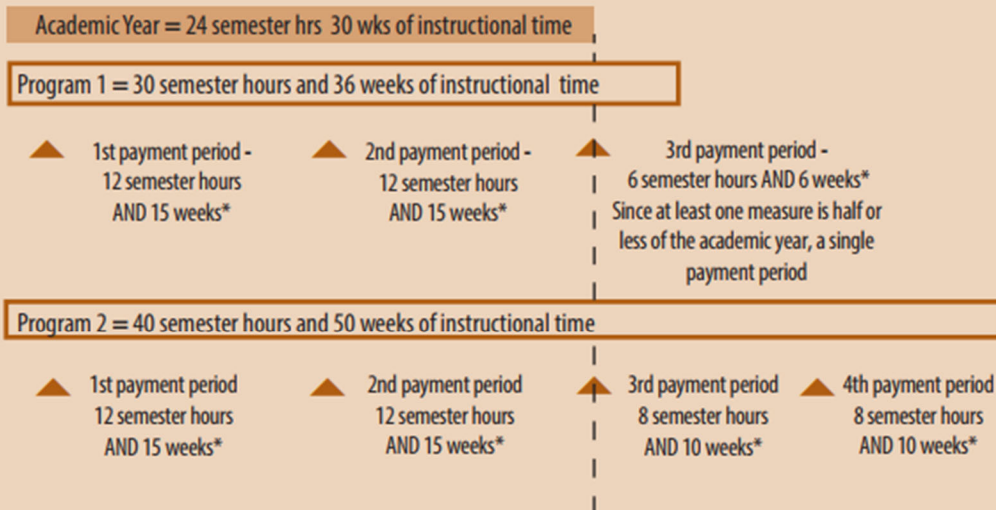
Non-term Programs—One Academic Year or Less

In both of these examples, the school defines the academic year for the program as 24 semester hours and 30 weeks of instructional time. The first program is less than an academic year; the second program is a full academic year.



Non-term Programs—More than an Academic Year

In both of these examples, the school defines the academic year for the program as 24 semester hours and 30 weeks of instructional time. The first program is an academic year with a remaining portion less than half of an academic year; the second program is an academic year with a remaining portion greater than half of an academic year.



*Weeks of instructional time.

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Progression to Next Payment Period Based on Completion of Hours and Weeks

There are two cases where you must use credit or clock-hours and weeks of instructional time to determine the length of the payment period:

- Clock-hour and non-term credit-hour programs, and
- For Direct Loans, programs with nonstandard terms that are not substantially equal in length.

Note: For these programs, a new payment period for purposes of making the next disbursement of a grant or loan cannot begin until the student successfully completes both the credit or clock-hours and the weeks of instruction in the previous payment period. A student “successfully completes” credit or clock-hours if your school considers the student to have passed the coursework associated with those hours.

The Pell Grant amount that a student is eligible to receive for a payment period is determined based on the number of hours and weeks in the scheduled payment periods for a program that are established at the beginning of the program based on the program length. These scheduled payment periods do not change, regardless of a student’s rate of progression through a clock-hour or non-term credit hour program. This means that if a student completes additional weeks of instructional time or hours while completing the other measure of a payment period, the actual number of weeks or hours that the student completes before a disbursement can be made for the next payment period may differ from the number of weeks or hours in the scheduled payment period used to determine the student’s grant amount for the payment period.

Important: Although a student’s completion of additional weeks or hours in a payment period has no effect on the scheduled payment periods for purposes of determining Pell Grant payment amounts, an undergraduate student who accelerates in a clock-hour or non-term credit-hour program may have reduced Direct Loan eligibility in the final academic year of a program. Specifically, if a student enrolled in a program that is greater than one academic year in length completes additional clock or credit hours prior to the final academic year of the program, this may result in a final period of study that contains fewer clock or credit hours than the number of hours in the program’s defined academic year. In this circumstance, the Direct Loan annual loan limit for an undergraduate student must be prorated (reduced).

Prior-Year Charges Allowance Policy

Date of Last Revision: 3/26/2025

You may include up to \$200 for prior-year charges in one or more payment periods in the current award year (\$200 total, not in each payment period in the current award year). This \$200 allowance must only be for tuition, fees, school-provided room & board, and, with the student’s or parent’s authorization, educationally related goods and services provided by the prior-year school. For more details, see 34 CFR 668.164(c)(3).

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COST OF ATTENDANCE (BUDGET)

Policy Reason

Cost of Attendance (COA) is determined by law (Higher Education Act, Sec. 472) and is not subject to regulation by the Department. The law specifies the types of costs that are included in the COA, but each school must determine the appropriate and reasonable amounts to include for each eligible COA category for its students, based on the criteria described in this chapter.

DDBS calculates the COA (cost of attendance) based on the individual student Federal Student Aid non-need-based on award eligibility, the student's program, and dependency status. The remaining FSA need based award eligibility is calculated based on the student's COA minus SAI. COA is documented individually in the enrolled student's files upon receipt of a valid Institution Student Report (ISIR) from the United State Department of Education. Cost of Attendance is provided to prospective or enrolled students upon request.

Direct Costs

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

Indirect Costs

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

Note: Registration Fee is required to be paid prior to enrollment. The charges will be included as part of the Cost of Attendance (COA).

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

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

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

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Responsible Parties

Third Party Servicer

- Third Party Servicer populates the students Cost of Attendance based on the information on the ISIR and program of interest and academic year.
- Third Party Servicer develops an award letter based on the information provided.

Financial Aid Administrator

- Reviews
- Contact the student once one receives the ISIR.
- Discuss info with the student.
- Have student sign the award letter to accept, deny, or decrease.
- Give copy to the student.

Date of Last Revision: 3/26/2025

Procedure to Determine Annual COA – 2020-2021 AY (Initial Year)

The tuition and the books & supplies components are exact figures, taken from the published prices in DDBS materials for the year.

Because Cosmetology is a 12-month program, all figures stated are for a full year, while the Manicuring, Esthetics, and Esthetics Instructor programs are all 400 clock-hours and 12 weeks, which is approximately 3 months. All annual COA components, where applicable, are prorated for 3 months for the manicuring, esthetics, and esthetics instructor programs.

We have chosen to associate a zero cost for both room and board for all students who indicate that they plan to live “with parent” for the academic year. For full-time students who have marked that they will live “off campus,” we have utilized data from the Bureau of Economic Analysis, as published by 24/7 Wall St. online at <https://247wallst.com/state/cost-of-living-in-michigan>. This resource states that the typical renter in Michigan spends \$850 a month on housing and \$3,240 annually on food for a single adult. \$9,930 is the amount the average single adult in the state spends a year on transportation (not including the cost of purchase of a vehicle). The personal/misc component of the COA is comprised of the \$3,455 per year average health care costs for a single adult in the state.

The State of Michigan registration is \$63 for cosmetology, manicuring, and esthetics, and the PSI exam/test fee is \$167 for each exam.

The loan fees component of the cost of attendance figure takes the current loan origination fee for the 1st year dependent student annual loan amounts.

Procedure to Determine Annual COA – 2024-2025 AY

The tuition and books & supplies components are taken from exact figures.

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The social security cost-of-living adjustment (COLA) is 3.2% in 2024, as reported by Barrons.com. Therefore, we have taken the previous year's dollar figures for room, board, transportation, and personal/misc and have multiplied them by the annual COLA percentage to obtain the new figures.

The loan fee has not changed, and the State of Michigan registration and the PSI exam/test fees remain the same.

2024-2025 Cost of Attendance for Entire Program (effective 3/1/2025)

2024-2025 Cost of Attendance for Entire Program - Effective 3/1/2025						
	Cosmetology - 11 mo		750 Esthetics - 6 mo		750 Advanced Esthetics - 6 mo	
	w/parent	not w/parent	w/parent	not w/parent	w/parent	not w/parent
Tuition	\$25,337	\$25,337	\$11,437	\$11,437	\$16,500	\$16,500
Books & Supplies	\$2,000	\$2,000	\$1,600	\$1,600	\$2,500	\$2,500
Housing*	\$0	\$11,252	\$0	\$6,137	\$0	\$6,137
Food*	\$3,574	\$3,574	\$1,949	\$1,949	\$1,949	\$1,949
Transportation	\$10,954	\$10,954	\$5,975	\$5,975	\$5,975	\$5,975
Personal/Misc	\$3,811	\$3,811	\$2,078	\$2,078	\$2,078	\$2,078
Loan Fees ESTIMATE	\$58	\$58	\$58	\$58	\$58	\$58
Registration Fee	\$100	\$100	\$100	\$100	\$100	\$100
State of MI registration	\$63	\$63	\$63	\$63	\$63	\$63
Administrative Fee	\$500	\$500	\$800	\$800	\$650	\$650
	<u>\$46,397</u>	<u>\$57,649</u>	<u>\$24,060</u>	<u>\$30,197</u>	<u>\$29,873</u>	<u>\$36,010</u>
2024 COLA = 3.2% (from www.ssa.gov/cola/) base year information from https://247wallst.com/state/cost-of-living-in-michigan/ room, board, transportation & personal/misc calculated using 2023-2024 monthly figures multiplied by COLA Housing = \$991.18/mo x 1.032 = \$1,022.90/mo Food = \$314.84/mo x 1.032 = \$324.91/mo Transportation = \$964.94/mo x 1.032 = \$995.82/mo Personal/misc = \$335.74/mo x 1.032 = \$346.48/mo Loan origination fee for 24/25 is 1.057% = \$5500 x 0.01057 = \$58.13						
*"Housing and food" replaces the old "room and board," component of Cost of Attendance, per the FAFSA Simplification Act						
updated 3/1/2025						

Cost of Attendance Procedure

Date of Last Revision: 3/26/2025

The COA for a student is an estimate of that student's educational expenses for the period of enrollment. DDBS establishes student COA using average expenses (for students with the same enrollment status) rather than actual expenses. Students must be awarded on the basis of a COA comprised of allowable costs assessed all students carrying the same academic workload.

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The types of costs that may be included are the same for all FSA programs. For the Campus-Based and Direct Loan programs, the COA is based on the student's enrollment status, is a student's cost for the period for which the aid is intended. For Pell Grants and Iraq & Afghanistan Service Grants, the COA is always the full-year costs for a full-time student, so DDBS may have to prorate actual or average costs for students who are attending less than an academic year (or who are part-time in a term program) or prorate down for students who are attending for periods longer than an academic year.

As explained above, the types of costs included in the COA are determined by law in accordance with section 472 of the HEA. These costs, as described below, are the only costs that may be included in a student's COA. If a cost is not listed below, it may not be included as part of the COA.

Allowable Costs

A student's COA is the sum of the following:

- (1) **The tuition and fees normally assessed for a student carrying the same academic workload.** This includes graduation fees, if incurred while the student is still enrolled and when required by the program and paid by all students, and costs of rental or purchase of equipment (including equipment for instruction by telecommunications), materials, or supplies required of all students in the same course of study.
- (2) **An allowance for books, supplies, transportation, and miscellaneous personal expenses.** This allowance can include:
 - a. A reasonable amount, as determined by your school, for the documented **rental or purchase of a personal computer** that the student will use for study for the enrollment period. For example, a computer purchased in the summer for use in the fall term may be included.
 - b. Costs for **operating and maintaining a vehicle that is used to transport the student to and from school**, but not for the purchase of a vehicle.
 - c. Costs incurred by a student for a **prior learning assessment** (e.g., an exam or a portfolio evaluation).
- (3) **An allowance for room and board.** For all students, schools must include in their COA an allowance for room and board. For students residing in institutionally owned or operated housing, the allowance should be based on the amount normally assessed most of DDBS's institutionally-housed residents for room and board. For all other students, the allowance should be based on the expenses reasonably incurred by each type of student for room and board.
- (4) **For a student with dependents, an allowance for costs expected to be incurred for dependent care.** This covers care during periods that include but are not limited to class time, study time, field work, internships, and commuting time for the student. The amount of the allowance should be based on the number and age

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of such dependents and should not exceed reasonable cost in the community for the type of care provided. Note that because students are often unaware of this allowance, schools should make clear when counseling students, about the availability of the dependent care allowance and how to request that an allowance for dependent care be included in their cost of attendance.

- (5) **An allowance for the one-time direct costs of obtaining a first professional license or certificate for students who are enrolled in a program that requires such professional licensure or certification.** This allowance may only be provided one time per student per eligible academic program. Examples of allowable costs include fees charged to take a licensing exam, costs of applying for and obtaining the license or certification, and, at the discretion of DDBS, costs incurred in traveling to a residency interview for a medical student. Under this provision, the costs must be incurred during (not after) a period of enrollment, even if the exam is after the end of the period.
- (6) **For study-abroad programs approved for credit by the student's home institution, reasonable costs associated with such study.** This is not applicable for study at DDBS.
- (7) **For a student with a disability, an allowance for expenses related to the student's disability.** These expenses include special services, personal assistance, transportation, equipment, and supplies that are reasonably incurred and not provided by other agencies.

A student is considered to have a disability if he or she has a physical or mental impairment that substantially limits a major life activity, such as if the student is deaf, has a mental disability, is hard of hearing, has a speech or language impairment, is visually disabled, is seriously emotionally disturbed, orthopedically impaired, autistic, has a traumatic brain injury, is otherwise health impaired, or has specific learning disabilities that require special education and related services.
- (8) **For students engaged in a work experience through a cooperative education program, an allowance for reasonable costs associated with such employment.**
- (9) **For students receiving loans, the fees required to receive them (for example, the loan fee for a Direct Loan).** You may also include the fees required for non-federal student loans that must be considered estimated financial assistance (EFA) for the student when packaging aid. In all cases, you can either use the exact loan fees charged to the student or an average of fees charged to borrowers of the same type of loan at your school. To be included in the COA, any loan fees for private loans must be charged to the borrower during the period of enrollment for which the loan is intended.

For Less-than-half-time Students

For students enrolled less-than-half-time, COA can include only:

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- (1) **Room and board for a limited duration.** Schools have the option to include in the COA for a less-than-half-time student an allowance for room and board for up to three semesters (or equivalent), with no more than two of the semesters being consecutive at any one school. You are not required to monitor COA components from other schools attended by the student.
- (2) **Tuition and fees;**
- (3) **An allowance for books and supplies;**
- (4) **Transportation (but not miscellaneous & personal expenses); and**
- (5) **An allowance for dependent-care expenses.**

Adjustments for Special Circumstances

The Director of Financial Aid has the authority to use **professional judgment** to adjust the COA on a case-by-case basis to allow for special circumstances. Such adjustments must be documented in the student's file.

Limitations to Tuition and Fees Component

- (1) **Overtime charges.** A school may not use Title IV funds to pay overtime charges for a student who fails to complete his or her academic program within the normal time frame. Section 472 of the HEA defines COA as the tuition and fees normally assessed a student carrying the same academic workload required of all students in the same course of study. Overtime charges are in addition to normal tuition and fees, and since they are not charges normally assessed, they may not be included in a student's COA for Title IV purposes, and therefore Title IV funds may not be used to pay charges, even if a school obtains a student's (or parent's) authorization to do so.

This restriction applies to both clock-hour and credit-hour programs. For example, some clock-hour programs assess "overtime charges" for students who don't complete the program within an established timeframe. Some credit-hour programs also charge additional tuition or fees for each course a student takes if the student fails to complete his/her program(s) within an established time-frame. In both cases, such charges may not be counted in the Title IV COA, and Title IV funds may not be used to pay for the additional charges

- (2) **Finance Charges.** You may not use Title IV funds to pay finance charges or fees that are incurred because a student utilizes a financing method provided by DDBS to pay for educational expenses over time. Because students or families choose to incur these additional expenses rather than paying the balance due at registration, the additional charges are not considered educational expenses, and may not be included in a student's cost of attendance.

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Costs for Periods Other Than Nine Months

The COA used to package Campus-Based aid and Direct Loans covers the student's actual period of enrollment. Therefore, if the student will be attending for more than nine months, you must use a higher COA that includes living expenses, such as room and board, for the longer period of time. If the student will be attending for less than nine months, you must use a lower COA. You can choose to prorate the allowances you use for nine months, or you can calculate the cost in any other reasonable way.

When calculating for periods other than nine months, be sure to use the rules for the corresponding EFC type. There are three types of EFC for periods other than nine months, each with their own treatment: EFC for dependent students; EFC for independent students without dependents other than a spouse; and EFC for independent students with dependents other than a spouse.

Adjusting Costs for Pell Grants

The types of costs included in the Pell Grant budget are the same as those for the other FSA programs; however, Pell Grant costs are always based on the costs for a *full-time student for a full academic year*.

For Pell, costs for programs or enrollment periods longer or shorter than an academic year must be prorated so that they are the costs for one full academic year. This is true for both parts of the academic year definition: if either the number of weeks or the number of clock/credit-hours differs from the academic year standard, the costs must be prorated to determine the full-time, full-year Pell budget.

PACKAGING AND AWARDING AID

Packaging and Awarding Aid Policy

DDBS interviews a prospective student and develops a financial plan for the incoming student. DDBS is responsible for informing the student of all Title IV financial aid programs, including the maximum loan eligibility available for the student's program of study. DDBS also informs the student of when aid can be expected to be disbursed, e.g., in each payment period. With the consent of the student, DDBS forwards the request for aid to the Boston Educational Network for awarding and packaging. This is accomplished by DDBS submitting a Student Aid Profile into the BEN software system. Based on the information submitted by DDBS, the student ISIR and following USDE awarding regulations, BEN develops a financial aid notification for each student. BEN will not award or disburse any Title IV aid for an award year until the student has satisfied all other eligibility requirements including, but not limited to:

- all C Codes have been satisfactorily resolved;
- verification process has been completed, as required;
- all conflicting information has been resolved.

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BEN is responsible for evaluating numerous student specific factors when determining the Title IV aid that the student qualifies for. Some of the main factors are the student's:

- selected program of study,
- dependency status,
- EFC, and
- prior Title IV aid (NSLDS).

DDBS is responsible for informing the student of their rights, requirements, and responsibilities in accepting the aid package. It is DDBS's responsibility to review the student ISIR and resolve any conflicting information (preferably prior to the submission of the student profile).

Institutions are responsible for providing student enrollment data to the National Student Loan Data System (NSLDS) and to report students who transfer to their institution in the same award year in which they have received aid from another institution to the NSLDS transfer student monitoring list. BEN will verify DDBS's policies, procedures and practices during the 24 Student File and Institution Policy Review to ensure accurate and timely reporting of student enrollment status to NSLDS.

Packaging and Awarding Aid Procedure

DDBS is responsible for creating and submitting a Student Profile using the secure Boston Educational Network software system for each student who is requesting Title IV aid. The student must have an ISIR for the corresponding aid request submitted and all qualifying conditions met (see above) by DDBS before an award notification can be evaluated and created by BEN.

It is DDBS's responsibility to review the student ISIR and resolve any conflicting information (preferably prior to the submission of the student profile). BEN will not award or disburse any Title IV aid for a specific award year until the student has satisfied all other eligibility requirements including, but not limited to, all C-Codes have been resolved and documented, the verification process has been completed and all conflicting information has been resolved.

After all eligibility requirements have been satisfied (verification, C Codes, conflicting information, etc.) the student file is ready for further evaluation by qualified BEN staff to prepare for the awarding of Title IV aid.

ISIR Review

When a student file is deemed ready to be awarded (termed "In Process" by the BEN system) (which includes clearing all the compliance edits), a qualified BEN processor will perform additional reviews of the ISIR to determine if there are additional factors that will impact the ability to award Title IV aid to the student. The qualified BEN processor will review the ISIR to determine if they find any conflicting information within the data contained in the ISIR. This review will occur even in cases where the student has cleared the verification and/or C Code review process. The BEN processor will review the comment codes on the ISIR to determine if there are any items the USDE has highlighted and will create a **compliance delay** if the comment code requires further documentation. In

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addition, the BEN processor will review the information on the ISIR to determine if information appears to be incorrect or conflicting.

For example, if the ISIR indicates that the student is recently married (and would not have filed a joint tax return because they were not married during the tax year), but the AGI reflects only one income earned from work values, a compliance delay may be created which will require DDDBS to review the ISIR data.

When Title IV aid has been awarded for a previous award year and an aid request for a subsequent award year is created by DDDBS, the BEN processor will review both the current ISIR and the subsequent award year ISIR. This is done to determine if there are any material discrepancies between the two award years that create a conflicting information situation.

When conflicting information is found, the BEN processor will create a Compliance Delay for DDDBS. It is DDDBS's responsibility to work with the student to address and resolve the discrepancy. Resolution may require ISIR corrections and/or DDDBS providing an explanation on the Compliance Delay. Until the conflict has been properly rectified, the student file will remain **On Hold** status in the BEN system and no Title IV aid will be awarded or disbursed for either award year.

Any necessary ISIR corrections will be processed by the student/parent or by DDDBS (with documented authorization from the student/parent). When DDDBS determines that the information is correct on the ISIR, DDDBS will provide a further explanation in the compliance delay (usually in the Response Box) that is also retained in the student's file at DDDBS. BEN will be alerted by the BEN system when a corrected ISIR is available and will review the corrected ISIR or institutional response when available and re-evaluate the information to determine if the student is ready for awarding.

Federal Pell Grant Recalculation Policy

DDDBS awards Pell Grants to those who qualify. Students qualify by completing the FAFSA and the student would earn a Federal Pell Grant Based on need. Students are not required to pay back Federal Pell Grant. Recalculation occurs if a student has a status change or if their SAI changes.

Federal Pell Grant Recalculation Procedure

Director of Financial Aid

- Reviews Students ISIR
- Communicates with Third Party to see if eligible with revised ISIR.
- Prints off award letter for student to sign (keep a copy, give a copy)
- Gets on portal and request amount to be disbursed.

Third Party Servicer

- Calculates amount eligible for
- Third party awards to those who qualify.
- Disburses funds.

Business Office Liaison

- Transfers funds from Federal Funds Account

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- Puts Disbursements on Ledger
- Gives student receipt.

Financial Assistance Available Policy

Federal Pell Grants provide a foundation of financial assistance that may be supplemental by other resources and does not have to be repaid after graduation. Federal Pell Grants are determined after the financial status of a student is fully reviewed. Based on a student's financial circumstances, a specific amount of money is disbursed annually toward the student's education through the Federal Pell Grant. How much you can expect to receive from a Federal Pell Grant is solely based on your financial situation and other criteria.

William D. Ford Federal Direct Loan Program (Need & Non-Need Based Aid)

Loans made through this program are referred to as Federal Direct Loans, because eligible student and parents borrow directly from the US Department of Education. You must be enrolled at least a half-time student to be eligible for a loan. Direct Loans include the following:

- Federal Direct Subsidized Loans – you must have financial need to receive a subsidized loan. The US Department of Education will pay (subsidize) the interest that accrues on your Direct Subsidized Loan during certain periods.
- Federal Direct Unsubsidized Loans – financial need is not a requirement to obtain an unsubsidized loan. You are responsible for paying the interest that accrues on your Direct Unsubsidized Loan.
- Federal Direct PLUS Loans (Plus Loans) are loans parents can obtain to help pay the cost of education for their dependent undergraduate children.

For updates and more information on federal financing, go to www.studentaid.ed.gov to learn more.

Federal student loan records of students and parents will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guaranty agencies, lenders, and institutions to determine to be authorized users of the data system. Students and parents may view their loan record history by visiting the website: www.nsls.ed.gov

Financial Assistance Available Procedure

Student

To be eligible to receive Title IV funds, we require applicants to provide requested information during the time period(s) July 1st through June 30th the following Award Year. Applicants must certify that the following data items are correct as listed on the original application; or if not correct, must update the date items, as the date of verification:

- Number of family member in the household.
- Number of family members the household now enrolled as at least half-time students in postsecondary educational instructions.
 - Change in dependency instructions.

Federal Pell Grant applicants whose dependency status changes during the

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Award Year must file a correction application.

Consequences of Failure to Provide Documentation within the Specified Time Period(s)

If the student cannot provide all required documentation, DDBS cannot complete the verification process with one week from the date of enrollment. DDBS must then advise applicants that they may not be eligible for Financial Aid funds. DDBS then gives the applicants the following options:

- The student may continue training on a cash payment basis.
- Promptly submit needed items within 48 hours

If a Federal Pell Grant or Federal Direct Subsidized/Unsubsidized Loan applicant has not processed Part 2 of the SAR within one week of enrollment, DDBS must advise them that they are not eligible for Financial Aid. DDBS will then provide applicants with the following options:

- The student may continue training on a cash payment basis.
- Promptly submit needed items within 48 hours

Date of Last Revision: 3/26/2025

General Eligibility Criteria for FSA Policy

It is the policy of DDBS to ensure that each student is eligible to receive Federal Student Aid (FSA) programs. The Director of Financial Aid and Third-Party Servicer are provided to help student determine their eligibility for FSA.

Date of Last Revision: 3/26/2025

General Eligibility Criteria for FSA Procedure

Director of Financial Aid

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

Date of Last Revision: 3/26/2025

Processing Aid Applications Policy

Date of Last Revision: 3/26/2025

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

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Processing Aid Applications Procedure

Student

- Takes a tour of campus for info
- Completes the FAFSA
- Applies for admission

Director of Financial Aid

- Ensures that student is not in default
- Verifies high school diploma
- Verifies dependent or independent status
- Completes verifications on student, if applicable
- Checks the NSLDS web site for borrowing limits and other documents needed from previous schools (transcripts)
- Verifies all info on ISIR is correct
- Meets with student to discuss financial options
- Request is submitted to Third Party Servicer for award offer letter
- Has student sign award letter
- Notifies the Director of Operations of new students and refunds to be received
- Puts disbursements on ledger

Third Party Servicer

- Processes ISIR
- Completes verification, if needed.
- Generates award offer letter
- Disburses funds

Business Office Liaison

- Requests funds

Director of Operations

- Transfers funds from Federal Funds Account

Records Clerk

- Gives student receipt.

Pell Grant Policy

Date of Last Revision: 3/26/2025

DDBS awards Federal Pell Grants to those who qualify. Students qualify by completing the FAFSA and the student would earn a Pell Grant Based on Need. Students are not required to pay back Federal Pell Grants.

Date of Last Revision: 3/28/2025

Federal Pell Grant Procedure

Director of Financial Aid

- Reviews Students ISIR
- Communicates with Third Party to see if eligible.
- Prints off award letter for student to sign (keep a copy, give a copy)
- Puts Disbursements on Ledger

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Third Party Servicer

- Calculates amount eligible for
- Third party awards to those who qualify.
- Disburses funds.

Director of Operations

- Gets on secure BEN portal and request amount to be disbursed.
- Transfers funds from Federal Funds Account

Records Clerk

- Gives student receipt.

Direct Loan Quality Assurance System

Date of Last Revision: 3/25/2025

DDBS is required by statute, 34 CFR 685.300(b)(9), to implement a quality assurance system within our financial aid office. Our Director of Financial Aid in concert with our third-party servicer, The Boston Educational Network, initiates and maintains the quality assurance system. The Director of Operations of DDBS will review and comment periodically on the effectiveness of this system.

The Director of Financial Aid is responsible for updating the process to ensure our school complies with the Direct Loan quality assurance component.

Reporting to the Common Origination and Disbursement (COD) System

A. Reporting to the Common Origination and Disbursement (COD) System

1. Reporting Loan Originations

Financial Aid Director

- Once an enrolled student has received a valid Institutional Student Information Record (ISIR) and has met all our enrollment requirements, sends a financial aid profile to our servicer, BEN;
- The profile consists of the student's enrollment/registration information and the aid the student is requesting.
- After the student has been awarded by BEN, retrieves the financial aid offer letter;
- Sends financial aid offer letter to student.

Third Party Servicer

- Reviews the information submitted by the Director of Financial Aid;
- Cross-references the student's ISIR for any conflicting data;
- Awards the student – generates the financial aid offer letter;
- Submits a loan origination record to COD;
- Retrieves the student's loan origination record acknowledgement the next business day;

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- If necessary, reviews and/or corrects any errors or rejections and resubmits to COD

2. Reporting Loan Disbursements and Adjustments

Third Party Servicer

- Creates a loan disbursement file for transmission to COD at the end of the workday that consists of all loan disbursements processed that day;
- Retrieves the file acknowledgement;
- Imports the file into BEN's internal accounting system;
- Reviews all files;
- Identifies all accepted and rejected student files;
- Corrects the affected file(s) for any new errors or rejects;
- Resubmit new file to COD with these
- Retrieves the corrected file for corrections
- Reviews the corrected file and once again identifies any errors or rejections;
- Once all disbursement files have been accepted by COD, creates a disbursement roster containing all the accepted student disbursement records.

B. Disbursing and Returning Loan Funds

1. Disbursing Loan Funds

Director of Financial Aid

- Ensures that student has completed Loan Entrance Counseling;
- Ensures that student has signed Master Promissory Note;
- Confirms that student has met all eligibility requirements (e.g. admissions requirements, successful completion of a payment period, maintaining SAP and accepted loans on award letter);
- Credit the student's account with the amount of their disbursement(s) based on the disbursement records;
- Post the student's account/ledger the date of the roster, which coincides with the date ED accepted the student disbursement.

Business Office Liaison

- Coordinates the disbursing of loan funds with BEN;
- Verifies that all awarding issues have been satisfied (i.e. verification, C-codes, loan origination, etc.);
- Double checks that student has met all eligibility requirements (e.g. admissions requirements, successful completion of a payment period, maintaining SAP and accepted loans on award letter);
- Download "disbursement roster" from the BEN website;
- Review roster for appropriateness and accuracy;

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- Notify BEN if there are any variations between the expected disbursement and the actual disbursement roster;
- The next business day, verifies that the funds have been transmitted from ED into DDBS's institutional Title IV (federal funds) account;
- If funds have not arrived or if they are different that the total amount on the disbursement roster, instruct BEN of discrepancy;
- Transfer funds from the federal funds (Title IV) account to DDBS's operating account;
- Notify the student the day of the disbursement;
- Also inform student that they have the right to rescind all or part of the loan disbursement.

Third Party Servicer

- Coordinates the disbursing of loan funds with DDBS;
- Verifies that all awarding issues have been satisfied (i.e. verification, C-codes, loan origination, etc.);
- Will not disburse an "interim" disbursement to students before awarding issues have been resolved;
- Reviews each disbursement request with the goal of ensuring that the request is accurate and appropriate;
- If any questions arise, notifies DDBS via a "Compliance Delay" notice;
- Processes the student's disbursement after the discrepancy has been resolved and no remaining eligibility issues exist;
- Processes the loan disbursement request in BEN's internal accounting system;
- Creates and transmits a disbursement file to COD
- After ALL of the transmitted loan disbursement records have been accepted by COD, BEN creates a "disbursement roster"
- Requests funds using the G5 system

This system is developed to ensure that all reporting of disbursements is in compliance with the ED's 15-day reporting, posting, and notification requirements.

2. Returning Loan Funds

Financial Aid Director

- Upon determining that a student has ceased enrollment, perform refund (Title IV and Institutional) calculations;
- If it has been determined that there is a Title IV refund due ED, notifies the Director of Operations of the refund amount that is needed to be deposited into DDBS's federal funds (Title IV) account for this student refund;
- Upon notification of the refund transaction by the Director of Operations, immediately notifies BEN with a Title IV Refund Request form via secure email;
- Post the refund to the student's account/ledger

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Director of Operations

- Deposits the refund amount into the federal funds account. This may take place by a transfer of funds from the operating account to the federal funds account, or if for some reason this is not available a physical check is written, and a deposit is completed.
- On the date that the refund was deposited/transferred into the federal funds account, notifies the Director of Financial Aid of this transaction.

Third Party Servicer (BEN)

- Receives the Title IV Refund Report;
- Reviews the Title IV Refund Report for accuracy and appropriateness (i.e., T4 program, award year, amount, etc.);
- Posts the refund in G5;
- Once G5 retrieves the funds from DDDBS's account and acknowledges the deposit, BEN then notifies COD of the student's refund;\
- Receives notification of the date G5 acknowledged the refund, the T4 program refunded, as well as the corresponding award year.

Making and Posting Student Title IV refunds are a high priority. Accuracy and timeliness are of utmost importance. A large amount of DDDBS' Financial Aid training budget is dedicated to this process. The ownership of DDDBS understands the complexity of this subject and strives to be in complete compliance.

C. Disbursing the correct loan amount to the correct student

1. Disbursing the correct loan amount

Financial Aid Director

- Reviews each student financial aid offer letter for accuracy prior to delivering it to the student;
- Generates and calculates an estimated date of disbursement for each student loan.

Business Office Liaison

- Confirms loan amount when requesting student disbursement(s);
- Enters date information when requesting student disbursement(s)

Third Party Servicer

- At the same time that a student's award letter is generated, all loan origination records are submitted to COD;
- All loan origination records contain the amount and expected date of all anticipated disbursements for a student;
- Ensures that each student loan disbursement record corresponds identically with the student loan origination record, if not, COD rejects the record;
- Ensures that an "accepted" loan originated record must be on file for each student loan prior to disbursing any loan funds;

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- No student disbursement is initiated until all disbursement records are accepted and processed by COD.

2. Disbursing to the correct student

Financial Aid Director

- Reviews each student's enrollment and financial aid information;
- Communicates with the Business Office representative re: date and amount of disbursement request.
- Posts the roster detail to each individual student's account.

Business Office Representative

- Reviews the expected/anticipated disbursement prior to submission of request;
- Submits request for disbursement to BEN;
- Retrieve the disbursement roster from BEN;
- Review the disbursement roster for appropriateness and accuracy;
- Communicate any issues to the Financial Aid Director and/or BEN;
- Notifies the student that the disbursement has taken place and
- Informs student of their right to rescind all or part of the loan disbursement;
- Verifies that the funds posted to the student's accounts equal the amount indicated on BEN's disbursement roster.

Third Party Servicer

- Reviews the disbursement request for accuracy and appropriateness;
- If the request is not accurate or appropriate (i.e. too early), the request is suspended until the discrepancy is resolved;
- Submits the disbursement to COD (the amount, award year, T4 program, etc.);
- Retrieves the accepted disbursement record from COD;
- Places the student on the disbursement roster;
- Makes the disbursement roster available to DDBS;
- If there are no issues with the disbursement roster, requests the roster funds via the G5 system.

Director of Operations

- Notifies the Director of Financial Aid that the funds have been transmitted from ED to DDBS's federal funds account.

To ensure accuracy, the Director of Operations verifies that the funds transmitted from ED to DDBS's federal funds account equal the grand total of BEN's roster. The Director of Financial Aid posts the roster amount to each individual student account. The Business Office Representative verifies that the funds posted to the student's accounts equal the amount indicated on BEN's disbursement roster.

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D. Completing monthly reconciliation and Program Closeout

Third Party Servicer

- At the beginning of every month a BEN reconciliation specialist will print out a G5 summary for each school and
- Compares the summary to the BEN journals using inception to date for each Title IV program per award year;
- Identifies, reviews, documents, and resolves when necessary;
- Reviews the BEN Disbursement Differential YTD Report to identify any discrepancies;
- Runs a report is from EdExpress to identify and correct any disbursements or adjustments that have not been accepted by COD.
- Utilizes the DLSAS report provided by COD every month - reviews the ending cash balance for each institution.
- When the ending cash balance does not equal \$0, a reconciliation specialist at BEN will review, identify, and resolve any outstanding issues.
- Documents any issues on the monthly spreadsheet;
- Completes yearly reconciliation;
- Officially closes out the Direct Loan award year on behalf of each institution in COD by the deadline imposed by ED.
- Provides critical data and reports for schools during their annual audit, ED Program Reviews and upon demand from any client institution

Business Office Representative

- Reconciles student disbursement rosters with all student records on a monthly basis in coordination with BEN;
- Examines, reviews, and rectifies any discrepancies from federal funds deposits with student disbursement rosters;
- Contacts BEN if the discrepancy cannot be resolved at DDBS level.

Note: DDBS (nor BEN) does not “offset” disbursement requests with actual deposited refunds, therefore all federal deposits are reconciled with student accounts and actual disbursement rosters.

Policy for Reporting Accurate Disbursement Dates to COD and Student Ledger

Date of Last Revision: 3/25/2025

Once a student has started class or achieved the next level for financial aid disbursements, the following procedure is to be followed for accurately logging payments/disbursement dates to the student account card.

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Procedure for Reporting Accurate Disbursement Dates to COD and Student Ledger

Director of Financial Aid

- Verifies that the student has met a list of required criteria prior to any and all disbursements of Title IV federal funds. The student must:
 - Physically matriculate in the program of their choice;
 - Meet all admissions requirements;
 - Have completed a Master Promissory Note for participation in the Direct Loan program;
 - Maintain SAP;
 - Have completed Loan Entrance Counseling for participation in the Direct Loan program;
 - Have accepted award notifications.
- Obtains the period start date from the secure student database:
 - Period 1 – always the student’s start date;
 - Period 2-4 are determined by when the student begins the period;
- Notifies the Business Office representative when the student hits the number of clock hours earned for the next payment period. For instance, if it is the second payment period for Cosmetology, when the student reaches 450 clock hours, the date is recorded and an email is sent to the Business Office representative.
- NOTE: Transfer, re-enroll and students with overlapping academic years may have different measurement points than those listed. The Director of Financial Aid works directly with BEN to determine the period start dates for these students.
- Prints out the SAP progress report for each payment period;
- Logs the payments to the student ledger account;
- Retains the disbursement report

Business Office Representative

- Locates the period start date for each student and includes it in the disbursement request;
- Enters the total number of clock hours the student has completed on the disbursement request page
- Submits a disbursement request in the secure BEN portal by clicking on the “Disbursement Requests” link
- Selects the type of aid, Pell Grant or Direct Loans;
- Selects the payment period
 - Cosmetology:
 - P1 = 0 – 450
 - P2 = 451 – 900
 - P3 = 901 – 1200
 - P4 = 1201 – 1500
 - Esthetics and Advanced Esthetics
 - P1 = 0 – 375
 - P2 = 376 – 750
- Reviews the disbursement report

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- Contacts BEN if there are any discrepancies including the date posted;
- Circles the date on the disbursement report showing the date reported to COD – This avoids any confusion on what date is to be used.
- Provides each student with a notice of disbursement and right to cancel for loan disbursements
- Files a copy of this notice in the student file
- Reviews the disbursement dates again during the monthly Title IV reconciliation.

Director of Operations

- Determines how many total clock hours the student has completed;
- Notifies the Business Office representative;

Third Party Servicer (BEN)

- Reviews each student disbursement request to ensure accuracy;
- If question(s) arise, notifies DDBS via a posted Compliance Delay on the BEN website;
- Once the Compliance Delay has been resolved, creates and transmits a disbursement file to COD
- Creates a disbursement roster once all of the transmitted loan disbursement records have been accepted by COD;
- Resolves any discrepancies found by the Business Office representative;
- Requests funds from the G5 system

Policy and Procedure for Timely Updates to NSLDS

DDBS is responsible for accurate and timely accounting and reporting of the student's enrollment data to National Student Loan Data System (NSLDS). The accuracy and timeliness of the data reported to NSLDS is imperative for ED to determine if the student is still attending, must be moved into repayment, or is eligible for an in-school deferment, etc.

Student Schedule Change

Student

- Requests schedule change;
- Pays the requisite fee.

Business Center Representative

- Completes a Schedule Change form;
- Notifies the entire staff and pertinent faculty

Director of Financial Aid

- Makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Updates NSLDS within 30 days of the schedule change request;
- In NSLDS, the effective date is entered, the new schedule is selected, and the new expected completion date is also entered;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change
- Gives this copy to the Records Clerk for filing in student's paper and digital files.

Director of Operations

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- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS;

Records Clerk

- Files the NSLDS printout in the applicable student's paper and digital files.

Student Leave of Absence - If DDBS has an LOA policy

Student

- Requests Leave of Absence in writing, according the LOA policy;

Business Center Representative

- Completes a Leave of Absence form;
- Notifies the entire staff and pertinent faculty

Director of Financial Aid

- Makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Updates NSLDS within 30 days of the LOA
- In NSLDS, the effective date is entered, Leave of Absence is selected, and the new expected completion date is also entered;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change
- Gives this copy to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS;

Records Clerk

- Files the NSLDS printout in the applicable student's paper and digital files.

Student Graduates

Business Center Representative

- When a student graduates, updates the student database;
- Notifies the entire administrative staff via email;

Director of Financial Aid

- Makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Updates NSLDS within 30 days of graduation;
- In NSLDS, the effective date is entered and a status of Graduated is selected;
- Reviews the expected completion date previously entered into NSLDS;
- If it is accurate, no change is made;
- If it is not accurate, the accurate graduation date is entered prior to confirming the information;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change
- Gives this copy to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS.

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Records Clerk

- Prints out the student graduation certificate for the student and for the file;
- Files the NSLDS printout in the applicable student's paper and digital files.

Student Withdraws/Is Terminated

Business Center Representative

- When a student has withdrawn or is terminated, notifies the entire administrative staff and pertinent faculty;
- Assists the Director of Financial Aid with the refund/R2T4 calculation, when applicable;

Director of Financial Aid

- Upon notification that a student has withdrawn or is terminated, makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Calculates student refund/R2T4, when applicable;
- Updates NSLDS within 30 days of graduation;
- In NSLDS, the effective date is entered and a status of Withdrawn is selected;
- Enters the last date of attendance as the end date in NSLDS;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change;
- Gives a copy of all of the withdrawal paperwork to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS.

Records Clerk

- When a student has withdrawn or is terminated, updates the student database;
- Files the NSLDS printout in the applicable student's paper and digital files.

