



# Consumer Information Guide 2017 - 2018



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#### Consumer Information Guide 2017-2018

All institutions participating in federal financial student aid programs are required to provide current and prospective students and current and prospective employees' available consumer information. This guide provides you with important information and institutional policies. Where applicable, each section lists specific locations where additional information is available. To request and receive this information in writing, contact a student advisor or designee at (602) 943-2311 or (866) 948-4636 during regular business hours.

Students should contact a student advisor at [inquiries@west.edu](mailto:inquiries@west.edu) or (866) 948-4636 for additional information on consumer information.

# University Information

Western International University (West) was founded in 1978 as a private, nonprofit institution and was regionally accredited in 1984. In 1995, West was acquired by Apollo Education Group, Inc., and became a for-profit subsidiary of one of the leading educational corporations in the United States.

In keeping with its mission, Western International University provides programs with a broad educational foundation to prepare students for leadership positions.

West is headquartered in Arizona, the Grand Canyon State. Its ground campus is conveniently located in Tempe, Arizona. Campus classrooms are designed to encourage student and faculty interaction and discussion. Computer facilities for hands-on instruction are readily available to students, as are various audio-visual aids. The state-of-the-art Learning Resource Center at the Tempe campus provides access to many resources. West offers degree programs at its Tempe-campus as well as online.

Further information regarding Western International University is available on the University's website [www.west.edu](http://www.west.edu). A print copy of the University Catalog may be requested by calling (602) 943-2311 or 1(866) 948-4636.

All institutions participating in federal financial student aid programs are required to provide current and prospective students and current and prospective employees' available consumer information. This guide provides you with important information and institutional policies. Where applicable, each section lists specific locations where additional information is available. To request and receive this information in writing, contact a student advisor or designee at (602) 943-2311 or (866) 948-4636 during regular business hours.

Students should contact a student advisor at (602) 943-2311 or (866) 948-4636 or <http://www.west.edu/contact-info> for additional information on consumer information.

## Ownership Information

Western International University is a subsidiary of Apollo Education Group, Inc. The University's central administration offices are located in Tempe, Arizona.

## Mission Statement

Western International University provides a broad educational foundation, including a focus on business and technology, designed to prepare students for leadership positions in a dynamic, global marketplace.

## Core Values

- Learning
- Academic Quality
- Student Service
- Global Awareness
- Integrity

## Accreditation

Western International University is accredited by the Higher Learning Commission (<http://hlcommission.org>). Since 1984, Western International University has been continually accredited by the Higher Learning Commission and its predecessor. Western International University obtained its most recent 10-year Reaffirmation of Accreditation in 2012-13. A comprehensive evaluation is scheduled for 2016-17, and the next Reaffirmation of Accreditation is scheduled for 2022-23. For more information about Western International University accreditations and licensures, please visit <http://west.edu/why-west/accreditation.html>.



For additional information, contact [ncahlc.org](http://ncahlc.org)

Copies for review of Western International University accreditation and licensure may be obtained upon written request to: Office of the President Western International University 1601 W. Fountainhead Parkway, Tempe, AZ 85282

### **State Approvals**

Western International University is licensed by the following state regulatory agency:

- Arizona State Board for Private Postsecondary Education

Click here (<http://west.smartcatalogiq.com/en/2015-2016/Catalog/State-Specific-Requirements>) for further State-Specific Information

### **State Authorization Reciprocity Agreement**

Western International University is an approved institution under the State Authorization Reciprocity Agreement (SARA), and therefore has reciprocity for approval of distance education with other SARA-approved states.

SARA is an agreement among member states, districts and territories that establishes comparable national standards for interstate offering of postsecondary distance education courses and programs. It is intended to make it easier for students to take online courses offered by postsecondary institutions based in another state. SARA is overseen by a National Council and administered by four regional education compacts.

For more information visit the National SARA Council [www.nc-sara.org](http://www.nc-sara.org), or the Arizona SARA Council [www.azsara.arizona.edu](http://www.azsara.arizona.edu).