Program Changes

Should DDBS changes programs or schedules for any program offered, the following procedure is followed:

Director of Financial Aid

- Upon notification that there is a program or schedule change for DDBS, makes the necessary additions or changes in NSLDS;
- Informs BEN, in writing
- Files the email to BEN in the filing cabinet in the Director of Financial Aid's office.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS.

Third Party Servicer

- Upon receiving notification of a program or schedule change, makes the necessary additions or changes in COD

Program Additions

Should DDBS add a program to the curriculum, the following procedure is followed:

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Director of Financial Aid

- Upon notification that there is a program addition to the curriculum, makes the necessary additions or changes in NSLDS;
- If unable to make the NSLDS updates, enters the updated information in NSLDS.
- Informs BEN, in writing
- Files the email to BEN in the filing cabinet in the Director of Financial Aid's office.

Third Party Servicer

- Upon receiving notification of a program or schedule change, makes the necessary additions or changes in COD

OVERAWARDS

Date of Last Revision: 3/25/2025

Overaward Policy

An overaward occurs when the Title IV aid that has been awarded and the Estimated Financial Assistance (EFA) added together exceeds need or COA, or both.

Two Types of Overawards:

1. Awarded aid exceeds the student's **need**
 - The aid package includes subsidized federal student aid and other EFA. When totaled, the amount exceeds need.
2. Awarded aid exceeds the student's **Cost of Attendance (COA)**
 - The aid package includes any combination of unsubsidized federal student aid, subsidized federal student aid, and other EFA. When totaled, the amount exceeds COA.

Procedures for Handling Overawards

Director of Financial Aid

- Stop – Do not disburse aid until overaward is resolved;
- Alerts the Business Center Liaison of the overaward upon discovery;
- Alerts the third-party servicer of the overaward as soon as possible;
- If it is a case of student submitting an outside check causing the overaward, BEN will reduce the student's unsubsidized student loan 1st by the amount of the overaward;
- Using order of funds returned, if there is still an overaward, the student's subsidized student loan would be reduced.
- At no point is the Pell Grant reduced!
- A new financial aid offer letter will be generated;
- Student must sign updated financial aid offer letter prior to disbursing aid funds;
- Enters the outside check to the student ledger;
- Give a copy of the student ledger to the Records Clerk for filing in the student's file.

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Business Center Representative

- Notifies student of the overaward within 14 days of the disbursement;
- Processes the outside check and enters into school account;
- Issues the amount of the refund to the student, if applicable,

Records Clerk

- Places copy of the student ledger in the financial aid file.

It is extremely important that packages are checked for **both** types of over awards, and both types of over awards are resolved appropriately.

Over award exception: When Pell Grant is the only federal student aid in the package.

OVERPAYMENT

Date of Last Revision: 3/25/2025

Overpayment Definition

An overpayment exists when a student's financial aid package exceeds their eligibility.

Student Overpayment Policy

DDBS always takes care not to overpay a student when packaging their Title IV financial aid. However, circumstances may change after a student has been packaged. The student may have aid that results in an overpayment. ED needs to be notified if it is over \$50.00.

Causes

1. School error
2. Student error

If due to school error – school repays entire amount. Possible causes:

- Unresolved overawards
- Interim disbursements
- Failure to complete verification
- Miscalculated COA
- Payment in excess of loan limits
- Required recalculations not performed

If due to student error – student repays amounts of \$25 or more. Possible causes:

- School must notify student in writing requesting repayment
- Inform student that failure to repay or make satisfactory arrangements to repay will result in loss of eligibility for Title IV aid
- School must consider claims by student that school made error

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Overpayments Due to Student Error

If due to student error—student repays amounts of **\$25** or more

- Student repays school in full
- If school permits, student may make satisfactory arrangements to repay school
- If student does not repay or make satisfactory arrangements to repay, school must refer overpayment to ED.

Informing ED of Overpayments

School must report overpayments via NSLDS website within 30 days of the date DDBS learns of the overpayment. Pell Grant overpayments greater than or equal to \$25 due to student error to ED's Debt Resolution Group or DDBS may repay the overpayment for the student.

Steps to Correct Pell Grant Overpayments

- School repays amount for which it is responsible, and/or may repay for the student;
- Student repays amount for which he/she is responsible or makes satisfactory arrangements to repay.

Steps to Correct Direct Loan Overpayments

- If loan is fully disbursed when overpayment is discovered, no action required
- Student will repay according to terms of their promissory note.

Procedures for Handling Overpayments

Director of Financial Aid

- Enters the overpayment disbursement information on the student's ledger;
- Alerts the Business Center representative of the overpayment upon discovery;
- Enters the overpayment disbursement information on the student's ledger;
- Enters any student payment information on the student's ledger; or
- Applies the student's repayment information to the student's ledger
- Gives a copy of the student ledger to the Records Clerk for filing in the student's file.

Business Center Representative

- Notifies student of the disbursement and overpayment within 14 days of the disbursement;
- Issues the overpayment to the student, if applicable, or
- Informs student that failure to repay or make satisfactory arrangements to repay will result in loss of eligibility for Title IV aid
- Considers claims by the student that DDBS made the error
- If student does not make satisfactory arrangements to repay, refers overpayment to ED.

Records Clerk

- Places copy of the student ledger in the financial aid file.

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RETURN OF TITLE IV FEDERAL STUDENT AID

Created: 9/14/2021

Updated: 3/15/2022, 7/23/2022, 3/19/2024, 3/8/2025

Revised: 3/15/2022, 7/23/2022, 3/19/2024, 3/8/2025

Reference

Federal Student Aid Handbook, Volume 5 Chapter 1 Withdrawals and the Return of Title IV Funds

34 CFR 668.22

Policy Reason

The U. S. Department of Education requires that schools determine the amount of Title IV aid earned by a student who withdraws or fails to complete the period of enrollment. DDBS must determine the earned and unearned portions of Title IV aid as of the date the student ceased attendance based on the amount of time the student was scheduled to be in attendance (in a clock-hour program). Up through the 60% point in the period of enrollment, a pro-rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60% point in the period of enrollment, a student has earned 100% of the Title IV aid funds he or she was scheduled to receive. If a student did not start or begin attendance at DDBS, the R2T4 formula does not apply. For a student who withdraws after the 60% point, there are no unearned funds. Federal regulations can be found at:

BEN Procedure

Dymond Designs Beauty School will develop and maintain a compliant USDE Title IV R2T4 policy, provide BEN's Refund Calculation Form (Appendix B) to BEN, provide the student with the completed R2T4 (in person with a signed statement or by certified mail), and maintain copies of all relevant documentation in the student's file for proof of R2T4 completion.

When a Title IV eligible student terminates from a program, DDBS will submit a Refund Calculation Form to BEN immediately upon the student's termination. The information on the form must include the student's last date attended, disbursement and attendance records for the payment period in which the student was in when he/she withdrew. BEN will complete the R2T4 in accordance with USDE regulations and report the information to DDBS. DDBS will return the Title IV funds within 45 days of DDBS's determination that the student had withdrawn. DDBS will transfer the funds to the appropriate federal funds account and complete and submit a "Refund Report"(Appendix C) to BEN. The "Refund Report" is available from the BEN's institution portal and must be filled out and submitted after the Title IV funds have been deposited in the appropriate federal fund accounts. The "Refund Report" can be submitted through BEN's secure portal or via password protected e-mail. BEN will post the adjustments to COD and initiate the cash to be removed from DDBS's federal funds account via the USDE G5 system. DDBS will post the Title IV refund to the student's ledger and obtain student/parent authorization when a Post Withdrawal Disbursement of Direct loan funds are available. DDBS will obtain authorization from the loan borrower prior to submitting disbursement requests. DDBS will notify NSLDS of grant funds owed by the student and provide BEN with a BEN COD Monitoring Report when a student terminates, is a no show, or cancels a Direct loan, if for some reason the "Refund Report" was not

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used. BEN will update the student record in Edexpress to reflect any adjustment, which will then be submitted to COD via Edconnect each business day. After BEN receives the "Refund Report" they will evaluate and determine if the entire loan needs to be cancelled, if the loan period needs to be updated, if the loan amount needs to be updated. DDBS and BEN will annually review DDBS's Refund Policy to ensure that the policy is compliant with the USDE regulation.

Procedural Statement

At DDBS, Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded. When a student withdraws, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive.

If a recipient of a Title IV grant or loan withdraws from an institution after beginning attendance, the amount of Title IV grant or loan assistance earned by the student must be determined. If the amount disbursed to the student is greater than the amount the student earned, the unearned funds must be returned. If the amount disbursed to the student is less than the amount the student earned and for which the student is otherwise eligible, they may be eligible to receive a post-withdrawal disbursement of the earned aid not received.

If a student never begins attendance, funds are unearned. Eligibility to receive the awarded funds was never established. Therefore, no R2T4 calculation is performed and all of the FSA funds are returned to the FSA programs. 34 CFR 668.21. Example: when a student reduces their course load, this represents a change in enrollment status, not a withdrawal. Therefore, no R2T4 is required.

As a clock-hour school, DDBS is required to take attendance. If a school is required to take attendance, then a determination must be made within 14 days of the student ceasing attendance whether s/he has withdrawn. If so, the withdrawal date is always the last date of attendance.

The date of determination is the date as of which DDBS determines a student has ceased attendance.

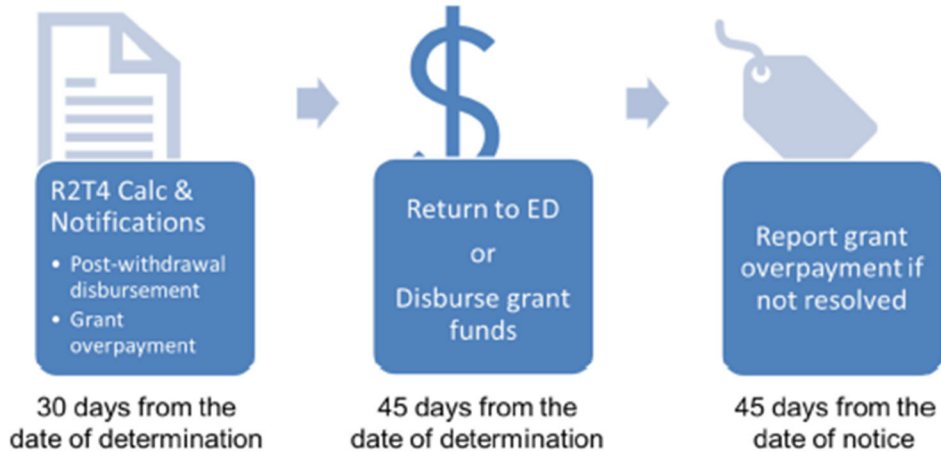
Within **30 days** from the date of determination:

- The R2T4 calculation must be completed,
- The student must be notified of any post-withdrawal disbursement for which they are eligible, and
- The student must be notified of any grant overpayment they may owe.

Within **45 days** from the date of determination:

- Any funds must be returned to the Department of Education and
- Any post-withdrawal disbursement of Title IV grant funds must be made.

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Borrower permission must be obtained to make a post-withdrawal disbursement of Direct Loan funds. Students must be given at least 14 days to respond to your notice about available post-withdrawal loans.

Permission is not required for disbursement of grant funds. Loans may be disbursed as late as 180 days from the date of determination.

Within 180 days from the date of determination:

- Any post-withdrawal disbursement of Title IV loan funds the student accepted after being notified must be made.

Note: The requirements for Title IV program funds calculations are separate from any DDBS institutional refund policy when a student withdraws.

Leave of Absence/Withdrawal Process

A student may leave DDBS by either taking a leave of absence (leaving DDBS temporarily with the firm and stated intention of returning) or withdrawing (leaving DDBS with no intention of returning). Students choosing to take a leave of absence should first contact their instructor(s) to discuss their plans while on leave and to work out any conditions that may be necessary for a smooth return to DDBS.

A student deciding to leave DDBS should take the following steps:

- Submit a request in writing requesting a Leave of Absence to their instructor

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

Note: For the complete Leave of Absence policy, see the current DDBS Operations Handbook.

***NEW* WITHDRAWAL EXEMPTION CATEGORIES**

If met, these withdrawal exemptions allow a student who has otherwise withdrawn or left DDBS to **not** be considered a withdrawal for Title IV purposes.

Withdrawal exemption for graduates or completers

A student meets the withdrawal exemption for graduates or completers if the student completes all of the academic requirements for graduation and is able to graduate before completing all of the days or clock hours in the period they were scheduled to complete. This withdrawal exemption can apply to any type of program or academic calendar.

NOTE: Schools with clock-hour programs in which a student graduates without successfully completing all of the established hours in the program must re-prorate the amount of Title IV aid and only pay the student for the hours successfully completed. This includes proration of Pell Grants, Iraq-Afghanistan Service Grants, TEACH Grants, and Direct Loans.

When prorating a student's awards in this situation DDBS does not consider the number of weeks of instructional time completed by the student.

Re-proration is applicable for clock hour programs in this situation because Title IV aid is based, in part, upon the overall number of clock hours in a program of study. There is an expectation that a student will successfully complete all clock hours as they progress through their program of study. When a student graduates from a clock hour program without completing all of the established/reported hours in a program, the student has effectively shortened their program length. By doing so, the Department sees that student as now being enrolled in a program with fewer clock hours. As such, we then require DDBS to re-prorate (or adjust) Title IV aid provided to an amount equivalent to the actual hours the student successfully completed.

NEW* withdrawal exemption categories established by the Department in final regulations on 9/2/2020

Determination of Withdrawal Date

Because DDBS is required to take attendance, a student's withdrawal date is always the last date of academic attendance as determined by DDBS from its attendance records. This date is used for all students who cease attendance, including those who do not return from an approved LOA, those who take an unapproved LOA, and those who officially or unofficially withdraw.

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Official Withdrawals (Notification Provided by the Student)

It is the responsibility of the student to provide written notice of the intention to withdraw or take a leave of absence from DDBS. This written notification can be provided to the student's instructor or the administrative staff.

For students who notify DDBS of their intent to withdraw or take a leave of absence, the official date of withdrawal or leave of absence is the last date of academic attendance.

Unofficial Withdrawals (No Official Notification Provided by the Student)

For a student who withdraws without providing notification to DDBS, DDBS determines the withdrawal date as the student's last date of attendance as determined by DDBS from its attendance records. This category of withdrawals includes students that drop out and students that do not earn a passing grade.

An unofficial withdrawal occurs when a student leaves DDBS without notice and/or when he/she is not meeting satisfactory academic progress. A student's withdrawal date is their last date of physical attendance. Any student that does not provide official notification of his or her intent to withdraw and is absent for more than 14 consecutive calendar days will be subject to termination and be considered to have unofficially withdrawn.

Date of Determination that the Student Withdrew

The date of determination is the date as of which DDBS determines that a student has ceased attendance, or the day that the student notifies DDBS that they will not be returning.

Except in unusual instances, the date of DDBS's determination that the student withdrew should be no later than 14 days after the student's last date of attendance as determined by DDBS from its attendance records.

Calculation of Earned Title IV Assistance

Only *scheduled hours* are used to determine the percentage of the period completed by a student withdrawing from a clock-hour program. For a clock-hour program, the percentage of the period completed is determined by dividing the number of hours the student was scheduled to complete in the payment period or period of enrollment, as of the day the student withdrew, by the total number of clock hours in the same period as follows:

$$\frac{\text{number of clock hours the student was scheduled to complete in the period}}{\text{total number of clock hours in the period}}$$

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The amount of Title IV federal aid earned by the student is determined on a pro-rata basis up to 60% of the semester. If the student completed 30% of a term, 30% of the aid originally scheduled to be received would have been earned. Once a student has completed more than 60% of a term, all awarded aid (100%) has been earned. Federal regulatory requirements define the percentage of federal aid earned and the order in which the unearned aid is returned.

The calculation of earned Title IV funds includes the following grant and loan funds if they were disbursed or could have been disbursed to the student for the period of enrollment for which the return calculation is being performed:

- Pell Grant
- Iraq and Afghanistan Service Grant
- Federal Supplemental Opportunity Grant (FSEOG)
- Unsubsidized Direct Stafford Loans
- Subsidized Direct Stafford Loans
- Federal PLUS Loans

Please note that a school does NOT count scheduled hours during periods when a student is on a leave of absence or “make-up” hours that were not part of the student’s normal schedule.

Institutional Charges

Institutional charges are used to determine the portion of unearned Title IV aid that DDBS is responsible for returning. DDBS ensures that all charges for tuition, fees, books, kit bags, and all other applicable institutional charges are included in the return calculation. Institutional charges do not affect the amount of Title IV aid that a student earns when they withdraw. DDBS charges used in the calculation usually are the charges that were initially assessed by the student for the period of enrollment. If, after a student withdraws, DDBS changes the amount of institutional charges it is assessing a student or decides to eliminate all institutional charges, those changes affect neither the charges nor aid earned in the calculation.

Amount of Title IV Aid Earned by the Student

The amount of Title IV aid earned by the student is determined by multiplying the percentage of Title IV aid earned by the total of *Title IV program Aid disbursed* plus the *Title IV aid that could have been disbursed* to the student or on the student’s behalf.

Total Title IV Aid to Be Returned

Suppose the total amount of Title IV grant and loan assistance that was earned as of the withdrawal date is less than the amount that was disbursed to the student. In that case, the difference between the two amounts will be returned to the Title IV program(s), and no further disbursements will be made.

If a student has received excess funds, DDBS must return a portion of the excess equal to the lesser of the student's institutional charges multiplied by the unearned percentage of funds or the entire amount of the excess funds.

The funds will be returned in the order below as prescribed by federal regulations within 45 days from the date of determination that a student withdrew:

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- Unsubsidized Direct Stafford Loans
- Subsidized Direct Stafford Loans
- Federal PLUS loans
- Federal Pell Grants
- Iraq and Afghanistan Service Grant
- Federal Supplemental Educational Opportunity Grant (FSEOG)

Post-Withdrawal Disbursements

If the total amounts of the Title IV grant and loan assistance earned as of the withdrawal date are more than the amount that was disbursed to the student, the difference between the two amounts will be treated as a **post-withdrawal disbursement**. If there are outstanding charges on the student's account, DDBS will credit the student's account for all or part of the post-withdrawal disbursement amount up to the amount of allowable charges.

Any amount of a post-withdrawal disbursement that is not credited to a student's account will be offered to the student within 30 days of the date that DDBS determined that the student withdrew. Upon receipt of a timely response from the student, DDBS will disburse the funds within 90 days of the date of determination of the student's withdrawal date.

Any post-withdrawal disbursement due must meet the current required conditions for late disbursements. For example, the Department must have processed a SAR or ISIR with an official expected family contribution (EFC) prior to the student's withdrawal.

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

Overpayment

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

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

- Repays the overpayment in full to DDBS;
- Enters into a repayment agreement with DDBS in accordance with repayment arrangements satisfactory to DDBS; or

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- Signs a repayment agreement with the Department, which will include terms that permit a student to repay the overpayment while maintaining his/her eligibility for Title IV federal program funds.

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

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

Example: Harry

Student Harry's cosmetology program started on January 8 and on January 26, DDBS discovered that Harry had stopped attending. His **last date of attendance** was January 17 (through which time Harry was **scheduled to have attended** 45 hours). Harry received a Pell Grant in the amount of \$2,000.00 and a Subsidized Direct Loan for \$1,700.00.

The Financial Aid Office began the withdrawal process and required calculations. Because DDBS is required to take attendance, Harry's **withdrawal date** is his last date of attendance at an academically related activity, January 17. The date of DDBS's **determination** that Harry withdrew is the date that the aid office received information that Harry had ceased attendance, which was January 26.

Because DDBS uses the payment period as the basis for its Return calculation, the \$2,000.00 in Pell funds and the \$1,700.00 in Subsidized Direct Loan funds Harry was scheduled to receive once he had completed the first 450 hours of his program is included as Title IV funds that **could have been disbursed**. Therefore, **total Title IV aid disbursed and could have been disbursed** for the period of enrollment equals $\$2,000.00 + \$1,700.00 + \$2,000.00 + \$1,700.00 = \$7,400.00$.

Only scheduled hours are used to determine the percentage of the period completed by a student withdrawing from a clock-hour program. The percentage of the period completed by a student is determined by dividing the number of hours the student was scheduled to complete in the payment period or period of enrollment as of the day the student withdrew by the total number of clock hours in the same period.

- Number of clock hours Harry was scheduled to complete by January 17 = 45
- Number of clock hours in the period of enrollment = 900
- $45 \text{ clock hours} \div 900 \text{ clock hours} = 0.050$.

Percentage of period of enrollment completed = 5.0%.

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Because this percentage is less than or equal to 60%, the **percentage of Title IV aid earned** is 5.0%.

The **amount of Title IV aid earned by the student** is calculated by multiplying the percentage of period of enrollment completed by the total of the Title IV aid disbursed and could have been disbursed for the period of enrollment.

$$5.0\% \times \$7,400.00 = \$370.00.$$

Because the total Title IV aid earned is less than the total Title IV aid disbursed, no post-withdrawal disbursement is due.

Because the total Title IV aid disbursed is greater than the total Title IV aid earned, **Title IV aid must be returned**. In this example, \$3,330.00 is the amount of Title IV aid that must be returned.

$$\$3,700.00 - \$370.00 = \$3,330.00.$$

The **total institutional charges** for the period of enrollment are \$8,500.00.

Subtracting the percentage of Title IV aid earned from 100% equals the **percentage of Title IV aid unearned**. In this case, 95.0%.

The **amount of unearned charges** in this case:

$$\$8,500 \times 95.0\% = \$8,075.00.$$

The **amount of unearned Title IV aid due from DDBS** is the lesser of the amount of Title IV aid to be returned (\$3,330.00) and the unearned institutional charges (\$8,075.00). The amount of unearned Title IV aid due from DDBS is \$3,330.00.

The only Title IV loan disbursement Harry received was a Subsidized Direct Loan disbursement of \$1,700.00. Since \$1,700.00 is less than the \$3,330.00 amount for DDBS to return, DDBS must return the entire \$1,700.00 to the Direct Loan Program.

After DDBS returns \$1700.00 to the Direct Loan program, the balance to be returned by DDBS is \$1,630.00 (\$3,330.00 – \$1700.00). Harry received \$2,000.00 in Pell Grant funds, so DDBS returns the \$1,630.00 to the Pell Grant Program.

DDBS must return any unearned funds within 45 days from the date of the institution's determination that Harry withdrew.

Because the difference between the amounts of Title IV aid DDBS must return (\$3,330.00) and the total amount of Title IV aid that is to be returned (\$3,330.00) is \$0.00, there is **no amount of Title IV aid due from the student**.

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Six Calendar Days – Pre-registered Student

Any student who either officially or unofficially withdraws before six (6) calendar days after the beginning of School will be considered to be a “pre-registered,” or never attended student.

Credit/Debit Balance on Student’s Account

All refunds will be calculated based on the student’s last date of attendance. If the Return to Title IV Funds (R2T4) calculation results in a credit balance on the student’s account, this credit balance must be disbursed as soon as possible and no later than 14 days after the calculation of the R2T4.

In the case of disabling illness or injury, death in the student's immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made.

If the R2T4 calculation results in an amount to be returned that exceeds DDBS’s portion, the student must repay some funds.

Veterans Refund Policy

The unused portion of tuition, fees, and other charges for veterans or eligible persons who fail to enter a course or who withdraw or discontinue prior to completion will be refunded for all amounts paid that exceed the approximate pro-rata portion of the total charges that the length of the completed portion of the course bears to the total length of the course. The pro-ration will be determined on the ratio of the number of days or hours of instruction completed by the student to the total number of instructional days or hours in the course. Please refer to DDBS Refund Policy.

Contact

Questions regarding this policy or its intent should be directed to the Director of Financial Aid at 313-974-6164.

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Institutional Refund Policy

Date of Last Revision: 3/6/2025

Institutional Refund Policy

1. **Refunds for Classes Canceled by DDBS.** If tuition and fees are collected in advance of the start date of a program and DDBS cancels the class, 100% of the tuition and fees collected must be refunded. The refund shall be made within 45 days of the planned start date.

2. **Refunds for Students Who Withdraw on or Before the First Day of Class.** If tuition and fees are collected in advance of the start date of classes and the student does not begin classes or withdraws on the first day of classes, no more than \$100 of the tuition and fees may be retained by DDBS. Appropriate refunds for a student who does not begin classes shall be made within 45 days of the start date.

3. **Refunds for Students Enrolled Prior to Visiting DDBS.** Students who have not visited DDBS facility prior to enrollment will have the opportunity to withdraw without penalty within three days following either attendance at a regularly scheduled orientation or following a tour of the facilities and inspection of the equipment.

4. **Refunds for Students Enrolled in Professional Development, Continuing Education, or Limited Contract Instruction.** Institutions engaging in programs, which are short-term, must have a written policy or contract statement regarding whether fees and instructional charges are refundable.

5. **Refunds for Withdrawal after Class Commences**

Refunds policy for programs obligating students for periods of 12 Months or less the refund policy for Students attending non-public institutions who incur a financial obligation for a period of 12 months or less shall be as follows: (i) During the first 10% of the period of financial obligation, DDBS shall refund at least 90% of the tuition; (ii) After the first 10% of the period of financial obligation and until the end of the first 25% of the period of obligation, DDBS shall refund at least 50% of the tuition; (iii) After the first 25% of the period of financial obligation and until the end of the first 50% of the period of obligation, DDBS shall refund at least 25% of the tuition; and, (iv) After the first 50% of the period of financial obligation, DDBS may retain all of the tuition.

6. **Refund Policy for programs obligating students for periods beyond twelve months**

Programs longer than 12 months that financially obligate the student for any period beyond 12 months shall release the student of the obligation to pay beyond the 12 months if the student withdraws during the first 12 months. The calculation of the refund for the unused portion of the first 12 months shall be based on the section above. If the student withdraws during any subsequent period following the first 12 months, the student's refund for the unused portion of the tuition applicable to the period of withdrawal shall be based on the section above. Students agree to comply with the assigned schedule for applicable All Beauty

Programs, which may change from time to time at the discretion of DDBS. Students agree to attend theory class as scheduled for the duration of the course of study regardless of whether all required tests have been taken and passed.

REFUND POLICY-NOTICE OF CANCELLATION

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

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

1. Applicants are not accepted by DDBS: The applicant shall be entitled to a refund of all monies paid.

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2. A student (or legal guardian) cancels his/her enrollment in writing within three business days of signing the enrollment agreement. In this case all monies collected by DDBS shall be refunded, regardless of whether the student has actually started classes.
3. A student cancels his/her enrollment after three business days of signing the contract but prior to starting classes. In these cases, he/she shall be entitled to a refund of all monies paid to DDBS less the registration fee in the amount of
\$100.00
4. A student notifies DDBS of his/her withdrawal in writing.
5. A student on an approved leave of absence notifies DDBS that he/she will not be returning. The date of withdrawal shall be earlier than the date of expiration of the leave of absence or the date the student notifies DDBS that the student will not be returning.
6. A student is expelled by DDBS: (Unofficial withdrawals will be determined by DDBS by monitoring attendance at least every 30 days.)
7. In type 2, 3, 4 or 5, official cancellations or withdrawals, the cancellation date will be determined by the postmark on the written notification, or the date said notification is delivered to DDBS administrator or owner in person.
8. Any student who either officially or unofficially withdraws before six (6) calendar days after the beginning of school will be a “pre-registered” or never attended student.

For students who enroll and begin classes but withdraw prior to course completion (after three business days of signing the contract), the following schedule of tuition earned by DDBS applies. All refunds based on scheduled hours:

PERCENT SCHEDULED TIME TOTAL TUITION SCHOOL ENROLLED TO TOTAL COURSE/PROGRAM SHALL RECEIVE/RETAIN

0.01% to 04.9%	20%
5% to 09.9%	30%
10% to 14.9%	40%
15% to 24.9%	45%
25% to 49.9%	70%
50% and over	100%

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All refunds will be calculated based on the student's last date of attendance. Any funds due to a student who withdraws shall be refunded within 45 days of a determination that a student has withdrawn, whether officially or unofficially. In the case of disabling illness or injury, death in the student's immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If permanently closed or no longer offering instruction after a student has enrolled, DDBS will either provide a full refund of all funds paid or completion of the course later. If the course is canceled after a student's enrollment, DDBS will either provide a full refund of all funds paid or completion of the course later.

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Executed: 1/5/19, 1/2/2020, 3/20/2024, 2/26/2025

Revised: 1/2/2020, 3/20/2024, 2/26/2025

LEAVE OF ABSENCE POLICY AND PROCEDURE

Purpose

DDBS recognizes that it is sometimes necessary for students to interrupt their enrollment for a short period of time and take a leave of absence. The policy and procedure will guide the student through the processes needed to grant request.

An authorized leave of absence (LOA) is a temporary interruption in a student's program of study. LOA refers to the specific time during a program when a student is not in attendance. A LOA is not required if a student is not in attendance only for an institutionally scheduled break. However, a scheduled break may occur during LOA. A LOA must meet certain conditions to be counted as a withdrawal requiring an institution to perform a refund calculation. For a student at DDBS to be approved for a Leave of Absence for medical or personal reasons, the following conditions must be met:

Leave of Absence Procedures

- DDBS's policy for Leave of Absence (LOA) requires a student to submit a request in writing.
- The written request must contain dates for the leave and the reason for the request and include the student's signature.
- The LOA together with any additional Leaves of Absence must not exceed a total of 180 days in any 12- month period.
- DDBS's policy requires a student to apply in advance for a LOA unless unforeseen circumstances (emergency) prevent the student from doing so. For example, if a student were injured in a car accident and needed a few weeks to recover before returning to school, the student would not have been able to request the LOA in advance.
- The Director of Operations may grant an LOA to a student who did not provide the request prior to the LOA due to unforeseen circumstances if DDBS documents the reason for its decision and collects the request from the student later either via mail, email, fax, an authorized individual or in person. In this example, the beginning date of the approved LOA would be determined by DDBS Director/Administrator to be the date the student was unable to attend school because of the accident.
- The request for Leave of Absence Form is made available in the Student Handbook & Catalog.
- A student granted a LOA that meets these criteria is not considered to have withdrawn, and no refund calculation is required at that time. For the Leave of Absence to be approved, there must be a firm and clear reasonable expectation that the student will return from the LOA. If it is determined that the student has no intention of returning, refer to the Withdrawal Policy. The students' contract will be extended by the same number of days taken in the LOA. Changes to the contract period to the enrollment agreement must be

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initiated by all parties. If the student does not return by the withdrawal date for the purpose of calculating a refund, it is always the student's last day of attendance.

- When the student returns from LOA, the student's education will continue from the actual hours earned. The start and end date will be adjusted accordingly.
- Please note that any student who fails to return to school at the end of an approved Leave of Absence is considered to have withdrawn from DDBS.
- Students who do not follow the procedure for obtaining an approved Leave of Absence will be subject to DDBS's stated policies on attendance for all absences recorded, regardless of circumstances.

Responsible Parties:

Director of Operations/Business Center Liaison

- Receive a request in advance in writing from the instructor which will include the reason for the student's request and include the student's signature within two weeks.
- Approve the leave
- Make sure the leave of absence does not exceed 30 days with any additional leaves with a twelve-month period (only 1 leave will occur within 12-month period).
- The Business Center Liaison will make an addendum on the original contract to make sure it is the same number of days taken in the LOA then report it to the Digital Records Clerk for file update.
- The Director of Operations along with the instructor assures the education of the student continues upon his return

Student

- Request in advance in writing a request for leave of absence
- Get approval following the policy of DDBS
- Make sure it does not exceed 30 days with any additional leave within a 12-month period.
- Make sure an addendum is made to student contract
- Return with request days of actual leave of absence

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Leave of Absence Form



LEAVE OF ABSENCE FORM

Student Name:

_____ **First**

_____ **Last**

Course:

Instructor Name:

LOA Begins:

___/___/___

LOA Ends:

___/___/___

Original Contract End Date:

___/___/___

Revised Contract End Date:

___/___/___

Changed Weeks:

Student Signature:

Date:

___/___/___

Parent /Guardian Signature:

Date:

___/___/___

(If Applicable)

Accepted by School Official

Date:

___/___/___

Chapter 5 Federal Pell Grant

Chapter 5 – Federal Pell Grant

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Chapter 5 Federal Pell Grant

Pell Grant Basics

Date of Last Revision: 3/26/2025

Policy Reason

Pell Grant Scheduled Awards are based on information provided on the FAFSA application, the presence of a valid Student Aid Index (SAI) on the student's FAFSA Submission Summary or ISIR, the academic year structure, and the Pell Grant cost of attendance (COA) for a full-time student for a full academic year.

General Eligibility Requirements for Federal Pell Grants

In general, a student must be enrolled in an undergraduate course of study at a non-foreign institution to receive a Pell Grant. For the Pell Grant program, a student is an undergraduate only if the student has not earned or completed the requirements for a bachelor's or professional degree. A student who has earned a baccalaureate degree or a first professional degree cannot receive a Pell Grant.

Federal Pell Grant Eligibility Restrictions

(1) Undergraduates only

Recipients must be undergraduates who do not already have a bachelor's or professional degree. A student with a baccalaureate or professional degree is ineligible even if the degree is from an unaccredited school. Similarly, a student with a baccalaureate or professional degree from a foreign school usually isn't eligible for a Pell Grant.

(2) Concurrent awards at more than one school

A student may not receive Pell Grant payments concurrently from more than one school.

(3) Involuntary civil commitment

Students are not eligible to receive a Federal Pell Grant if they are subject to involuntary civil commitment upon completion of a period of incarceration for a forcible or non-forcible sexual offense.

(4) Incarceration

Beginning July 1, 2023, all confined or incarcerated students who are enrolled in eligible prison education programs and meet other criteria will be eligible for Pell Grants.

Definition of an Undergraduate Student

A student who completes a master's program has earned a degree beyond the baccalaureate level, making the student ineligible for a Pell Grant even if they do not have a bachelor's degree and enroll in an undergraduate program.

A student who has received an associate degree—or any certificate or diploma below the baccalaureate level—and who enrolls in another undergraduate program continues to be considered an undergraduate student until the student has completed the curriculum requirements for a first bachelor's degree.

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A student with a baccalaureate or professional degree is ineligible even if the degree is from an unaccredited school. Similarly, a student with a baccalaureate or professional degree from a foreign school usually isn't eligible for a Pell Grant.

Wrong Grade Level on the FAFSA

When an undergraduate student incorrectly reports on the Free Application for Federal Student Aid (FAFSA®) form that the student will be a graduate student or has a bachelor's degree, the student must correct that information. Because the application shows that the student isn't an undergraduate, the Department's records will show that the student is ineligible for Pell. If the application isn't corrected, DDBS won't be able to pay the student a Pell Grant.

Prohibition on Receiving Two Pell Grant Payments for Concurrent Enrollment

A student may not receive Pell Grant payments concurrently from more than one school.

For Pell purposes, the phrase "concurrently from more than one institution" means that the student must be attending both schools at the same time for the concurrent Pell Grant prohibition to apply. A student who withdraws from one school and enrolls at least one day later in another school is normally not considered to have been enrolled concurrently.

Maximum Pell Grant Eligibility for Dependents of Certain Deceased Service members and Public Safety Officers

The *FAFSA Simplification Act* changed eligibility for what were formerly called "Iraq and Afghanistan Service Grants (IASG)" and "Children of Fallen Heroes (CFH) Scholarships." Beginning with the 2024-25 award year, students who meet the eligibility requirements for Pell Grants under the Special Rule in HEA Section 401(c) will receive a maximum Pell Grant award, regardless of their calculated SAI. To receive a Pell Grant based on eligibility under the Special Rule, a student must be:

- The child of a parent or guardian who died in the line of duty while either (a) serving on active duty as a member of the U.S. Armed Forces on or after September 11, 2001; or (b) actively serving as and performing the duties of a public safety officer; and
- Less than 33 years old as of the January 1 prior to the award year for which the applicant is applying (e.g., for the 2024-25 award year, a student must be less than 33 years old as of January 1, 2024, to be eligible).

In this situation, eligible students will have a Scheduled Award equal to a maximum Pell Grant award, regardless of SAI. Other aid for these students will be based on their calculated SAI.

Federal Pell Grant Definitions

Payment Periods

A payment period is equal to one half the clock hours in the program or academic year – whichever is less.

At DDBS, payment periods for the Cosmetology program are as follows:

- i. 0-450 clock hours
- ii. 451-900 clock hours

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- iii. 901-1200 clock hours
- iv. 1201-1500 clock hours.

For the Esthetics and Advanced Esthetics programs, payment periods are as follows:

- i. 0-375 clock hours
- ii. 376-750 clock hours.

Scheduled Award

A **Scheduled Award** is the maximum Federal Pell Grant a student can receive during the award year if the student attends full-time for a full **academic year**. The award year begins on July 1 of one year and ends on June 30 of the next year. The student's **Scheduled Award** is established by DDBS using the student's Pell Grant COA and the information received on the student's ISIR, which will include the student's Pell Grant eligibility and SAI.

Annual Award

The **annual award** is the maximum amount a student would receive during a full academic year based on enrollment intensity and COA. Note that for a full-time student, the annual award will be the same as the Scheduled Award. A part-time student who is enrolled in a term-based program will have an annual award that is less than the Scheduled Award.

- The award is taken from the corresponding Payment Schedule
- If the student is full-time, the Annual Award is the Scheduled Award.

Published Maximum and Minimum Pell Grant Award Amounts

The maximum Pell Grant award amount is determined by the appropriation Act applicable to that award year. The Department will announce the maximum Pell Grant award amount for the award year, as required, when the amount is available. The minimum Pell Grant award amount will be 10% of the maximum Pell Grant award amount for the award year. Both the maximum and minimum award amounts will be rounded to the nearest \$5.

Pell Grant Eligibility Criteria

Beginning with the 2024–25 award year, a student may qualify for a Pell Grant under one of three sets of eligibility criteria:

- Maximum Pell Grant eligibility (Max Pell)
- Minimum Pell Grant eligibility (Min Pell)
- Calculated Pell Grant eligibility, based on SAI

If FPS has determined that an ISIR transaction is eligible for a Pell Grant, the “Pell Grant Eligibility Flag” will be set to “Y”. Schools will use additional information on the ISIR to determine whether students qualify for Max Pell, Min Pell, or a Calculated Pell Grant. Actual Pell Grant award amounts are unique to individual students and are based upon and limited by the student's enrollment intensity, SAI, COA, and Lifetime Eligibility Used (LEU).

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Maximum Pell Grant Eligibility Criteria

This section describes eligibility criteria to qualify for a Max Pell Grant and the “Max Pell Indicator” value that you will see on the student’s ISIR.

Dependent Student

Max Pell Indicator	Eligibility Criteria
1	The student’s parent(s) is not required to file a federal income tax return.
2	The student’s parent is a single parent and has an AGI greater than zero and less than or equal to 225% of the poverty guideline for the applicant’s family size and state of residence.
3	The student’s parent is not a single parent and has an AGI greater than zero and less than or equal to 175% of the poverty guideline for the applicant’s family size and state of residence.
Blank	Ineligible for Max Pell

Independent Student

Max Pell Indicator	Eligibility Criteria
1	The student (and spouse, if applicable) is not required to file a federal income tax return.
2	The student is a single parent and has an AGI greater than zero and less than or equal to 225% of the poverty guideline for the applicant’s family size and state of residence.
3	The student is not a single parent and has an AGI greater than zero and less than or equal to 175% of the poverty guideline for the applicant’s family size and state of residence.
Blank	Ineligible for Max Pell

Minimum Pell Grant Eligibility Criteria

This section describes eligibility criteria to qualify for a Min Pell Grant and the “Minimum Pell Indicator” value that you will see on the student’s ISIR.

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Dependent Student

Min Pell Indicator	Eligibility Criteria
1	The student's parent is a single parent and has an AGI less than or equal to 325% of the poverty guideline for the applicant's family size and state of residence.
2	The student's parent is not a single parent and has an AGI less than or equal to 275% of the poverty guideline for the applicant's family size and state of residence.
Blank	Ineligible for Min Pell

Independent Student

Min Pell Indicator	Eligibility Criteria
3	The student is a single parent, and the AGI is less than or equal to 400% of the poverty line.
4	The student is a parent and is not a single parent, and the AGI is less than or equal to 350% of the of the poverty guideline for the applicant's family size and state of residence.
5	The student is not a parent, and the student's (and spouse's if applicable) AGI is less than or equal to 275% of the of the poverty guideline for the applicant's family size and state of residence.
Blank	Ineligible for Min Pell

Calculated Pell Grant (Eligibility Based on SAI and COA)

If the "Pell Grant Eligibility Flag" on the ISIR is set to "Y", but the "Max Pell Indicator" and "Minimum Pell Indicator" are blank, the student is eligible for a calculated Pell Grant. To determine the amount of a calculated Pell Grant, subtract the student's calculated SAI from the award year's published Max Pell amount. Round the result to the nearest \$5. If the result is greater than the award year's published Min Pell amount and less than the student's COA, the student is eligible for a calculated Pell Grant of that resulting amount.

Examples

Volume 7, Chapter 2, Example 1: Eligible for calculated Pell Grant

A student's calculated SAI is 1,004 and the Pell COA is \$10,000. For demonstration purposes, assume the published Max Pell for the award year is \$7,395. DDBS subtracts the student's calculated SAI from the published Max Pell and rounds the result to the nearest \$5.

Max Pell (\$7,395) - SAI (1,004) = \$6,391 (rounded to \$6,390)

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Since the calculated Scheduled Award is less than the Pell COA, DDBS determines the student is eligible for a Scheduled Award of \$6,390.

Volume 7, Chapter 2, Example 2: Eligible for calculated Pell Grant, capped at COA

A student's calculated SAI is 1,004 and the Pell COA is \$6,385. For demonstration purposes, assume the published Max Pell for the award year is \$7,395. DDBS subtracts the student's calculated SAI from the published Max Pell and rounds the result to the nearest \$5.

Max Pell (\$7,395) - SAI (1,004) = \$6,391 (rounded to \$6,390)

Since the calculated Scheduled Award is greater than the Pell COA, DDBS determines the student's Scheduled Award must be capped at the COA. The student is eligible for a Scheduled Award of \$6,385.

Volume 7, Chapter 2, Example 3: Ineligible for calculated Pell Grant

A student's calculated SAI is 7,001 and the Pell COA is \$9,000. For demonstration purposes, assume the published Max Pell for the award year is \$7,395. DDBS subtracts the student's calculated SAI from the published Max Pell and rounds the result to the nearest \$5.

Max Pell (\$7,395) - SAI (7,001) = \$394 (rounded to \$395)

The published Min Pell for the award year is 10% of the Max Pell, or \$739. Since this student's calculated Pell Grant is less than the published Min Pell, the student is not eligible for a calculated Pell Grant.

Pell Grant Enrollment Intensity for Clock-Hour or Nonterm-Based Programs

Students enrolled in clock-hour or non-term-based programs are enrolled full-time for Pell Grant purposes.

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Pell Formula 4: Clock-Hour Programs

All clock-hour and non-term credit-hour programs must use Formula 4.

Awarding Pell Grants Using Formula 4

Enrollment Intensity in Clock-Hour and Non-Term Credit-Hour Programs

The annual award for a student in a clock-hour or non-term credit-hour program is always based on the full-time Scheduled Award, even if the student is attending less than full-time.

Calculating Payment Amounts in Clock-Hour and Non-Term Credit-Hour Programs

Pell Grants must be paid in installments over the course of the academic year or program of study to help meet the students' costs in each payment period. The payment period determines when Pell funds are disbursed and the exact amount to be disbursed.

If a program is less than an academic year in length (in either clock/credit hours or weeks of instructional time), students enrolled in the program won't receive a full Scheduled Award.

You must perform comparable prorations of the award for each payment period in the student's program. The calculation for the payment period pro-rates a student's Scheduled Award based on either (1) the number of clock hours in the payment period compared to the clock hours in the defined academic year or (2) the number of weeks of instructional time in the payment period compared to the weeks of instructional time in the academic year. To determine the payment for a payment period, multiply the student's Scheduled Award by the lesser of:

Number of clock hours in the payment period ÷ Number of clock hours in the program's academic year

OR

Weeks in the payment period ÷ Weeks in the program's academic year

Notes:

- These fractions use weeks of instructional time, which are not necessarily the same number as the calendar weeks in an academic year.
- The program's academic year must be at least 26 weeks for clock-hour programs.

Enrollment Intensity Standards for Clock-Hour and Other Non-Term Programs

For non-term programs, the enrollment minimums are:

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- Full time enrollment (clock hours): at least 24 clock hours per calendar week.
- Less than half-time enrollment (clock hours) is defined as less than half of the workload of the minimum full-time requirement.

Pell Formula 4 Examples

Volume 7, Chapter 4, Example 9: Payments for clock-hour program

A school offers a program that is 900 clock-hours and 22 weeks of instructional time in length. The school defines the academic year for the program based on the regulatory minimums: 900 clock-hours and 26 weeks of instructional time. The school has established two payment periods of 450 clock hours and 11 weeks each for this program.

To determine the disbursement for the payment period, the school must multiply the Scheduled Award by the lesser of:

- the fraction comparing the hours in the payment period to the hours in the academic year (450/900), or
- the fraction comparing the weeks in the payment period to the weeks in the academic year (11/26).

If the student's Scheduled Award is \$7,500, the two possible calculations would be as follows:

- (450 clock hours in the payment period * \$7,500) ÷ 900 clock hours in the academic year = \$3,750; or
- (11 weeks in the payment period * \$7,500) ÷ 26 weeks in the program's academic year = \$3,173.08

In this example, the lesser fraction is the one based on weeks. Therefore, the student's payment for the first payment period will be \$3,173.08 (or \$3,173 if your school does not award cents). The student can get this payment when they begin the program. They can receive a second payment of \$3,173.08 (or \$3,173 if your school does not award cents) after the student successfully completes the 450 clock hours and 11 weeks in the first payment period.

Pell Grant Fractions & Rounding Policy

Date of Last Revision: 3/26/2025

COD only accepts cents in disbursement record payment amounts for Pell Grants (not origination records). Schools can choose to round Pell Grant disbursements if they do not wish to process cents.

Pell Grant Fractions Procedure

When using fractions, be careful to multiply first, and then divide to avoid an incorrect result. For example, here's the correct way to prorate a \$2,150 Scheduled Award for a payment period

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that is a nonstandard term of 10 weeks of instructional time, for a program that has 30 weeks of instructional time.

$$\$2,150 \times (10/30) \text{ is multiplied as } (2,150 \times 10)/30 = \$716.67$$

In this case, if you divide the fraction to get a decimal (0.333333...) and then round the decimal either down (0.33) or up (0.34), your calculation will result in a number that's too low (\$709.50) or too high (\$731.00).

Pell Grant Rounding Procedure

The Common Origination and Disbursement System (COD) accepts cents and whole dollar amounts in payment amounts for Pell. When rounding, round up if the decimal is 0.50 or higher; round down if it is less than 0.50. When rounding for a student expected to be enrolled for more than one payment period in an award year, alternate rounding up and down.

It is DDDBS's policy to round to the nearest dollar. Students expected to be enrolled for more than one payment period in an award year will have the greater dollar Pell award in the 1st payment and the lesser dollar Pell award in the 2nd payment to account for the rounding. This policy on rounding is applied equally to all students.

Important: These rounding rules do not apply if the amount disbursed would exceed the student's Scheduled Award or place the student's LEU over 600%.

Crossover Payment Periods

Date of Last Revision: 3/26/2025

Payment periods don't always fall neatly into one award year or another. A payment period that begins before July 1 and ends on or after July 1 is called a "crossover payment period." The formula for calculating the payment for a crossover payment period is the same as that for any other payment period in the award year.

Determining the Award Year for Crossover Pell Awards

You may assign crossover payment periods to the award year that best meets the needs of your students and maximizes a student's eligibility over the two award years in which the crossover payment period occurs (you must source Pell funds from the award year to which the payment period is assigned). 34 CFR 690.64.

Crossover Payment Periods

- Payment period that includes June 30 **and** July 1
- Aid may be paid from *either* award year

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- A crossover payment period *must* be assigned to and paid from one award year*

*Student *must* have valid SAR/ISIR for assigned year and have remaining eligibility

- Any aid drawn down for crossover period may pay all costs associated with the period (even if paying from next award year)
- May use different award year for Pell than for other Title IV aid

Checking Half-time Enrollment Status

For clock-hour programs and for non-term credit-hour programs, enrollment status only makes a difference if the student is attending less than half-time. If that's the case, only certain components of the COA are used.

The annual award for a student in a clock-hour or non-term credit-hour program is taken from the full-time payment schedule, even if the student is attending less than full-time.

Calculating Payment Amounts

Pell Grants must be paid in installments over the course of the academic year or program of study to help meet the student's cost in each payment period. The payment period determines when Pell funds are disbursed and the exact amount to be disbursed.

In non-term programs, the student's Pell award is not reduced for part time enrollment unless the student is enrolled less than half-time in which case the student's COA must be adjusted. However, if the program is less than an academic year (in either clock/credit-hours or weeks of instructional time), students enrolled in that program won't receive a full Scheduled Award.

As in the case of the other formulas, you must perform comparable prorations of the award for each payment period in the student's program. The calculation for the payment period prorates a student's Scheduled Award based on the number of credit or clock-hours in the payment period as they compare to the credit or clock-hours in the defined academic year or the number of weeks of instructional time in the payment period as they compare to the weeks of instructional time in the academic year. To determine the payment for a payment period, multiply the student's Scheduled Award by the lesser of:

Number of clock-hours in the payment period
Number of clock-hours in the program's academic year

OR

Weeks in the payment period
**Weeks in the program's academic year (at least 30
for credit-hour, at least 26 for clock-hour)**

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Enrollment Status Standards for Clock-hour and Other Non-term Programs

For non-term programs, the enrollment minimum is:

- Full-time in clock-hours: at least 24 clock-hours per calendar week

Coursework Completion Requirement & Withdrawal/Re-entry

Students in non-term programs must successfully complete a payment period to receive subsequent payments.

Payment Period – Two Award Years

If a student enrolls in a payment period that is scheduled to occur in two award years:

- The entire payment period must be considered to occur within one award year;
- DDBS must determine for each Federal Pell Grant recipient the award year in which the payment period will be placed;
- If an institution places the payment period in the first award year, it must pay a student with funds from the first award year; and
- If an institution places the payment period in the second award year, it must pay a student with funds from the second award year.

An institution may not make a payment which will result in the student receiving more than his or her Scheduled Federal Pell Grant for an award year.

Year-Round Pell (YRP)

Date of Last Revision: 3/26/2025

Policy Reason

Students may be eligible to receive up to 150% of their Scheduled Award for an award year. This provision is called “Year-Round Pell.” Students eligible for Year-Round Pell awards are subject to the normal duration of eligibility rules and LEU limits.

Year-Round Pell allows students who have already exhausted their Scheduled Award for an award year to continue receiving Pell funds (for example, for a summer trailer term), or to receive Pell funds without prematurely reducing their Pell eligibility for the remainder of the award year (for example, for a summer header term). A student’s Year-Round Pell eligibility is certified by the Additional Eligibility Indicator (AEI) in COD.

Year-round Pell Procedure

To be eligible to receive Pell funds in excess of 100% of their Scheduled Award during a single award year, students must be enrolled at least half-time. With Year-Round Pell, students do not receive more Pell Grant funds in each payment period. They receive the same amount as is

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normally calculated for a payment period, but students who are otherwise eligible for Pell Grants may receive Pell Grant funds for an award year up to 150% of their Scheduled Award.

You may assign the Pell Grant award to a different award year than the rest of the student's *Title IV* aid. You can make a payment for a crossover payment period out of either award year, if the student has a valid FAFSA Submission Summary/ISIR for the award year selected. You may assign two consecutive crossover payment periods to the same award year.

Although you may assign a crossover payment period to either of the relevant award years, you must make the assignment based on what you determine will be most beneficial to students.

You may not make a payment which will result in the student receiving more than their Scheduled Award for an award year, unless the student is eligible for a Year-Round Pell award, in which case the student may be eligible to receive up to 150% of their Scheduled Award for the award year.

Receiving Less than the Scheduled Award Due to Crossover

A student may also receive less than a Scheduled Award in an award year, if the program crosses award years and the student's Pell Grant award in one of the award years is for a portion of the program that is less than a full academic year.

Example

Volume 7, Chapter 5, Example 5: Year-Round Pell in a clock-hour program

A student enrolls in an 1,125 clock-hour program over 32.5 weeks. Payment periods 1 and 2 consist of 450 clock hours and 13 weeks; payment period 3 consists of 225 clock hours and 6.5 weeks. The program is scheduled to occur entirely within the 2024–25 award year and has an academic year of 900 clock hours and 26 weeks of instructional time. The student has a Scheduled Award of \$7,000.

The school awards the student \$3,500 in Pell for each of the first two payment periods of 450 clock hours and 13 weeks of instructional time. For the remaining 225 hours and 6.5 weeks of instructional time in the program, the school calculates that the student would be eligible to receive \$1,750 in Pell if the student's Scheduled Award would allow it. Without Year-Round Pell, the student would have no remaining Pell Grant eligibility, as they have already received a 100% Scheduled Award of \$7,000 for 2024–25, but with Year-Round Pell, if the student remains in all other ways Pell-eligible, the student is eligible to receive up to an additional 50% of their \$7,000 Scheduled Award, for a maximum total of \$10,500.

Adding \$1,750 to the \$7,000 the student has already received, the school sees that the student will be awarded a total of \$8,750 for 2024–25, which is within their \$10,500 Year-Round Pell maximum. Note that the school does not increase the student's final award for the award year to match their Year-Round Pell maximum; the student's awards for each payment period are calculated according to the Pell rules described previously in this volume.

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Transfer Students and Remaining Eligibility

Calculating and Awarding Remaining Eligibility

The Pell payment for a transfer student is calculated in the same way as for any new student. That is, you must calculate payments for each payment period following the rules. However, a transfer student's remaining Pell eligibility at your school is reduced if the student received Pell funds for the same award year at any prior schools. You can identify the student's prior Pell disbursements when you review his or her Financial Aid History in NSLDS and COD.

Calculating Remaining Eligibility

Once you've identified the Pell amounts that a transfer student has already received for the ongoing award year, you must calculate the percentage of the Scheduled Award that has been used. This percentage is calculated by dividing the amount disbursed at the previous school by the student's Scheduled Award at that school (COD calculates this and you can refer to COD to see what the percentage of remaining eligibility will be for a student).

$$\frac{\text{Pell disbursed at prior school}}{\text{Scheduled Award at prior school}} = \% \text{ of Scheduled Award used}$$

Then subtract this percentage from 100% (or 150%, if the student is enrolled and eligible for a Year-Round award). The result is the maximum percentage of the Scheduled Award that the student may receive at your school. Note that a transfer student receives the same payments as any other student until the limit (up to 150% of a Scheduled Award, see Year-Round Pell & IASG section, previously in this chapter) is reached. **Give the student the full amount for each payment period, rather than trying to ration the remaining amount by splitting it evenly across the remaining terms.**

Payment Period for a Transfer Student at a Non-term School

When a student transfers into a non-term credit-hour or clock-hour program at a new school, that student is starting a new payment period.

For a transfer student, the length of the program is the number of clock or credit-hours and the number of weeks of instructional time that the student will be required to complete in the new program. If the remaining clock or credit-hours *or weeks of instructional time* are half an academic year or less, then the remaining hours and weeks of instructional time constitute one payment period.

Why Percentages are Used

The reason for using percentages when calculating remaining eligibility is that a student may have different Scheduled Awards at different schools/programs, and using percentages ensures that a student does not receive more than 100% (or 150%, if enrolled and eligible for a Year-Round award) of the student's Scheduled Award. For example,

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the costs of attendance at the two schools may be different. The percentages are also used to compare the portions of a student's total eligibility that have been used at both schools. (If the student's Scheduled Award is the same at both schools, the financial aid administrator can find the amount of the student's remaining eligibility simply by subtracting the amount received at the first school from the Scheduled Award).

Avoiding Pell Grant Overawards

A Pell Grant overaward can be caused by a school making an error in reading the Pell payment schedule (for example, using the wrong SAI or COA). A Pell Grant overaward can also be caused by a school using the wrong payment schedule (for example, using the full-time schedule to determine the award for a student who is not registered as a full-time student, or who dropped to less than full time enrollment status before beginning attendance in all classes.)

A Pell Grant overaward can also result if an applicant enters incorrect data on a FAFSA and the EFC derived from the incorrect data is smaller than it should be (for more detail about the FAFSA and EFC data, see the Application and Verification Guide). A Pell overaward also exists if a student scheduled to receive a Pell Grant fails to begin class or is otherwise determined to be ineligible for FSA assistance (for example, having exceeded the Lifetime Eligibility Used [LEU]) in COD.

Finally, an overaward exists whenever a student is scheduled to receive or is receiving a Pell Grant for attendance at two or more schools concurrently. All of these Pell Grant overawards must be corrected. For more detail on the requirements and methods of resolving overawards, see *Volume 4, Chapter 3*.

NSLDS Financial Aid History and Transfer Monitoring

Before disbursing FSA funds to a transfer student, you must obtain a financial aid history for the student and you must inform NSLDS about the transfer student so that you can receive updates through the Transfer Student Monitoring Process. The financial aid history will not only identify Pell Grant disbursements that the student received at other schools, but also tell you if the student is ineligible for any FSA aid due to default or overpayment, if the student has reached or exceeded the annual or aggregate loan limits, or if the student has reached the Pell Lifetime Eligibility Used limit (LEU). There are several ways for you to get a student's financial aid history from NSLDS. You can:

- Use the NSLDS Financial Aid History section of the ISIR;
- Log on to the NSLDS Professional Access website and access the data online for a student;
- For multiple students, use the FAT 001 Web report, which you submit from the Reports tab on the NSLDS site (you retrieve the results through SAIG); or
- Send a batch Transfer Student Monitoring/Financial Aid History (TSM/FAH) Inform file to request aid history data for several students, which will be returned in either extract or report format through SAIG. The TSM/FAH processes and batch file

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layouts are posted on the IFAP website at the NSLDS reference materials link under Processing Resources.

Pell Grant Lifetime Eligibility Used (LEU)

Per the Consolidated Appropriations Act of 2012 (CAA), a student's maximum duration of Pell eligibility is six Scheduled Awards, as measured by the percentage of "Lifetime Eligibility Used" (LEU) field in COD (one Scheduled Award equals 100% LEU). A student is ineligible to receive further Pell Grant funds if they have reached or exceeded the 600% limit for the applicable program.

To calculate an award for a student whose LEU level will reduce the student's eligibility (i.e., an LEU greater than 400% but less than 600%), you must first check the most current LEU level in COD. Subtract the LEU percentage from 600%, then multiply the student's Scheduled Award by the resulting percentage.

Initial Calculations, Recalculations and Overawards

Initial Calculation

Date of Last Revision: 3/26/2025

An initial calculation is the first calculation that is made on or after the date DDBS has received a Department-produced SAI such as the student's initial FAFSA Submission Summary or ISIR with an official SAI and a Pell Eligibility Flag of "Y." This may be from a FAFSA Submission Summary/ISIR, the FAFSA Partner Portal, or FAFSA.gov. The initial calculation uses the student's enrollment intensity at the time of the calculation. If you've estimated the student's eligibility before receiving a FAFSA Submission Summary or ISIR for the student, you must confirm prior estimated eligibility or determine the student's eligibility at the time you receive the FAFSA Submission Summary or ISIR.

You should document the date that you initially calculate a student's Pell Grant, which can be no earlier than the date your school received a Department-produced SAI. If you fail to document the date of the initial calculation, you must use the later of

- a. The date that the FAFSA Submission Summary or ISIR is first received and the student's enrollment status as of that date, or
- b. The date the student enrolls.

Your school is considered to have received the ISIR on the date it was processed. This date is labeled "Processed Date" on the ISIR. In the case of a FAFSA Submission Summary, your school is considered to have received it on the date processed unless you document a later date. The processing date on a FAFSA Submission Summary is the date above the SAI.

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Federal Pell Grant Recalculation Policy

Date of Last Revision: 3/26/2025

DDBS awards Pell Grants to those who qualify. Students qualify by completing the FAFSA and the student would earn a Federal Pell Grant Based on need. Students are not required to pay back Federal Pell Grant. Recalculation occurs if a student has a status change or if their EFC changes.

Federal Pell Grant Recalculation Procedure

Director of Financial Aid

- Reviews Students ISIR
- When there is a question, communicates with third party servicer to determine student eligibility with revised ISIR.
- Prints off award letter for student to sign (keep a copy, give a copy) or emails to student using DocuSign;
- Enters disbursements into RollCall using correct disbursement dates

Business Center Liaison

- Requests disbursement on BEN's internal system

Third Party Servicer

- Calculates amount of Pell Grant student is eligible for;
- Awards Pell Grant to eligible student
- Disburses funds upon request

Director of Operations

- Transfers funds from federal funds account

Pell Recalculation Due to Change in SAI or Other Pell Eligibility Indicators

If the student's SAI or one of the other Pell eligibility indicators change due to corrections, updates, or an adjustment, and the change would alter the amount of the Pell award, you must recalculate the Pell award for the entire award year. In addition to the SAI, these indicators include the Max Pell, Minimum Pell, CFH, or IASG indicators. If the student has received more than their Scheduled Award amount due to the recalculation, then the student has received an overpayment. In some cases, you may be able to adjust an award by reducing or canceling later payments to the student.

A student selected for verification can be paid based on the corrected output document you receive during the "verification extension" (120 days after the student's last day of enrollment, not to extend beyond the deadline date established by a Federal Register notice). For example, if you receive a reprocessed ISIR reflecting the results of the student's verification during the extension period and the ISIR has a lower SAI than the previous ISIR (increasing the student's eligibility), you calculate the student's Pell Grant based on the valid ISIR.

If you receive a FAFSA Submission Summary or ISIR with a SAI different from the one you used for the payment calculation, you must first decide which document is valid. If the new information is the correct information, the new FAFSA Submission Summary or ISIR is the valid record. In most cases, you must recalculate the student's Pell award for the entire award year based on the new SAI.

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Pell Recalculation Due to Change in Enrollment Intensity

You must report changes to a student's enrollment status to NSLDS in a timely manner. Any change requiring a recalculation of award may also require an update to the student's enrollment intensity. If the student doesn't begin attendance in all of his or her classes, resulting in a change in the student's enrollment status, you must recalculate the student's award based on the lower enrollment status. A student is considered to have begun attendance in all of his or her classes if the student attends at least one day of class for each course in which that student's enrollment status was determined for Federal Pell Grant eligibility. Note that clock-hour and non-term programs are always based on full-time enrollment status for Pell.

If you recalculate a Pell award because the student's enrollment intensity has changed, you must also take into account any changes in the student's costs at that time. For example, if a student enrolls full-time for the first semester and then drops to less than half time during that semester, the student's costs will change, because only certain cost components are allowed for less-than-half-time students. You must use the cost for a less-than-half-time student for a full year to calculate the student's less-than-half-time award. You must not combine the two costs or average them.

Change in Enrollment Intensity within a Payment Period after a Student Has Begun Attendance in All Classes

The regulations don't require any recalculation for changes in enrollment status after the student has begun attendance in all of his or her classes. However, your school may have a policy of recalculating an award if a student's enrollment status changes within a term. If such a policy is established, it must take into account any changes in the student's COA and must be applied consistently to all students in a program. If your school chooses to recalculate for a student whose enrollment status increases from half-time to full-time, it must also recalculate for a student whose enrollment intensity decreases.

The initial calculation of a student's Pell Grant may occur subsequent to the "add/drop" date of the term, including terms with compressed coursework. If that is the case, you must use the student's effective enrollment status on the date of the initial calculation, and there would be no recalculations of the student's Pell Grant for the term due to a subsequent change in enrollment intensity, assuming the student began attendance in each class. If the student's payment for the term is being disbursed in a subsequent payment period, you may pay the student only for the coursework completed in the term.

If you don't establish a policy for recalculation within a term, a student who begins attendance in all classes would be paid based on the initial calculation, even if his or her enrollment status changes before the disbursement is made. If the student withdraws from all of his or her classes (or doesn't begin attending any classes), you must follow the procedures discussed in *Volume 5*.

Enrollment Change within Payment Period Example

Jonathan registers for a full-time course load at Coulton College, and Coulton initially calculates a full-time award for him. He begins attending all of his classes but subsequently drops to half-time. Depending on Coulton's recalculation policy, Jonathan may still be paid based on full-time

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enrollment as long as he's otherwise eligible for payment. On the other hand, if Coulton did not receive Jonathan's first processed valid SAR or ISIR with an official EFC until after he dropped to half-time enrollment, the Pell initial calculation would be based on his enrollment status at the time the output document was received (half-time).

Change in COA

When a student's COA changes during the award year, and his or her enrollment status remains the same, you may (but are not required to) establish a policy under which you recalculate the student's Pell Grant award. If you choose to establish a policy under which you recalculate Pell for changes in costs, you must consistently apply that recalculation policy to all students in the program.

Enrollment Change Recalculation Example

Sammy registers for a full-time course load (15 credit-hours), and Danbury College makes a first-term disbursement on that basis 10 days before the term starts. When the term starts, Sammy only begins attendance in three classes (9 credit-hours). Danbury must recalculate Sammy's Pell award based on the lower enrollment status. Any difference between the amount Sammy received and his new recalculated award is an overpayment.

Tuition and Fee Charges and Recalculation

If DDBS recalculates a student's Pell Grant due to a change in enrollment status, continuing to charge tuition and fees for credit hours no longer included in the student's enrollment status for Pell Grant purposes does not affect the requirement to recalculate the student's Pell Grant. For example, Jayson enrolls as a full-time student at Wilson University with 12 credits, but never starts attendance in a 3-credit class that starts after DDBS's "add/ drop" date. Jayson's award must be recalculated as three-quarter-time even though the college charges tuition for any classes dropped after the "add/ drop" date and continues to charge Jayson for 12 credits.

Disbursement for Books and Supplies

Date of Last Revision: 3/26/2025

Disbursement of Books & Supplies for Pell Eligible Students 34 CFR 668.164(m)

A Federal Pell Grant eligible student, with a valid Institutional Student Aid Report (ISIR) on file with DDBS may purchase, by the seventh day of a payment period, the books and supplies required for the payment period by clarifying their intent to use HEA program funds at the time of registration if, 10 days before the beginning of the payment period:

- (i) DDBS could disburse the title IV, HEA program funds for which the student is eligible; and
- (ii) Presuming the funds were disbursed, the student would have a credit balance.

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The amount DDBS provides to the Federal Pell Grant eligible student to obtain for purchase books and supplies is the lesser of the presumed credit balance or the amount needed by the student, as determined by DDBS.

The Federal Pell Grant eligible student may opt out of the way DDBS provides for the student to obtain or purchase books and supplies.

If a Federal Pell Grant eligible student uses the way provided by DDBS to obtain or purchase books and supplies, the student is considered to have authorized the use of title IV, HEA funds and DDBS does not need to obtain written authorization.

30-day Delay Requirement

If the 30-day delayed disbursement provisions for Direct Loans apply to a student, and a Direct Loan is the only Title IV aid the student is receiving, DDBS does not have to comply with the provisions above. DDBS, in both its financial aid information and its notifications provided to students receiving FSA funds, is required to provide information detailing how DDBS will provide for Pell-eligible students to obtain or purchase required books and supplies by the seventh day of a payment period under certain conditions and how the student may opt out. The information must indicate whether DDBS will enter a charge on the student's account at DDBS for books and supplies or pay funds to the student directly. Also, during the financial aid counseling process, DDBS must explain, to students who qualify for advanced funds, how:

- To purchase books and supplies
- The process is handled at DDBS
- To opt out.

Verification

To be eligible to receive the disbursement for books and supplies, a student must meet all of the student eligibility requirements prior to the start of their payment period. In order to be covered by the special provisions for books and supplies a student must have completed the verification process, cannot have an unresolved "C" code on the SAR and ISIR, or have unresolved conflicting information within at least 10 days before the start of the student's payment period.

Institutional Charges vs. Non-Institutional Charges

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

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

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manner.

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

Prorating Institutional Charges

If an institution routinely debits students' ledger accounts for books, supplies, and equipment along with tuition and fees, it is an institutional charge. We consider all institutional charges to be part of a student's tuition and fees for the purposes of implementing the regulations found in 34 CFR 668.164(c)(1)(i) relating to the crediting of a student's account. The regulations provide a specific formula for prorating charges if an institution assesses charges for more than a payment period at a time.

For programs with substantially equal payment periods, where DDBS charges up-front for the whole program, total institutional charges, including any books, supplies or equipment charges, must be divided by the number of payment periods in the program. For other programs, DDBS must divide the number of clock hours in the payment period by the number of hours in the program and multiply the result by the total institutional charges for the program.

Regardless of whether DDBS charges for other types of tuition and fees by the payment period, if students do not have a real and reasonable opportunity to purchase the books, supplies, and equipment elsewhere and those items are intended for use over a greater timeframe than a payment period, the cost of books, supplies, and equipment (including kits) must be prorated when determining the amount of Title IV aid to credit for a given payment period.

In cases where an institution charges tuition and fees by payment period, but is required to prorate the cost of books, supplies, and equipment over more than one payment period, DDBS should add the cost of the books and supplies prorated under the regulatory formula to the tuition and fees it charges for the payment period when determining the amount of Title IV aid to credit to the student's account for that payment period and the amount to provide to the student as a credit balance.

Return of Title IV Funds Considerations

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

1. The prorated amount of the student's institutional charges as determined under 34 CFR 668.164(c)(5); or

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2. The amount of Title IV funds that DSDT retained as of the student's withdrawal date, which may exceed the prorated amount as a result of the student or parent's authorization for DSDT to retain those funds.

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

Fiscal Records and Disbursement Requirements for Pell Grants and Direct Loans

Fiscal Reporting Process Policy

Date of Last Revision: 3/26/2025

DDBS is required to submit financial records audited by a CPA with annually updated credentials from GAAP, ED, and COE. To remain in good standing with both the ED and COE, the audited financial report's outcome must fall within their guidelines.

Fiscal Reporting Process Procedure

Third-Party Servicer:

- Maintain records throughout the year.
- At the end of each year, submit the records and relevant documentation to DDBS (for review and verification).

Business Center Liaison & Director of Financial Aid:

- **Review and Verification:** Both administrators review the records and verify the accuracy of the information submitted by the third-party servicer.
- **Submission to Auditor:** After verification, the administrators submit the records to the Auditor for further review and approval.

Fiscal Recordkeeping Process Policy

Date of Last Revision: 3/26/2025

DDBS must keep comprehensive, accurate program and fiscal records related to its use of FSA program funds. The importance of maintaining complete, accurate records cannot be over-emphasized. Program and fiscal records must demonstrate DDBS can meet the administrative and fiscal requirements for participating in the FSA programs.

DDBS has a CPA and third-party auditor that maintains documentation of all fiscal records:

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Nathan Ferguson, CPA L.L.C.
120 E FM 544,
Suite 72 # 262
Murphy, TX 75094
(214) 263-7705
www.nathanfergusoncpa.com

Electronic Brain Solutions, LLC secures all of DDBS's electronic fiscal data.

Records must demonstrate proper administration of FSA program funds and a clear audit trail for FSA program expenditures. For example, records for each FSA recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed in accordance with program regulations. In addition to the general, institutional record keeping requirements discussed here, DDBS must also comply with all program-specific record keeping requirements contained in the individual FSA regulations.

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

- Hard copy
- Optical disk
- Microform
- USB Drive
- Computer file
- Other media formats.

All other record information, regardless of the format used, must be retrievable in a coherent hard-copy format or in a media format acceptable to the ED. The requirement providing for other media formats acceptable to the Department allows for the use of new technology as it is developed. The Department will notify DDBS of acceptable media formats; schools should not apply for approval of a media format.

DDBS must comply with the following laws of record retention:

- The minimum Record Retention Periods for FSA funds is approximately 3 years
- Loans are retained UNTIL THE END of the award year in which the student last attended
- The loan is satisfied, or the documents are needed to enforce the obligation
- The date on which a loan is assigned to the DOE, cancelled, or repaid
- End of the award year for which the aid was awarded
- End of the award year in which the report was submitted.

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

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contained on it is necessary for the document to be used for the purposes for which it is being retained.

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

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

Fiscal Recordkeeping Process Procedure

Third-Party Servicer

- **Record Maintenance:** The third-party servicer is responsible for maintaining accurate and up-to-date financial records for DDBS, including student accounts, transactions, and other relevant financial data.
- **End-of-Year Submission:** At the end of each fiscal year, the third-party servicer submits the financial records to the designated institution administrators (such as the Business Center Liaison or Director of Financial Aid) for review.

Business Center Liaison & Director of Financial Aid

- **Initial Review and Verification:** Both the Business Center Liaison and Director of Financial Aid receive the records from the third-party servicer and review them for completeness, accuracy, and compliance with relevant financial and regulatory standards.
 - This review includes verifying student balances, payments, disbursements, and financial aid.
- **Corrections (if necessary):** If discrepancies or errors are identified during the review, the administrators work with the third-party servicer to correct the records before further submission.
- **Approval and Final Verification:** After ensuring all records are accurate and complete, the administrators approve the records for submission to the Auditor.

Records Clerk

- All fiscal records, including the third-party servicer's documentation, administrator reviews, and auditor reports, must be retained according to institutional policy and regulatory requirements. This may include digital storage and/or physical storage in the Records Room.
- The retention period typically aligns with legal or accreditation requirements (e.g., 7 years).

Auditor

- **Auditing:** The Auditor is responsible for reviewing the submitted financial records and conducting an audit to ensure that the records comply with applicable accounting standards, regulatory requirements, and internal policies.
 - The Auditor may request additional documentation or clarification during the audit process.
- **Report Preparation:** Upon completion of the audit, the Auditor provides a formal report on the findings, including any recommendations for improvements or corrections.

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- **Final Approval:** The finalized audit report has been submitted to Director of Operations and Business Center Liaison for approval.

Disbursement of Federal Funds Policy

Date of Last Revision: 3/19/2025

DDBS will inform students of the amount of funds that they or their parents can expect to receive back from each FSA program. This includes FWS, how, and when those funds will be disbursed. This notification must be sent before the disbursement is made. If the funds include a Stafford Loan (whether Direct Loan), the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans. DDBS must provide the best information that it has regarding the amount of FSA program funds a student can expect to receive. Because the disbursements received by a student may differ slightly from the amount projected by DDBS due to loan fees and rounding differences, DDBS may include the gross amount of the loan disbursement or a close approximation of the net disbursement amount. DDBS must also notify students and/or parents when Stafford or PLUS loan funds are being credited to a student's account. This notification must be sent no earlier than 30 days before and no later than 30 days after crediting the student's account. The notification must include:

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

These policies apply to the following programs: Pell Grant and Direct Loans.

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

Disbursement of Federal Funds Procedure

Business Center Liaison

- (1) Notifications & Authorizations
 - a. Notification of disbursement
 - b. Required student/parent authorizations
 - c. Notification/authorization by electronic means
- (2) Disbursement rules/ timing of multiple disbursements
 - a. Funds may be disbursed up to 10 days before classes begin (in most cases)
 - b. Disbursements to 1st-time, 1st-year, Stafford borrowers must be delayed 30 days
 - c. Requirement to successfully complete coursework in clock-hour
 - d. DDBS may make unequal FSEOG disbursements to meet uneven costs
 - e. Under certain conditions, late disbursements must be made to students
- (3) Prompt disbursement rules
 - a. Usually there is a 3-day timeframe for DDBS to disburse to student/parent after receiving funds

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- i. Exception: school may delay returning Stafford/PLUS funds to the lender in some cases.
- b. DDBS may not use an in-person or telephonic conversation as the sole means of notification because these are not adequate and verifiable methods of providing notice
 - i. However, a school may use in person and telephone notices in addition to those provided in writing.

Director of Financial Aid

(4) Method of disbursement

- a. Credit to the student's account (school may hold credit balance if authorized)
- b. Disbursement directly to the student or parent

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

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

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

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

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

If a student or parent cancels an authorization to use FSA program funds, the cancellation or modification cannot be retroactive—it takes effect on the date that DDBS receives it from the student or parent. Upon notifying a student of their next disbursement by electronic mail or otherwise, following up on any electronic notice for which it receives an “undeliverable” message is encouraged.

Anytime a school returns a loan disbursement or any portion of a loan disbursement to a lender,

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the origination fee is reduced in proportion to the amount returned. If a student returns the full amount of a loan within 120 days of disbursement, the loan is cancelled, and the origination fee is eliminated.

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

Iraq and Afghanistan Service Grant Program

Date of Last Revision: 3/26/2025

Policy Reason

The Iraq and Afghanistan Service Grant (IASG) is awarded to a student whose parent or guardian died because of performing military service in Iraq or Afghanistan and the student is not receiving a Federal Pell Grant only because of that program's need requirement. The Iraq and Afghanistan Service Grant award amount provided to an eligible student for an award year may not exceed the maximum Federal Pell Grant for that award year with adjustments, if necessary, for things such as the student's enrollment status and the student's Title IV cost of attendance (COA) used to determine financial need.

It is important to note that the Iraq and Afghanistan Service Grant is not based on an eligible student's financial need nor is it considered estimated financial assistance that reduces the amount of any other Federal student aid that the student may also qualify for. It is also important to note that effective with the 2012-2013 award year, the duration of a student's eligibility to receive an Iraq and Afghanistan Service Grant is limited to a total of 12 semesters (or its equivalent).

Procedures for the Iraq and Afghanistan Service Grant

DOD Match Flag and SAR Comment Code 298

DDBS monitors incoming ISIRS for the DOD Match Flag "Y", with the parent's date of death and SSN for student(s) who could potentially be eligible for additional Title IV aid, including a maximum Pell Grant award or an Iraq and Afghanistan Service Grant.

The DOD Match Flag is the result of the match with the Department of Defense to identify an applicant whose parent was a member of the U.S. Armed Forces who died as a result of service in Iraq or Afghanistan after September 11, 2001.

When a student matches with the DOD file, the ISIR always shows a "Y" in the DOD Match Flag field and the parent's date of death is populated. But SAR comment code 298 (which informs the student of a possible change in the student's eligibility for federal student aid) is only generated when the CPS DOD Table is updated after the student filed the FAFSA (a system generated transaction occurs and generates the comment). For more details, see the 2021-22 ISIR Guide.

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Identification of Eligible Students and Notification by the Department

The Department will notify the student when a student appears to meet the criteria for Zero EFC treatment for children of soldiers or the Iraq & Afghanistan Service Grant, based on a match with a Department of Defense (DoD) file of eligible dependents. The match will be performed when a student submits a FAFSA or FAFSA correction (and periodically thereafter). When an eligible student is identified, the Department will generate a Central Processing System (CPS) transaction for the student, and the resulting ISIR will include a “DOD Match Flag,” associated comment code 298 (in some cases), and the parent or guardian’s date of death.

Note that Zero EFC treatment under this provision will not force an auto-zero EFC; the EFC will be calculated based on the student’s financial situation, but the flag and date of the parent or guardian’s death, along with the student’s calculated EFC, will aid DDBS in determining if the student is eligible for Zero EFC treatment for children of soldiers, or an award under the Iraq & Afghanistan Service Grant program. The Department will also send a letter to each matched student that informs the student of his or her possible increase in eligibility for FSA funds. The letter advises the student to contact his or her financial aid administrator for more information.

Additional Aid Eligibility for Certain Children of Soldiers: Zero EFC Treatment or Iraq & Afghanistan Service Grant

HEA Sec. 420R, November 6, 2009 Electronic Announcement

An otherwise Pell-eligible student whose parent or guardian died as a result of U.S. military service in Iraq or Afghanistan after September 11, 2001, may receive increased amounts of federal student aid if the student was less than 24 years old when the parent or guardian died, or was enrolled at an institution of higher education at the time of the parent or guardian’s death.

There are two different provisions for eligible children of soldiers, depending on whether the student has an EFC that falls within the range for Pell Grant eligibility or not.

Zero EFC Treatment for Dependents of Soldiers

A school must use an EFC of 0 to package all federal student aid if the student meeting the above criteria has a Pell-eligible EFC. (Note that the zero EFC is only used for packaging purposes; DDBS does not actually change the student’s calculated EFC.) When submitting an origination to COD for a student of this type, DDBS must include the CPS transaction containing the

DOD Match Flag set to “Y,” or the award will not be accepted.

A student with an EFC that is not Pell eligible is potentially eligible to receive an award under the Iraq & Afghanistan Service Grant program (see Iraq & Afghanistan Service Grant below).

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Iraq and Afghanistan Service Grant

To receive the Iraq & Afghanistan Service Grant, the student must have an EFC that is not Pell eligible. Iraq & Afghanistan Service Grants are made under the same terms and conditions as Pell, and disbursements for each payment period are calculated in the same manner as described for Pell.

Unlike Pell Grants, however, Iraq and Afghanistan Service Grant award amounts must be reduced as required by the federal budget cut known as the sequester.

When submitting an origination to COD for a student receiving an Iraq & Afghanistan Service Grant, DDBS must include the CPS transaction containing the Department of Defense (DOD) Match Flag set to “Y,” or the award will not be accepted. The award may not exceed the student’s COA. Iraq and Afghanistan Service Grants are not considered Estimated Financial Assistance for packaging purposes.

Note that children of public safety officers are not eligible for Iraq & Afghanistan Service Grants.

The Year-Round Pell provision also applies to Iraq & Afghanistan Service Grants.

Reconciliation

Monthly and Annual Reconciliation Policy

Date of Last Revision: 3/19/2025

The DDBS is responsible for reconciling all cash and funds disbursed on a monthly and annual basis. This reconciliation process involves comparing the disbursements with the Business Center Administrator, Records, ledger, and bank statements to ensure that all transactions align accurately.

Monthly Reconciliation Procedure

Business Center Liaison & Director of Financial Aid

- Compare the amounts disbursed (as reported by the third-party servicer, BEN) against Business Center records, ledger, and bank statements.
- Confirm the amount of funds disbursed each month according to the third-party service’s report and BEN records.
- Identify, review, and correct any discrepancies promptly.

Business Center Liaison:

- Determines the total amounts disbursed and cash collected each month.
- This determination is based on Business Center Administrator Records, the ledger, and bank statements.

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Annual Reconciliation Procedure

Business Center Liaison & Director of Financial Aid

- At the end of each fiscal year, the monthly reconciliations are aggregated, and a comprehensive review is conducted to ensure that the totals from all months align with the annual Business Center records, ledger, and bank statements.
- The annual reconciliation also includes reviewing the total disbursed funds and collected cash, ensuring that any adjustments made throughout the year are accounted for accurately.

This procedure ensures that the financial records are aligned and consistent between the Financial Aid and Business Center departments, maintaining accurate financial tracking and reporting on both a monthly and annual basis.