### **Memberships**

Western International University holds membership in the following associations or organizations:

- American Association of Collegiate Registrars and Admissions Officers (AACRAO)
- American Council on Education (ACE)
- Arizona Veterans Programs Association (AVPA)
- Better Business Bureau (BBB)
- Council for Adult and Experiential Learning (CAEL)
- Council on Higher Education Accreditation (CHEA)
- Independent Colleges and Universities of Arizona (ICUA)
- NAFSA: Association of International Educators (NAFSA)
- Pacific Association of Collegiate Registrars and Admissions Officers (PACRAO)
- Professional and Organizational Development Network (POD)
- University Continuing Education Association (UCEA)
- Western Association of Student Financial Aid Administrators (WASFAA)

### **Federal-State-Regional**

#### **Better Business Bureau (BBB) Accreditation**

In addition to post-secondary educational institution accreditation, West has also attained accreditation as a business through the Better Business Bureau (BBB). Visit <http://www.bbb.org/phoenix/> to view the online BBB Reliability Report for Western International University.

West is proud to continue to receive BBB Accreditation and the highest A+ rating awarded by the BBB. West has been a BBB Accredited business since 1995 and meets the stringent BBB Code of Business Practices, or accreditation standards that BBB sets for businesses.

The BBB ratings are based on detailed information and experience in seventeen key areas. While a BBB rating is not a guarantee of a business' reliability or performance, it does indicate the BBB's degree of confidence that the business upholds the BBB Standards for Trust and attempts to address customer concerns in good faith.

West is proud of our A+ BBB rating and pledges to continue upholding the BBB Standards for Trust with our students, faculty, staff, and community.

**Federal**

Western International University has been approved by the Department of Education to participate in each of the following listed Title IV, HEA programs:

- Federal Pell Grant Program
- Federal Direct Student Loan Program
- Federal Supplemental Educational Opportunity Grant Program

**Additional Information**

Copies for review of Western International University's accreditation and licensure may be obtained by sending a written request to the following address:

Office of the President

Western International University

1601 W Fountainhead Parkway

Tempe, AZ 85282

**State Board**

In Arizona, the student may contact the Arizona State Board for Private Postsecondary Education, 1400 W. Washington, Room 260, Phoenix, AZ 85007, telephone (602) 542-5709.

Students may obtain a copy of the University's accreditation and/or license documents, or information on how to contact any of the agencies that regulate the University, by contacting the Apollo Legal Department at (602) 557-1818.

## Contact Information

General contact information questions regarding available programs, facilities, finance issues, or general institutional issues should be directed to your local campus, [inquiries@west.edu](mailto:inquiries@west.edu), <http://west.edu/contact-us> or call (866) 948-4636 or (602) 943-2311.

### Management

The West management team (<http://west.edu/west-management>) provides the focus, direction, and leadership for every aspect of University administration.

### Faculty

Western International University faculty members are accomplished managers, technology leaders, professional educators, corporate executives, financial officers, human services professional, and leaders in other professional areas. A listing of faculty can be viewed by clicking here (<http://west.smartcatalogiq.com/en/2014-2015/Catalog/Copy-of-Faculty>).

# Academic Information

Academic program offerings and instructional facilities vary according to geographic area and delivery mode (campus or online). Not all programs are available at all locations.

## Programs

Western International University offers undergraduate and graduate programs in business, business administration, international business, accounting, management, human resource management, behavioral science, information systems and technology, and leadership. Detailed information regarding academic programs can be viewed at <http://west.edu/online-degree-programs> and the Academic Programs Section11.

Admissions and program requirements vary by state. Please refer to the University Academic Catalog for state and/or program information.

## Program Improvement

Western International University is committed to promoting a culture of continuous quality improvement across the institution. University administration and faculty ensure programs are of high academic quality by regularly assessing and updating program content and learning outcomes. Multiple assessment techniques are used to assess student learning and results are used to revise programs and train faculty for improvement of student learning and the overall academic experience.

Current or prospective students may obtain a copy of the improvement plan for a specific program by contacting:

Office of Academic Affairs

1601 West Fountainhead Parkway

Tempe, AZ 85282

(602) 943-2311 or (866) 948-4636

## Transfer Plans

Information regarding criteria used to evaluate the transfer of credit earned at another institution is located at <http://west.smartcatalogiq.com/en/2015-2016/Catalog/Institutional-Policies/Transfer-of-Credit>.

For additional information about course transfer credits, students may speak with a student advisor at (866) 948-4636 or (602) 943-2311, or email [inquiries@west.edu](mailto:inquiries@west.edu).

## Articulations Agreements

A listing of college articulation agreements is available here: <http://www.west.edu/earned-credit/transfer-credit-options>.

# Services and Information

## American Disabilities Act

We believe education should be accessible to everyone. If you have temporary health issues or a permanent disability, we have services to help meet your needs. Western International University recognizes and accepts its obligation under Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act (ADA) of 1990, and the ADA Amendments of 2008, prohibiting discrimination on the basis of a disability and requiring the University to provide reasonable accommodations to otherwise qualified disabled students in all University programs, activities, and employment.

The Western International University® (West) Disability Services Office provides services to students with temporary health issues or permanent disabilities. Explore the link (<http://west.edu/student-services/education-resources/disability-services.html>) to find additional information about disability accommodations, eligibility requirements, and how to apply for accommodations through the Disability Services Office. We're here to assist you in a timely manner, regardless of location or modality of your course of study.

After you complete the application process, (<http://west.edu/student-services/education-resources/disability-services.html>) a disability services advisor will work with you to determine eligibility and identify what types of accommodations are available. Once you work with the disability services advisor to complete a *Student Accommodation Agreement*, faculty members will be notified of any accommodations that they need to implement. We will not disclose health issues or specific diagnoses. It's your choice whether to disclose your health information to faculty members or classmates.

Individuals who require assistance during an emergency situation must self-disclose this need to a Disability Services Advisor. The Disability Services Advisor, in conjunction with the Campus Security Authority, should develop a personal emergency plan for the student, including specific notification and evacuation procedures which would be utilized in the event of an emergency, regardless of whether the student intends to apply for or receives classroom accommodations.

### **Accommodations for Students**

Western International University® (West) strives to provide you with pertinent eligibility information and help you formally request assistance to meet your temporary or permanent disability needs. We never forget that our students are here to learn, and we're here to help.

#### Possible Accommodations

Accommodations are determined on a case-by-case basis, depending on the student's particular circumstances.

Accommodations are available for otherwise qualified students who suffer from a temporary or permanent health situation and complete the accommodation application process.

Any individual (1) with a physical or mental impairment that substantially limits a major life activity; (2) has a record of such an impairment; or (3) is regarded as having such an impairment, may qualify under the Americans with Disabilities Act (ADA). Please consult with a disability services advisor for more information.

Examples of possible accommodations:

- Additional time for individual assignments or tests
- Screen-reading software
- Typing software
- Printed materials
- Sign language interpreters
- Note takers

### **Temporary Health Situations**

Students experiencing a temporary health situation that limits the ability to perform coursework may qualify for temporary accommodations. Examples of temporary situations may include a broken bone, surgery complications, emergency hospitalization, treatment for temporary health conditions, or pregnancy complications, among others.

### **Permanent Health Situations**

Students experiencing a permanent health situation that limits their ability to perform their schoolwork may qualify for permanent accommodations. Examples of permanent situations may include deafness, blindness, low vision, learning disabilities, chronic illnesses, cancer, fibromyalgia, emotional or mental health issues, treatment for debilitating illnesses or recovered drug or alcohol abuse, speech disorders, spinal cord or traumatic brain injury, post-traumatic stress, or ADD/ADHD, among others.

### **Student Disability Handbook**

Login to your my.west.edu account and select the Resources tab, ADA Policy link under Other Resources.

### **Disability Services Advisors**

Leslie Wynkoop  
(602) 943-2311 x 4291031  
leslie.wynkoop@west.edu

504 Coordinator

Dr. Christopher Davis  
(602) 429-1112  
christopher.davis@west.edu

### **Applying for Accommodations**

All requests for accommodations follow a standard process managed through the Disability Services Office.