Chapter 6 Federal Direct Loan Program

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Borrower Eligibility for Federal Direct Loans/Parent PLUS Loans

Date of Last Revision: 3/26/2025

Policy Reason

Before the School originates a Federal Direct Loan, it must determine the student's eligibility.

Direct Loan Eligibility

A person must be enrolled as a regular student in an eligible program to receive Federal Student Aid (FSA) funds. To be eligible for Direct Loans, undergraduate students attending a school that participates in the Pell Grant Program must first receive a determination of their eligibility for Pell Grants. Generally, a student must be enrolled or accepted for enrollment in a degree or certificate program to receive Title IV funds. A student must meet all of the general Title IV eligibility requirements and be enrolled at least half-time.

Cost of Attendance

Cost of attendance policy and procedure is covered in chapter 4 of this manual.

Estimated Financial Assistance

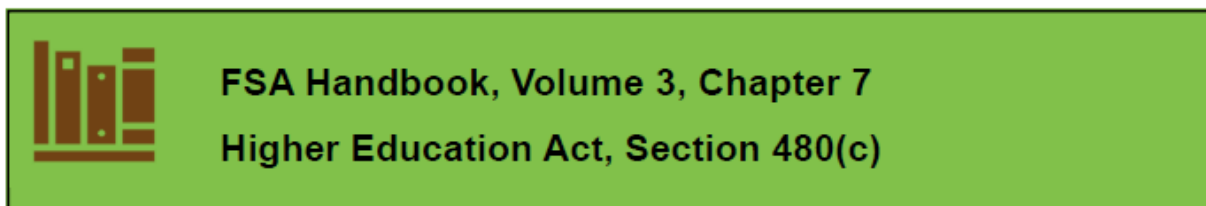
Estimated Financial Assistance (EFA) is the amount of federal, state, institutional, and private financial assistance a school estimates a student will receive. As part of a packaging calculation, it is the aid received, or expected to receive, during a payment period of enrollment.

EFA includes sources of support that a student receives as a result of being a student. Some examples include:

- Pell Grants
- Educational loans
- Grants and scholarships
- Tuition and fee waivers
- Net earnings from need-based employment
- Fellowships and assistantships
- Employer tuition reimbursement

Treatment of VA Educational Benefits

VA educational benefits are not treated as estimated financial assistance (EFA). Veterans' educational benefits are also not to be counted as income, and therefore are not reported as income on the FAFSA.



150% Direct Subsidized Loan Limit

On December 27, 2020, Congress passed the Consolidated Appropriations Act, which in part, repealed the lifetime limit on the period for which a borrower can receive subsidized loans of up to 150% of program length (often referred to as Subsidized Usage Limit Applies).

General Requirements

Date of Last Revision: 3/26/2025

Policy Reason

To ensure Federal Direct Loan/PLUS loans are awarded properly

Basics of Student Loans

The U.S. Department of Education (ED) offers Direct Loans through the William D. Ford Federal Direct Loan (Direct Loan) Program. There are three types of Direct Loans that can help students and parents pay for education after high school.

LOAN TYPE	AVAILABLE TO	DETAILS AND UPDATES
Direct Subsidized Loans*	Undergraduate students who have financial need	StudentAid.gov/sub-unsub
Direct Unsubsidized Loans*	Undergraduate, graduate, and professional degree students	StudentAid.gov/sub-unsub
Direct PLUS Loans	Graduate and professional degree students, and parents of dependent undergraduate students (you must not have an adverse credit history)	StudentAid.gov/plus

Subsidized and unsubsidized loans are federal student loans for eligible students to help cover the cost of higher education at a four-year college or university, community college, or trade, career, or technical school. The U.S. Department of Education offers eligible students at participating schools Direct Subsidized Loans and Direct Unsubsidized Loans. (Some people refer to these loans as Stafford Loans or Direct Stafford Loans.)

Chapter 6 Federal Direct Loan Program

Steps to Receive Direct Loans

Step 1: Fill out the FAFSA form

To apply for Direct Loans, you need to complete the Free Application for Federal Student Aid (FAFSA®) form every year you're in school. Completing and submitting the FAFSA form is free, and the fastest and easiest way to do so is online at StudentAid.gov.

Step 2: Complete the Loan Agreement (Master Promissory Note (MPN)) and Loan Entrance Counseling

Before you can receive a Direct Loan, you'll have to sign a loan agreement called a Master Promissory Note (MPN). If you're borrowing for the first time, you'll also need to complete Entrance Counseling. Both requirements can be completed on StudentAid.gov.

Step 3: Determine how much you should borrow

Figure out how much money you will need to borrow to cover your education expenses for each year you're in school.

Your school determines the amount and loan type(s) you can borrow based on your cost of attendance and other financial aid you receive each academic year. However, there are limits on the amount in subsidized and unsubsidized loans that you may be eligible to receive each academic year and the total amounts that you may borrow for undergraduate and graduate study (aggregate loan limits). The actual loan amount you are eligible to receive each academic year may be less than the annual loan limit. These limits vary depending on:

- What year you are in school and
- Whether you are a dependent or independent student.

Direct Loan Origination Fees

Origination fees are deducted from the gross amount of the loan borrowed. The loan fee is a percentage of the loan amount and is proportionately deducted from each loan disbursement. The percentage varies depending on when the loan is first disbursed, as shown in the chart below.

Loan Fees for Direct Subsidized Loans and Direct Unsubsidized Loans

First Disbursement Date	Loan Fee
On or after 10/1/20 and before 10/1/25	1.057%
On or after 10/1/19 and before 10/1/20	1.059%

Loan Fees for Direct PLUS Loans

First Disbursement Date	Loan Fee
On or after 10/1/20 and before 10/1/25	4.228%
On or after 10/1/19 and before 10/1/20	4.236%

Loans first disbursed prior to Oct. 1, 2019, have different loan fees.

Direct Loan Interest Rates

Interest Rates for Direct Loans First Disbursed on or After July 1, 2024, and Before July 1, 2025

Loan Type	Borrower Type	Fixed Interest Rate
Direct Subsidized Loans and Direct Unsubsidized Loans	Undergraduate	6.53%
Direct Unsubsidized Loans	Graduate or Professional	8.08%
Direct PLUS Loans	Parents and Graduate or Professional Students	9.08%

All interest rates shown in the chart above are fixed rates. A fixed rate will not change for the life of the loan.

Chapter 6 Federal Direct Loan Program

Interest Payments

If you choose not to pay the interest while you are in school and during grace periods, and during deferment or forbearance periods, your interest will accrue (accumulate) and be capitalized (that is, your interest will be added to the principal amount of your loan).

Annual Limits for Subsidized and Unsubsidized Loans

The following chart shows the annual limits for subsidized and unsubsidized loans for both dependent and independent students.

Year	Dependent Students (except students whose parents are unable to obtain PLUS Loans)	Independent Students (and dependent undergraduate students whose parents are unable to obtain PLUS Loans)
First-Year Undergraduate Annual Loan Limit	\$5,500-No more than \$3,500 of this amount may be in subsidized loans.	\$9,500-No more than \$3,500 of this amount may be in subsidized loans.
Second-Year Undergraduate Annual Loan Limit	\$6,500-No more than \$4,500 of this amount may be in subsidized loans.	\$10,500-No more than \$4,500 of this amount may be in subsidized loans.

Master Promissory Note Requirement

Policy Reason

To include procedures that outline requirements for borrowers to complete the Master Promissory Note (MPN).

Master Promissory Note Policy

Date of Last Revision: 3/26/2025

Completion of the Master Promissory Note (MPN) is required before a student can receive their first Direct Subsidized or Direct Unsubsidized Loan as an undergraduate. Parent borrowers who elect to take out the Parent PLUS loan are also required to complete a Master Promissory Note for a Parent PLUS loan prior to disbursement.

Master Promissory Note Information

The Master Promissory Note (MPN) is the legal document used to make one or more Direct Loans for one or more academic years (up to 10 years). By signing an MPN, the borrower is agreeing to repay all loans made under the MPN. Schools may choose to use Master Promissory

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Notes to make multiple loans for multiple academic years (Multi-Year Functionality feature) or choose to require that each borrower sign a new note for each academic year (Single-Year Functionality feature).

MPNs are not school-specific and may be used across schools. For example, if a student transfers from school A to school B, the previously completed MPN may be used to obtain loans while attending school B (if school B also uses the Multi-Year Functionality feature of the MPN).

Master Promissory Note Procedure

The Master Promissory Note (MPN) can be completed online at studentaid.gov. The MPN is your promise to repay your loan(s) and any accrued interest and fees to the U.S. Department of Education. It also explains the terms and conditions of your loan(s).

You may receive more than one loan under an MPN over a period of up to 10 years to pay for your or your child's educational costs. Completion of the MPN is transmitted to your School.

For a PDF or Read-Only version of the student subsidized/unsubsidized Direct Loan MPN, go to

<https://studentaid.gov/mpn/subunsub/landing>.

For a PDF or Read-Only version of the Parent PLUS MPN, go to

<https://studentaid.gov/mpn/parentplus/landing>.

Counseling Requirements

Policy Reason

To include procedures that outline requirements for initial and exit counseling.

Entrance Counseling Policy

Date of Last Revision: 3/26/2025

Entrance Counseling is required before a student can receive their first Direct Subsidized, or Direct Unsubsidized Loan as an undergraduate. Parent borrowers who elect to take out the Parent PLUS loan are also required to complete Entrance Counseling prior to disbursement.

Entrance Counseling Procedure

To ensure that students understand their responsibilities regarding their obligations that they are assuming, if a student has not previously received a subsidized, unsubsidized, or a PLUS loan (graduate/professional students only) under the Direct Loan Program, the student must complete entrance counseling for their specific loan type before receiving any funds.

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Documentation of any prior approvals of loans, Title IV funds, or HEA funds will be available for review from the National Student Loan Data System (NSLDS). This documentation should include a transcript or other similar forms from any previous institution that demonstrates Title IV enrollment.

A counseling session will take 20-30 minutes to complete. Students must complete the counseling in a single session. Students cannot save a partially completed counseling session. The Financial Aid Office will contact students via email to notify them of the requirement of Entrance Counseling. **Studentaid.gov** provides entrance loan counseling in an interactive, online format. All students will be informed that Entrance Counseling is required before they can receive their first Direct Subsidized or Direct Unsubsidized Loan as an undergraduate.

Initial Loan Counseling 685.304(a) for Direct Subsidized Loan, Direct Unsubsidized Loan, and Direct PLUS Loan Borrowers

Counseling Borrowers	Located In	Offices Involved
<p>Initial Counseling: Must ensure that entrance counseling is conducted with each student loan borrower prior to making the first disbursement of the proceeds of a loan to a student borrower unless the student borrower has received a prior Loan. <u>685.304(a)(2)</u></p>	Student's file	Financial Aid
<p>Entrance Counseling for borrowers must provide the borrower with comprehensive information on the terms and conditions of the loan and on the responsibilities of the borrower with respect to the loan. This information may be provided to the borrower:</p> <ul style="list-style-type: none"> • During an entrance counseling session, conducted in person; • On a separate written form provided to the borrower that the borrower signs and returns to the school; or • Online or by the interactive electronic means, with the borrower acknowledging receipt of the information. <p><u>685.304(a)(3)</u></p>	Financial Aid Office	Financial Aid
<p>If entrance counseling is conducted online or through interactive electronic means, the school must take reasonable steps to ensure that each student borrower receives the counseling materials, and participates in and completes the entrance counseling, , which may include completion of any interactive program that tests the borrower's understanding of the terms and conditions of the borrower' loans. <u>685.304 (a) (3)iii</u>.</p>	Financial Aid Office	Financial Aid
<p>Must ensure that an individual with expertise in the title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. As an alternative, in the case of a student borrower enrolled in a correspondence program or a study-abroad program approved for credit at the home institution, the student borrower may be provided with written counseling materials before the loan proceeds are disbursed. <u>685.304(5)</u></p>	Financial Aid Office	Financial Aid
<p>Entrance counseling for Direct Subsidized Loan Direct Unsubsidized Loan borrowers must explain the use of a Master Promissory Note (MPN), emphasize to the borrower the seriousness and importance of the repayment obligation the student borrower is assuming. And describe the information outlined in <u>685.306</u> and <u>685.307</u></p>	Financial Aid Office	Financial Aid
<p>Develop initial loan counseling materials to include all of the elements outlined in <u>685.304(a)(6)</u>.</p>	Financial Aid Office	Financial Aid

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Maintain documentation of initial counseling in each student's file. <u>685.304(9)</u>	Student's file	Financial Aid
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Exit Counseling Policy

Date of Last Revision: 3/26/2025

Just as students who receive Direct Loans must complete entrance counseling prior to receiving their first loan disbursement, a student who withdraws or graduates must be provided exit counseling if they received Direct Loans at DDBS.

Because student borrowers are required to be enrolled at least half-time to receive Direct Loans, exit counseling must also be provided to students who drop below half-time enrollment.

As with entrance counseling, students may complete exit counseling at **studentaid.gov**, using the Department's counseling guide, or schools may provide counseling via other methods if all required elements are present. Though the elements of exit counseling are similar to entrance counseling, the focus is more on helping students to transition to repayment and manage their Direct Loan debt responsibly.

Exit Counseling Procedure

Regulations require that schools provide exit counseling. DDBS requires all students who have received a student loan to complete an in-person exit counseling workshop or an online exit counseling at **studentaid.gov**.

The Financial Aid Office will contact students via email to notify them of the requirement of Exit Counseling. **Studentaid.gov** provides exit loan counseling in an interactive, online format.

Students must complete the counseling in a single session. All students will be informed that Exit Counseling is mandatory prior to graduation, program completion, and upon withdrawal.

Exit Loan Counseling 685.304(b) for Direct Subsidized and Direct Unsubsidized Loan Borrowers

Counseling Borrowers	Located In	Offices Involved
<p>Exit Counseling: Determine the method that exit counseling is conducted with each Direct Subsidized Loan or Direct Unsubsidized Loan borrower shortly before the student borrower ceases at least half-time study at the school (i.e. in person, audiovisual presentation or interactive electronic means). If interactive electronic means is the method, your procedures include reasonable steps to ensure that each student borrower receives the counseling materials and participates in and completes the exit counseling.</p> <p>Note: Grad PLUS exit requirement: If a school is conducting exit counseling for a borrower who has also received a Stafford loan, Grad</p>	Financial Aid Office	Financial Aid

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<i>PLUS information must be included in the exit counseling.</i>		
Ensure staff member with expertise in the Title IV programs to be reasonably available shortly after the exit counseling to answer questions.	Financial Aid Office	Financial Aid
Ensure borrowers enrolled in correspondence programs or study abroad programs are provided with written counseling materials within 30 days after the student borrower completes the program.	n/a	n/a
Ensure borrowers who withdraw from the school without the school's prior knowledge or fail to complete exit counseling are provided with exit counseling through interactive electric means or by mailing written counseling materials to the borrower's last known address within 30 days after the school learns the borrower has withdrawn or failed to complete the required exit counseling.	Financial Aid Office	Financial Aid
Develop exit counseling materials to include all of the elements outlined in <u>685.304(b)(4)</u> .	Financial Aid Office	Financial Aid
Ensure that the information required in <u>685.304(b)(4)(ix)</u> is provided to the Secretary within 60 days after the borrower provides the information.	Financial Aid Office	Financial Aid
Maintain documentation of exit counseling in each student's file.	Financial Aid Office	Financial Aid

Parent Loan for Undergraduate Students (PLUS)

Date of Last Revision: 3/26/2025

Policy Reason

To provide information on the Parent PLUS Loan and detail instructions on obtaining a Parent PLUS Loan to assist with the student's educational expenses.

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Parent PLUS Direct Loan Program

The U.S. Department of Education makes Direct PLUS Loans to eligible parents through schools participating in the Direct Loan Program. A Direct PLUS Loan is commonly referred to as a parent PLUS loan when made to a parent borrower.

Because DDBS is strictly a trade school, the graduate student PLUS Loan is not offered.

Parent PLUS Direct Loan Eligibility

To receive a parent PLUS loan, you must

- Be the biological or adoptive parent (or in some cases, the stepparent) of a dependent undergraduate student enrolled at least half-time at an eligible school;
- Not have an adverse credit history (unless you meet certain additional requirements); and
- Meet the general eligibility requirements for federal student aid.

Steps to Apply for the Parent PLUS Loan

Step 1: Fill out the online parent PLUS application form

Your student must have filled out the FAFSA application form. To apply for the parent PLUS loan, go to the online Direct PLUS Loan Application for Parents at [**https://studentaid.gov/plus-app/parent/landing**](https://studentaid.gov/plus-app/parent/landing).

The information that you provide will be sent to the school that you select. The School will use the information collected to determine your eligibility for a Direct PLUS Loan as a parent and process your application.

Step 2: Complete the Master Promissory Note (MPN) and Entrance Counseling

If you are eligible for a parent PLUS loan, you will be required to sign a Direct PLUS Loan *Master Promissory Note* (MPN), agreeing to the terms of the loan. If you are a first-time PLUS loan borrower, you are also required to complete Entrance Counseling at [**studentaid.gov**](https://studentaid.gov). If you're taking out parent PLUS loans for more than one child, you'll need to sign separate Direct PLUS Loan MPNs for the loans you receive for each child.

Step 3: Determine how much you should borrow

The maximum PLUS loan amount you can borrow is the cost of attendance at your child's school minus any other financial assistance your child receives. The cost of attendance is determined by the school.

PLUS Loan Request for Supplemental Information

When you apply for a Direct PLUS Loan as a parent, you can authorize the school to use your loan funds to satisfy your student's other educational related charges after tuition and fees, and

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room and board (for on-campus students) have been paid. You are not required to provide this authorization.

As a parent borrower, you can also use the Direct PLUS Loan Application to:

- Designate whether the school pays any credit balance to the student or to you.
- Request a deferment while the student is in school, and for an additional deferment for six months after the student ceases to be enrolled at least half time, and
- Request a change to the loan amount specified in a previously submitted application.

Parent PLUS Loan Origination Fee

There is a loan fee on all Direct PLUS Loans. Origination fees are deducted from the gross amount of the loan borrowed. The loan fee is a percentage of the loan amount and is proportionately deducted from each loan disbursement. The percentage varies depending on when the loan is first disbursed, as shown in the chart below.

Loan Fees for Direct PLUS Loans

First Disbursement Date	Loan Fee
On or after 10/1/20 and before 10/1/25	4.228%
On or after 10/1/19 and before 10/1/20	4.236%

Loans first disbursed prior to Oct. 1, 2019, have different loan fees.

Parent PLUS Loan Current Interest Rate

The Direct PLUS Loan offers a fixed 8.05% interest rate for the 2023-2024 school year and flexible loan limits. This is a fixed interest rate for the life of the loan.

The Direct PLUS Loan offers a fixed 9.08% interest rate for the 2024-2025 school year and flexible loan limits. This is a fixed interest rate for the life of the loan.

Adverse Credit History

A credit check will be performed during the application process. If you have an adverse credit history, you may still receive a parent PLUS loan through one of these two options:

1. Obtaining an endorser who does not have an adverse credit history. An endorser is someone who agrees to repay the parent PLUS loan if you do not repay it. The endorser cannot be the child on whose behalf you are borrowing.

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2. Documenting to the satisfaction of the U.S. Department of Education that there are extenuating circumstances relating to your adverse credit history.

With either option 1 or option 2, you also must complete credit counseling for parent PLUS loan borrowers.

**Electronic Announcement dated
January 27, 2015**

What is considered “adverse credit”?

(1) Has one or more debts with a total combined outstanding balance greater than \$2,085, that are 90 or more days delinquent as of the date of the credit report, or that have been placed in collection or charged off, during the two years preceding the date of the credit report; or

(2) Has been the subject of a default determination, bankruptcy discharge, foreclosure, repossession, tax lien, wage garnishment, or write-off of a debt under Title IV of the Act during the five years preceding the date of the credit report.

Additional Direct Unsubsidized Loans

If you are unable to obtain a parent PLUS loan, your child may be eligible for additional unsubsidized loans. Contact the school’s financial aid office for more information.

Note: Before originating a loan for increased loan amounts, the financial aid administrator must document the basis of the dependent student’s increased unsubsidized loan eligibility. It is not automatic.

Special Loan Counseling for Certain PLUS Borrowers

Special loan counseling is required for any PLUS Loan applicant who has an adverse credit history but who qualifies for a PLUS Loan through the process for reconsideration due to extenuating circumstances or by obtaining an endorser for the loan. This counseling is mandatory only for these certain PLUS Loan borrowers. However, it is available to all PLUS Loan borrowers. This special PLUS Loan counseling is separate and distinct from the PLUS Loan

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entrance counseling that all graduate and professional student PLUS Loan borrowers must complete. Special PLUS Loan counseling is available on [Studentaid.gov](https://studentaid.gov) (click on *Apply for Aid*). Borrowers that are required to complete this counseling will be notified. Once the counseling is completed, COD will generate a code and notify the school.

Student Loan Code of Conduct for Educational Student Loans

Date of Last Revision: 3/25/2025

Created 11/15/2023

Executed: 11/17/2023

The Higher Education Opportunity Act of 2008 (HEOA) requires that institutions participating in the federal student loan programs develop, publish and enforce a code of conduct with respect to students loans.

DDBS is committed to the highest standards of professional conduct and staff are expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner of student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity. Our staff will refrain from taking any action they believe is contrary to law, regulation, or the best interests of the students and parents that they serve. The financial aid staff's number one priority is to serve and act in the best interest of all students. In pursuing this goal, employees must remain cognizant of all federal and state regulations and institutional policies and remain in compliance with said regulations and policies, without limitation.

The code of conduct specifically bans any revenue-sharing arrangements with any lender, steering borrowers to particular lenders or delaying loan certifications, and offering of funds for private loans to students in exchange for providing concessions or promises to the lender for a specific number of FSA loans, a specified loan volume, or a preferred lender arrangement.

The code of conduct applies to the officers, employees, and agents of the school and must also prohibit employees of the financial aid office from receiving gifts from a lender, guaranty agency, or loan servicer.

The code also prohibits financial aid office staff from accepting compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans; and service on an advisory board, commission, or group established by lenders or guarantors, except for reimbursement for reasonable expenses.

Distribution

Annual distribution of the Code of Conduct to all school officers, employees and agents with responsibilities related to student loan activities

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Definitions

1. “**Employee**” or “**School employee**” means any employee, agent, student financial aid staff member, director, officer or trustee of the School. For purposes of the Code of Conduct provisions relating to gifts, this term includes family members of the employee and those living in the same household as the employee.
2. “**School**” means all campuses, departments or other components of the higher education institution adopting this Code of Conduct that is located in Michigan.
3. “**Student loan lender**” or “**lender**” means any entity involved in making, holding, consolidating, originating, servicing or guaranteeing any loan to students or parents to finance higher education expenses. This includes lenders who provide private education loans as well as lenders who provide loans that are made, insured or guaranteed by the U.S. Department of Education, except loans under the William D. Ford Direct Loan Program.
4. “**Revenue-sharing arrangement**” means an arrangement between a school and a lender under which –
 - a. A lender provides or issues a loan that is made, insured, or guaranteed under a Title IV financial aid program.
 - b. The institution recommends the lender or the loan products of the lender and, in exchange, the lender pays a fee or provides other material benefits, including revenue- or profit-sharing, to the institution, an officer, or employee of the institution, or an agent.
5. “**Gift**”
 - a. In general means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary or retail value of more than ten dollars (\$10.00) as calculated over a 12-month period, or as defined by a School policy consistent with applicable federal and state law. The term includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.
 - b. Exceptions include:
 - i. Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.
 - ii. Food, refreshments, training, or informational material furnished to an officer or employee of an institution, or to an agent, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the institution, if the training contributes to the professional development of the officer, employee, or agent.

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- iii. Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the institution if the terms, conditions, or benefits are comparable to those provided to all students of the institution.
 - iv. Entrance and exit counseling services provided to borrowers to meet the institution's responsibilities for entrance and exit counseling as required under the Title IV financial aid loan program as long as the institution's staff are in control of the counseling (whether in person or via electronic capabilities) and the counseling does not promote the products or services of any specific lender.
 - v. Philanthropic contributions to an institution from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.
 - vi. State education grants, scholarships, or financial aid funds administered by or on behalf of a State.
- c. Gifts to a family member of an officer or employee of an institution, to a family member of an agent, or to any other individual based on that individual's relationship with the officer, employee, or agent, will be considered a gift if:
- i. The gift is given with the knowledge and acceptance of the officer, employee, or agent; and
 - ii. The officer, employee, or agent has reason to believe the gift was given because of the official position of the officer, employee, or agent.

Code of Conduct

This code is supplemental to existing school policies related to conflicts of interest and commitment.

Institutional Compensation

Dymond Designs Beauty School will not enter into any revenue-sharing arrangement with any lender. The school will not accept anything of value from a student loan lender in exchange for any advantage or consideration to the lender related to its education loan activity. This prohibition shall include, but not limited to: (1) the School's receipt from any lender of any computer hardware for which the School pays below market prices, (2) preferential rates for, or access to, a lender's other financial products and (3) printing costs or services.

Financial Relationship Prohibition

No officer or employee of Dymond Designs Beauty School who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

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Dymond Designs Beauty School shall inform borrowers of the procedure(s) for completing the Master Promissory Note or other loan agreement with the lender of the borrower's choice, whether the lender is the U.S. Department of Education or a private lender. Dymond Designs Beauty School does not have preferred lender arrangements of any kind or a preferred list.

Private Loans

Dymond Designs Beauty School shall not certify student eligibility for a private education loan without first informing the borrower that (a) federal financial assistance (including grants and Title IV loans) may be available and (b) federal loans may provide more advantageous terms to the borrower than private loans.

Opportunity Loans

Dymond Designs Beauty School shall not enter into an opportunity loan agreement with a student loan lender under which the School provides concessions or promises to the lender that prejudice other borrowers. An "opportunity" loan means a student loan provided to borrower with poor or no credit history, or who otherwise would not meet the student loan lender's eligibility criteria. In addition, DDBS shall not certify student eligibility for an opportunity loan made available pursuant to an agreement between the School and a lender unless (i) the agreement includes the option of short term or partial loans not to exceed one year and (ii) the School informs the borrower of the short term or partial loan option, so the borrower can consider different or less expensive financing if the borrower's financial condition improves.

Staffing Assistance from Lenders

Dymond Designs Beauty School shall not request or accept from any lender any assistance with call center or financial aid office staffing, including in-person school-required initial or exit counseling, except as permitted by applicable federal student loan requirements. The School shall ensure that any lender employees on campus are accurately represented as such and not misidentified as School agents or employees. While lenders may provide professional development training to financial aid administrators and participate in financial literacy outreach activities, lender employees must clearly disclose the name of the entity preparing any written materials and may not promote the lender's products.

Implementation

Dymond Designs Beauty School:

1. Agrees to publish the Student Loan Code of Conduct prominently on its website within ten business days of its adoption by the School; and
2. Shall require all of its employees with direct responsibilities relating to student loans to obtain training concerning the Student Loan Code of Conduct, applicable federal and state student loan laws and regulations, and related School policies and procedures within 90 days of the date the School adopts this Code, or for new employees, within 90 days of the date of hire. The School shall adopt procedures to ensure these employees maintain current knowledge of the Code and applicable regulations.

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Payment of a Refund or Return of Title IV Funds

Date of Last Revision: 3/26/2025

Policy Reason

To include procedures for the school to pay a portion of the student's refund or return of title IV, HEA program funds that is allocable to a Direct Loan to the Secretary.

Notification

DDBS provides simultaneous written notice to the borrower if the School pays a refund or return of title IV, HEA program funds to the Secretary on behalf of the borrower.

In determining the portion of a student's refund or return of title IV, HEA program funds that is allocable to a Direct Loan, the school follows the procedures established in 668.22 for allocating and paying a refund or return of title IV, HEA program funds that is due.

Return of Title IV Funds Procedure

Refer to Chapter 3 for information on the Return of Title IV funds.

Direct Loan Quality Assurance System

Date of Last Revision: 3/26/2025

Direct Loan Quality Assurance System

DDBS is required by statute, 34 CFR 685.300(b)(9), to implement a quality assurance system within our financial aid office. The Director of Financial Aid in concert with our third-party servicer, The Boston Educational Network, initiates and maintains the quality assurance system. The Director of Operations of the School will review and comment periodically on the effectiveness of this system.

The Director of Financial Aid is responsible for updating the process to ensure DDDBS complies with the Direct Loan quality assurance component.

Reporting to the Common Origination and Disbursement (COD) System

1. Reporting Loan Originations
 - a. Once an enrolled student has received a valid Institutional Student Information Record (ISIR) and has met all our enrollment requirements, a financial aid profile is sent to our servicer, BEN. The profile consists of the student's enrollment/registration information and the aid the student is requesting.
 - b. BEN then reviews the information, cross-references the ISIR for any conflicting data, and then awards the student the appropriate aid.
 - c. The award letter is then retrieved by the school and provided to the student.

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- d. A loan origination record is submitted to COD by BEN.
- e. The next business day BEN retrieves the student's loan origination acknowledgement from COD. If necessary, any errors or rejections are reviewed and/or corrected and resubmitted to COD.

2. Reporting Loan Disbursements and Adjustments

- a. Based on the processing of loan disbursements (See Disbursing Loan Funds below), at the end of the workday BEN creates a loan disbursement file for transmission to COD. The file consists of all loan disbursements processed that working day.
- b. The file acknowledgement is then retrieved by BEN from COD.
- c. This file is imported into BEN's internal student accounting system.
- d. All files are reviewed. All accepted and rejected student files are identified at that time.
- e. If there are any errors or rejected files BEN promptly corrects the affected file(s) and resubmits a new file to COD. BEN then retrieves the corrected file submitted for corrections.
- f. BEN then reviews the corrected file and once again identifies any errors or rejections.
- g. Once all the disbursement files have been accepted by COD, BEN creates a disbursement roster containing all the accepted student disbursement records.

Disbursing and Returning Loan Funds

1. Disbursing Loan Funds

- a. Our financial aid office and BEN coordinate the disbursing of loan funds. Our primary focus is to ensure that students are eligible for Title IV aid at the time of disbursement. Both offices verify that all awarding issues have been satisfied (i.e. verification, C-Codes, loan origination, etc.). Our school will not disburse an "interim" disbursement to students before awarding issues have been resolved.
- b. Prior to requesting the student's first disbursement of student loans, the school performs or verifies that the student has completed loan entrance interview counseling.
- c. Once we have confirmed that the student has met all eligibility requirements (e.g. admissions, successful completion of a payment period, maintaining SAP, accepted award letter, COD accepted signed promissory note, etc.) we then log into the secure BEN institutional portal and request the student's disbursement.
- d. BEN reviews each student disbursement request with the goal of ensuring that the request is accurate and appropriate. If any question(s) arise, BEN will notify the school via a "compliance delay" notice before processing the student's disbursement request. The student's disbursement will be processed after the discrepancy has been resolved and no remaining eligibility issues exist.
- e. BEN processes the loan disbursement request in their internal accounting system.
- f. BEN creates and transmits a disbursement file to COD via the CPS (See Reporting Loan Disbursements and Adjustments above).

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- g. After ALL of the transmitted loan disbursement records have been accepted by COD, BEN creates a “disbursement roster” which we download from our school portal.
- h. We then review the roster for appropriateness and accuracy. We notify BEN if there are any variations between our expected disbursements and the actual disbursement roster.
- i. BEN then requests the funds using the G5 system. The funds are wired directly into our institutional Title IV (federal funds) account.
- j. The next business day we verify that the funds have been transmitted from ED into our federal funds account. We instruct BEN if the funds have not arrived or are different than the total amount on our disbursement roster. Next, we transfer those funds from the federal funds (Title IV) account to our operating account.
- k. We credit the student’s account with the amount of their disbursement(s). In addition, we notify the student that day of the disbursement, as well as, inform them they have the right to rescind all or part of the loan disbursement. We post the student’s account/ledger the date of the roster, which coincides with the date ED accepted the student disbursement.

This system is developed to ensure that all reporting of disbursements is in compliance with the ED’s 15-day reporting, posting, and notification requirements.

2. Returning Loan Funds

- a. Once it has been determined that a student has ceased enrollment our financial aid office immediately performs refund calculations. (Title IV and Institutional)
- b. If it has been determined that there is a Title IV refund due ED, the financial aid office notifies the Director of Operations of the refund amount that is needed to be deposited into the school’s federal funds (Title IV) account for this student refund.
- c. The Director of Operations then deposits the refund amount into the federal funds account. This may take place by a transfer of funds from the operating account to the federal funds account, or if for some reason this is not available a physical check is written, and a deposit is completed.
- d. On the date that the refund was deposited/transferred into the federal funds account, the business office notifies the financial aid office of this transaction.
- e. Once the financial aid office is notified of the refund transaction, we immediately notify BEN with a Refund Request form via secure email.
- f. The school posts the refund to the student’s account/ledger.
- g. BEN reviews the Refund Report for accuracy and appropriateness (i.e., T4 program, award year, amount, etc.).
- h. BEN then posts the refund(s) in G5.
- i. Once G5 retrieves the funds from the school’s account and acknowledges the deposit, BEN then notifies COD of the student’s refund.
- j. COD is notified of the date G5 acknowledged the refund, the T4 program refunded, as well as the corresponding award year.

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Making and Posting Student Title IV refunds are a high priority of our institution. Accuracy and timeliness are of utmost importance. A large amount of our Financial Aid training budget is dedicated to this issue. The ownership of the institution understands the complexity of this subject and strives to be in complete compliance.

Disbursing the Correct Loan Amount to the Correct Student

1. Disbursing the Correct Loan Amount

- a. With the assistance of our third-party servicer, BEN, we have a two-tier system of disbursing funds and adjustments.
- b. Before any disbursement is initiated a student, award letter has been generated by our third-party servicer and accepted by the student. We review this award letter for accuracy and appropriateness prior to delivering it to the student.
- c. The student's scheduled award is created, and an estimated date of disbursement is generated.
- d. All student loan origination records are submitted to COD at the time the award letter is generated.
- e. All loan origination records contain the amount and expected date of all anticipated disbursements for a student.
- f. Prior to disbursing any loan funds an "accepted" loan originated record must be on file for each student loan.
- g. The submission of the student loan disbursement record to COD must correspond identically with the student loan origination record, if not, COD rejects the record.
- h. No student disbursement is initiated until all disbursement records are accepted and processed by COD.

2. Disbursing to the Correct Student

- a. After reviewing each student's enrollment and financial aid information we submit a request for disbursement to our servicer, BEN. When requesting this disbursement, we review the expected/anticipated disbursement for this transaction.
- b. BEN reviews the request for accuracy and appropriateness. If the request is not accurate or appropriate (i.e., too early), the request is suspended until the discrepancy is resolved.
- c. BEN submits the disbursement to COD (the amount, award year, T4 program, etc.).
- d. BEN retrieves the accepted disbursement record from COD.
- e. The accepted disbursement record is then placed on a student disbursement roster and made available to us.
- f. We then review the roster for appropriateness and accuracy.
- g. If we do not have any issues, BEN then requests the roster funds via the G5 system.
- h. The Director of Operations notifies financial aid that the funds have been transmitted from ED to our federal funds account.
- i. The Business Office posts the roster detail to each individual's student account.

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- j. The students are then notified via receipts, that the disbursement has taken place and informs them of their right to rescind all or part of the loan disbursement.

Summary

To ensure accuracy, the Director of Operations verifies that the funds transmitted from ED to the school's federal funds account equal the grand total of BEN's roster. The Business Office posts the roster amount to each individual student account.

The Director of Operations verifies that the funds posted to the student's accounts equal the amount indicated on BEN's disbursement roster.

Reporting Requirements

Policy for Reporting Accurate Disbursement Dates to COD

Date of Last Revision: 3/18/2025

Once a student has started class or achieved the next level for financial aid disbursements, the following procedure is to be followed for accurately logging payments/disbursement dates to the student account card.

Procedure for Reporting Accurate Disbursement Dates to COD and Student Ledger

Prior to any and all disbursements of Title IV Federal funds, the Financial Aid Director verifies that the student has met a list of required criteria. Students who have opted to utilize Title IV funds must have first met all requirements that would have made them considered an eligible recipient. Once it has been established that the student is eligible, and the student's file has been awarded and processed then a disbursement request can be made. The criterion is as follows but not limited to:

- The student must physically matriculate in the program of their choice,
- The students must meet all of the outlined admissions requirements of the school,
- The student must have completed and submitted a Master Promissory Note for students who are electing to participate in the Direct Loan Program
- The student is enrolled at least half time.
- The student is maintaining SAP as per the school's policy.
- Entrance loan counseling has been completed.
- Award notifications have been accepted by the students.

The period start date must be entered. For period 1, it is always the student's start date. Subsequent period's start dates are determined by the date the student began the 2nd, 3rd, or 4th payment period. This information is found in the secure student database. The Business Center Administrator locates the period start date for each student and includes it in the disbursement request. The hour trigger number is entered for the next payment period. For instance, if it is the

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second payment period for Cosmetology, the number 450 is entered. A report is then generated showing the exact date the student hit that mark.

NOTE: Transfer, re-enroll and students with overlapping academic years may have different measurement points than those listed. The Director of Financial Aid works directly with BEN to determine the period start dates for these students.

The Financial Aid Director prints the SAP progress report for each payment period by going to the secure student database system and requesting the SAP progress report for each period as outlined above.

The Director of Operations, using the secure student database system, determines how many total clock hours the student has completed and enters that number on the disbursement request page. This number is found by selecting student master and selecting the student by name. The complete number of hours will appear in this section.

The Business Center Administrator logs in to the secure BEN portal and submits a disbursement request by clicking on the “Disbursement Requests” link.

The type of aid is selected, Pell or Direct Loans.

The payment period is selected and that is:

Cosmetology:

- P1 = 0 – 450 clock hours
- P2 = 451 – 900 clock hours
- P3 = 901 – 1200 clock hours
- P4 = 1201 – 1500 clock hours

Esthetics:

- P1 = 0 – 375 clock hours
- P2 = 376 – 750 clock hours.

Advanced Esthetics:

- P1 = 0 – 375 clock hours
- P2 = 376 – 750 clock hours.

BEN reviews each student’s disbursement request to ensure accuracy. If questions arise, BEN will notify the school via a posted compliance delay on the BEN website. Once the compliance delay has been resolved, BEN processes the loan disbursement request in their internal accounting system. BEN creates and transmits a disbursement file to COD via CPS. Once all of the transmitted loan disbursement records have been accepted by COD, BEN creates a disbursement roster.

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Once the disbursement report is generated by BEN, the disbursement report is printed and reviewed by the Business Center Administrator. If there are any discrepancies including the date posted, the Business Center Administrator contacts BEN to address the discrepancies. BEN then requests the funds from the G5 system. The disbursement date on the report is circled by the Director of Operations showing the date reported to COD. This avoids any confusion about what date is to be used. The circled date is verified to be the same as the date on the student ledger account. The Business Office logs the payments to the student ledger account and provides each student with a notice of disbursement and right to cancel for loan disbursements. Another copy of the notice is filed in the student file.

The disbursement report is filed by the Records Clerk.

The disbursement dates are reviewed once again during the monthly Title IV reconciliation.

Disbursement Notification Procedure

Third Party Servicer

- Disburses funds.

Director of Operations

- Transfers funds from FF Account

Director of Financial Aid

- Puts disbursements on ledger

Business Center Liaison

- Notifies students on ledger, email or gives student receipt.

Records Clerk

- Files disbursement report.

Policy for Timely Updates to NSLDS

Date of Last Revision: 3/18/2025

DDBS is responsible for accurate and timely accounting and reporting of the student's enrollment data to National Student Loan Data System (NSLDS). The accuracy and timeliness of the data reported to NSLDS is imperative for the USDE to determine if the student is still attending, must be moved into repayment, or is eligible for an in-school deferment, etc.

Student Schedule Change

Student

- Requests schedule change;
- Pays the requisite fee.

Business Center Representative

- Completes a Schedule Change form;
- Notifies the entire staff and pertinent faculty

Director of Financial Aid

- Makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Updates NSLDS within 30 days of the schedule change request;

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- In NSLDS, the effective date is entered, the new schedule is selected, and the new expected completion date is also entered;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change
- Gives this copy to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS;

Records Clerk

- Files the NSLDS printout in the applicable student's paper and digital files.

Student Leave of Absence - If DDBS has an LOA policy

Student

- Requests Leave of Absence in writing, according to the LOA policy;

Business Center Representative

- Completes a Leave of Absence form;
- Notifies the entire staff and pertinent faculty

Director of Financial Aid

- Makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Updates NSLDS within 30 days of the LOA
- In NSLDS, the effective date is entered, Leave of Absence is selected, and the new expected completion date is also entered;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change
- Gives this copy to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS;

Records Clerk

- Files the NSLDS printout in the applicable student's paper and digital files.

Student Graduates

Business Center Representative

- When a student graduates, updates the student database;
- Notifies the entire administrative staff via email;

Director of Financial Aid

- Makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Updates NSLDS within 30 days of graduation;
- In NSLDS, the effective date is entered and a status of Graduated is selected;
- Reviews the expected completion date previously entered into NSLDS;
- If it is accurate, no change is made;
- If it is not accurate, the accurate graduation date is entered prior to confirming the information;

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- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change
- Gives this copy to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS.

Records Clerk

- Prints out the student graduation certificate for the student and for the file;
- Files the NSLDS printout in the applicable student's paper and digital files.