### **HOW TO APPLY FOR ACCOMMODATIONS**

#### **1. Student Rights and Responsibilities**

Read, sign and return the Student Rights & Responsibilities form to the Disability Services Office to acknowledge a clear understanding of your rights and responsibilities under the University's accommodation process.

#### **2. Student Self-Disclosure**

Complete, sign and return the Student Self-Disclosure Statement disclosing a formal request for accommodations under the Americans with Disabilities Act (ADA).

#### **3. Student Release of Information**

The Student Release of Information form informs the Disability Services Office of the diagnosing professional who will be providing the medical documentation (see below) or filling out the *Student Disability Information/Verification* form. Please fill out this information, if necessary, and return with your completed paperwork.

#### **4. Student Disability Information/Verification**

The Student Disability Information/Verification form should be fully completed by your diagnosing professional (i.e., physician, psychologist, or psychiatrist). The diagnosing professional will need to complete the form in its entirety; otherwise, additional information may be needed. **Note:** A diagnosis, classroom limitations and specific recommendations for accommodations by a doctor or other legally acceptable health care professional as defined by the ADA are usually required. Please make sure to leave the doctor's, psychiatrist's, psychologist's, or other appropriate health care professional's office with paperwork, letters, forms, and testing information filled out correctly. It is your responsibility to provide proper documentation (see "Medical Documentation" below).

#### **5. Return Completed Paperwork**

Return completed paperwork to the Disability Services Office as soon as possible.

#### **6. Application Review**

The Disability Services Office will review your application to verify your eligibility for disability services and determine whether the requested accommodations or any other accommodations might be reasonable.

#### **7. Student Accommodation Agreement**

Once reviewed, the Disability Services Advisor will contact you to discuss any reasonable accommodations that might be available to you. After you and the Disability Services Advisor reach an agreement regarding the accommodations to be provided, the *Student Accommodation Agreement* will be sent to you. Any agreed-upon accommodations will be documented in the *Student Accommodation Agreement* for you to sign and return to the Disability Services Advisor.

### **8. Making Accommodations**

Accommodations will be made available once the Disability Services Advisor has received the signed *Student Accommodation Agreement*. Accommodations are not typically retroactive.

#### **Requesting a Copy of Your Accommodation File**

Once you apply for accommodations, your complete accommodations file will be housed in the Disability Services Office. Request to view the file can be made by completing the Student Release of the ADA File Information form.

### **MEDICAL DOCUMENTATION**

For students seeking disability services, verification is required. The first option for students is to provide documentation from the diagnosing professional verifying the current condition of the student's disability to the Disability Services Office. This option generally provides sufficient disability documentation.

If the only available documentation does not reflect the student's current disability the Disability Services Office can help identify other forms of verification, such as a history of accommodations received while enrolled in a previous educational institution. The student's former educational institution can provide verification of disability accommodations; that the educational institution supports the medical verification; and the dates the student attended the educational institution.

Please note that students may be required to provide a copy of medical documentation from the diagnosing professional accompanying the letter and accommodation information from the previous educational institution.

**Students having trouble securing appropriate documentation of disability, should contact their Disability Services Advisor.**

## Vaccination and Immunization

West does not require immunizations for attendance. Students wanting more information on immunizations and flu prevention, please visit [www.cdc.gov/vaccines](http://www.cdc.gov/vaccines) and [www.cdc.gov/flu](http://www.cdc.gov/flu).

## Register to Vote

The National Mail Voter Registration Form can be used to register U.S. citizens to vote, to update registration information due to a change of name, make a change of address or to register with a political party. You must follow the state-specific instructions listed for your state. After completing the form, you must sign your name where indicated and send it to your state or local election office for processing.

The national form also contains voter registration rules and regulations for each state and territory. For more information about registering to vote, contact your state election office at [http://www.eac.gov/voter\\_resources/contact\\_your\\_state.aspx](http://www.eac.gov/voter_resources/contact_your_state.aspx).

Register to vote by following your state-specific instructions and using the National Mail Voter Registration form at [http://www.eac.gov/voter\\_resources/register\\_to\\_vote.aspx](http://www.eac.gov/voter_resources/register_to_vote.aspx).