Student Withdraws/Is Terminated

Business Center Representative

- When a student has withdrawn or is terminated, notifies the entire administrative staff and pertinent faculty;
- Assists the Director of Financial Aid with the refund/R2T4 calculation, when applicable;

Director of Financial Aid

- Upon notification that a student has withdrawn or is terminated, makes notations on the annual Financial Aid Tracking spreadsheet and the Enrollment Reporting spreadsheet;
- Calculates student refund/R2T4, when applicable;
- Updates NSLDS within 30 days of graduation;
- In NSLDS, the effective date is entered and a status of Withdrawn is selected;
- Enters the last date of attendance as the end date in NSLDS;
- Confirms and saves the new information in NSLDS;
- Prints out a copy of the NSLDS change;
- Gives a copy of all of the withdrawal paperwork to the Records Clerk for filing in student's paper and digital files.

Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS.

Records Clerk

- When a student has withdrawn or is terminated, updates the student database;
- Files the NSLDS printout in the applicable student's paper and digital files.

Program Changes

Should DDDBS change programs or schedules for any program offered, the following procedure is followed:

Director of Financial Aid

- Upon notification that there is a program or schedule change for DDDBS, makes the necessary additions or changes in NSLDS;
- Informs BEN, in writing
- Files the email to BEN in the filing cabinet in the Director of Financial Aid's office.

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Director of Operations

- If the Director of Financial Aid is unable to make the NSLDS updates, makes the updates in NSLDS.

Third Party Servicer

- Upon receiving notification of a program or schedule change, makes the necessary additions or changes in COD

Program Additions

Should DDDBS add a program to the curriculum, the following procedure is followed:

Director of Financial Aid

- Upon notification that there is a program addition to the curriculum, makes the necessary additions or changes in NSLDS;
- If unable to make the NSLDS updates, enters the updated information in NSLDS.
- Informs BEN, in writing
- Files the email to BEN in the filing cabinet in the Director of Financial Aid's office.

Third Party Servicer

- Upon receiving notification of a program or schedule change, makes the necessary additions or changes in COD

NSLDS Student Status Confirmation Policy

DDDBS will report and certify enrollments for ALL students who are or were enrolled in the current month. This process is completed at least every two months (the "60-day rule").

NSLDS Student Status Confirmation Procedures

The Director of Financial Aid is responsible for reporting and certifying ALL student enrollments in NSLDS reporting at least every 60 days. In the absence of the Director of Financial Aid, the Director of Operations will perform the reporting requirements to NSLDS at least every 60 days.

Fiscal Records and Disbursement Requirements for Pell Grants and Direct Loans

Fiscal Reporting Process Policy

Date of Last Revision: 3/26/2025

DDDBS is required to submit financial records audited by a CPA with annually updated credentials from GAAP, ED, and COE. To remain in good standing with both the ED and COE, the audited financial report's outcome must fall within their guidelines.

Fiscal Reporting Process Procedure

Third-Party Servicer:

- Maintain records throughout the year.
- At the end of each year, submit the records and relevant documentation to the institution (for review and verification).

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Business Center Liaison & Director of Financial Aid

- **Review and Verification:** Both administrators review the records and verify the accuracy of the information submitted by the third-party servicer.
- **Submission to Auditor:** After verification, the administrators submit the records to the Auditor for further review and approval.

Fiscal Recordkeeping Process Policy

Date of Last Revision: 3/26/2025

DDBS must keep comprehensive, accurate program and fiscal records related to its use of FSA program funds. The importance of maintaining complete, accurate records cannot be over-emphasized. Program and fiscal records must demonstrate DDBS can meet the administrative and fiscal requirements for participating in the FSA programs.

DDBS has a CPA and third-party auditor that maintains documentation of all fiscal records:

Nathan Ferguson, CPA L.L.C.
120 E FM 544,
Suite 72 # 262
Murphy, TX 75094
(214) 263-7705
www.nathanfergusoncpa.com

Electronic Brain Solutions, LLC secures all of DDBS's electronic fiscal data.

Records must demonstrate proper administration of FSA program funds and a clear audit trail for FSA program expenditures. For example, records for each FSA recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed in accordance with program regulations. In addition to the general, institutional record keeping requirements discussed here, DDBS must also comply with all program-specific record keeping requirements contained in the individual FSA regulations.

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

- Hard copy
- Optical disk
- Microform
- USB Drive
- Computer file
- Other media formats.

All other record information, regardless of the format used, must be retrievable in a coherent hard-copy format or in a media format acceptable to the ED. The requirement providing for other media formats acceptable to the Department allows for the use of new technology as it is

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developed. The Department will notify DDBS of acceptable media formats; schools should not apply for approval of a media format.

DDBS must comply with the following laws of record retention:

- The minimum Record Retention Periods for FSA funds is approximately 3 years
- Loans are retained UNTIL THE END of the award year in which the student last attended
- The loan is satisfied, or the documents are needed to enforce the obligation
- The date on which a loan is assigned to the DOE, cancelled, or repaid
- End of the award year for which the aid was awarded
- End of the award year in which the report was submitted.

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

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

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

Fiscal Recordkeeping Process Procedure

Third-Party Servicer

- **Record Maintenance:** The third-party servicer is responsible for maintaining accurate and up-to-date financial records for the institution, including student accounts, transactions, and other relevant financial data.
- **End-of-Year Submission:** At the end of each fiscal year, the third-party servicer submits the financial records to the designated institution administrators (such as the Business Center Administrator or Financial Aid Administrator) for review.

Business Center Liaison & Director of Financial Aid

- **Initial Review and Verification:** Both the Business Center Liaison and Director of Financial Aid receive the records from the third-party servicer and review them for completeness, accuracy, and compliance with relevant financial and regulatory standards.
- This review includes verifying student balances, payments, disbursements, and financial aid.
- **Corrections (if necessary):** If discrepancies or errors are identified during the review, the administrators work with the third-party servicer to correct the records before further submission.
- **Approval and Final Verification:** After ensuring all records are accurate and complete, the administrators approve the records for submission to the Auditor.

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Records Clerk

- All fiscal records, including the third-party servicer's documentation, administrator reviews, and auditor reports, must be retained according to institutional policy and regulatory requirements. This may include digital storage and/or physical storage in the Records Room.
- All fiscal records, including the third-party servicer's documentation, administrator reviews, and auditor reports, must be retained according to institutional policy and regulatory requirements. This may include digital storage and/or physical storage in the Records Room.
 - The retaining period typically aligns with legal or accreditation requirements (e.g., 7 years).

Auditor

- **Auditing:** The Auditor is responsible for reviewing the submitted financial records and conducting an audit to ensure that the records comply with applicable accounting standards, regulatory requirements, and internal policies.
 - The Auditor may request additional documentation or clarification during the audit process.
- **Report Preparation:** Upon completion of the audit, the Auditor provides a formal report on the findings, including any recommendations for improvements or corrections.
- **Final Approval:** The finalized audit report has been submitted to Director of Operations and Business Center Administrator for approval.

Disbursement of Federal Funds Policy

Date of Last Revision: 3/19/2025

DDBS will inform students of the amount of funds that they or their parents can expect to receive back from each FSA program. This includes FWS, how, and when those funds will be disbursed. This notification must be sent before the disbursement is made. If the funds include a Stafford Loan (whether Direct Loan), the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans. DDBS must provide the best information that it has regarding the amount of FSA program funds a student can expect to receive. Because the disbursements received by a student may differ slightly from the amount projected by DDBS due to loan fees and rounding differences, DDBS may include the gross amount of the loan disbursement or a close approximation of the net disbursement amount. DDBS must also notify students and/or parents when Direct or PLUS loan funds are being credited to a student's account. This notification must be sent no earlier than 30 days before and no later than 30 days after crediting the student's account. The notification must include:

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

These policies apply to the following programs: Pell Grant and Direct Loan.

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

Disbursement of Federal Funds Procedure

Business Center Liaison

(1) Notifications & Authorizations

- a. Notification of disbursement
- b. Required student/parent authorizations
- c. Notification/authorization by electronic means

(2) Disbursement rules/ timing of multiple disbursements

- a. Funds may be disbursed up to 10 days before classes begin (in most cases)
- b. Disbursements to 1st-time, 1st-year, Stafford borrowers must be delayed 30 days
- c. Requirement to successfully complete coursework in clock-hour
- d. DDBS may make unequal FSEOG disbursements to meet uneven costs
- e. Under certain conditions, late disbursements must be made to students

(3) Prompt disbursement rules

- a. Usually there is a 3-day timeframe for DDBS to disburse to student/parent after receiving funds
 - i. Exception: school may delay returning Stafford/PLUS funds to the lender in some cases.
- b. The school may not use an in-person or telephonic conversation as the sole means of notification because these are not adequate and verifiable methods of providing notice
 - i. However, a school may use in person and telephone notices in addition to those provided in writing.

Director of Financial Aid

(4) Method of disbursement

- a. Credit to the student's account (school may hold credit balance if authorized)
- b. Disbursement directly to the student or parent

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

When acting upon a loan cancellation request, DDBS must return the loan proceeds and cancel the loan as appropriate. DDBS is not responsible for returning any portion of a loan that was disbursed to a student or parent directly before the request for cancellation was received.

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However, DDBS takes an active role in advising the borrower to return the funds already received.

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

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

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

If a student or parent cancels an authorization to use FSA program funds, the cancellation or modification cannot be retroactive—it takes effect on the date that the school receives it from the student or parent. Upon notifying a student of their next disbursement by electronic mail or otherwise, following up on any electronic notice for which it receives an “undeliverable” message is encouraged.

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

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

Reconciliation

Monthly and Annual Reconciliation Policy

Date of Last Revision: 3/19/2025

The DDBS is responsible for reconciling all cash and funds disbursed on a monthly and annual basis. This reconciliation process involves comparing the disbursements with the Business Center Administrator, Records, ledger, and bank statements to ensure that all transactions align accurately.

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Monthly Reconciliation Procedure

Business Center Liaison & Director of Financial Aid

- Compare the amounts disbursed (as reported by the third-party servicer, BEN) against Business Center records, ledger, and bank statements.
- Confirm the amount of funds disbursed each month according to the third-party service's report and BEN records.
- Identify, review, and correct any discrepancies promptly.

Business Center Liaison:

- Determines the total amounts disbursed and cash collected each month.
- This determination is based on Business Center Administrator Records, the ledger, and bank statements.


Annual Reconciliation Procedure

Business Center Liaison & Director of Financial Aid

- At the end of each fiscal year, the monthly reconciliations are aggregated, and a comprehensive review is conducted to ensure that the totals from all months align with the annual Business Center records, ledger, and bank statements.
- The annual reconciliation also includes reviewing the total disbursed funds and collected cash, ensuring that any adjustments made throughout the year are accounted for accurately.

This procedure ensures that the financial records are aligned and consistent between the Financial Aid and Business Center departments, maintaining accurate financial tracking and reporting on both a monthly and annual basis.

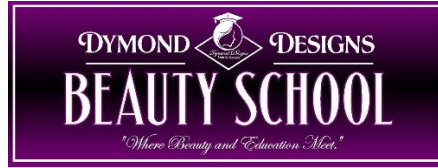
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Appendix A



AUTHORIZATION TO HOLD A FEDERAL STUDENT AID CREDIT BALANCE

A Federal Student Aid (FSA) credit balance is created when the total of all FSA funds credited to a student’s account exceeds the total of tuition, fees, and other eligible educational charges on a student’s account. In accordance with Federal Regulations, Dymond Designs Beauty School (DDBS) must refund a credit balance to a student or parent (in the case of a Parent PLUS loan) as soon as possible, but no later than 14 calendar days after the balance is created.

Students can authorize credit balances from FSA funds to be held on their student account for use against future charges. This is completely voluntary, and the student can opt out of this authorization at any time. FSA funds include the following:

- Federal Direct Subsidized/Unsubsidized Loans
- Federal Pell Grants
- Federal Direct Parent PLUS Loans
- Federal Supplemental Educational Opportunity Grant (FSEOG)

By completing and signing this form, you authorize DDBS to hold any credit balance from FSA funds on your student account. Any FSA credit balance being held by the school, per this authorization, will be refunded to you, should you withdraw from the program. DDBS will pay credit balances by sending a check through the United States Postal Service to a chosen address. A student or parent has the right to withhold agreement from all or part of the authorization.

This authorization will remain in effect for each subsequent payment period unless you withdraw it. Note, your cancellation is not retroactive. In no case will DDBS hold an FSA credit balance of loan funds beyond the end of the loan period, nor an FSA balance of other funds beyond the end of the last payment period in the award year for which the funds were authorized.

“I understand that this authorization is voluntary. I further acknowledge that at any time, I may rescind my authorization by submitting a written request to the Business Office at DDBS.”

Name: _____

Student’s Signature: _____ Date: _____

Parent’s Signature*: _____ Date: _____

(*applicable to Parent PLUS Loan borrower only)

Appendix B

Default Prevention and Management Plan

Reference

- 34 CFR 668 Subpart N, 34 CFR 682.604, and 34 CFR 685.304
- [DCL-GEN-05-14](#) – Sample Default Prevention and Management Plan
- [Default Prevention and Management](#) – Partner Connect
- [Cohort Default Rate Guide](#) – Partner Connect

Purpose

If DDBS has a single Cohort Default Rate (CDR) equal to or greater than 30%, it must establish a Default Prevention Task Force. DDBS must also develop a Default Management Plan to reduce defaults and prevent loss of institutional eligibility that accomplishes the following:

- Identifies the factors causing DDBS's CDR to exceed the acceptable threshold,
- Establishes measurable objectives and identifies steps to improve the CDR, and
- Specifies actions the school will take to improve student loan repayment including loan repayment counseling.
- Submit the default prevention plan to ED.

The Default Prevention and Management Plan provides activities, techniques, and tools to promote student and school success and reduce student loan defaults in the William D. Ford Federal Direct Loan (Direct Loan) programs. Schools participating in the Direct Loan programs for the first time, or schools participating in the Direct Loan programs that have undergone 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 (34 CFR 668.14(b)(15)). All schools are required to follow regulatory guidance including entrance counseling and exit counseling for borrowers, reporting timely and accurate enrollment information to the U.S. Department of Education (the Department), and sharing satisfactory academic progress information across campus.

Default Management Plan Procedure

See Appendix A to 34 CFR 668 Subpart N to reference an acceptable default management plan.

I. Core Default Reduction Strategies

1. DDBS has established a Default Prevention Team consisting of Marlene Brooks (Director of Operations), Rayna Karpuk (Director of Financial Aid), Roxy Dunlap (Business Center Representative) and Brenda Mansfield (Financial Aid Representative).
2. Data is collected on defaulted students with relevant statistics, including reason for default as explained by students.

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3. The Director of Financial Aid has written a Default Prevention and Management Plan and will submit this plan to the U.S. Department of Education upon reaching a single Cohort Default Rate (CDR) equal or greater than 30%.
 4. All former students with a default or delinquent status will be contacted by a member of the Default Prevention Team to provide payment options to students, such as deferment or forbearance.
 5. DDBS tracks student loan repayment status on a spreadsheet, complete with contact information, adding notes to indicate status and contact notations.
 6. The Director of Financial Aid will establish an annual reduction percentage target based on the published CDR.
 7. The Director of Financial Aid will verify the available NSLDS reports and the CDR with internal default statistics.
 8. Evaluation methods have been defined in section III.

II. Additional Default Prevention Strategies

1. During the new student orientation, students are provided with Financial Literacy counseling, which includes a presentation of student loan information and repayment responsibilities.
2. On an individual basis following graduation and withdrawal, students are provided an estimate of the required monthly payments on their loan balance. Students are introduced to the Loan Simulator and provided information about their Loan Servicer. They also introduced NSLDS for students and given a copy of *Repaying Your Student Loans* publication.
3. The Business Center representative meets with incoming students and discusses possible alternative payment sources that would reduce or eliminate the need for incoming student borrowing.
4. Upon presentation of the students' financial aid award offer letter, students are provided with information regarding exact amounts of Direct Loans they will be taking out for their education and how much they can expect to repay. This enhances the borrower's understanding of her or her loan repayment responsibilities.
5. Student academic progress is monitored in part with SAP evaluations. Faculty provides academic counseling and assistance on an as-needed basis, which enhances enrollment retention.
6. Information regarding borrowers' academic progress and enrollment status is part of the information shared by all relevant offices across campus including the Financial Aid Office and the Business Office. Accurate and timely communication ensures the right aid is getting to the right student and such communication helps DDBS to comply with regulations regarding the school's standards of administrative capabilities, accurate and timely reporting of borrowers' enrollment status, and satisfactory academic progress.
7. As part of mandatory Loan Exit Counseling, students are individually counseled upon their own indebtedness upon completion of program. They are shown how to view their student loans online and how to contact their loan servicer, including how to set up an account online.

8. All students, graduates, and withdrawn students are instructed on how to access the Loan Simulator to estimate their monthly student loan payments and choose a loan repayment option that best meets their needs and goals.
9. The Default Prevention Team maintains contact with borrowers after they leave DDBS to answer any questions and inquire about any barriers to repayment the students may have.
10. The Team assists borrowers who may be experiencing difficulty in finding employment through career counseling, job placement assistance, and obtaining temporary relief with an unemployment forbearance or deferment.
11. DDBS tracks student loan repayment status on a spreadsheet, complete with contact information, adding notes to indicate status and contact notations.
12. The Director of Financial Aid completes timely and accurate enrollment reporting to ED as is required by regulation and promotes school and student success. This ensures that borrowers receive their full grace period and further ensures that contacts from the loan service processor such as correspondence and telephone calls occur at the appropriate time and sequence. The servicer's contacts are designed to increase the likelihood that borrowers will satisfy loan obligations. Timely and accurate reporting of changes in enrollment status is required of all schools.
13. DDBS requests the NSLDS Date Entered Repayment (DER) Report from NSLDS on a bi-monthly basis. The Director of Financial Aid compares the DER Report to DDBS records and makes any necessary corrections to their borrowers' status using NSLDS Enrollment Reporting. Reviewing the DER Report results in more accurate data, assuring that borrowers enter repayment in the correct cohort year and that DDBS receives accurate cohort default rates (CDRs).
14. The Director of Financial Aid obtains borrower delinquency reports from NSLDS. All delinquent borrowers are contacted with information on how delinquency affects them and counseled on how to obtain deferment or forbearance status.
15. DDBS serves as a liaison between delinquent borrowers and staff experienced in borrower assistance by participating in Late-Stage Delinquency Assistance (LSDA). LSDA techniques enable schools to rescue severely delinquent borrowers, those who are more than 240 but less than 361 days delinquent, from default. By contacting the students monthly let the most delinquent borrowers know that they have options, and that help is available.
16. Upon receiving the school's CDR rate, DDBS examines the Loan Record Detail Report (LRDR), the report containing all the data that comprises the CDR calculation. DDBS reviews the LRDR regardless of the CDR. It is the school's responsibility to challenge incorrect data reflected in their draft CDR, or request an adjustment, or submit an appeal of inaccurate data as reflected in their official CDR.

III. Evaluation – Key Statistics for Measuring Progress

No matter how effective and far-reaching a default prevention and management plan is, some borrowers default. A major part of any plan is to periodically review progress in preventing defaults. One element of this review is a comprehensive analysis of defaulters. Schools should gather information to discern who is defaulting and why. Schools can then use this information to improve their default prevention and management practices and initiatives.

Internal data includes key information such as the high school the prospect attended, program of study, demographics, grades, etc. Reviewing the LRDR also provides key data about borrowers that can assist in determining common characteristics among defaulters. Causes for defaults can include, but are not limited to, absent or incomplete internal procedures, practices, and communication, particular programs and course requirements or structure, and ineffective counseling. Frequent examination of defaulter characteristics coupled with an assessment of default prevention and management successes and shortcomings provide valuable information. DDBS promotes success by taking preventive measures to correct ineffective practices thereby preventing current and future borrowers from experiencing the same difficulties that plagued past defaulters. One solution to preventing future defaults lies in understanding what caused past defaults.

The following metrics are examined as part of the internal data analysis to measure progress:

1. The number of students enrolled at DDBS during each fiscal year.
2. The average amount borrowed by a student each fiscal year.
3. The number of borrowers scheduled to enter repayment each fiscal year.
4. The number of enrolled borrowers who have received default prevention counseling services each fiscal year.
5. The average number of contacts that DDBS had with a borrower who was in deferment or forbearance or in repayment status during each fiscal year.
6. The number of borrowers at least 60 days delinquent each fiscal year.
7. The number of borrowers who defaulted in each fiscal year.
8. The type, frequency, and results of activities performed in accordance with the default prevention plan.

General Responsibilities

Admissions Representative

- Maintain updated records documenting borrowers' addresses, telephone numbers, employers, and employers' addresses; and
- Undertake activities such as the process of "skip tracing" or sending letters "Forwarding and Address Correction Requested" to maintain contact with borrowers who have moved.

Instructors

- Reteach/tutor students on academic probation,
- Develop content to assist students with health problems,
- Develop content to assist students with language problems,
- Develop content to assist students with transportation problems, and
- Develop content to assist students with financial problems - such as financial literacy.

Workforce Development Representative

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- Assist non-completers undertaking the job-hunting process,
 - Assist borrowers with trouble finding employment through:
 - Career counseling
 - Job placement
 - Obtaining information about repayment options. This includes the availability of deferments and forbearances.
 - Assess to determine if the student has financial difficulties, and
 - Assess to determine the students' level of financial literacy.

Director of Operations

- Identify and allocate the personnel, administrative resources, and financial resources appropriate to implement the default management plan
- Ensure that DDBS's admission policies and screening practices only admit students who have a reasonable expectation of succeeding in their program of study; and
- When necessary, evaluate and improve DDBS's curriculum, facilities, materials, equipment, qualifications of faculty, size of staff, and other aspects of its educational programs to ensure that borrowers remain in school, are successful in their studies, and that they are employed after they complete their program.

Financial Aid Administrator

- Establish a process to ensure the accuracy of the data used to calculate draft and official cohort default rate reports
- Establish a data collection system to track and analyze borrowers who default on their loans
- Define evaluation methods, set default reduction targets, and conduct an annual, comprehensive, self-evaluation to implement modifications to DDBS's administration of Title IV informed by programs designed to identify institutional practices that should be modified to reduce defaults
- Enhance the enrollment retention and academic persistence of borrowers through counseling and academic assistance, especially for academically high-risk students
- Understand who is defaulting and why. Create a picture of who is at risk and what works
- Identify and implement alternative financial aid award policies and develop alternative financial resources to reduce the need for student borrowing
- In addition to requirements of 34 CFR 682.604 and 34 CFR 685.304, provide enhanced initial and exit counseling
- Use interactive electronic materials, audio-visual materials, and written tests during counseling to ensure that borrowers understand the terms and conditions of their loans, when necessary

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- Provide additional, increasingly intensive, counseling to borrowers who demonstrate that they do not understand the terms and conditions of their loans (for example, by failing a written test)
 - Remain abreast of borrowers' in-school status to ensure that FA recognizes instances in which borrowers withdraw without notice
 - Contact borrowers during their grace period to remind them of the importance of the repayment obligation and of the consequences of default
 - Track borrowers' delinquency status by obtaining reports from ED, Direct Loan program guaranty agencies, and lenders
 - Provide Exit Counseling
 - Provide Information about delinquency and default; and
 - Request current borrower information.

All Staff

- Understand and keep in mind that student success and program completion are key to fewer defaults.

Technical Assistance

If you need technical assistance in implementing a default prevention and management plan, or if you have comments or suggestions about the *Sample Default Prevention and Management Plan*, you may contact the Default Prevention and Management Team by:

- Call 202-377-4259
- or email fsa.schools.default.management@ed.gov
- For questions related to default prevention, contact defaultpreventionassistance@ed.gov.

Date of last revision :2/26/2025

Reference

- 34 CFR Part 86.1-86.7, 34 CFR Subpart B 86.100
- [Complying with the Drug-Free School and Campuses Regulations](#)

Purpose

The Part 86 regulations require that, as a condition of receiving funds or any other form of financial assistance under any federal program, an institution of higher education (IHE) must certify that it has adopted and implemented a program “to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees” both on the institution’s premises and as part of any of its activities, in order to comply with the Drug-Free Schools and Campuses Regulations (EDGAR Part 86.100, Subpart B).

Drug and Alcohol Prevention Policy Procedure

- Target population is the student body and high-risk groups
- Increase awareness of drug and alcohol use and addiction
- Increase awareness of prevention and treatment programs
- Annually distribute in writing to each employee, and to each student:
 - Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities
 - A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol
 - A description of the health risks associated with the use of illicit drugs and the abuse of alcohol
 - A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
 - A clear statement that DDBS will impose disciplinary sanctions on students and employees (consistent with local, State, and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct required by [paragraph \(a\)\(1\)](#) of this section. For the purpose of this section, a disciplinary sanction may include the completion of an appropriate rehabilitation program.
- Publish a written certification that DDBS has adopted and implemented the drug prevention program.
- Review every two years the effectiveness of DDBS’s Drug and Alcohol Abuse and Prevention Program.
- Evaluate the consistency of sanctions imposed for violations of disciplinary standards and codes of conduct related to drugs and alcohol
- Identify areas requiring improvement or modification
- Describe the research methods and data analysis tools that were used to determine the effectiveness of the program.

DDBS Drug and Alcohol Policy

DDBS provides a drug-free and alcohol-free environment for its faculty, staff and students. The unlawful possession, use, distribution, dispensation, sale, or manufacture of drugs or alcohol is prohibited on DDBS campus premises and at any DDBS school activity/function. No employee or student is to report or return to school, work, or any company activity while under the influence of drugs or alcohol.

State of Michigan Alcohol Laws

Under Michigan law, it is illegal for anyone under the age of 21 to purchase, consume, possess or have any bodily content of alcohol. The following summarizes some of the potential legal consequences for violating state law:

- A first-time conviction may result in a fine, substance abuse education and treatment, community service and court-ordered drug screenings.
- There also is a provision for possible imprisonment or probation for a second or subsequent offense.
- The use of false identification by minors in obtaining alcohol is punishable with a fine, loss of driver's license, probation and community service.

Individuals can be arrested and/or convicted of operating a vehicle while intoxicated with a blood alcohol concentration (BAC) level at .08 or higher. If a student is under 21, there is a “zero tolerance” law in the state of Michigan, and any blood alcohol level of .01 or higher can lead to a minor in possession (MIP) citation as well as being cited for operating a vehicle while intoxicated, if applicable. This is in addition to suspension of driving privileges in the state of Michigan.

State of Michigan Medical Marijuana Laws

The Michigan Medical Marijuana Act of 2008 and the Michigan Regulation and Taxation of Marijuana Act of 2018 permit qualified persons 21 years of age or older, patients and their primary caregivers to use, possess and grow limited amounts of marijuana for personal use and treatment of certain debilitating medical conditions. However, these laws conflict with federal criminal laws governing controlled substances, as well as federal laws requiring institutions receiving federal funds, by grant or contract, to maintain drug-free campuses and workplaces. DDBS receives federal funding that would be in jeopardy if those federal laws did not take precedence over state law. Thus, the use, possession or cultivation of marijuana in any form and for any purpose constitutes a violation of school policy and the student code of conduct.

DDBS’s Policy on Consumption of Alcoholic Beverages on Campus

The use or possession of alcohol is expressly prohibited in classrooms, conference rooms, the student media center, within the building, or any area where events, lectures, or meetings are held. The use of alcohol is expressly prohibited in all public areas of the campus building.

For employees only, social activities held off-premises and paid for on a personal basis are not affected by this policy. If management considers it appropriate and approves of such use in

writing, alcoholic beverages may be served at company-sponsored events held off-premises.

DDBS's Policy on Consumption and Possession of Marijuana

DDBS does not allow the use, possession, or cultivation of marijuana or marijuana paraphernalia on its property or on any DDBS controlled premises. DDBS recognizes that federal laws take precedence over state laws. *Therefore, all students, employees, and visitors must be aware that the Michigan Medical Marijuana Act (MMMA) and the Michigan Regulation and Taxation of Marijuana Act (MRTMA) conflict with Federal, criminal laws governing controlled substances as well as Federal laws requiring institutions receiving Federal funds, by grant or contract, to maintain drug-free campuses and workplaces.*

Because DDBS participates in such federal grant programs that would be jeopardized, the use, possession, or cultivation of marijuana in any form, for any purpose, on DDBS's property or premises, violates the DDBS Drug and Alcohol Policy even if a student, employee, or visitor has been properly certified as a medical marijuana user.

Students, employees, and visitors are asked to remove or dispose of their marijuana from DDBS's property and premises immediately. Furthermore, the MMMA and MRTMA state that employers are not required to accommodate employees who use medical marijuana. Therefore, employers have the right to refuse employment to anyone who fails a drug test. Additionally, the State of Michigan prohibits a person from undertaking any task under the influence of marijuana, when doing so would constitute negligence or professional malpractice, as in many areas of the medical field. As a result, drug testing may be required at any time by a prospective employer consistent with the laws of the State of Michigan and the requirements of potential employers.

Alcohol and Drug Testing Policy

If DDBS believes that a student or employee has been observed possessing or using prohibited substance while on campus, random drug or alcohol testing may be conducted. Drug or alcohol testing may also occur if DDBS reasonably believes that any student or employee may be under the influence of drugs or alcohol during school/work hours, while engaged in school business or a sponsored activity and that this may adversely affect their performance or the campus environment. Any student or employee who has a positive drug or alcohol impairment test may be subjected to periodic, random testing for a period of up to one year.

Testing Methods and Conditions

Testing will ordinarily be conducted during, immediately before, or immediately after regularly scheduled school/work hours. For current employees, time spent on testing and traveling to and from the regular work site to the place of testing is considered work time.

Testing shall be conducted under the following conditions:

- Sample collection shall be performed under reasonable and sanitary conditions.
- Sample collection shall be labeled in such a way as to reasonably preclude the possibility of misidentification of test results.
- Prior to testing, the individual shall be provided with an opportunity to notify DDBS

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- of any information relevant to the test.
- Sample collection, storage, and transportation shall be performed in a manner prudently designed to preclude the possibility of sample contamination or misidentification.
 - Sample testing will be done in compliance with scientifically accepted analytical methods and procedures by a laboratory approved or certified by at least one of the following:
 - United States Department of Health and Human Services,
 - College of American Pathologists, or
 - Michigan Department of Health and Human Services.

Upon written request, a positive drug test result shall be confirmed by a subsequent test using a different but comparably reliable chemical process than used in the initial drug screen. For instance, chromatographic spectroscopy could be conducted to confirm results.

Employee and Student Testing Rights

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

Refusal of Testing

Refusal to participate in drug or alcohol testing or refusal to accept the terms and conditions of testing as specified in this policy may result in disciplinary action up to and including termination from DDBS. Any prospective employee or student who refuses to undergo drug or alcohol testing is not eligible for hire or admission (respectively).

Please direct any questions, concerns, or reports regarding this policy to the Director of Operations.

Drug-Free Workplace with Drug & Alcohol Policies and Abuse Prevention Program

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

DDBS has established this program to inform employees and students about:

- DDBS's policy of maintaining a drug-free environment,
- Drug and alcohol counseling and rehabilitation,
- Penalties that may be imposed upon students and employees for drug abuse

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- violations, and
 - The dangers of drug abuse in the workplace.

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

- Employees shall notify their supervisor or other appropriate management personnel, and students shall notify the Director of Operations of any criminal conviction for a substance-related violation occurring in the workplace no later than five (5) days after such conviction.
- Within ten (10) days of having received notice, DDBS shall notify any federal contracting agency that a student or employee engaged in the performance of a federal contract or grant has had a criminal drug statute conviction for a violation in the workplace.
- Any student or employee who is convicted for a violation occurring in the workplace is required to satisfactorily participate in a drug abuse assistance or rehabilitation program.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of, disciplinary action may request approval to take unpaid time off to participate in a rehabilitation or treatment program.

Disciplinary Action upon Conviction

Any violation of or unsatisfactory conduct related to DDBS's drug-free campus policy may result in discipline including (but not limited to):

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

Title IV Federal Financial Aid Drug Policies

Disciplinary action by DDBS does not preclude the possibility of criminal charges being filed. Similarly, the filing of criminal charges does not preclude action by DDBS.

Any student or employee who is convicted of a criminal drug offense at the workplace shall be subject to discipline consistent with applicable DDBS policies and contracts. Offenders may be required to participate in an appropriate drug or alcohol treatment program as a condition of further enrollment or employment.

Advisory Committee Board Members encourage the administration to explore additional ways to ensure that members of the DDBS community are aware of the dangers inherent in the abuse of drugs and alcohol, and to assist those who suffer from alcohol or drug abuse disorders

in obtaining access to necessary rehabilitation and treatment. All faculty, staff, and students must abide by the terms of this policy as a condition of enrollment/employment at DDBS.

All students and employees must comply with federal, state, and local laws regarding the possession and consumption of alcohol and controlled substances. Legal sanctions for failure to comply with local, state, and federal laws may include:

- Suspension, revocation, or denial of a driver's license
- Loss of eligibility for federal financial aid or other federal benefits
- Disqualification from employment
- Property seizure
- Community service
- Imprisonment; and
- Monetary fines.

Biennial Review Procedure

The Director of Financial Aid and the Director of Operations will:

- Conduct a review of the Drug and Alcohol program in even-numbered years starting in 2022
- Post the review of the Drug and Alcohol Prevention Policy on the school's website, and in the Financial Aid office
- Post the updated Drug and Alcohol Prevention Policy on the school's website
- Provide, upon request, to the U.S. Department of Education and to any interested parties, all information distributed to students and employees regarding the results of a biennial review of the school's program
- Determine the effectiveness of the program and what changes need to be implemented
- Tally the number of drug and alcohol-related instances that occurred on-campus or as part of DDBS's activities and that are reported to school officials.
- Determine the number and type of sanctions that were imposed by the school because of drug and alcohol-related violations and fatalities on the school's campus or as part of any DDBS activities; and
- Ensure that sanctions are consistently enforced.

DDBS Drug and Alcohol Abuse Prevention Program Review Committee

DDBS Drug and Alcohol Abuse Prevention Program (DAAPP) will be reviewed biennially. DDBS is committed to monitoring and assessing the effectiveness of the policies, program and what changes need to be made. DDBS ensures the uniform application of sanctions to employees and students. DDBS has created and maintains a Drug and Alcohol Prevention Committee. The Committee determines the effectiveness of this program and ensures the standards of conduct are fair and consistently enforced. Future reviews are scheduled to take place in even-numbered years.

Reviewers

Marlene Brooks – Director of Operations
Roxy Dunlap – Business Center Representative
Rayna Karpuk – Director of Financial Aid



Biennial Review Objectives:

1. To determine the effectiveness of, and to implement any needed changes to, the DSDT prevention program.
2. To ensure that the school is enforcing the disciplinary sanctions for violating standards of conduct and policies consistently.

Procedures for distributing annual notification to students and employees

The biennial review must be completed and on file by December 31st of each even-numbered year. The results of the biennial review are made public and available upon request to the Secretary of the Department of Education for three years after the fiscal year in which it was created.

Abuse Prevention Program

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

DDBS employees and students may obtain confidential assistance through Michigan's "Get Help Now" map at www.michigan.gov/bhrecovery or by calling 1-800-622-HELP for a referral to a treatment center or support group in your area.

If a student or employee witnesses a violation of this policy by their peers, they are required to report as much to the Director of Operations or a member of the administration. If you need additional resources such as crisis intervention, treatment and recovery support, counseling, prevention information, or local contact information, please see the drug and alcohol awareness board located at the school. These are confidential resources.

For a complete list of the federal penalties due to a conviction for possession or distribution of drugs, please see the on-campus drug and alcohol awareness bulletin board or Appendices A and B.

Help, Information, & Resources

Drugs and alcohol can be highly addictive and injurious to the body. Consumption of drugs or alcohol cause several marked changes in behavior and serious health threats. Impairment of employees while on the job or students while in school is likely to result in injury to others or third parties and affects the morale & productivity of everyone.

DDBS does not offer Drug and Alcohol treatment programs.

Employees or students seeking confidential substance abuse treatment and counseling can contact United Way of Southeastern Michigan by dialing 2-1-1, or the National Helpline – 1-800-662-HELP (4357). SAMHSA's National Helpline is a free, confidential, 24/7, 365-day-a-

year treatment referral and information service (in English and Spanish) for individuals and families facing mental and/or substance use disorders. A list of resources is also available online at www.mi211, which offers information about local health services, including substance abuse support.

Abuse of alcohol and drugs can present significant health risks and medical consequences including, but not limited to, the following:

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

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

Impact of Drug and Alcohol Training

DDBS has successfully maintained a drug- and alcohol-free school, as there have been no related incidents reported. This suggests the current program is effective.

Drug & Alcohol Prevention Program Strengths

DDBS has appropriately tailored its training and policies to align with the differing laws in Michigan and Texas. • According to Rayna Karpuk, the rules, regulations, and policies surrounding drug and alcohol use are clearly articulated and comprehensive.

Drug & Alcohol Prevention Program Areas for Improvement

- Introduce training during student orientation to clearly communicate expectations regarding class conduct and the risks of drug and alcohol use and abuse
- With student turnover throughout the year, once-a-year training may be insufficient. Considering the 6-month programs, more frequent and inclusive training could be beneficial

FEDERAL TRAFFICKING PENALTIES—

DRUG/SCHEDULE	QUANTITY	PENALTIES	QUANTITY	PENALTIES
Cocaine (Schedule II)	500–4999 grams mixture	First Offense: Not less than 5 yrs, and not more than 40 yrs. If death or serious injury, not less than 20 or more than life. Fine of not more than \$5 million if an individual, \$25 million if not an individual. Second Offense: Not less than 10 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	5 kgs or more mixture	First Offense: Not less than 10 yrs, and not more than life. If death or serious injury, not less than 20 or more than life. Fine of not more than \$10 million if an individual, \$50 million if not an individual. Second Offense: Not less than 20 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual. 2 or More Prior Offenses: Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
Cocaine Base (Schedule II)	28–279 grams mixture		280 grams or more mixture	
Fentanyl (Schedule II)	40–399 grams mixture		400 grams or more mixture	
Fentanyl Analogue (Schedule I)	10–99 grams mixture		100 grams or more mixture	
Heroin (Schedule I)	100–999 grams mixture		1 kg or more mixture	
LSD (Schedule I)	1–9 grams mixture		10 grams or more mixture	
Methamphetamine (Schedule II)	5–49 grams pure or 50–499 grams mixture		50 grams or more pure or 500 grams or more mixture	
PCP (Schedule II)	10–99 grams pure or 100–999 grams mixture		100 gm or more pure or 1 kg or more mixture	

PENALTIES				
Other Schedule I & II drugs (and any drug product containing Gamma Hydroxybutyric Acid)	Any amount	First Offense: Not more than 20 yrs. If death or serious injury, not less than 20 yrs, or more than life. Fine \$1 million if an individual, \$5 million if not an individual. Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.		
Flunitrazepam (Schedule IV)	1 gram	First Offense: Not more than 10 years. If death or serious injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual. Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.		
Other Schedule III drugs	Any amount	First Offense: Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual. Second Offense: Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.		
All other Schedule IV drugs	Any amount	First Offense: Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual. Second Offense: Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.		
Flunitrazepam (Schedule IV)	Other than 1 gram or more			
All Schedule V drugs	Any amount			

FEDERAL TRAFFICKING PENALTIES—MARIJUANA—

DRUG	QUANTITY	1st OFFENSE	2nd OFFENSE *
Marijuana (Schedule I)	1,000 kg or more marijuana mixture; or 1,000 or more marijuana plants	Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.	Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	100 kg to 999 kg marijuana mixture; or 100 to 999 marijuana plants	Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.	Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	More than 10 kgs hashish; 50 to 99 kg marijuana mixture More than 1 kg of hashish oil; 50 to 99 marijuana plants	Not less than 20 yrs. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.	Not less than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana (Schedule I)	Less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight) marijuana plants; 1 to 49 marijuana plants;	Not less than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual	Not less than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual
Hashish (Schedule I)	10 kg or less		
Hashish Oil (Schedule I)	1 kg or less		

*The minimum sentence for a violation after two or more prior convictions for a felony drug offense have become final is a mandatory term of life imprisonment without release and a fine up to \$20 million if an individual and \$75 million if other than an individual.

Beginning the 2021-22 academic year, there will no longer be an impact to a student's Title IV aid eligibility if a drug conviction occurs while receiving federal aid. This is per the Federal Register notice Vol. 86, No. 115, June 17, 2021 and electronic announcement (GENERAL-21-04).

Appendix D

Family Education Rights and Privacy Act



FERPA (34 CFR, Part 99)

Date of Last Revision: 3/6/2025

Purpose

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

FERPA affords eligible students certain rights with respect to their education records. (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution at any age.)

Student Rights under FERPA

1. **Inspecting student records.** The right to inspect and review the student's education records within 45 days after the day DDBS receives a request for access. A student should submit to the Director of Operations a written request that identifies the record(s) the student wishes to inspect. DDBS will plan for access and notify the student of the time and place where the records may be inspected. DDBS is not required to provide copies of materials in education records unless, for reasons such as great distance, it is impossible for parents or eligible students to inspect the records. DDBS may charge a fee for copies.
2. **Amending student records.** Parents or eligible students have the right to request that DDBS amend the student's education records that they believe to be inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA. A student who wishes to ask DDBS to amend a record should write to the Director of Operations and clearly identify the part of the record the student wants changed and specify why it should be changed.

If DDBS decides not to amend the record as requested, DDBS will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. After the hearing, if DDBS still decides not to amend the record, the parent or eligible student has the right to place a statement within the record setting forth his or her comments about the contested information.

3. **Releasing and disclosing student records.** The right to provide written consent before DDBS discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. Generally, DDBS must have written permission from the parent or eligible student before releasing any information from a student's record. However, the law allows DDBS to

disclose education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests to the following parties or under the following conditions (34 CFR § 99.31):

- a. DDBS administrative, supervisory, academic, research, or support staff employees
- b. a person serving on the DDBS Institutional Advisory Board who has a need to know
- c. Certain government officials, to carry out lawful functions
- d. Appropriate parties, in connection with financial aid for which a student has applied or which the student has received
- e. Contractors outside of DDBS who perform an institutional service of function for which DDBS would otherwise use its own employees and who are under the direct control of the school with respect to the use and maintenance of PII from education records
- f. Organizations conducting certain studies for, or on behalf of, DDBS
- g. Accrediting organizations
- h. Individuals who have obtained court orders or subpoenas
- i. People who need to know in cases of health and safety emergencies, and State and local authorities, within a juvenile justice system, under specific State law.

Upon request, DDBS also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

4. **Notification of disclosure.** DDBS may disclose, without consent, "directory" type information, such as a student's name, address, telephone number, date of birth, honors and awards, and dates of attendance. However, DDBS must tell parents and eligible students about directory information requests and allow parents and eligible students a reasonable amount of time to request that DDBS not disclose directory information about them. DDBS must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, student handbook, or newspaper article) is left to the discretion of DDBS.
5. **Faculty responsibilities regarding FERPA.** DDBS faculty must understand that once a student reaches 18 years of age, they, not the parents or guardians, hold legal privacy rights regarding grades, academic records, classroom performance, attendance, and behavior or discipline matters. In other words, if a parent, guardian, spouse, or other claimant contacts a faculty member with questions—academic, disciplinary, social, etc.—about any DDBS student, the faculty member must not divulge any information to protect the rights of the eligible student. If the parent/guardian/spouse/other claims that the student in question has signed a release that allows the claimant access to protected information, the faculty member must verify with DDBS administration that such a document is on file before divulging any information or answering any questions. Failure to follow these guidelines could result in legal action against both the institution and the faculty member.

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6. **Right to file a complaint.** The right to file a complaint with the U.S. Department of Education concerning alleged failures by DDBS to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:

**Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202**

Frequently Asked Questions by Parents

Q. Why do I have limited access to my student’s college records?

A. Under FERPA, the access rights that parents and legal guardians had in the elementary and secondary school setting are transferred to students once they attend a post-secondary educational institution like DDBS OR turn 18. Parents can be given access to records if the student grants the parent permission to access his or her records by submitting such information in writing to DDBS administrative staff.

Q. What records does FERPA cover?

A. The privacy protection FERPA gives to students is very broad. With limited exceptions, the FERPA regulations give privacy protection to the student’s “education records.” These are defined as records that are “directly related to a student and are maintained by an educational agency or institution or by a party acting for the agency or institution.” Examples of student records covered by FERPA are grade reports, transcripts, and most disciplinary files. FERPA does not cover counseling or medical records, but other policies do.

Q. How can I find out my student’s grades?

A. The best approach is to ask your student directly. Parents cannot have access to a student’s grades unless they have written consent from the student.

Q. Will I be notified if my student is placed on academic or disciplinary probation or suspension?

A. No. Information about grades and academic standing is sent directly to students. You can, of course, ask your student to keep you informed about his or her academic performance.

Q. In addition to the student, who has access to the education record?

A. Generally, schools must have written permission from the student to release any information from a student’s education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions:

- School officials with legitimate educational interest
- Other schools to which a student is transferring
- Specified officials for audit or evaluation purposes
- Appropriate parties in connection with financial aid to a student
- Organizations conducting certain studies for or on behalf of the school
- Accrediting organizations
- To comply with a judicial order or lawfully issued subpoena

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- Appropriate officials in cases of health and safety emergencies; and
 - State and local authorities pursuant to specific state law.

Q. Will I be notified if my son or daughter is hurt or in danger?

A. If we learn of an emergency involving one of our students, we will attempt to notify the students' parents in accordance with our emergency notification policy and procedures. Hospitals and police agencies will also follow their own notification protocols.

Q. Will I be notified if my student is not attending classes?

A. No. DDBS requires faculty to take attendance, however, parents are not notified.

Q. I've seen press reports about a new FERPA provision allowing notice to parents when a student violates alcohol or drug laws. What position has DDBS taken on this new rule?

A. FERPA regulations authorize - but do not require - disclosure to parents of "the student's violation of any federal, state, or local law, or of any rule or policy of the institution, governing the use or possession of alcohol or a controlled substance." DDBS does not disclose violations to parents, except in health and safety situations.

Directory Information

The only public information available is "directory information." DDBS may disclose this information for any purpose without the student's written consent. However, students may choose to restrict disclosure of directory information by contacting DDBS administrative staff. DDBS defines "Directory Information" as:

- Student name
- Address
- Telephone number(s)
- E-mail address
- Date and place of birth
- Field of study/program
- Enrollment status (i.e., enrolled full-time, half-time or not enrolled)
- Dates of attendance/enrollment
- Certificate(s) received
- Honors/awards received

Appendix E

GLBA Required Information Security Program

Date of Last Revision: 1/25/2025

Overview

In accordance to the Department of Education implementing regulations at 34 C.F.R., Standards for Safeguarding Customer Information, 16 C.F.R. Part 314, issued by the Federal Trade Commission (FTC), compliance with the Family Educational Rights and Privacy Act (FERPA), as required by the Gramm-Leach-Bliley Act (GLBA) Act, P.L. 106-102, and upon signing a Program Participation Agreement (PPA) that requires financial institutions to explain their information-sharing practices to their customers and to safeguard sensitive data. Colleges participating in the Federal Student Aid (FSA) programs are subject to the information security requirements established by the FTC for financial institutions. DDBS is responsible for complying with the limitations on the disclosure of PII in students' education records under FERPA and is subject to Sections 501 and 505 (b) (2) of the GLB Act.

Financial Services Modernization Act of 1999 (Public Law 106-102, 113 Statue 1338) also known as the GLB Act regulates the protection, collection, and disclosure of consumers nonpublic personal information or personal identifiable information (PII) by financial institutions.

As a financial institution covered under these information security requirements, Dymond Designs Beauty School (DDBS) has developed, implemented, and maintains a comprehensive data and information security program that is designed to create and implement the following: the written incident response, safeguards to control identified risk, monitor and test regularly/daily the effectiveness of our safeguards, train staff, and monitor our service providers by keeping this information security program current. DDBS has annual risk/technology assessments provided by Electronic Brain Solution which includes a perform control analysis, assess risk analysis, recommended control measures, and a threat vulnerability statement. DDBS has qualified staff members that oversee, implement, and report to our board annually any changes, deletions, additions, and suggestions for this program.

Designated Qualified Employees & Personnel Responsible

Marlene Brooks-Director of Operations

Roxy Dunlap- Business Center Administrator

Third-Party Contractual IT Company

Doug Pettigrew -Electronic Brain Solutions

Hartford Insurance

Plan Evaluation, Revision, and Training

The Data Privacy, Cyber Incident & Information Security Response Plan is in the Title IV Manuel in hard copy print throughout the school and on digital print on the school website www.ddbs.edu. This plan is reviewed annually by school committees and employees. Training for this plan is conducted annually with the personnel responsible for this plan and the third-party contractor who is over all our IT on-site and off-site.

The Safeguards Rule

- An information security program is defined as the administrative, technical, or physical safeguards used to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information.
- Customer information is defined as any record containing nonpublic personal information as defined in 16 CFR 313.3(n), about a customer of a financial institution, whether in paper, electronic, or other form, that is handled or maintained by or on behalf of the financial institution or its affiliates.
- A service provider is defined as any person or entity that receives, maintains, processes, or otherwise is permitted access to customer information through its provision of services directly to a financial institution that is subject to the Safeguards Rule.
- In the PPA signed by each IHE to participate in the Title IV federal student aid programs, the IHE agrees to

comply with the FTC's regulations for implementing the GLB Act, 16 CFR part 314, Standards for Safeguarding Customer Information (also referred to as the Safeguards Rule). Since the GLB Act is intended to ensure the security and confidentiality of customer information, ED considers any breach of the security of student records and information as a demonstration of a potential lack of administrative capability as stated in 34 CFR section 668.16(c). ED has mandated IHE's must notify ED of any known or suspected breaches (See Volume 2, Chapter 7 of the 2017-2018 Federal Student Aid Handbook, page 2-201) and strongly encouraged IHEs to inform their students, in compliance with applicable state regulation.

- In addition, an institution that participates in any Title IV, Higher Education Act (HEA) program is subject to the requirements of the FTC Identity Theft Red Flags Rule (72 Fed. Reg. 63718) issued on November 9, 2007. The "Red Flags Rule" requires an institution to develop and implement a written Identify Theft Prevention Program to detect, prevent, and respond to patterns, practices, or specific activities that may indicate identity theft.
- If your response contains PII that information must be protected. PII is any information about a student which can be used to distinguish or trace the student's identity (some examples are name, social security number, date and place of birth).
- PII being submitted electronically or on media (e.g., CD, disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip, however, files created with encryption software are also acceptable, if they are compatible with WinZip and are encrypted with AES encryption.
- The Department must receive an access password to view the encrypted information. The password must be e-mailed or otherwise communicated separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).
- Hard copy files and media containing PII must be:
 - Sent via a shipping method that can be tracked with signature required upon delivery.
 - Double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
 - Labeled with both the "To" and "From" addresses on both the inner and outer packages.
 - Identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender)."

Information Security Plan

This Information Security Plan ("Plan") describes safeguards implemented by DDBS to protect covered data and information in compliance with the FTC's Safeguards Rule promulgated under the Gramm Leach Bliley Act (GLBA). With the use of the following updated firewall configuration, protection, and security software called Huntress, Webroot, Canari, RMM Monitoring, and Pen Testing Scanning. These safeguards are provided to:

- Ensure the security and confidentiality of covered data, student, and information.
- Protect against anticipated threats or hazards to the security or integrity of such information; and
- Protect unauthorized access to or use of covered data and information that could result in substantial harm or inconvenience to any customer.

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Information Security Program

DDBS has developed written policies and procedures to manage control information such as identity and assess the

risks that may threaten covered data and information maintained by DDBS. Directories have been created and controlled to allow for the sharing of data in one centralized controlled location. There are adjustments for the future of this program which includes annual and daily meetings and discussions around technology with Staff, Board Members, and IT Contractors which will allow DDBS to reflect on any changes in technology, the sensitivity of covered data/information, and internal or external threats to information security.

Risk Management & Compliance Assessment of Risks to Student/Customer Information

Risk assessments are conducted to identify, quantify, prioritize, and manage risks. Controls which are applicable to each situation have been applied to avoid violations of any legal obligation (e.g., statutory, regulatory, or contractual) which is also assessed through Electronic Brain Solutions (EBS). DDBS recognizes that it is exposed to both internal and external risks, including but not limited to the following:

Unauthorized Access: For unauthorized access of covered data and information by someone other than the owner of the covered data and information access control is done by specific sharing with only one person having access to specific data. In addition, DDBS has implemented a policy for risk management & compliance by locking doors, locking computer screens when not in use and not leaving data on screen when not in use, and the use of strong computer passwords. This plan will assist with making sure that data/information is not compromised as result of system access by any unauthorized person.

Interception of Data: The business center at DDBS is responsible for the set-up and management of all email systems through Microsoft. Every message that is sent from the Microsoft account is encrypted. Employees do not use Gmail accounts to send anything with PII. Offsite data backup is encrypted at transit and at rest.

Privacy Settings: The privacy settings on each device can be changed to limit the amount of personal data shared.

Data Back-up

Western Digital Backup is used along with an image backup to the cloud to ensure that data/information is protected offsite with encryption. It is also used for detecting and remediating errors in the system, corruption of data, unauthorized access of covered data and information, unauthorized request for covered data and information/pretext calling which is followed by DDBS policy and procedure that states that no one will be allowed access to PII of another person, unauthorized access through hardcopy files/reports(files are kept in a fire proof locked cabinet in the padlocked data room) and unauthorized transfer of covered data and information through third party(third parties are vetted and not allowed access to data without an escort of DDBS personnel).

Recognizing that this may not represent a complete list of the risks associated with the protection of covered data and information, and that new risks are created regularly, the DDBS Information Security Program Coordinator along with the third-party contractor Electronic Brain Solutions, will actively participate and monitor appropriate cybersecurity advisory groups for identification of risks. There is also an annual 3rd party penetration testing and remediation assessment that is conducted.

Current safeguards are implemented, monitored, and maintained by the DDBS Information Security Program Coordinator and Electronic Brain Solution (third-party contractor) are reasonable, and considering current risk assessments are sufficient to provide security and confidentiality to covered data and information maintained by the school. Additionally, these safeguards reasonably protect against currently anticipated threats or hazards to the integrity of such information.

Personnel Security Policy and Procedure

References and/or background checks (as appropriate, depending on position) of new employees working in areas that regularly work with covered data and information, financial, and financial aid are checked. DDBS has contractual agreements in place that target to keep client information secure.

Training & Awareness Policy and Procedure

Employees are trained annually to understand this plan and about all the changes and revisions to this plan. Employees are taught what is acceptable regarding client data, which allows staff to become educated on the secure use of all applications and technology solutions. During employee orientation, each new employee in these departments receives proper training on the importance of confidentiality of student hard-copy and digital records, user-groups, student financial information, and all other covered data and information. Each new employee is also

trained in the proper use of computer information and passwords. Training includes controls and procedures to prevent employees from providing confidential information to an unauthorized individual, as well as how to properly dispose of documents that contain covered data and information. These training efforts should help minimize risk and safeguard covered data and information. Refresher training is required on an annual basis.

Physical Security Plan/ Policy

DDBS has addressed the physical security of covered data and information that will allow unauthorized parties the inability to access sensitive data by limiting access to only those employees who have a legitimate business reason to handle such information. For example, financial aid applications, income and credit histories, accounts, balances, and transactional information are available only to DDBS employees with an appropriate business need for such information. Furthermore, each department is responsible for maintaining covered data and information and is instructed to take steps to protect the information from destruction, loss, or damage due to environmental hazards such as fire and water damage or technical failures. This Plan/Policy has been implemented, this plan is implemented for permitting and enabling physical access to alternate authorized individuals (e.g., in the event primary authorized individuals are sick or not available).

Information Systems Network Security Plan/Policy

Access to covered data and information via DDBS computer information system is limited to those employees and faculty who have a legitimate business reason to access such information. DDBS has policies and procedures in place including but not limited to access controls list for any data stored on the server to complement the physical and technical safeguards to provide security to DDBS information systems. Social security numbers are considered protected information under both GLBA and the Family Educational Rights and Privacy Act (FERPA). The following are existing controls:

- Authorized individuals only.
- Workstations with passwords.
- Information sent electronically is encrypted and sent by authorized individuals only.
- Vulnerabilities on both network and systems are constantly monitored and addressed.
- All systems must be managed on a managed services platform to ensure systems are patched when needed.
- Unauthorized access to third parties is not permitted.

Logical Access

Processes are in place to ensure unauthorized access to systems does not take place, users set up using permissions and groups based on job function by doing the following:

- All users must have unique ID's not only for windows but for 3rd party software as well.
- Email's systems have unique user ID's/Passwords in place.
- User rights must be adjusted as needed for employees' current job function.

Operations Management Policy and Procedure

Operating systems are established to protect documents, computer media, tapes, removeable media, disks, input/output data and system documentation to protect sensitive information from unauthorized disclosure, modification, removal, and destruction by doing the following:

- All sensitive data is handled appropriately by the authorized person.
- Equipment containing data that has been decommissioned or repaired must have any data wiped to DOD standards provided the hardware contains any data.
- IT providers will test as needed at their facility.
- Employees will have other employees with different job functions check and double check that data has been entered correctly and is not mistakenly modified.
- Any changes must be discussed with the designated employee(s) that are trained in how to appropriately use equipment/software that was modified to prevent errors and/or risks.

Management of System Failures

DDBS Information Security Program Coordinator has developed procedures to detect any actual or attempted attacks on DDBS systems and has detailed instructions for responding to actual or attempted unauthorized access to covered data and information. In the event of a system failure The Program Coordinator/Contractual IT Company must first discover the cause of failure (If the failure was due to corrupt files or a hardware failure, addressing/fixing

the issue and then restoring backup), if the cause of the failure is determined to be a third-party attack or something malicious, each machine effected should be disconnected from the network but kept running. It is important to contact the cybersecurity insurance provider first for guidance as to how to proceed within the parameters of policy.

Oversight of Service Providers

Electronic Brain Solutions and DDBS will oversee the oversight of service providers by the requirements of the GLBA. DDBS has taken reasonable steps to select and retain service providers who maintain appropriate safeguards for covered data and information. This Information Security Program ensures that such steps are taken by contractually requiring service providers to implement and maintain such safeguards.

Procedure for Reporting Security Breaches to Students and the Department

The Department considers any breach in the security of student records and information to be a demonstration of a potential lack of administrative capability.

Schools' SAIG Agreements include a provision that schools must notify Washington D.C. at the Department at CPSSAIG@ed.gov the same day of actual breaches as well as suspected breaches of the security of student records and information, and ED strongly encourages schools to notify their students of the breach at the same time.

- In their reports to the Department, schools should include the following:
- Date of breach (suspected or known)
- Impact of breach (of records, etc.)
- Method of breach (hack, accidental disclosure, etc.)
- Information Security Program Point of Contact - Email and phone details
- Remediation Status (complete, in process - with detail)
- Next steps (as needed)

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

Procedures to Maintain Compliance with the GLB Act Re: Personally Identifiable Information (PII)

1. All records containing PII are stored and maintained in a secure location.
 - a. Paper records and files are always stored in a locked fireproof cabinet in a locked room that is locked when unattended. The School Director of Operations controls access to these areas.
 - b. All stored data are protected against destruction or potential damage such as floods, fire, etc. by employing fire-proof cabinets.
 - c. Paper records and electronic customer information are also stored on a secure server whose access is controlled by the Information Security Program Coordinator, Electronic Brain Solutions. Access to this information is password protected and not available to students.
 - d. Staff computers are password protected, and students do not have access to them.
 - e. Student and employee PII are not stored on any computer system with a direct internet connection.
 - f. All student information is backed up daily through Electronic Brain Solution. Backup is stored in a secure location as determined by the Director of operations. All credit card information is processed through QuickBooks.
2. All electronic transmissions of student and employee PII are secured.
 - a. Social Security information, IRS information, and other sensitive financial data transmitted to DDBS directly from students shall use a secure connection such as a Secure Sockets Layer (SSL) or other currently accepted standard. This is so that the security of such information is protected in transit. Such secure transmissions are automatic. Students are advised against transmitting sensitive data via electronic mail.
 - b. DDBS contractually requires that inbound transmissions of PII, delivered to DDBS via other means, be encrypted or otherwise secured.

- c. All outbound transmissions of PII are secured in a manner acceptable to the Information Security Program Coordinator. If PII must be transmitted to DDDBS by e-mail, such transmissions are password protected or otherwise secured against compromise at the discretion of the Information Security Program Coordinator.
 - d. The Information Security Program Coordinator and third-party services review all student applications to ensure an appropriate level of security both within DDDBS and within the third-party server and the IRS.
 - e. Sensitive data must be transmitted to DDDBS by electronic mail, such transmissions are passwords controlled or otherwise protected from theft or unauthorized access at the discretion of the Director of Operations.
3. All paper transmissions of student and employee information by DDDBS are secure.
 - a. Any PII delivered by DDDBS to third parties are always kept sealed.
 - b. Paper-based student/employee information is never left unattended in an unsecured area.
 - c. All paper transmission of student and employee information is stored in a fireproof locked cabinet inside a padlocked records room.
4. All PII is disposed of in a secure manner.
 - a. The Information Security Program Coordinator (Director of Operations/Business Center Administrator) will supervise the disposal of all records containing PII.
 - b. Paper-based PII is shredded and stored in a secure area until a disposal or recycling service picks it up.
 - c. All hard drives, diskettes, magnetic tapes, or any other electronic media containing PII shall be erased and/or destroyed prior to disposal. All hardware is recycled.
 - d. All PII is disposed of in a secure manner after any applicable retention period.
5. The Information Security Program Coordinator (Director of Operations/Business Center Administrator) maintains an inventory of the school computers and handheld devices on or through which PII may be stored, accessed, or transmitted.
6. The Information Security Program Coordinator (Director of Operations/Business Center Administrator) develops and maintains appropriate oversight and audit procedures to detect the improper disclosure or theft of student information.

Definitions

- As used in the Gramm-Leach-Bliley Act, “customers” (those to whom DDDBS provides services of any kind for).
- For the purposes of this Safeguarding Program, “customer information” is defined as any record containing non-public, personally identifiable financial information regarding any of the school’s customers, whether records are maintained on paper, electronically, or by any other means, this security program does not create contractual agreements between the student and any other entity or person.

Applicability

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

Information Security Program Policies and Procedures

By using an updated firewall configuration, protection, and security software (huntress, Webroot, canari, RMM Monitoring, and Pen testing Scanning) DDDBS continues to keep the objectives of the Information Security Program. DDDBS implements, maintains, and enforces the following attack and intrusion safeguards to detect, prevent, and respond to attacks, intrusions, or other system failures.

DDBS employs Rollcall educational management software and Boston Educational Network, a fully encrypted school interface. Participating in school administrators must be secured with a unique logon ID and password for access.

The Information Security Program Coordinator(s):

DDBS Information Security Program Coordinator is Marlene Brooks (Director of Operations), and Roxy Dunlap (Business Center Liaison). They are responsible for ensuring DDBS has adequate procedures in place to address any compromise of DDBS's information safeguards. The procedures include appropriate responses to specific types of attacks, i.e., hackers, general security failure, denial of access to databases and computer systems, etc.

Based on the information contained in the questions below, there is a mix of hardware and software solutions to help protect and defend DDBS's infrastructure. The coordinators are responsible for the following:

1. Maintaining a working knowledge of appropriate technology for the protection of student PII.
1. EBS trains Spec Ops on a weekly basis along with other training throughout the year.
2. Ensuring that DDBS has installed the most recent updates needed to resolve software vulnerabilities, the Information Security Program Coordinator periodically communicates with DDBS's computer vendor.
3. Making sure updates are installed automatically 4-5 days after they are released. They are monitored for any issues or failures. Third party patching occurs as updates are released.
4. Ensuring DDBS utilization of anti-virus and EDR software that updates automatically. Currently using Webroot monitored Anti-virus along with Canauri for ransomware protection and huntress for IDS and EDR.
5. Ensuring that DDBS maintains up-to-date firewalls. Firewall is updated according to the schedule of releases from the firewall company.
6. Managing DDBS's information security tools for employees and passing along updates about any security risks or breaches. Updates provided related to DDBS's specific infrastructure.
7. In the event of a computer or other technological failure, the Information Security Program Coordinator's will implement previously established procedures to preserve the security, confidentiality, and integrity of student PII. Electronic Brain Solutions will be managing or making repairs so they will know where the data is located and who is accessing it. Once the computer dies, Electronic Brain Solutions will destroy (physically) the hard drive and recycle the computer.
8. Ensures that access to student information is granted only to legitimate and valid users. The student information that resides on the server is access controlled by active directory logins.
9. Notifies students promptly if their PII is compromised.

DDBS has established a way for a person whose "personal identification information" was the subject of a "data breach" in compliance with the mandatory "data breach" notification statutes or regulations to contact students if PII is found to be compromised and a monitoring service that provides "data breach" victims with credit, fraud, public records or other monitoring alerts through Electronic Brain solutions as well as services that are covered under The Hartford.

Cyber Incident Response Procedure

In the event of a cyber incident (ransomware, breach, successful phishing attack etc....) the qualified coordinators or IT provider must do the following:

1. Disconnect the computer from the network but keep the system powered on. This may be done with huntress software but if not, it will require someone to physically disconnect the machine.
2. After the qualified individual has been alerted, they will reach out to Electronic Brain Solutions if that has not already been done.
3. The designated personnel must login to FSA in Washington D.C. (U.S. Department of Education) to report a security breach through the Cybersecurity Intake Page with 24 hours of the data breach or call the Education Security Center (EDSOC) at 202-245-6550.
4. The coordinator of Electronic Brain solutions will contact The Hartford, which provides the cyber liability policy for instructions on how to proceed.
5. The Hartford will indicate the next steps and if a 3rd party investigator or response unit will be needed.

Physical Incident Procedure

In the event of a physical disaster (fire, flood, etc.) the following must be done:

1. The coordinator must have access to the school to assess the damage to physical storage as well as technology.
2. After the assessment The Hartford insurance company will be notified.
3. An onsite evaluation of all IT equipment will be performed by qualified coordinators and Electronic Brain Solutions.
4. After the assessment of any damage by the IT coordinator and Electronic Brain Solutions is performed and if a new server or solution is needed to restore the backup files and get the business applications up and running must be functioning as soon as possible.
5. Physical media will also be evaluated for damage and restoration possibilities.
6. If physical IT equipment is rendered useless, a virtual machine will be created in the cloud and all data, and all data and information temporarily migrated to that server.

Incident Management Strategy Policy and Procedure

A consistent approach to managing information security incidents, consistent with applicable law, is in place to handle information security events and weaknesses once they are reported by doing the following:

- reporting any security incidents by documenting the incident completely. Logs and any other evidence of a “security breach” are saved for review.
- Measures to correct any breaches are taken immediately to stop ongoing attacks if found.
- Communicate information security events and vulnerabilities associated with information systems effectively, allowing for appropriate and timely corrective actions.
 - **Incident Response:** This formalized plan outlines detailed procedures for incident prevention, detection, assessment, forensics, containment, and recovery activities. This plan aims to mitigate computer security risks through comprehensive, structured responses to incidents.
 - **Designated Incident Response Personnel:** Designated personnel are responsible for responding to incidents. The personnel responsible are responsible for executing the procedures detailed in the Incident Response Plan. These responsibilities include initial response, investigation, mitigation actions, and coordination with external experts if necessary.

Business Continuity Management Policy/System failure

Backup and recovery plans are documented, distributed, through the organization and easily obtained by office personnel if an event occurs by doing the following:

- Any Backup and recovery options that are presented to DDBS are reviewed and tested regularly to ensure that the best plan is in place per DDBS needs.
- Currently all data is backed up offsite and tested for recoverability in the event of data loss.
- Physical security analysis of both electronic and hardcopy records regularly.

Threat Assessment Policy

This policy is in place to detect and prevent malware, phishing, compromised credentials or passwords along with sabotage and or fire by doing the following:

- The use of the anti-virus with Webroot.
- Constant monitoring with Huntress and anti-ransomware with Canauri.
- Monitoring via RMM.
- Firewall logs and updates.
- Backups both onsite and offsite are performed for disaster recovery.

Records Policy

This policy explains how records are protected including stored information such as:

financial records school (restricted), financial records student(private), tax information(restricted), loan applications(restricted),employee HR information(restricted), employee contact information(private), student contact information(private), student account balances(private), website content(public), student personal information(private), parent personal information(private), client personal medical information(private), student financial aid information(private), student grades and attendance(private), emergency contact(private), student paper files(private), student digital files(private). These are the procedures as follows:

- Working with Galactic Scan.
- Penetration testing is done annually.
- All information transferred to DDBS.
- Huntress 24/7
- SOC reviews possible incidents and removes nodes from the network if necessary.
- Traditional anti-virus by Webroot
- Monitoring by RMM.
- Canauri is staffed 24/7 and has alerts for any attempts to remove ransomware.
- Data housed on a specific drive or specific program named Rollcall which doesn't have encrypted database but relies on the security of the server where it resides.

Disposal

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

Monitoring and Detection

All institutional data and computing resources must be continuously monitored to detect any events that may compromise their security. This includes system, security, and operational events. This is to ensure that DDBS identifies potential security incidents promptly and effectively.

Commitment to Continuous Improvement

DDBS commits to continually improving its response capabilities. This includes regular reviews and updates to the Data Privacy, Cyber Incident & Information Security Response Plan and training programs for the Incident Response Personnel to ensure they are prepared to manage new and evolving threats.

Audits and Monitoring

DDBS reserves the right to perform periodic and random audits. This continuous monitoring of its networks and systems will ensure compliance with this cybersecurity policy.

Handling Non-Compliance

Non-compliance with this policy must be reported to the Director of Operations. An assessment of the non-compliance, potential risks involved, and the corrective actions to require preventing future occurrences will be

reviewed and if necessary, escalated review and action of the individual (s) involved.

Incident Reporting and Investigation

All breaches of information security, whether actual or suspected, must be immediately reported to the designated personnel. Designated personnel are responsible for initiating an investigation and working with relevant parties to address the breach. A standard procedure for reporting and managing breaches will be outlined in the Incident Response Plan.

Disciplinary Actions

Individuals found in violation of this policy are subject to disciplinary action, which may include, but not limited to, loss of computer and network access and privileges, reprimands, suspension, termination of employment, or legal action, depending on the severity of the breach. Disciplinary measures will be applied consistently and in accordance with DDBS policies.

Compliance Training

To support compliance with this policy, DDBS will provide regular training and awareness programs to all members of the DDBS staff. These programs will cover the importance of information security, the specific requirements of this policy, and the roles and responsibilities of individuals in maintaining security.

INSURANCE to COVER DATA and INFORMATION POLICY

The Hartford Data Breach Response Expense Policy and Procedure

The Hartford will pay for “data breach expenses” that DDBS incurs because of a “data breach” of personally identifiable information. The following is the procedure in the event of a loss you must:

- The designated personal responsible on the campus site must report the data breach to Washington within 24 hours of breach by logging into FSA (U.S. Department of Education) and report the breach through the Cybersecurity Intake page or call the Education Security Center (EDSOC) at 202-245-6550.
- Report the “data breach” to The Hartford within 30 days of the discovery of the “data breach.”
- Immediately record the specifics of the “data breach” and the date discovered.
- Cooperate with the investigation of the “data breach.”
- Assist The Hartford, upon request in the enforcement of any right against any person or organization which may have accessed, stolen or disclosed the information or data giving rise to a “data breach.”
- DDBS may not, except at your own cost, voluntarily make a payment, assume any obligation, or incur any expense without prior written consent.
- DDBS has 1 year from the date of reporting a “data breach” to initiate services provided to the school.
- As soon as possible, give The Hartford should be told the description of how, when and where the “data breach” occurred, including but not limited to all the following, information as it becomes known to you:
 1. The method of “data Breach”
 2. The approximate date and time of the “data breach”
 3. The approximate number of files compromised because of the “data breach.”
 4. A detailed description of the type and nature of the information that was compromised.
 5. Whether or not the information was encrypted, and if so, the level of encryption.
 6. Whether or not law enforcement has been notified
 7. If available, the place of domicile for all persons whose “personally identifiable information” was the subject of a “data breach.”
 8. If available, who received the information contained in the “data breach.”
 9. Any other access, information or documentation were reasonably required to investigate or adjust the loss.
 10. Take all reasonable steps to protect “personally identifiable information” remaining in your care, custody, or control.
 11. Preserve, and permit us to inspect, all evidence of the “data breach.”
 12. If requested, permit The Hartford to question DDBS under oath, orally or in writing, at times as may be reasonably required about any matter relating to the insurance or loss, including copies of DDBS books and records. In answering questions in writing DDBS answers must be signed.

The Hartford Data Breach Defense Policy and Procedure

The Hartford will pay for “loss” on behalf of DDBS resulting from a “data breach claim” if the following conditions are met:

- The ‘data breach claim’ was first made against DDBS during the policy period. A “data breach claim” will be deemed to have been made when notice of such “data breach claim” is received by you or by The Hartford, whichever comes first.
- DDBS had no knowledge of the “data breach” out of which the “data breach” arises.
- The “data breach claim” is reported to The Hartford within 30 days after you receive notice of the claim, but in no event later than 30 days after the end of the “policy period.”
- The “data breach” must involve “personally identifiable information” that was held by DDBS or on behalf in the “coverage territory.”
- DDBS must cooperate with The Hartford in any investigation, settlement, or defense of the “data breach claim”, and assist The Hartford, upon their request in the enforcement of any right of recovery regarding any payment of “loss” under DDBS Data Breach Policy. DDBS must execute all papers required and do everything necessary to secure and preserve such rights, including the execution of any documents needed to enable The Hartford to bring suit in DDBS’s name.
- DDBS may not, except at our own cost, voluntarily make a payment, assume any obligation, or incur any expense without prior written consent.
- DDBS must take all reasonable steps to protect “personally identifiable information” remaining in the care of DDBS.
- DDBS must preserve all evidence of the “data breach”.

DDBS has established crises management services through Electronic Brain Solution that will be able to perform services a way for a person whose “personal identification information” was the subject of a” data breach” in compliance with the mandatory “data breach” notification statutes or regulations to contact students if PII is found to be compromised.

Continuing Evaluation and Adjustment

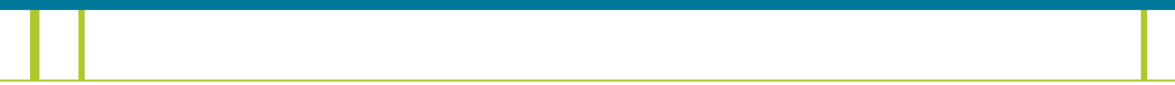
The Information Security Program will be reviewed annually by the schools’ boards, staff, and 3rd party IT company, and will be subject to periodic review and adjustment. Continued administration of the development, implementation and maintenance of the program will be the responsibility of the designated Information Security Program Coordinators, who will assign specific responsibility for technical (IT), logical, physical, and administrative safeguards implementation and administration as appropriate.

Additional Definitions

Covered data and information - for the purpose of this program includes student financial information (defined below) that is protected under the GLBA. In addition to this coverage, which is required under federal law, DDBS chooses as a matter of policy to include in this definition all sensitive data, including credit card information and checking/banking account information received during business hours by the school, whether such information is covered by GLBA. The covered data and information will include both paper and electronic records.

Pretext calling - occurs when an individual attempts to improperly obtain personal information of DDBS customers to be able to commit identity theft. It is accomplished by contacting the school, posing as a customer or someone authorized to have the customer's information, and using trickery and deceit, convincing an employee of the school to release customer-identifying information.

Student financial information - is that information that DDBS has obtained from a student or customer in the process of offering a financial product or service, or such information provided to the school by another financial institution. Offering a financial product or service includes offering student loans to students, receiving income tax information from a student’s parent when offering a financial aid package, and other miscellaneous financial services. Examples of student financial information include addresses, phone numbers, bank and credit card account numbers, income and credit histories and Social Security numbers,



in both paper and electronic format.

Data Breach- means loss, theft, accidental release, or accidental publication of “personally identifiable information”, or circumstances objectively giving rise to a substantial risk that such a loss, theft release, or publication has occurred.

Data Breach Expense- Notification expenses to notify a person whose “personally identifiable information” was a subject of a “data breach” notification statutes or regulations.

Loss- meaning civil awards, settlements, and judgments (including any award or prejudgment interest), expenses incurred in the defense of a “regulatory proceeding.”

Regulatory Proceeding- meaning an investigation, demand or proceeding, including a request for information, brought by, or on behalf of, the Federal Trade Commission, Federal Communications Commission or other administrative or regulatory agency, or any federal, state, local or foreign governmental entity in such entity’s regulatory or official capacity seeking relief based upon a “data breach.

FTC regulations: 16 CFR 313.3(n) and 16 CFR 314.1–5 Gramm-Leach-Bliley Act: Sections 501 and 505(b)(2) U.S. Code: 15 USC 6801(b), 6805(b)(2)

Appendix F Institutional Refund Policy

Institutional Refund Policy – updated 3/18/2024

REFUND POLICY AND SIGNATURE FORM

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

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

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

4. Refunds for Students Enrolled in Professional Development, Continuing Education, or Limited Contract Instruction. Institutions engaging in programs, which are short-term, must have a written policy or contract statement regarding whether or not fees and instructional charges are refundable.

5. Refunds for Withdrawal after Class Commences

Refunds policy for programs obligating students for periods of 12 Months or less the refund policy for Students attending non-public institutions who incur a financial obligation for a period of 12 months or less shall be as follows: (i) During the first 10% of the period of financial obligation, the institution shall refund at least 90% of the tuition; (ii) After the first 10% of the period of financial obligation and until the end of the first 25% of the period of obligation, the institution shall refund at least 50% of the tuition; (iii) After the first 25% of the period of financial obligation and until the end of the first 50% of the period of obligation, the institution shall refund at least 25% of the tuition; and, (iv) After the first 50% of the period of financial obligation, the institution may retain all of the tuition.

6. Refund Policy for programs obligating students for periods beyond twelve months

Programs longer than 12 months that financially obligate the student for any period of time beyond 12 months shall release the student of the obligation to pay beyond the 12 months if the student withdraws during the first 12 months. The calculation of the refund for the unused portion of the first 12 months shall be based on section above. If the student withdraws during any subsequent period following the first 12 months, the student's refund for the unused portion of the tuition applicable to the period of withdrawal shall be based on the section above. Student agrees to comply with the assigned schedule for applicable All Beauty

Programs, which may change from time to time at the discretion of the school. Students agree to attend theory class as scheduled for the duration of the course of study regardless of whether all required tests have been taken and passed.

REFUND POLICY-NOTICE OF CANCELLATION

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

Any funds due the applicant or students shall be refunded within 45 days of official

cancellation or withdrawal. Official cancellation or withdrawal shall occur on the earlier of the dates that:

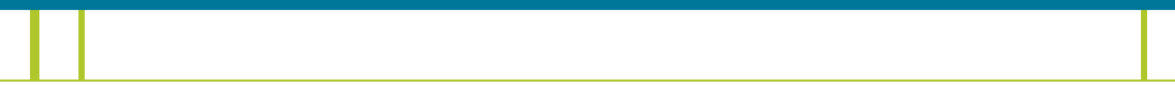
- (1) Applicant is not accepted by the school: The applicant shall be entitled to a refund of all monies paid.
- (2) A student (or legal guardian) cancels his/her enrollment in writing within three business days of signing the enrollment agreement. In this case all monies collected by the school shall be refunded, regardless of whether or not the student has actually started classes.
- (3) A student cancels his/her enrollment after three business days of signing the contract but prior to starting classes. In these cases, he/she shall be entitled to a refund of all monies paid to the school less the registration fee in the amount of \$100.00
- (4) A student notifies the institution of his/her withdrawal in writing.
- (5) A student on an approved leave of absence notifies the school that he/she will not be returning. The date of withdrawal shall be the earlier of the date of expiration of the leave of absence or the date the student notifies the institution that the student will not be returning.
- (6) A student is expelled by the school: (Unofficial withdrawals will be determined by the institution by monitoring attendance at least every 30 days.)
- (7) In type 2, 3, 4 or 5, official cancellations or withdrawals, the cancellation date will be determined by the postmark on the written notification, or the date said notification is delivered to the school administrator or owner in person.
- (8) Any student who either officially or unofficially withdraws before six (6) calendar days after the beginning of school will be considered to be a “pre-registered” or never attended student.

For students who enroll and begin classes but withdraw prior to course completion (after three business days of signing the contract), the following schedule of tuition earned by the school applies. All refunds based on scheduled hours:

PERCENT OF SCHEDULED TIME TOTAL TUITION SCHOOL ENROLLED TO TOTAL COURSE/PROGRAM SHALL RECEIVE/RETAIN

0.01% to 04.9%	20%
5% to 09.9%	30%
10% to 14.9%	40%
15% to 24.9%	45%
25% to 49.9%	70%
50% and over	100%

All refunds will be calculated based on the student’s last date of attendance. Any funds due to a student who withdraws shall be refunded within 45-days of a determination that a student has withdrawn, whether officially or unofficially. In the case of disabling illness or injury, death in the student’s immediate family



or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If permanently closed or no longer offering instruction after a student has enrolled, the school will either provide a full refund of all funds paid or completion of the course at a later time. If the course is canceled subsequent to a student's enrollment, the school will either provide a full refund of all funds paid or completion of the course at a later time.

Created: 9/14/2021
Updated: 3/15/2022, 7/23/2022, 3/19/2024
Revised: 3/15/2022, 7/23/2022, 3/19/2024

Appendix G

RETURN OF TITLE IV FEDERAL STUDENT AID

Created: 9/14/2021
Updated: 3/15/2022, 7/23/2022, 3/19/2024, 3/8/2025
Revised: 3/15/2022, 7/23/2022, 3/19/2024, 3/8/2025

Reference

Federal Student Aid Handbook, Volume 5 Chapter 1 Withdrawals and the Return of Title IV Funds
34 CFR 668.22

Policy Reason

The U. S. Department of Education requires that schools determine the amount of Title IV aid earned by a student who withdraws or fails to complete the period of enrollment. DDBS must determine the earned and unearned portions of Title IV aid as of the date the student ceased attendance based on the amount of time the student was scheduled to be in attendance (in a clock-hour program). Up through the 60% point in the period of enrollment, a pro-rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60% point in the period of enrollment, a student has earned 100% of the Title IV aid funds he or she was scheduled to receive. If a student did not start or begin attendance at the school, the R2T4 formula does not apply. For a student who withdraws after the 60% point, there are no unearned funds. Federal regulations can be found at:

BEN Procedure

Dymond Designs Beauty School will develop and maintain a compliant USDE Title IV R2T4 policy, provide BEN's Refund Calculation Form (Appendix B) to BEN, provide the student with the completed R2T4 (in person with a signed statement or by certified mail), and maintain copies of all relevant documentation in the student's file for proof of R2T4 completion.