## Campus Safety and Security

### **Annual Security Report**

Western International University complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or "Clery Act," a federal statute requiring all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their campuses. The Clery Act requires that the University annually publish crime statistics and policies and raise awareness of safety on campus. To review the University's Annual Security Report, visit, <http://west.edu/content/dam/westedu/pdu/West-Campus-Safety-Policies.pdf>

## Campus Safety Policies

The University **Campus Safety Policies**, <http://west.edu/content/dam/westedu/pdf/West-Campus-Safety-Policies.pdf>, have been prepared to increase Western International University community's awareness of current programs that exist to protect its members' safety and well-being and to satisfy the requirements of the Safe and Drug Free Schools and Communities Act, Clery Act and Violence Against Women Act (VAWA). The information included relates to the following topics:

- Alcohol and other drug abuse
- Annual crime statistics
- Available counseling programs
- Crime prevention
- Emergency Mass Notification
- Health Risks
- Information related to campus safety
- Legal effects of alcohol and other drug use
- Prohibited use or distribution of alcohol and other drugs
- Safety and awareness
- Violence Against Women Act and sexual assault information

The information is intended to provide a general description of Western International University campus safety policies; however, it is not intended to serve as a contractual agreement between the University and the recipient. Additionally, the University will disseminate and publicize, for its campus location, crime statistics from the most recent calendar year and two preceding calendar years.

Visit <http://west.edu/campus-safety.html> to access a PDF file of the University Campus Safety Policies.

## Campus Crime Statistics

This report is compiled in conjunction with Western International University Campus Safety Policies. The following statistics are in accordance with definitions used in the Uniform Crime Reporting System of the Department of Justice and FBI. The data includes all crimes reported to the police or a Western International University campus security authority. If a crime has occurred, but has not been reported, it cannot be reflected in the following statistics. For this reason, Western International University encourages everyone to report all crimes to their designated campus security authority or local law enforcement agency.

Campus crime statistics are available electronically at: <http://west.edu/content/dam/westedu/pdf/West-Campus-Safety-Policies.pdf>. and at <http://www.west.edu/campus-crime-statistics.html> or by requesting a printed copy from West's security authority.

Western International University expressly reserves the right to modify or to adopt additional campus policies and procedures relating to campus safety, at any time without notice.

NOTE: Please use the latest version Internet browser when reviewing the campus crime statistics. Google Chrome is recommended.

## Statement of Policy on Sex Offender Registration

The Federal Campus Sex Crimes Prevention Act requires colleges and universities to issue a statement advising the campus community where state law enforcement agency information concerning registered sex offenders may be obtained. The Act also mandates that sex offenders who are already required to register in a state to provide notice of each institution of higher education in that state at which the offender is employed or is a student.

To learn the identity of registered sex offenders on or near a campus, or anywhere in the United States, visit the Sex Offender databases at <http://www.sexoffender.com> or <http://www.nsopw.gov/Core/Portal.aspx>. You can search by city, county, or zip code. This information is collected by other agencies and this institution cannot guarantee this information is correct or complete. The information provided here is intended to be in compliance with the Clery Act and for campus safety purposes only. It should not be used to intimidate, threaten, or harass. Misuse of this information may result in prosecution.

## Emergency Mass Notification Policy



Apollo Education Group, (Apollo), and Western International University (West), have established an emergency mass notification process that includes emergency escalation processes, mass notifications, and supporting systems. These processes enable Apollo and West to contact or send notices, alerts or warnings without delay to employees, faculty, and students in the event of an emergency, dangerous or otherwise high-risk situation at a West site.

Apollo and West maintain emergency management policies, procedures, and systems to protect lives and property, and to continue necessary critical functions and essential services. An emergency is defined as a situation that poses an immediate threat to the health or safety of someone in the University community at a West site or that significantly disrupts programs and activities.

The Emergency Mass Notification Policy applies to all employees, faculty, and students of West in the event of an emergency, dangerous or otherwise high-risk situation at a West site.

The policy can be viewed in its entirety in the Campus Safety Policies (<http://west.edu/content/dam/westedu/pdf/West-Campus-Safety-Policies.pdf>) or by requesting a printed copy from the campus.