When a Title IV eligible student terminates from a program, DDBS will submit a Refund Calculation Form to BEN immediately upon the student's termination. The information on the form must include the student's last date attended, disbursement and attendance records for the payment period in which the student was in when he/she withdrew. BEN will complete the R2T4 in accordance with USDE regulations and report the information to the institution. The institution will return the Title IV funds within 45 days of the school's determination that the student had withdrawn. The institution will transfer the funds to the appropriate federal funds account and complete and submit a "Refund Report"(Appendix C) to BEN. The "Refund Report" is available from the BEN's institution portal and must be filled out and submitted after the Title IV funds have been deposited in the appropriate federal fund accounts. The "Refund Report" can be submitted through BEN's secure portal or via password protected e-mail. BEN will post the

adjustments to COD and initiate the cash to be removed from the institution's federal funds account via the USDE G5 system. The institution will post the Title IV refund to the student's ledger and obtain student/parent authorization when a Post Withdrawal Disbursement of Direct loan funds are available. DDBS will obtain authorization from the loan borrower prior to submitting disbursement requests. The institution will notify NSLDS of grant funds owed by the student and provide BEN with a BEN COD Monitoring Report when a student terminates, is a no show, or cancels a Direct loan, if for some reason the "Refund Report" was not used. BEN will update the student record in Edexpress to reflect any adjustment, which will then be submitted to COD via Edconnect each business day. After BEN receives the "Refund Report" they will evaluate and determine if the entire loan needs to be cancelled, if the loan period needs to be update, if the loan amount needs to be updated. DDBS and BEN will annually review the institution's Refund Policy to ensure that the policy is compliant with the USDE regulation.

Procedural Statement

At DDBS, Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded. When a student withdraws, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive.

If a recipient of a Title IV grant or loan withdraws from an institution after beginning attendance, the amount of Title IV grant or loan assistance earned by the student must be determined. If the amount disbursed to the student is greater than the amount the student earned, the unearned funds must be returned. If the amount disbursed to the student is less than the amount the student earned and for which the student is otherwise eligible, they may be eligible to receive a post-withdrawal disbursement of the earned aid not received.

If a student never begins attendance, funds are unearned. Eligibility to receive the awarded funds was never established. Therefore, no R2T4 calculation is performed and all of the FSA funds are returned to the FSA programs. 34 CFR 668.21. Example: when a student reduces their course load, this represents a change in enrollment status, not a withdrawal. Therefore, no R2T4 is required.

As a clock-hour school, DDBS is required to take attendance. If a school is required to take attendance, then a determination must be made within 14 days of the student ceasing attendance whether s/he has withdrawn. If so, the withdrawal date is always the last date of attendance.

The date of determination is the date as of which the school determines a student has ceased attendance.

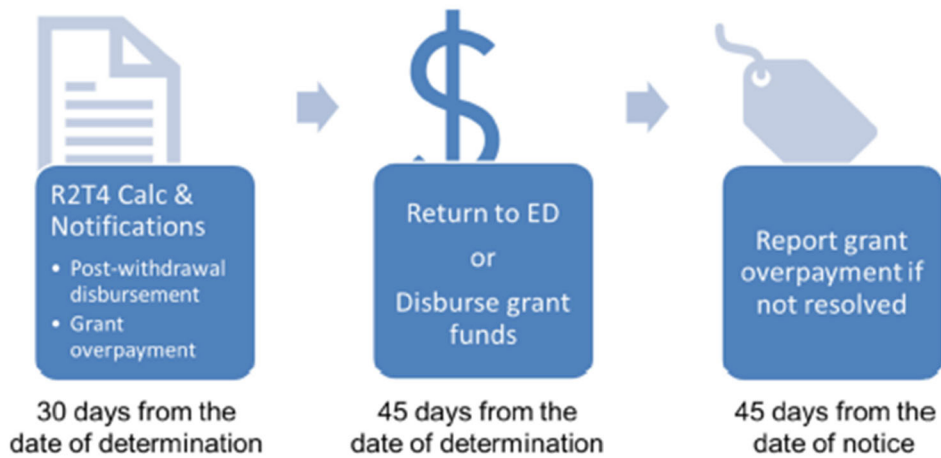
Within **30 days** from the date of determination:

- The R2T4 calculation must be completed,
- The student must be notified of any post-withdrawal disbursement for which they are eligible, and

- The student must be notified of any grant overpayment they may owe.

Within **45 days** from the date of determination:

- Any funds must be returned to the Department of Education and
- Any post-withdrawal disbursement of Title IV grant funds must be made.



Borrower permission must be obtained to make a post-withdrawal disbursement of Direct Loan funds. Students must be given at least 14 days to respond to your notice about available post-withdrawal loans.

Permission is not required for disbursement of grant funds. Loans may be disbursed as late as 180 days from the date of determination.

Within 180 days from the date of determination:

- Any post-withdrawal disbursement of Title IV loan funds the student accepted after being notified must be made.

Note: The requirements for Title IV program funds calculations are separate from any DDBS institutional refund policy when a student withdraws.

Leave of Absence/Withdrawal Process

A student may leave DDBS by either taking a leave of absence (leaving DDBS temporarily with the firm and stated intention of returning) or withdrawing (leaving DDBS with no intention of returning). Students choosing to take a leave of absence should first contact their instructor(s) to discuss their plans while on leave and to work out any conditions that may be necessary for a smooth return to DDBS.

A student deciding to leave DDBS should take the following steps:

- Submit a request in writing requesting a Leave of Absence to their instructor
- The written request must contain dates for the leave and the reason for the request and include the student's signature

Note: For the complete Leave of Absence policy, see the current DDBS Operations Handbook.

***NEW* WITHDRAWAL EXEMPTION CATEGORIES**

If met, these withdrawal exemptions allow a student who has otherwise withdrawn or left the institution to **not** be considered a withdrawal for Title IV purposes.

Withdrawal exemption for graduates or completers

A student meets the withdrawal exemption for graduates or completers if the student completes all of the academic requirements for graduation and is able to graduate before completing all of the days or clock hours in the period they were scheduled to complete. This withdrawal exemption can apply to any type of program or academic calendar.

NOTE: Schools with clock-hour programs in which a student graduates without successfully completing all of the established hours in the program must re-prorate the amount of Title IV aid and only pay the student for the hours successfully completed. This includes proration of Pell Grants, Iraq-Afghanistan Service Grants, TEACH Grants, and Direct Loans.

When prorating a student's awards in this situation the institution does not consider the number of weeks of instructional time completed by the student.

Re-proration is applicable for clock hour programs in this situation because Title IV aid is based, in part, upon the overall number of clock hours in a program of study. There is an expectation that a student will successfully complete all clock hours as they progress through their program of study. When a student graduates from a clock hour program without completing all of the established/reported hours in a program, the student has effectively shortened their program length. By doing so, the Department sees that student as now being enrolled in a program with fewer clock hours. As such, we then require the school to re-prorate (or adjust) Title IV aid provided to an amount equivalent to the actual hours the student successfully completed.

NEW* withdrawal exemption categories established by the Department in final regulations on 9/2/2020

Determination of Withdrawal Date

Because DDBS is required to take attendance, a student's withdrawal date is always the last date of academic attendance as determined by DDBS from its attendance records. This date is used for all students who cease attendance, including those who do not return from an approved LOA, those who take an unapproved LOA, and those who officially or unofficially withdraw.

Official Withdrawals (Notification Provided by the Student)

It is the responsibility of the student to provide written notice of the intention to withdraw or take a leave of absence from DDBS. This written notification can be provided to the student's instructor or the administrative staff.

For students who notify DDBS of their intent to withdraw or take a leave of absence, the official date of withdrawal or leave of absence is the last date of academic attendance.

Unofficial Withdrawal (No Official Notification Provided by the Student)

For a student who withdraws without providing notification to DDBS, the institution determines the withdrawal date as the student's last date of attendance as determined by DDBS from its attendance records. This category of withdrawals includes students that drop out and students that do not earn a passing grade.

An unofficial withdrawal occurs when a student leaves DDBS without notice and/or when he/she is not meeting satisfactory academic progress. A student's withdrawal date is their last date of physical attendance. Any student that does not provide official notification of his or her intent to withdraw and is absent for more than 14 consecutive calendar days will be subject to termination and be considered to have unofficially withdrawn.

Date of Determination that the Student Withdrew

The date of determination is the date as of which the school determines that a student has ceased attendance, or the day that the student notifies the school that they will not be returning.

Except in unusual instances, the date of the institution's determination that the student withdrew should be no later than 14 days after the student's last date of attendance as determined by the institution from its attendance records.

Calculation of Earned Title IV Assistance

Only *scheduled hours* are used to determine the percentage of the period completed by a student withdrawing from a clock-hour program. For a clock-hour program, the percentage of

the period completed is determined by dividing the number of hours the student was scheduled to complete in the payment period or period of enrollment, as of the day the student withdrew, by the total number of clock hours in the same period as follows:

$$\frac{\text{number of clock hours the student was scheduled to complete in the period}}{\text{total number of clock hours in the period}}$$

The amount of Title IV federal aid earned by the student is determined on a pro-rata basis up to 60% of the semester. If the student completed 30% of a term, 30% of the aid originally scheduled to be received would have been earned. Once a student has completed more than 60% of a term, all awarded aid (100%) has been earned. Federal regulatory requirements define the percentage of federal aid earned and the order in which the unearned aid is returned.

The calculation of earned Title IV funds includes the following grant and loan funds if they were disbursed or could have been disbursed to the student for the period of enrollment for which the return calculation is being performed:

- Pell Grant
- Iraq and Afghanistan Service Grant
- Federal Supplemental Opportunity Grant (FSEOG)
- Unsubsidized Direct Stafford Loans
- Subsidized Direct Stafford Loans
- Federal PLUS Loans

Please note that a school does NOT count scheduled hours during periods when a student is on a leave of absence or “make-up” hours that were not part of the student’s normal schedule.

Institutional Charges

Institutional charges are used to determine the portion of unearned Title IV aid that the school is responsible for returning. DDBS ensures that all charges for tuition, fees, books, kit bags, and all other applicable institutional charges are included in the return calculation.

Institutional charges do not affect the amount of Title IV aid that a student earns when they withdraw. The institutional charges used in the calculation usually are the charges that were initially assessed by the student for the period of enrollment. If, after a student withdraws, the institution changes the amount of institutional charges it is assessing a student or decides to eliminate all institutional charges, those changes affect neither the charges nor aid earned in the calculation.

Amount of Title IV Aid Earned by the Student

The amount of Title IV aid earned by the student is determined by multiplying the percentage of Title IV aid earned by the total of *Title IV program Aid disbursed* plus the *Title IV aid that could have been disbursed* to the student or on the student’s behalf.

Total Title IV Aid to Be Returned

Suppose the total amount of Title IV grant and loan assistance that was earned as of the withdrawal date is less than the amount that was disbursed to the student. In that case, the difference between the two amounts will be returned to the Title IV program(s), and no further disbursements will be made.

If a student has received excess funds, DDBS must return a portion of the excess equal to the lesser of the student's institutional charges multiplied by the unearned percentage of funds or the entire amount of the excess funds.

The funds will be returned in the order below as prescribed by federal regulations within 45 days from the date of determination that a student withdrew:

- Unsubsidized Direct Stafford Loans
- Subsidized Direct Stafford Loans
- Federal PLUS loans
- Federal Pell Grants
- Iraq and Afghanistan Service Grant
- Federal Supplemental Educational Opportunity Grant (FSEOG)

Post-Withdrawal Disbursements

If the total amounts of the Title IV grant and loan assistance earned as of the withdrawal date are more than the amount that was disbursed to the student, the difference between the two amounts will be treated as a **post-withdrawal disbursement**. If there are outstanding charges on the student's account, DDBS will credit the student's account for all or part of the post-withdrawal disbursement amount up to the amount of allowable charges.

Any amount of a post-withdrawal disbursement that is not credited to a student's account will be offered to the student within 30 days of the date that the institution determined that the student withdrew. Upon receipt of a timely response from the student, DDBS will disburse the funds within 90 days of the date of determination of the student's withdrawal date.

Any post-withdrawal disbursement due must meet the current required conditions for late disbursements. For example, the Department must have processed a SAR or ISIR with an official expected family contribution (EFC) prior to the student's withdrawal.

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

Overpayment

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

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

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

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

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

Example: Harry

Student Harry's cosmetology program started on January 8 and on January 26, the school discovered that Harry had stopped attending. His **last date of attendance** was January 17 (through which time Harry was **scheduled to have attended** 45 hours). Harry received a Pell Grant in the amount of \$2,000.00 and a Subsidized Direct Loan for \$1,700.00.

The Financial Aid Office began the withdrawal process and required calculations. Because DDBS is required to take attendance, Harry's **withdrawal date** is his last date of attendance at an academically related activity, January 17. The date of the institution's **determination** that Harry withdrew is the date that the aid office received information that Harry had ceased attendance, which was January 26.

Because DDBS uses the payment period as the basis for its Return calculation, the \$2,000.00 in Pell funds and the \$1,700.00 in Subsidized Direct Loan funds Harry was scheduled to receive once he had completed the first 450 hours of his program is included as Title IV funds that **could have been disbursed**. Therefore, **total Title IV aid disbursed and could have been disbursed** for the period of enrollment equals $\$2,000.00 + \$1,700.00 + \$2,000.00 + \$1,700.00 = \$7,400.00$.

Only scheduled hours are used to determine the percentage of the period completed by a student withdrawing from a clock-hour program. The percentage of the period completed

by a student is determined by dividing the number of hours the student was scheduled to complete in the payment period or period of enrollment as of the day the student withdrew by the total number of clock hours in the same period.

- Number of clock hours Harry was scheduled to complete by January 17 = 45
- Number of clock hours in the period of enrollment = 900
- $45 \text{ clock hours} \div 900 \text{ clock hours} = 0.050$.

Percentage of period of enrollment completed = 5.0%.

Because this percentage is less than or equal to 60%, the **percentage of Title IV aid earned** is 5.0%.

The **amount of Title IV aid earned by the student** is calculated by multiplying the percentage of period of enrollment completed by the total of the Title IV aid disbursed and could have been disbursed for the period of enrollment.

$$5.0\% \times \$7,400.00 = \$370.00.$$

Because the total Title IV aid earned is less than the total Title IV aid disbursed, no post-withdrawal disbursement is due.

Because the total Title IV aid disbursed is greater than the total Title IV aid earned, **Title IV aid must be returned**. In this example, \$3,330.00 is the amount of Title IV aid that must be returned.

$$\$3,700.00 - \$370.00 = \$3,330.00.$$

The **total institutional charges** for the period of enrollment are \$8,500.00.

Subtracting the percentage of Title IV aid earned from 100% equals the **percentage of Title IV aid unearned**. In this case, 95.0%.

The **amount of unearned charges** in this case:

$$\$8,500 \times 95.0\% = \$8,075.00.$$

The **amount of unearned Title IV aid due from the school** is the lesser of the amount of Title IV aid to be returned (\$3,330.00) and the unearned institutional charges (\$8,075.00). The amount of unearned Title IV aid due from the school is \$3,330.00.

The only Title IV loan disbursement Harry received was a Subsidized Direct Loan disbursement of \$1,700.00. Since \$1,700.00 is less than the \$3,330.00 amount for the school to return, the school must return the entire \$1,700.00 to the Direct Loan Program.

After the school returns \$1700.00 to the Direct Loan program, the balance to be returned by

the school is \$1,630.00 (\$3,330.00 – \$1700.00). Harry received \$2,000.00 in Pell Grant funds, so the school returns the \$1,630.00 to the Pell Grant Program.

The school must return any unearned funds within 45 days from the date of the institution's determination that Harry withdrew.

Because the difference between the amounts of Title IV aid the school must return (\$3,330.00) and the total amount of Title IV aid that is to be returned (\$3,330.00) is \$0.00, there is **no amount of Title IV aid due from the student.**

Six Calendar Days – Pre-registered Student

Any student who either officially or unofficially withdraws before six (6) calendar days after the beginning of School will be considered to be a “pre-registered,” or never attended student.

Credit/Debit Balance on Student's Account

All refunds will be calculated based on the student's last date of attendance. If the Return to Title IV Funds (R2T4) calculation results in a credit balance on the student's account, this credit balance must be disbursed as soon as possible and no later than 14 days after the calculation of the R2T4.

In the case of disabling illness or injury, death in the student's immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If the R2T4 calculation results in an amount to be returned that exceeds the school's portion, the student must repay some funds.

Veterans Refund Policy

The unused portion of tuition, fees, and other charges for veterans or eligible persons who fail to enter a course or who withdraw or discontinue prior to completion will be refunded for all amounts paid that exceed the approximate pro-rata portion of the total charges that the length of the completed portion of the course bears to the total length of the course. The pro-ration will be determined on the ratio of the number of days or hours of instruction completed by the student to the total number of instructional days or hours in the course. Please refer to the Institution Refund Policy.

Contact

Questions regarding this policy or its intent should be directed to the Director of Financial Aid at 313-974-6164.

Appendix H
Date of Revision 3/28/2025

Verification Policy and Procedure

VERIFICATION POLICY AND PROCEDURE

Reference

Federal Register September 4, 2024 (Free Application for Federal Student Aid (FAFSA) Information to Be Verified for the 2025-2026 Award Year)

Federal Register September 19, 2023 (Free Application for Federal Student Aid (FAFSA) Information to Be Verified for the 2024-2025 Award Year)

34 CFR 668 Subpart E (668.51 – 668.61)

<https://www.federalregister.gov/documents/2023/09/19/2023-20211/free-application-for-federal-student-aid-fafsa-information-to-be-verified-for-the-2024-2025-award>

<https://www.federalregister.gov/documents/2024/09/04/2024-19786/free-application-for-federal-student-aid-fafsa-information-to-be-verified-for-the-2025-2026-award>

DCL-GEN-24-100

DCL-GEN-24-108

EA-APP-25-07

Purpose

Because students sometimes make errors on their FAFSA application, there is a process for verifying applications and making corrections. The FAFSA Processing System (FPS) selects which applications are to be verified, but the school also has the authority to verify additional students.

All applications selected by the FPS of students who will receive or have received subsidized Title IV aid must be verified. Verification is not required for students who are only eligible for unsubsidized Title IV. Students who are eligible for both subsidized and unsubsidized Title IV aid may not avoid verification by accepting only unsubsidized aid; they must complete the verification process to receive any Title IV aid. The school must verify applications selected by the CPS students who will receive (or have received) student financial assistance. These include the Pell Grant and Direct Loan programs.

DDBS performs verification on all applicants selected by the CPS and on any application that DDBS has reason to believe there is incorrect or conflicting documentation.

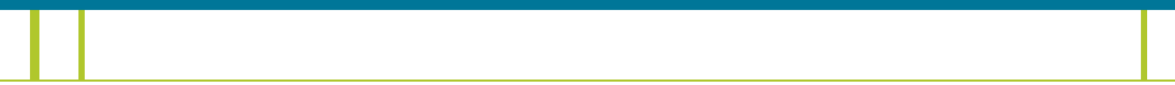
Procedure

- The Financial Aid Office at DDBS reviews each FAFSA to determine if the student has been selected for the process of notification;
- The Financial Aid Office notifies the student that their FAFSA has been selected for verification by the federal government, OR
- The Financial Aid Office notifies the student that DDBS has selected their FAFSA for the verification process;
- The Financial Aid Office will provide the student with written information on what documentation the student is required to submit;
- It is recommended that the student submit all verification documents as quickly as possible for review;
- The student will be required to complete the Verification Worksheet for Dependent or Independent Student if selected for verification tracking groups 1 and 5;
- Documentation may include tax returns, tax transcripts identification cards, signed statements or worksheets;
- All documentation submitted by student must include the student's name, social security number and original "wet" signature;
- Digital signatures are not accepted;
- The Financial Aid Office promptly reviews all documentation submitted by the student for completeness and signatures;
- The Financial Aid Office completes the verification process and notifies the student of the results;
- It is DDBS policy that students are not permitted to start school prior to the completion of the verification process.

Phase 1 – The BEN compliance engine

When a student Financial Aid Profile is submitted by the institution using the secure Boston Educational Network (BEN) software system and a student ISIR exists, the ISIR is evaluated by the automated BEN compliance engine. The BEN compliance engine reviews the most current ISIR for the award year and will generate a "compliance delay" when the compliance engine determines that the ISIR has been selected for verification by the USDE. The compliance delay will inform both the institution and BEN of the specific documents required from the student and/or parent to complete the verification process.

It is the institution's responsibility to obtain the required documents from the student and/or parent and provide the information to BEN. The institution submits the required documents directly to the student record via the electronically secure BEN school portal website. BEN highly encourages institutions to use the direct upload option available in the BEN school portal software to upload the verification documents as this offers the best means to provide the documents in a secure manner. Schools are reminded to password protect any documents that are not directly uploaded via BEN's secure website to protect PII. The student file will remain in



Phase 1 until the institution submits documents to BEN for review.

Phase 2 – The BEN compliance reviewer

Phase 2 begins after the institution has submitted verification documents through the secure portal for to BEN for review. The initial BEN reviewer will analyze and evaluate each uploaded document and determine whether the document is approved or needs additional clarification. Documents that are approved by BEN staff will be identified in the BEN system as “approved” and documents that are not approved will be identified in the BEN system as “rejected”. When the submitted document is placed under the rejected status, the BEN reviewer will provide an explanation and/or comment detailing why the document was rejected to assist the institution in resolving the issue. This process may be repeated multiple times if incorrect, insufficient, or conflicting information is provided in the submitted verification documents. Typically, if there are repeated reviews by BEN staff, they are not completed by the same person who did the initial (or previous) review.

Each time a student compliance file is reviewed by BEN, the BEN reviewer will review all documents, including documents that were previously approved by a BEN reviewer to confirm that each document is acceptable. Documents that have not been submitted by the institution will remain in “not set” status (Phase 1) until the institution submits the required document. Once BEN has approved all the documents submitted by the institution, the BEN reviewer places the student file in “final review” status. Phase 2 of the verification process will not be considered complete until all required documents have been submitted by the institution and set to the approved status by BEN staff. Final approval of the verification documents is required prior to the student being awarded or disbursed Title IV funds (see the Phase 3 Final Verification Approval section below).

Phase 3- Final Verification Approval

The Boston Educational Network requires two different qualified staff (at minimum) to review and approve the documents submitted for verification by the institution. This two-person review system minimizes the risk of human error in the verification process in an effort to obtain the highest level of accuracy in the awarding of Title IV aid.

After the student file has been moved to “Final Review” status by a BEN reviewer, a different BEN reviewer is tasked with reviewing all the previously accepted documents for final review and approval. It is only after the approval of all documents at this final Phase 3 review level of verification, and if there are no other outstanding eligibility issues, that the student is ready for awarding/packaging of Title IV Funds. If the BEN reviewer determines that any of the documents are not accepted, additional documents are required, or if they determine that conflicting information exists, then the compliance delay is updated appropriately, and the student file is placed back in (Phase 2) compliance delay. Once back in (Phase 2) compliance delay, the process will begin over again with the institution required to provide additional documentation/information to resolve the remaining discrepancies.

Conflicting Information Policy (ISIR)

The Boston Educational Network will review the documents submitted by the Institution and verify the information for accuracy and determine if conflicting information needs to be resolved. BEN will provide the reason(s) to the Institution if verification cannot be completed per USDE regulations. BEN will consider the verification process to be complete when all requested documents have been reviewed and accepted by BEN and no conflicting information exists. The Boston Educational Network will not award or disburse any Title IV Funds subject to the verification process until the verification process is complete and all conflicting information has been resolved.

If the student cannot provide all required documentation, DDBS cannot complete the verification process. DDBS may then advise applicants that they may not be eligible for Financial Aid funds. The school then gives the applicants the following options:

- The student may continue training on a cash payment basis.
- Promptly submit needed items within 48 hours

Conflicting Information Procedure (ISIR)

The institution has the responsibility to ensure that information in a student's file (that BEN may or may not have access to) does not contain conflicting information. If it is determined by either the institution or BEN that conflicting information exists, the conflicting information must be resolved before any Title IV Funds can be awarded or disbursed. BEN will work with the institution to resolve conflicting information before any Title IV Funds are awarded or disbursed.

Prior to the awarding of Title IV aid, BEN will review the student's most current ISIR and resolve any questionable data (regardless of whether the file was selected for USDE verification). Per 34 CFR 668.54(a)(2), "If an institution has reason to believe that an applicant's FAFSA information is inaccurate, it must verify the accuracy of that information." This includes, but is not limited to:

- discrepant tax data, including knowing:
- if a person was required to file a tax return,
- the appropriate tax filing status was used, and
- that an individual cannot be claimed as an exemption by more than one person
 - the ISIR indicates that the student was recently married but the tax data on the ISIR does not appear to reflect the combined tax data for both the student and spouse on the ISIR.
 - if the tax return shows significant interest and dividends income and/or capital gains but assets on the ISIR are \$0
 - if the tax return shows a business income
 - if the tax return shows farm income
 - if the students only claim to independent status is:
 - active duty
 - foster care or ward of the court

- emancipated minor.
- legal guardianship
- unaccompanied youth who was homeless or at risk of being homeless
- BEN may require additional IRS tax forms, W-2's, signed statements from the student, spouse and/or parent, school documented explanation(s) and/or any other pertinent documents that BEN deems necessary to complete the verification process and to resolve conflicting information. Conflicting information, whether discovered by BEN or the institution and regardless of when it is discovered, must be resolved.

BEN reserves the right to request additional documentation if BEN has determined that conflicting information exists, regardless of USDE verification selection.

Exclusions from Verification Requirements

Under certain circumstances a CPS selected application may be excluded from some or all of the federal verification requirements due to the following unusual circumstances including: death of the student, not an aid recipient, applicant is eligible to receive only unsubsidized student financial assistance, applicant was verified by another school, or post enrollment (the student was selected for verification after ceasing to be enrolled). With the exception of the death of the student, however, none of these exemptions excuse DDBS from the requirement to resolve conflicting information.

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

- Both parents are mentally incapacitated,
- Both parents, or the custodial parent, has died,
- The parents are residing in a country other than the United States and can't be contacted by normal means, or
- The parents can't be located because the student does not have and cannot get their contact information.

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

- The spouse has died,
- The spouse is mentally incapacitated,
- The spouse is residing in a country other than the United States and can't be contacted by normal means, or
- The spouse can't be located because the student does not have and cannot get their contact information.

Deadlines and Failure to Submit Documentation

The federally mandated deadline for completing the entire verification process is the earlier of 120 days from the applicant's last date of enrollment or, or before the U.S. Department of Education's deadline of **September 20, 2025 (2024-2025 academic year) or September 10, 2026 (2025-2026 academic year)**, whichever comes first. Verification must always be completed before any funds are disbursed. If the student provides documentation after the deadline, the school will reevaluate the student's eligibility for subsidized aid and will award aid based on the availability of federal funds at the time of documentation submission.

For Pell grants, the student must have corrected any errors or shown that the information is correct, and the DDBS must have his or her valid, corrected Student Aid Report (SAR) or ISIR.

The verification process is complete when DDBS has received all requested documentation and a valid processed FAFSA report is on file, including any necessary corrections to the report. If the student does not provide the verification documentation or if DDBS does not receive the valid processed FAFSA report by the deadline, the student forfeits his/her Pell grant for the award year.

If a student is selected for ED verification after Title IV aid has been awarded, the student must complete the verification process within the same time frame as outlined above in order to remain eligible for federal funds. Until verification (or re-verification) is finalized by BEN, the student's Title IV aid will be placed on hold and no Title IV disbursements will be processed until the process has been finalized.

Federal verification must typically be completed prior to the end of the academic year or before the student ceases enrollment, whichever occurs first. Students who fail to comply with verification requirements, including submitting documentation within required timelines, will not have Federal Title IV funds disbursed and may have Federal Title IV funds cancelled. DDBS considers the student to be the responsible party for providing information and completing the verification process.

Verification Selection

DDBS identifies the students selected for verification during the financial aid application process by viewing the FAFSA output document called the Institutional Student Information Record (ISIR). A review of the student's financial aid application occurs after ISIR data is received and data entry of required information is complete. The ISIR will provide information about the student and family including a calculated SAI, document codes identifying specific federal verification policy, information about applicant data submitted and written comments. The written messages provide additional information for the applicant to follow. The federal verification message for the student reads:

"Your FAFSA has been selected for a review process called verification. Your school has the authority to request copies of certain financial documents from you and your parent(s)."



How to Identify When a Student is Selected for Verification

In order to identify if a student is selected for the verification process, the Financial Aid Office at DDBS reviews the student's ISIR for one of the following:

- An asterisk (*) after the SAI;
- Verification tracking flag marked “Y” for yes on the ISIR;
- Verification tracking group V1, V4, or V5 on the ISIR;
- Comment Code 170 or 171 (Dependent/Independent) will appear in the “Application Status” section of the FAFSA/ISIR.

Students originally selected in V1 or V4 tracking group may be re-selected to the V5 group in a later transaction. DDBS must complete the additional applicable verification before any future disbursements are made. DDBS will not be liable for prior disbursements based on data available at that time. Verification tracking group changes will be designated with a “C” code in the Verification Selection Flag data field on the ISIR.

Verification Tracking Groups

Students selected for verification are placed into one of the verification tracking groups. Each group has its own verification requirements, as detailed on the verification worksheets.

- V1 Standard Verification Group
- V2 Reserved
- V3 Reserved
- V4 Custom Verification Group
- V5 Aggregate Verification Group
- V6 Reserved

Identity Verification Flags

The U.S. Department of Education (Department) flags applicants that meet defined criteria for potentially fraudulent activity, including applicants suspected to be assuming another individual's identity when submitting a 2024–25 and 2025–26 Free Application for Federal Student Aid (FAFSA) form. In these cases, schools will receive newly generated ISIRs with applicable Verification Tracking flags. These flags will require schools to complete the V4 or V5 verification process to verify the student's identity and determine their eligibility for Title IV funds.

Schools must complete verification for these students before disbursing Title IV funds and may not make subsequent disbursements of Title IV funds for students that are selected for verification after a disbursement has occurred. If the student does not complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the subsequent ISIR

transaction (group V4 or V5). The student is liable for the full amount because, without completing verification, there is no evidence they were eligible for that aid. As schools work with students to complete verification, they should report suspected cases of identity theft to the Department's Office of the Inspector General (OIG).

2024-2025 INFORMATION TO BE VERIFIED

Standard Verification Group V1 - Verifiable Items

The verification activity will initially compare applicant data for accuracy and completeness and continue to resolve conflicting information. In this process DDBS requires verification of the following items:

For all applicants:

Family size

For non-tax filers:

Income earned from work

For tax filers:

Adjusted Gross Income (AGI)

U.S. income tax paid

Income earned from work

Education tax credits (American Opportunity Tax Credit and Lifetime Learning Tax Credit)

Other untaxed income reported on tax return, for example: untaxed portions of Individual Retirement Account (IRA) distributions, untaxed portions of pensions, IRA deductions and payments, tax-exempt interest income

Foreign Income Exempt from Federal Taxation

Groups V2, V3, and V6

Reserved for future use by ED

Custom Verification Group V4

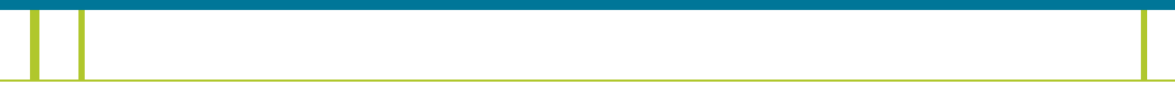
Students must complete the Identity/Statement of Educational Purpose

Aggregate Verification Group V5

Students selected for this verification tracking group must satisfy both V1 and V4 requirements.

Reporting Results for Verification Tracking Flags V4 and V5

Important: The school is required to report the outcome of completion of the Identity/Statement of Educational Purpose for applications with tracking flag V4 and V5.



Boston Educational Network (BEN) is the third-party servicer for DDBS. BEN reports this information through FAA access to CPS Online under the “Identity Verification Results” section.

How to Complete the Verification Process

DDBS will provide the student selected for verification with a DDBS Verification Worksheet. DDBS will send the worksheet through email to the email address on file for the student, and will follow-up with mailing a worksheet in the U.S. mail, if necessary. It is the student’s responsibility to submit the verification worksheet along with required documentation and applicable signature(s) promptly to the Financial Aid Office.

Financial Aid Direct Data Exchange (FA-DDX)

All students and contributors must provide consent and approval to have their federal tax information transferred directly into the FAFSA form via direct data exchange (FA-DDX) with the IRS. This federal tax information will be used to determine the student’s eligibility for federal student aid. If a student or required contributor doesn’t provide consent and approval, the student will not be eligible for federal student aid.

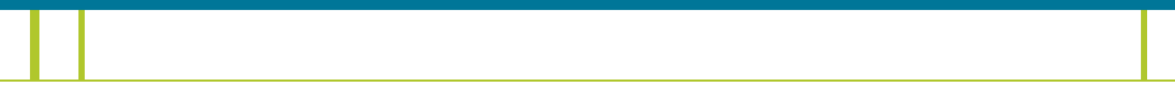
The IRS is the required source of tax information for the FAFSA form. When Federal Tax Information (FTI) is received from the IRS via the FA-DDX, the FTI is considered verified and no additional documentation is required. Other tax documentation, such as applicant-provided tax returns or transcripts, is secondary to the FTI received from the IRS via the FA-DDX, except when an applicant or contributor filed an amended return.

Tax Data Received from the FA-DDX and Manually Entered Information

Note: There will be instances where manual entry of tax information will still be required, even if a federal tax return was filed with the IRS. Foreign earned income exclusion amounts, for example, will not be transferred via the FA-DDX and will need to be entered manually. In addition, individuals who were married and filed jointly with the IRS and are no longer married to that spouse on the applicable tax return, or who have married a different spouse, will also be required to manually enter their income and tax information. Individuals who only file foreign tax returns will also be unable to use the FA-DDX since it does not link to foreign tax authorities. They will instead need to manually input their income and tax data by converting foreign currency to U.S. dollars and entering the resulting amounts in the comparable fields from U.S. tax returns, such as adjusted gross income, income tax paid, and any untaxed income.

Acceptable Documentation

The FAFSA Simplification Act requires that, wherever possible, the Department use data received directly from the IRS to calculate a student’s SAI and Pell Grant award. The Fostering Undergraduate Talent by Unlocking Resources for Education Act (FUTURE Act) requires the Department of Education to access tax information held by the IRS pertaining to FAFSA applicants and, where applicable, their parents and spouses through a secure method: the



FUTURE Act Direct Data Exchange (FA-DDX). The FUTURE Act amended the Internal Revenue Code (IRC) to mandate the disclosure of FTI directly from the IRS to the Department with an individual's consent and approval. The FUTURE Act also made providing consent and approval for the exchange of FTI a requirement for receiving federal student aid.

Applicants and contributors will be required to provide consent and approval to retrieve FTI directly from the IRS. When FTI is received from the IRS via the FA-DDX, the FTI received is considered verified and no additional documentation is necessary. As a result, the FA-DDX is the fastest, easiest, and most secure method of meeting income and tax verification requirements. The September 19, 2023, Federal Register Notice gives the documentation required for verifying 2024-25 application data, which depends on the item verified, as explained in this section.

In addition, the Department has developed suggested text that schools may use to create a verification document and to verify non-tax items, such as family size. To review the suggested text for 2024-25, please see Appendix A.

Income Information for Tax Filers

If an applicant is a **tax filer** selected to verify any of the following information, the school must obtain the specified documentation:

Adjusted Gross Income (AGI), income earned from work, or U.S. income tax paid, untaxed portions of IRA distributions, untaxed portions of pensions, IRA deductions and payments, tax exempt income, education credits, and foreign income exempt from federal taxation

If transferred directly from the IRS and unchanged, these items do not need to be verified.

If information is not transferred from the IRS, the following documentation is sufficient for verification:

- (1) A transcript obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or
- (2) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.
- (3) If the tax transcript or tax return contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution.

For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated,

divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return— A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or a copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and a copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document.

For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022— (a) A signed statement listing the sources of any 2022 income and the amount of income from each source; (b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022; (c) A copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document; and (d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.

Note: An school may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When a school receives such information, it must be used to re-verify the income and tax information reported on the FAFSA.

Qualified rollovers from one retirement account to another are not taxable, and they should not be counted as untaxed income (Untaxed portions of IRA distributions or Pensions). Since neither a tax transcript nor FTI transferred via the FA-DDX identifies rollovers, you must get documentation from the tax filer. This could be a signed statement with the rollover amount or a notation by the filer on the tax transcript or return that includes the word “rollover” beside any applicable item, like the instruction the IRS gives for Form 1040. The annotation must be signed and dated by the filer.

Income Information for Non-Tax Filers

If an applicant is a **non-tax filer** selected to verify income earned from work, the school must obtain the specified documentation.

Income earned from work

The following documentation is sufficient for verification:

- (1) A signed and dated statement certifying— (a) That the individual is not required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the

2022 tax year;

(2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN;

(3) A copy of IRS Form W-2 for each source of 2022 employment income received or an equivalent document; and

(4) Except for dependent students, verification of non-filing for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023.

Note: The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.

For non-tax filers you must request a W-2 form for each source of 2022 employment income and a signed statement certifying that the person has not filed and is not required to file a 2022 tax return. You must also get a signed statement giving the sources and amounts of the person's income earned from work not found on W-2s. Students may sign on a nonfiling spouse's behalf.

For residents of the Freely Associated States (the Republic of the Marshall Islands, the Republic of Palau, or the Federated States of Micronesia), a copy of the wage and tax statement from each employer (substitute for W-2s) and a signed statement identifying any other employment income for the year not identified on the wage and tax statement is acceptable. Persons from a U.S. territory, commonwealth, or a foreign country who are not required to file a tax return can provide a signed statement, as well as any supporting documentation they might have (e.g., a form comparable to a U.S. W-2), certifying their income.

The collection of documentation to verify income earned from work is used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return (or a return with a relevant tax authority) for the 2022 tax year. If the individual should have filed but failed to do so, that is conflicting information that you must resolve.

If a W-2 is not Available

If an individual who is required to submit an IRS Form W-2 did not save a copy, they should request a replacement W-2 from the employer who issued the original. A W-2 transcript from the IRS is also acceptable though it generally is not available until the year after the W-2 information is filed with the IRS (e.g., 2024 for 2022 information filed in 2023). If they are unable to obtain one in a timely manner, you may permit them to provide a signed statement that includes the amount of income earned from work, the source of that income, and the reason why the W-2 is not available in a timely manner.

Family size

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024–2025 award year and the relationship of that family member to the applicant.

Note: Verification of family size is not required if—

For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or

For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.

Other Information

If an applicant is selected to verify other information specified in the annual Federal Register notice, the applicant must provide the documentation specified for that information in the Federal Register notice.

Identity/Statement of Educational Purpose

Students should appear in person and present a valid, unexpired, government-issued photo identification (ID) such as a U.S. passport, a driver's license, or other state-issued ID. "Unexpired" means the ID has not expired at the time it is checked, even if it will expire before the end of the award year. A valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

The school must maintain an annotated copy of that ID that includes the date it was received and the name of the person authorized to receive it. At this time, the Director of Financial Aid is the only authorized school personnel approved to review an applicant's identity.

The following **are not sufficient** for identity verification:

- An ID issued by a state university or college, or
- A military ID (18 U.S. Code § 701 prohibits it from being photocopied).

Students must also sign (it must be a “wet” signature) a statement of educational purpose that certifies who they are and that the federal student aid they may receive will only be used for educational purposes and for the cost of attending the school for the 2024-25 year. The text for the “Statement of Educational Purpose” is not suggested--**the exact language must be used and is provided on the next page**. The student’s identification number is optional if it is collected elsewhere on the same page as the statement. After examining the statement, it may be converted into an electronic record. The electronic record or the original must be kept for at least the required Title IV record retention period.

A student who is unable to appear at the school must go to a notary public and sign the statement of educational purpose. They must then submit to the school that statement (again, with the “wet” signature), a certification from the notary that they appeared before the notary and presented a government-issued photo ID confirming their identity, and a copy of the same ID. Currently the Department does not authorize the use of online notary services as an alternative to traditional, in-person notary services.

The **REAL ID Act** affects people entering certain restricted areas where identification is required: federal facilities, nuclear power plants, and federally regulated commercial airplanes. Because there are currently no restrictions under the act on agencies accepting an ID that is not compliant with the act (typically one marked “not for federal identification”) for other purposes, such an ID is acceptable for verification of identity/statement of educational purpose. It must be a government-issued ID that has not expired and includes the student’s photo and name.

Identity/Statement of Educational Purpose Statement:

In addition to appearing in person and presenting identity documentation, the student must sign the Statement of Educational Purpose, using the exact language as follows, except that the student’s identification number is optional if collected elsewhere on the same page as the statement:

Statement of Educational Purpose

I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2024–2025. (Name of Postsecondary Educational School) _____

(Student's Signature)

(Date) _____

(Student's ID Number)

2025-2026 INFORMATION TO BE VERIFIED

Standard Verification Group V1 - Verifiable Items

The verification activity will initially compare applicant data for accuracy and completeness and continue to resolve conflicting information. In this process DDBS requires verification of the following items:

For all applicants:

Family size

For non-tax filers:

Income earned from work

For tax filers:

Adjusted Gross Income (AGI)

U.S. income tax paid

Income earned from work

Education tax credits (American Opportunity Tax Credit and Lifetime Learning Tax Credit)

Other untaxed income reported on tax return, for example: untaxed portions of Individual Retirement Account (IRA) distributions, untaxed portions of pensions, IRA deductions and payments, tax-exempt interest income

Foreign Income Exempt from Federal Taxation

Groups V2, V3, and V6

Reserved for future use by ED

Custom Verification Group V4

Students must complete the Identity/Statement of Educational Purpose

Aggregate Verification Group V5

Students selected for this verification tracking group must satisfy both V1 and V4 requirements.

Reporting Results for Verification Tracking Flags V4 and V5

Important: The school is required to report the outcome of completion of the Identity/Statement of Educational Purpose for applications with tracking flag V4 and V5. Boston Educational Network (BEN) is the third-party servicer for DDBS. BEN reports this information through FAA access to CPS Online (faaaccess.ed.gov) under the “Identity Verification Results” section.

How to Complete the Verification Process

DDBS will provide the student selected for verification with a DDBS Verification Worksheet. DDBS will send the worksheet through email to the email address on file for the student, and will follow-up with mailing a worksheet in the U.S. mail, if necessary. It is the student's responsibility to submit the verification worksheet along with required documentation and applicable signature(s) promptly to the Financial Aid Office.

Financial Aid Direct Data Exchange (FA-DDX)

All students and contributors must provide consent and approval to have their federal tax information transferred directly into the FAFSA form via direct data exchange with the IRS. This federal tax information will be used to determine the student's eligibility for federal student aid. If a student or required contributor doesn't provide consent and approval, the student will not be eligible for federal student aid.

Tax Data Received from the FA-DDX and Manually Entered Information

Note: There will be instances where manual entry of tax information will still be required, even if a federal tax return was filed with the IRS. Foreign earned income exclusion amounts, for example, will not be transferred via the FA-DDX and will need to be entered manually. In addition, individuals who were married and filed jointly with the IRS and are no longer married to that spouse on the applicable tax return, or who have married a different spouse, will also be required to manually enter their income and tax information. Individuals who only file foreign tax returns will also be unable to use the FA-DDX since it does not link to foreign tax authorities. They will instead need to manually input their income and tax data by converting foreign currency to U.S. dollars and entering the resulting amounts in the comparable fields from U.S. tax returns, such as adjusted gross income, income tax paid, and any untaxed income.

Acceptable Documentation

If an applicant is a **tax filer** selected to verify any of the following information, the school must obtain the specified documentation:

Adjusted Gross Income (AGI), income earned from work, or U.S. income tax paid, untaxed portions of IRA distributions, untaxed portions of pensions, IRA deductions and payments, tax exempt income, education credits, and foreign income exempt from federal taxation

If transferred directly from the IRS and unchanged, these items do not need to be verified.

If information is not transferred from the IRS, the following documentation is sufficient for verification:

- (1) A transcript obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign

government, that lists 2022 tax account information of the tax filer; or

(2) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.

(3) If the tax transcript or tax return contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution.

For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return— A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or a copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and a copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document.

For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022— (a) A signed statement listing the sources of any 2022 income and the amount of income from each source; (b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022; (c) A copy of IRS Form W–2 for each source of 2022 employment income received or an equivalent document; and (d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.

Note: An school may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When a school receives such information, it must be used to re-verify the income and tax information reported on the FAFSA.

If an applicant is a **non-tax filer** selected to verify income earned from work, the school must obtain the specified documentation.

Income earned from work

The following documentation is sufficient for verification:

(1) A signed and dated statement certifying— (a) That the individual is not

required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year;

(2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN;

(3) A copy of IRS Form W-2 for each source of 2022 employment income received or an equivalent document; and

(4) Except for dependent students, verification of non-filing for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023.

Note: The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.

Family size

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024–2025 award year and the relationship of that family member to the applicant.

Note: Verification of family size is not required if—

For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or

For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.

Other Information

If an applicant is selected to verify other information specified in the annual Federal Register notice, the applicant must provide the documentation specified for that information in the Federal Register notice.

Identity/Statement of Educational Purpose

An applicant must appear in person and present the following documentation to an institution authorized individual to verify the applicant's identity:

- (a) An unexpired valid government-issued photo identification such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport. The school must maintain an annotated copy of the unexpired valid government-issued photo identification that includes the date the identification was presented; and the name of the institution authorized individual who reviewed the identification; and
- (b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

Statement of Educational Purpose

I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2024–2025. (Name of Postsecondary Educational School)

(Student's Signature)
(Date) _____
(Student's ID Number)

If a school determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide the school with—
(a) A copy of an unexpired valid government-issued photo identification, such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and (b) An original notarized statement signed by the applicant using the exact language in the Statement of Educational Purpose, except that the student's identification number is optional if collected elsewhere on the same page as the statement.

Updating FAFSA Information

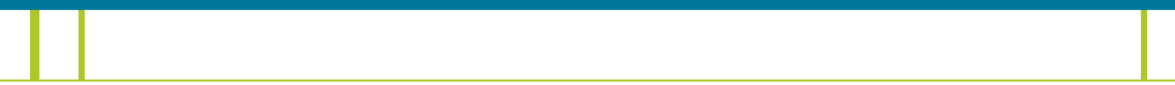
Generally, a student cannot update FAFSA information that was correct as of the date the application was signed because the FAFSA is considered to be a “snapshot” of the family’s financial situation as of that date. For example, if a student’s family sold some stock after signing the FAFSA and spent the proceeds on an automobile or home improvement, the student cannot update the FAFSA to reflect a change in assets. After the FAFSA is signed, only certain items can be updated under the conditions listed below:

- (1) **Dependency Status Change:** If a student’s dependency status changes at any time during the award year, the student must update their FAFSA information. Students that are married after completing the FAFSA should contact the Financial Aid Office for further information.
- (2) **Verification of Household Size or Number in College:** An applicant whose FAFSA information is selected for verification of household size or number in college must update those items to be correct as of the date of verification.
- (3) **Marital Status Change:** The school may require a student to update FAFSA information under paragraph (1) or (2) of this section for a change in the student’s marital status if the school determines that the update is necessary to address an inequity or to reflect more accurately the student’s ability to pay. This update is reviewed on a case-by-case basis.

Note that in order to update the marital status for an already independent student during the award year, the student must be selected for verification (by ED or the school).

Correcting Errors on FAFSA Information

Although a student cannot update FAFSA information that was filed correctly, except under limited conditions as listed above, errors made on the original FAFSA must be corrected. As stated previously, to apply for federal student aid, a student submits a Free Application for Federal Student Aid (FAFSA) to the Central Processing System (CPS). Generally, the FAFSA is submitted through the online process and the student receives from the CPS an electronic summary of their processed FAFSA, known as the Student Aid Report (SAR). Upon receipt of the SAR, the student should review all information listed on the SAR and submit for processing any errors reported on the original FAFSA to the CPS.



A student must be notified if their Title IV eligibility has changed as a result of the completion of verification.

After Documentation is Complete

When all necessary verification documents have been obtained from the student, they should be compared to the Institutional Student Information Record (ISIR) that is being reviewed for payment. If all the student's information is correct and there are no outstanding issues or conflicting information, the school may award and disburse aid for which the student is eligible. If verification reveals errors or inconsistencies, the student may have to make corrections or update information.

The Financial Aid Administrator must inform the prospect or student to do corrections on the fafsa.ed.gov website and eligibility must be re-calculated for Title IV funds. If the re-calculation does not change eligibility, no further action is required. If the corrections result in a change to the ISIR that will change the amount of Title IV funds, a corrected ISIR must be obtained. This can be done electronically through the school. All corrections due to verification requirements must be accomplished before an actual Financial Aid Offer is made. If the change to the award is made due to verification, the student will be notified by a revised Financial Aid Offer. No funds will be disbursed until corrections have been made. When the corrected ISIR is received, the student will be notified in person if their SAI and Title IV amounts change.

Threshold for Submitting Changes

After completing verification, the school may determine that certain data elements need to be corrected or updated. Changes to data resulting from verification must be submitted for reprocessing if they were to a non-dollar item or a single dollar item of \$25 or more. A non-dollar data item would be any field not presented in dollar values, such as household size or number in college.

If just one item meets the threshold for a required change, then all inaccurate items must be changed, including those that do not meet the threshold for required changes.

Federal Title IV Funds Disbursements

DDBS completes federal verification for CPS- or school-selected applicants as a requirement of completing a student's financial aid application. Federal Title IV funds will not be disbursed until verification is completed. In some instances, the school can make an interim disbursement of funds if it has no reason to believe that the application information is inaccurate. If the school makes an interim disbursement, the verification process must be completed prior to the disbursement of any additional funds. In all instances the school is liable for an interim disbursement if verification identifies an overpayment or the student fails to complete verification. DDBS does not make interim disbursements.



Student Responsibility

If the verification results do not justify aid already disbursed, the student is responsible for repaying all aid for which they are not eligible. Failure to meet the repayment obligation will result in the student being referred by DDBS to the U.S. Department of Education.

Completing the Process

A student selected for verification must complete it. The school has the authority, and in some instances is required, to withhold disbursement of any FSA funds until she does. Adopting this policy substantially reduces the incidence of overpayments.

Notification to Students

The school will notify students in person and prior to enrollment, of the required verification documents they must submit within 30 days prior to enrollment. They will be given a verification worksheet that details which documents to submit. In the case of a current student, they must also be informed that disbursements of any FSA funds will be withheld until all documentation is submitted.

An applicant whose FAFSA information is selected for verification is required to complete verification before the school exercises any authority under section 479A(a) of the HEA to make changes to the applicant's cost of attendance or to the values of the data items required to calculate the SAI.

Appendix A - Acceptable Documentation for Verification 2024-2025

64422

Federal Register / Vol. 88, No. 180 / Tuesday, September 19, 2023 / Notices

FAFSA Information	Acceptable documentation
<p><i>Income information for tax filers</i></p> <p>(a) Adjusted Gross Income (AGI) (b) Income Earned From Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>Items a through h, if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for Item i, the following documentation is sufficient for verification:</p> <p>(1) A transcript¹ obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or</p> <p>(2) A copy of the income tax return¹ and the applicable schedules¹ that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.</p> <p>(3) If item d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p>
<p><i>Income information for tax filers with special circumstances</i></p> <p>(a) Adjusted Gross Income (AGI) (b) Income Earned from Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>(1) For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return—</p> <p>(a) A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or</p> <p>(b) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and</p> <p>(c) A copy of IRS Form W-2² for each source of 2022 employment income received or an equivalent document.²</p> <p>(2) For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022—</p> <p>(a) A signed statement listing the sources of any 2022 income and the amount of income from each source;</p> <p>(b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022;³</p> <p>(c) A copy of IRS Form W-2² for each source of 2022 employment income received or an equivalent document;² and</p> <p>(d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.</p> <p>(3) If d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p> <p><i>Note:</i> An institution may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When an institution receives such information, it must be used to reverify the income and tax information reported on the FAFSA.</p> <p>(4) For an individual who was the victim of IRS tax-related identity theft—</p> <ul style="list-style-type: none"> • A Tax Return DataBase View (TRDBV) transcript¹ obtained from the IRS; and • A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS has been made aware of the tax-related identity theft.

FAFSA Information	Acceptable documentation
<p><i>Income information for non-tax filers</i> Income Earned from Work</p>	<p><i>Note:</i> Tax filers may inform the IRS of the tax-related identity theft and obtain a TRDBV transcript by calling the IRS's Identity Protection Specialized Unit (IPSU) at 1-800-908-4490. Unless the institution has reason to suspect the authenticity of the TRDBV transcript provided by the IRS, a signature or stamp or any other validation from the IRS is not needed.</p> <p>(5) For an individual who filed an amended income tax return with the IRS, a signed copy of the IRS Form 1040X that was filed with the IRS for tax year 2022 or documentation from the IRS that include the change(s) made to the tax filer's 2022 tax information, in addition to one of the following—</p> <ul style="list-style-type: none"> (a) Updated income and tax information from the IRS on an ISIR record with all tax information from the original tax return; (b) A transcript obtained from the IRS that lists 2022 tax account information of the tax filer(s); or (c) A signed copy of the 2022 IRS Form 1040 and the applicable schedules that were filed with the IRS. <p>For an individual who has not filed and, under IRS or other relevant tax authority rules (e.g., the Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia, a U.S. territory or commonwealth or a foreign government), is not required to file a 2022 income tax return—</p> <ul style="list-style-type: none"> (1) A signed and dated statement certifying— <ul style="list-style-type: none"> (a) That the individual is not required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year; (2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN; (3) A copy of IRS Form W-2² for each source of 2022 employment income received or an equivalent document²; and (4) Except for dependent students, verification of non-filing⁴ for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023. <p><i>Note:</i> The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.</p>
<p>Family Size</p>	<p>Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:</p> <p>A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024–2025 award year and the relationship of that family member to the applicant.</p> <p><i>Note:</i> Verification of family size is not required if—</p> <ul style="list-style-type: none"> • For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or • For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.
<p>Identity/Statement of Educational Purpose</p>	<p>(1) An applicant must appear in person and present the following documentation to an institutionally authorized individual to verify the applicant's identity:</p> <ul style="list-style-type: none"> (a) An unexpired valid government-issued photo identification⁵ such as, but not limited to, a driver's license, non-driver's identification card, other state-issued identification, or U.S. passport. The institution must maintain an annotated copy of the unexpired valid government-issued photo identification that includes— <ul style="list-style-type: none"> I. The date the identification was presented; and II. The name of the institutionally authorized individual who reviewed the identification; and

FAFSA Information	Acceptable documentation
	<p>(b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:</p> <p><i>Statement of Educational Purpose</i> I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2024–2025. (Name of Postsecondary Educational Institution)</p> <p>(Student's Signature) (Date)</p> <p>(Student's ID Number)</p> <p>(2) If an Institution determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide the institution with—</p> <p>(a) A copy of an unexpired valid government-issued photo identification,⁵ such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and</p> <p>(b) An original notarized statement signed by the applicant using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:</p> <p><i>Statement of Educational Purpose</i> I certify that I _____ am (Print Student's Name) the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending _____ for 2024–2025. (Name of Postsecondary Educational Institution)</p> <p>(Student's Signature) (Date)</p> <p>(Student's ID Number)</p>

¹ This footnote applies, where applicable, whenever an income tax return, the applicable schedules, or transcript is mentioned in the above chart.

The copy of the 2022 income tax return must include the signature of the tax filer, or one of the filers of a joint income tax return, or the signed, stamped, typed, or printed name and address of the preparer of the income tax return and the preparer's Social Security number, Employer Identification Number, or Preparer Tax Identification Number.

For a tax filer who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, the institution must use the income information (converted to U.S. dollars) from the lines of that form that correspond most closely to the income information reported on a U.S. income tax return.

An individual who did not retain a copy of his or her 2022 tax account information, and for whom that information cannot be located by the IRS or other relevant tax authority, must submit to the institution—

- a. Copies of all IRS Form W-2s for each source of 2022 employment income or equivalent documents; or
- b. If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2022; and
- c. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2022 tax account information cannot be located; and
- d. A signed statement that indicates that the individual did not retain a copy of his or her 2022 tax account information.

If an individual who was the victim of IRS tax-related identity theft is unable to obtain a TRDBV, the institution may accept an equivalent document provided by the IRS or a copy of the signed 2022 income tax return the individual filed with the IRS.

² An individual who is required to submit an IRS Form W-2 or an equivalent document but did not maintain a copy should request a duplicate from the employer who issued the original or from the government agency that issued the equivalent document. If the individual is unable to obtain a duplicate W-2 or an equivalent document in a timely manner, the institution may permit that individual to provide a signed statement, in accordance with 34 CFR 668.57(a)(6), that includes—

- (a) The amount of income earned from work;
- (b) The source of that income; and
- (c) The reason why the IRS Form W-2, or an equivalent document, is not available in a timely manner.

³ For an individual who was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, an institution must accept a statement from the individual certifying that he or she has not filed an income tax return or a request for a filing extension because of that service.

⁴ If an individual is unable to obtain verification of non-filing from a relevant tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a signed statement certifying that the individual attempted to obtain the verification of non-filing from the relevant tax authority and was unable to obtain the required documentation.

⁵ An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

The individual FAFSA items that an applicant must verify are based upon the Verification Tracking Group to which the applicant is assigned as outlined in the following chart.

Verification tracking flag	Verification tracking group name	FAFSA Information required to be verified
V1	Standard Verification Group	<p>Tax Filers</p> <ul style="list-style-type: none"> Adjusted Gross Income. Income Earned From Work. U.S. Income Tax Paid. Untaxed Portions of IRA Distributions. Untaxed Portions of Pensions. IRA Deductions and Payments. Tax Exempt Interest Income. Education Tax Credits. Foreign Income Exempt from Federal Taxation. <p>Non-Tax Filers</p> <ul style="list-style-type: none"> Income Earned from Work. <p>Tax Filers and Non-Tax Filers</p> <ul style="list-style-type: none"> Family Size.
V2	Reserved	N/A.
V3	Reserved	N/A.
V4	Custom Verification Group	<ul style="list-style-type: none"> Identity/Statement of Educational Purpose.
V5	Aggregate Verification Group	<p>Tax Filers</p> <ul style="list-style-type: none"> Adjusted Gross Income. Income Earned From Work. U.S. Income Tax Paid. Untaxed Portions of IRA Distributions. Untaxed Portions of Pensions. IRA Deductions and Payments. Tax Exempt Interest Income. Education Tax Credits. Foreign Income Exempt from Federal Taxation. <p>Non-Tax Filers</p> <ul style="list-style-type: none"> Income Earned from Work. <p>Tax Filers and Non-Tax Filers</p> <ul style="list-style-type: none"> Family Size. Identity/Statement of Educational Purpose.
V6	Reserved	N/A.

Other Sources for Detailed Information

We provide a more detailed discussion on the verification process in the following resources that will be available on the Knowledge Center web page at <https://fsapartners.ed.gov/knowledge-center>:

- 2024–2025 Application and Verification Guide.
- 2024–2025 FAFSA Specifications Guide: Volume 6- ISIR Guide, Volume 7—Comment Codes.
- 2024–2025 COD Technical Reference.
- Program Integrity Information—Questions and Answers on Verification at www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html.

Accessible Format: On request to the program contact person listed under **FOR FURTHER INFORMATION CONTACT**, individuals with disabilities can obtain this document in an accessible format. The Department will provide the requestor with an accessible format that may include Rich Text Format (RTF) or text format (txt), a thumb drive, an MP3 file, braille, large print, audiotope, or compact disc or other accessible format.

Electronic Access to This Document: The official version of this document is the document published in the **Federal Register**. You may access the official edition of the **Federal Register** and the Code of Federal Regulations at www.govinfo.gov. At this site you can view this document, as well as all other documents of this Department published in the **Federal Register**, in text or Portable Document Format (PDF). To use PDF, you must have Adobe Acrobat Reader, which is available free at the site.

You may also access documents of the Department published in the **Federal Register** by using the article search feature at: www.federalregister.gov. Specifically, through the advanced search feature at this site, you can limit your search to documents published by the Department.

Program Authority: 20 U.S.C. 1070a, 1070b–1070b–4, 1087a–1087j, and 20 U.S.C. 1087–51–1087–58.

Nasser H. Paydar,
Assistant Secretary for Postsecondary Education.
 [FR Doc. 2023–20211 Filed 9–18–23; 8:45 am]
BILLING CODE 4000–01–P

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

Combined Notice of Filings #1

Take notice that the Commission received the following exempt wholesale generator filings:

- Docket Numbers:** EG23–286–000.
- Applicants:** Earp Solar, LLC.
- Description:** Earp Solar, LLC submits Notice of Self-Certification of Exempt Wholesale Generator Status.
- Filed Date:** 9/13/23.
- Accession Number:** 20230913–5047.
- Comment Date:** 5 p.m. ET 10/4/23.
- Docket Numbers:** EG23–287–000.

Appendix B - Acceptable Documentation for Verification 2025-2026

FAFSA information	Acceptable documentation
<p><i>Income information for tax filers</i></p> <p>(a) Adjusted Gross Income (AGI)</p> <p>(b) Income Earned From Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions</p> <p>(f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits</p> <p>(i) Foreign Income Exempt from Federal Taxation</p> <p><i>Income information for tax filers with special circumstances.</i></p> <p>(a) Adjusted Gross Income (AGI)</p> <p>(b) Income Earned from Work (c) U.S. Income Tax Paid</p> <p>(d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments</p> <p>(g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>Items a through h, if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for item i, the following documentation is sufficient for verification:</p> <p>(1) A transcript ¹ obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2023 tax account information of the tax filer; or</p> <p>(2) A copy of the income tax return ¹ and the applicable schedules ¹ that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2023 tax account information of the tax filer.</p> <p>(3) If item d or e contains a rollover, a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p> <p>(1) For a student, or the parent(s) of a dependent student, who filed a 2023 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2023 joint income tax return—</p> <p>(a) A transcript ¹ obtained from the IRS or other relevant tax authority that lists 2023 tax account information of the tax filer(s); or</p> <p>(b) A copy of the income tax return ¹ and the applicable schedules ¹ that were filed with the IRS or other relevant tax authority that lists 2023 tax account information of the tax filer(s); and</p> <p>(c) A copy of IRS Form W-2² for each source of 2023 employment income received or an equivalent document.²</p> <p>(2) For an individual who is required to file a 2023 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2023—</p> <p>(a) A signed statement listing the sources of any 2023 income and the amount of income from each source;</p> <p>(b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2023;³</p> <p>(c) A copy of IRS Form W-2² for each source of 2023 employment income received or an equivalent document;² and</p>
FAFSA information	Acceptable documentation
	<p>(d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2023.</p> <p>(3) If d or e contains a rollover, a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.</p> <p><i>Note:</i> An institution may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript ¹ from the IRS, or by submitting a copy of the income tax return ¹ and the applicable schedules ¹ that were filed with the IRS that lists 2023 tax account information. When an institution receives such information, it must be used to reverify the income and tax information reported on the FAFSA.</p>

Income information for non-tax filers

Income Earned from Work

Family Size

- (4) For an individual who was the victim of IRS tax-related identity theft—
- A copy of the signed 2023 income tax return¹ and applicable schedules¹ the individual filed with the IRS; and
 - An IRS 4674C letter (a letter from the IRS acknowledging the identity theft) or a statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and the IRS is aware of it.
- (5) For an individual who filed an amended income tax return with the IRS, a signed copy of the IRS Form 1040X that was filed with the IRS for tax year 2023 or documentation from the IRS that include the change(s) made to the tax filer's 2023 tax information, in addition to one of the following—
- (a) Income and tax information from the IRS on an ISIR record with all tax information from the original tax return;
 - (b) A transcript obtained from the IRS that lists 2023 tax account information of the tax filer(s); or
 - (c) A signed copy of the 2023 IRS Form 1040 and the applicable schedules that were filed with the IRS.

For an individual who has not filed and, under IRS or other relevant tax authority rules (e.g., the Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia, a U.S. territory or commonwealth or a foreign government), is not required to file a 2023 income tax return—

- (1) A signed and dated statement certifying—
 - (a) That the individual is not required to file a 2023 income tax return; and
 - (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2023 tax year;
- (2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), a signed and dated statement certifying that they do not have an SSN, ITIN, or EIN;
- (3) A copy of IRS Form W-2² for each source of 2023 employment income received or an equivalent document;² and
- (4) Except for dependent students, verification of non-filing⁴ for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2024.

Note: The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2023 tax year.

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2025–2026 award year and the relationship of that family member to the applicant.

Note: Verification of family size is not required if—

- For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three and the parents are married, remarried or unmarried and living together; or
- For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two and the applicant is married or remarried; or
- The applicant manually updated their family size and the number is the same as the family size derived from data transferred directly from the IRS.

Identity/Statement of Educational Purpose

(1) An applicant must appear in person and present the following documentation to an institutionally authorized individual to verify the applicant's identity:

- (a) An unexpired, valid, government-issued photo identification⁵ such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport. The institution must maintain an annotated copy of the unexpired valid government-issued photo identification that includes—
 - i. The date the identification was presented; and
 - ii. The name of the institutionally authorized individual who reviewed the identification; and
- (b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

Statement of Educational Purpose

I certify that I ___ am

(Print Student's Name)

the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2025–2026.

(Name of Postsecondary Educational Institution)

(Student's Signature)___ (Date)___

(Student's ID Number)

(2) If an institution determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide the institution with—

- (a) A copy of an unexpired valid government-issued photo identification,⁵ such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and
- (b) An original notarized statement signed by the applicant using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

Statement of Educational Purpose

I certify that I ___ am

(Print Student's Name)

the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending ___ for 2025–2026.

(Name of Postsecondary Educational Institution)

(Student's Signature)___ (Date)___

(Student's ID Number)

¹ This footnote is applicable whenever an income tax return, the related schedules, or transcript is mentioned in the above chart. The copy of the 2023 income tax return must include the signature of the tax filer, or one of the filers of a joint income tax return, or the signed, stamped, typed, or printed name and address of the preparer of the income tax return and the preparer's Social Security number, Employer Identification Number, or Preparer Tax Identification Number.

For a tax filer who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, the institution must use the income information (converted to U.S. dollars) from the lines of that form that correspond most closely to the income information reported on a U.S. income tax return.

An individual who did not retain a copy of his or her 2023 tax account information, and for whom that information cannot be located by the IRS or other relevant tax authority, must submit to the institution—

- a. Copies of all IRS Form W-2s for each source of 2023 employment income or equivalent documents; or
- b. If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2023; and
- c. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2023 tax account information cannot be located; and
- d. A signed statement that indicates that the individual did not retain a copy of his or her 2023 tax account information.

² An individual who is required to submit an IRS Form W-2 or an equivalent document but did not maintain a copy should request a duplicate from the employer who issued the original or from the government agency that issued the equivalent document. If the individual is unable to obtain a duplicate W-2 or an equivalent document in a timely manner, the institution may permit that individual to provide a signed statement, in accordance with 34 CFR 668.57(a)(6), that includes—

- (a) The amount of income earned from work;
- (b) The source of that income; and
- (c) The reason why the IRS Form W-2, or an equivalent document, is not available in a timely manner.

³ For an individual who was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, an institution must accept a statement from the individual certifying that he or she has not filed an income tax return or a request for a filing extension because of that service.

⁴ If an individual is unable to obtain verification of non-filing from a relevant tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a signed statement certifying that the individual attempted to obtain the verification of non-filing from the relevant tax authority and was unable to obtain the required documentation.

⁵ An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

The individual FAFSA items that an applicant must verify are based upon the Verification Tracking Group to which the applicant is assigned as outlined in the following chart.

Verification tracking flag	Verification tracking group name	FAFSA information required to be verified
V1	Standard Verification Group	<p><i>Tax Filers</i></p> <ul style="list-style-type: none"> Adjusted Gross Income. Income Earned From Work. U.S. Income Tax Paid. Untaxed Portions of IRA Distributions. Untaxed Portions of Pensions. IRA Deductions and Payments. Tax Exempt Interest Income. Education Tax Credits. Foreign Income Exempt from Federal Taxation. <p><i>Non-Tax Filers</i></p> <ul style="list-style-type: none"> Income Earned from Work. <p><i>Tax Filers and Non-Tax Filers</i></p> <ul style="list-style-type: none"> Family Size.
V2	Reserved	N/A.
V3	Reserved	N/A.
V4	Custom Verification Group	<ul style="list-style-type: none"> Identity/Statement of Educational Purpose.
V5	Aggregate Verification Group	<p><i>Tax Filers</i></p> <ul style="list-style-type: none"> Adjusted Gross Income. Income Earned From Work. U.S. Income Tax Paid. Untaxed Portions of IRA Distributions. Untaxed Portions of Pensions. IRA Deductions and Payments. Tax Exempt Interest Income. Education Tax Credits. Foreign Income Exempt from Federal Taxation. <p><i>Non-Tax Filers</i></p> <ul style="list-style-type: none"> Income Earned from Work. <p><i>Tax Filers and Non-Tax Filers</i></p> <ul style="list-style-type: none"> Family Size. Identity/Statement of Educational Purpose.
V6	Reserved	N/A.

Other Sources for Detailed Information

We provide a more detailed discussion on the verification process in the following resources that will be available on the Knowledge Center web page at <https://fsapartners.ed.gov/knowledge-center>:

- 2025–2026 Application and Verification Guide.
- 2025–2026 FAFSA Specifications Guide: Volume 6—ISIR Guide, Volume 7—Comment Codes.

- 2025–2026 COD Technical Reference.

- Program Integrity Information—Questions and Answers on Verification at www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html.

Accessible Format: On request to the program contact person listed under **FOR FURTHER INFORMATION CONTACT**, individuals with disabilities can obtain this document in an accessible format. The Department will provide the requestor with an accessible format that

may include Rich Text Format (RTF) or text format (txt), a thumb drive, an MP3 file, braille, large print, audiotape, or compact disc or other accessible format.

Electronic Access to This Document: The official version of this document is the document published in the **Federal Register**. You may access the official edition of the **Federal Register** and the Code of Federal Regulations at www.govinfo.gov. At this site you can view this document, as well as all other documents of this Department

published in the **Federal Register**, in text or Portable Document Format (PDF). To use PDF, you must have Adobe Acrobat Reader, which is available free at the site.

You may also access documents of the Department published in the **Federal Register** by using the article search feature at www.federalregister.gov. Specifically, through the advanced search feature at this site, you can limit your search to documents published by the Department.

Program Authority: 20 U.S.C. 1070a, 1070b-1070b-4, 1087a-1087j, and 1087-51 through 1087-58.

Nasser H. Paydar,

Assistant Secretary, Office of Postsecondary Education.

[FR Doc. 2024-19786 Filed 9-3-24; 8:45 am]

BILLING CODE 4000-01-P

FOR FURTHER INFORMATION CONTACT: For specific questions related to collection activities, please contact Marcos Cerdeira, 202-453-5819.

SUPPLEMENTARY INFORMATION: The Department is especially interested in public comment addressing the following issues: (1) is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. Please note that written comments received in response to this notice will be considered public records.

Title of Collection: Rural, Insular, and

Dated: August 29, 2024.

Kun Mullan,

PRA Coordinator, Strategic Collections and Clearance, Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.

[FR Doc. 2024-19799 Filed 9-3-24; 8:45 am]

BILLING CODE 4000-01-P

DEPARTMENT OF ENERGY

Advanced Scientific Computing Advisory Committee

AGENCY: Office of Science, Department of Energy (DOE).

ACTION: Notice of open meeting.

SUMMARY: This notice announces an open meeting of the DOE Advanced Scientific Computing Advisory Committee (ASCAC). The Federal

2024-2025 Suggested Verification Text

APPENDIX A 2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Student Tax Filers

Important Note: The instructions below apply to the student and spouse (if the student is married). Notify the financial aid office if the student or spouse filed separate IRS income tax returns for 2022 or had a change in marital status after December 31, 2022.

Instructions: Complete this section if the student and spouse filed or will file a 2022 IRS income tax return(s). As part of federal student aid eligibility, students, and spouses (as appropriate), will be required to consent and approve sharing and importing income and tax information from the IRS to the FAFSA form, even if the attempt to obtain or use such data is ineffective. In other words, if the student and spouse filed separate 2022 IRS income tax returns, both must provide consent and approval to share and import income and tax information from the IRS. In most cases, no further documentation is needed to verify 2022 income information that was transferred into the student's FAFSA using income and tax information directly from the IRS.

If 2022 income tax return information for the student (or spouse, if applicable) was not available or could not be used, the student should provide the institution with a **2022 IRS Tax Return Transcript(s)** or a **signed copy of the 2022 income tax return and applicable schedules**.

A **2022 IRS Tax Return Transcript** may be obtained through:

- **Get Transcript by Mail** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request.
- **Get Transcript Online** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication.
- **Automated Telephone Request** – 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request.
- **Paper Request Form** – IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.

APPENDIX A
2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Parent Tax Filers

Important Note: The instructions below apply to each parent included in the household. Notify the financial aid office if the parents filed separate IRS income tax returns for 2022 or had a change in marital status after December 31, 2022.

Instructions: Complete this section if the parents filed or will file a 2022 IRS income tax return(s). As part of federal student aid eligibility, parents will be required to consent and approve sharing and importing income and tax information from the IRS to the FAFSA form, even if the attempt to obtain or use such data is ineffective. In other words, if the parents filed separate 2022 IRS income tax returns, both must provide consent and approval to share and import income and tax information from the IRS. In most cases, no further documentation is needed to verify 2022 income information that was transferred into the student's FAFSA using income and tax information directly from the IRS.

If 2022 income tax return information for the parents was not available or could not be used, the parents should provide the institution with a **2022 IRS Tax Return Transcript(s)** or a **signed copy of the 2022 income tax return and applicable schedules**.

A **2022 IRS Tax Return Transcript** may be obtained through:

- **Get Transcript by Mail** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request.
- **Get Transcript Online** – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and **NOT** the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication.
- **Automated Telephone Request** – 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request.
- **Paper Request Form** – IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.

APPENDIX A
2024–2025 Suggested Verification Text

Individuals Granted a Filing Extension by the IRS

An individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022, must provide:

- A signed statement listing the sources of any 2022 income and the amount of income from each source;
- A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022;
- A copy of IRS Form W-2 for each source of employment income received or an equivalent document for tax year 2022; and
- If self-employed, a signed statement certifying the amount of the individual's Adjusted Gross Income (AGI) and the U.S. income tax paid for tax year 2022.

Individuals Who Filed an Amended IRS Income Tax Return

An individual who filed an amended IRS income tax return for tax year 2022 must provide a signed copy of the 2022 IRS Form 1040X, "Amended U.S. Individual Income Tax Return," that was filed with the IRS or documentation from the IRS that include the change(s) made by the IRS, in addition to one of the following:

- Updated income and tax information from the IRS on an ISIR record with all tax information from the original tax return;
- A **2022 IRS Tax Return Transcript** (that will only include information from the original tax return and does not have to be signed), or any other IRS tax transcript(s) that includes all of the income and tax information required to be verified; or
- A signed copy of the 2022 IRS Form 1040 and the applicable schedules that were filed with the IRS.

APPENDIX A
2024–2025 Suggested Verification Text

Individuals Who Were Victims of IRS Tax-Related Identity Theft

An individual who was the victim of IRS tax-related identity theft must provide:

- A Tax Return DataBase View (TRDBV) transcript obtained from the IRS or, if unable to obtain a TRDBV, an equivalent document provided by the IRS or a copy of the signed 2022 income tax return and applicable schedules the individual filed with the IRS; **and**
- A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS is aware of the tax-related identity theft.

Individuals Who Filed Non-IRS Income Tax Returns

- A tax filer who filed an income tax return with a tax authority other than the IRS may provide a signed copy of his or her income tax return that was filed with the relevant tax authority. However, if we question the accuracy of the information on the signed copy of the income tax return, the tax filer must provide us with a copy of the tax account information issued by the relevant tax authority before verification can be completed.

APPENDIX A
2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Student Non-tax Filers

The instructions and certifications below apply to the student and spouse (if the student is married.) Complete this section if the student and spouse will not file and are not required to file a 2022 income tax return with the IRS.

Check the boxes that apply:

- The student and spouse were not employed and had no income earned from work in 2022.
- The student and/or spouse were employed in 2022 and have listed below the names of all employers, the amount earned from each employer in 2022, and whether an IRS W-2 form or an equivalent document is provided. [Provide copies of all 2022 IRS W-2 forms issued to the student and spouse by their employers]. List every employer even if the employer did not issue an IRS W-2 form.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Employer's Name	IRS W-2 or an Equivalent Document Provided?	Annual Amount Earned in 2022
<i>(Example) ABC's Auto Body Shop</i>	Yes	\$4,500.00
Total Amount of Income Earned From Work		\$

Provide a signed and dated statement certifying that the individual has not filed and is not required to file a 2022 income tax return, as well as the sources of 2022 income earned from work and the amount of income from each source.

- Check here if non-filing statement is signed and dated.
 Check here if non-filing statement will be provided later.

APPENDIX A
2024–2025 Suggested Verification Text

Verification of 2022 Income Information for Parent Non-tax Filers

The instructions and certifications below apply to each parent included in the household. Complete this section if the parents will not file and are not required to file a 2022 income tax return with the IRS.

Check the box that applies:

- Neither parent was employed, and neither had income earned from work in 2022.
- One or both parents were employed in 2022 and have listed below the names of all employers, the amount earned from each employer in 2022, and whether an IRS W-2 form or an equivalent document is provided. [Provide copies of all 2022 IRS W-2 forms issued to the parents by their employers]. List every employer even if the employer did not issue an IRS W-2 form.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Employer's Name	IRS W-2 or an Equivalent Document Provided?	Annual Amount Earned in 2022
<i>(Example) ABC's Auto Body Shop</i>	Yes	\$4,500.00
Total Amount of Income Earned From Work		\$

Provide a signed and dated statement certifying that the individual has not filed and is not required to file a 2022 income tax return, as well as the sources of 2022 income earned from work and the amount of income from each source.

- Check here if non-filing statement is signed and dated.
 Check here if non-filing statement will be provided later.

APPENDIX A
2024–2025 Suggested Verification Text

Family Size
(Independent Student)

Family Size - Includes the following:

- The student.
- The student's spouse, if applicable.
- The student's dependent children if the following are true:
 - They live with the student (or live apart because of college enrollment);
 - They receive more than half of their support from the student; and
 - They will continue to receive more than half their support from the student during the award year.
- Other persons if the following are true:
 - They live with the student;
 - They receive more than half of their support from the student; and
 - They will continue to receive more than half their support from the student during the award year.

The provided criteria for "dependent children" or "other persons" align with the requirement that family size align with whom the student could claim as a dependent on a U.S. tax return if the student were to file a U.S tax return at the time of completing the 2024-2025 FAFSA. As a result, the student should not include any unborn children in the family size.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Full Name	Age	Relationship
		<i>Self</i>

APPENDIX A
2024–2025 Suggested Verification Text

Family Size
(Dependent Student)

Family Size - Includes the following:

- The student.
- The student's parents, even if the student is not living with them. Exclude a parent who has died or is not living in the household because of separation or divorce. Include a parent who is on active duty in the U.S. Armed Forces apart from the family.
- The student's siblings if the following are true:
 - They live with the student's parents (or live apart because of college enrollment),
 - They receive more than half of their support from the student's parents, and
 - They will continue to receive more than half their support from the student's parents during the award year.
- Other persons if the following are true:
 - They live with the student's parents,
 - They receive more than half of their support from the student's parents, and
 - They will continue to receive more than half their support from the student's parents during the award year.

The provided criteria for "dependent children" or "other persons" align with the requirement that family size align with whom the parent could claim as a dependent on a U.S. tax return if the parent were to file a U.S. tax return at the time of completing the 2024-2025 FAFSA. As a result, the parent should not include any unborn children in the family size.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Full Name	Age	Relationship
		<i>Self</i>

APPENDIX A
2024–2025 Suggested Verification Text

Identity and Statement of Educational Purpose
(To Be Signed at the Institution)

The student must appear in person at _____ to
(Name of Postsecondary Educational Institution)

verify his or her identity by presenting an unexpired valid government-issued photo identification (ID), such as, but not limited to, a driver's license, other state-issued ID, or passport. The institution will maintain a copy of the student's photo ID that is annotated by the institution with the date it was received and reviewed, and the name of the official at the institution authorized to receive and review the student's ID.

In addition, the student must sign, in the presence of the institutional official, the Statement of Educational Purpose provided below.

Identity and Statement of Educational Purpose
(To Be Signed in the Presence of a Notary)

If the student is unable to appear in person at _____
(Name of Postsecondary Educational Institution)

to verify his or her identity, the student must provide to the institution:

- (a) A copy of the unexpired valid government-issued photo identification (ID) that is acknowledged in the notary statement below, or that is presented to a notary, such as, but not limited to, a driver's license, other state-issued ID, or passport; and
- (b) The original Statement of Educational Purpose provided below, which must be notarized. If the notary statement appears on a separate page than the Statement of Educational Purpose, there must be a clear indication that the Statement of Educational Purpose was the document notarized.

Statement of Educational Purpose

I certify that I _____ am the individual signing
(Print Student's Name)

this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending _____ for 2024–2025.
(Name of Postsecondary Educational Institution)

(Student's Signature) (Date)

(Student's ID Number)

APPENDIX A
2024–2025 Suggested Verification Text

Sample of a Notary's Certificate of Acknowledgement

Notary's certification may vary by State

State of _____

City/County of _____

On _____, before me, _____,

(Date)

(Notary's name)

personally appeared, _____, and proved to me

(Printed name of signer)

because of satisfactory evidence of identification _____

(Type of unexpired government-issued photo
ID provided)

to be the above-named person who signed the foregoing instrument.

WITNESS my hand and official seal

(seal)

(Notary signature)

My commission expires on _____

(Date)

**APPENDIX A
2024–2025 Suggested Verification Text**

**Certification and Signature
(Independent Student)**

Certification and Signature

Each person signing below certifies that all of the information reported is complete and correct.

WARNING: If you purposely give false or misleading information, you may be fined, sent to prison, or both.

Print Student's Name

Student's ID Number

Student's Signature (Required)

Date

Spouse's Signature (Optional)

Date

APPENDIX A
2024–2025 Suggested Verification Text

Certifications and Signatures
(Dependent Student)

Certifications and Signatures

Each person signing below certifies that all of the information reported is complete and correct. The student and one parent whose information was reported on the FAFSA must sign and date.

WARNING: If you purposely give false or misleading information, you may be fined, sent to prison, or both.

_____	_____
Print Student's Name	Student's ID Number
_____	_____
Student's Signature (Required)	Date
_____	_____
Parent's Signature (Required)	Date