### **Campus Security Authority**

The West Campus Security Authority will assist in the safety of the University community by serving as contact for University security issues. The contact information of the Campus Security Authority can be found at <http://west.edu/campus-safety.html>.

### **Violence Against Women Act (VAWA)**

Western International University is firmly committed to creating and maintaining a community in which students, faculty, and staff work in an atmosphere free from all forms of improper or unlawful harassment, discrimination, exploitation, intimidation or violence. West complies with the Violence Against Women Reauthorization Act of 2013 (VAWA) and further details can be viewed in the Campus Safety Policies (<http://west.edu/content/dam/westedu/pdf/West-Campus-Safety-Policies.pdf>).

### **Title IX Policy**

Title IX - Sex Discrimination, Sexual Harassment, and Sexual Assault

In accordance with federal law, including Title IX of the Education Amendments of 1972, Western International University does not discriminate on the basis of sex in its education programs and activities. Individuals with questions, concerns or a complaint related to sex discrimination, sexual harassment, or sexual assault may contact the University's Title IX Coordinator:

#### **Dr. Christopher Davis**

Western International University  
Title IX Coordinator  
Mail Stop: CF-SX01  
4025 S. Riverpoint Parkway  
Phoenix, Arizona 85040  
Phone: (602).429.1112  
Fax: (602).383.9756  
Email: [TitleIX@west.edu](mailto:TitleIX@west.edu)

Campus Security Authority Contact:

#### **Dr. Christopher Davis**

Western International University  
Campus Security Authority  
1601 W Fountainhead Parkway  
Tempe, AZ 85282  
Phone: (602).429.1112  
Email: [christopher.davis@west.edu](mailto:christopher.davis@west.edu)

## **Alcohol and Drug Abuse Prevention**

Drug abuse affects all aspects of American life. It threatens the workplace as well as our homes, our schools, and our community. The U.S. Department of Education requires institutions of higher education to implement a drug prevention and awareness program for their students and employees. West abides by federal Drug-Free Workplace and Drug-Free Schools and Community Act regulations regardless of individual state legalization.

Students are expected to conduct themselves ethically, honestly and with integrity as responsible members of the University's academic community. Any member of the University community found consuming or selling alcohol or other drugs on University property, including attending class or meeting with campus personnel, is subject to disciplinary action up to and including dismissal from the University, depending on the seriousness of the situation. All alcohol and other drug abuse policies, prevention and referrals can be viewed in the Campus Safety Policies<sup>15</sup> (<http://west.edu/content/dam/westedu/pdf/West-Campus-Safety-Policies.pdf>).

### **Prohibition of Illicit Drug Use**

The University community must adhere to a code of conduct that recognizes the unlawful manufacture, sale, delivery, unauthorized possession, or use of any illicit drug is prohibited on property owned or otherwise controlled by the Western International University. If an individual associated with the University is apprehended for violating any drug or alcohol related law when on University property, or participating in a University activity, the University will fully support and cooperate with federal and state law enforcement agencies. The University enforces a "Zero Tolerance" policy regarding underage drinking.

Underage possession and/or consumption of alcoholic beverages are not permitted on property owned or controlled by the University and the state laws will be enforced.

Also, intentionally or knowingly selling, or intentionally or knowingly furnishing alcoholic beverages to persons under the age of 21, or to persons obviously inebriated, is not permitted on property owned or controlled by the University.

### **Federal Financial Aid Penalties for Drug Violations**

According to the Higher Education Act (HEA), students convicted for a drug offense that occurred during a period of enrollment while they were receiving Federal Financial Aid may lose eligibility for Federal Financial Aid. Federal Aid includes Federal Pell and FSEOG Grants, Federal Work Study, Federal Perkins Loans, Federal Stafford Loans, Federal PLUS Loans, Graduate PLUS Loans, and other financial assistance.

The Free Application for Federal Student Aid (FAFSA) asks students if they have been convicted of a drug-related offense. If the student answers 'Yes' to the question then they will be sent a worksheet by the federal processing center in order to determine if the conviction affects eligibility for aid. Should the financial aid office be notified that a student has been convicted of sale or possession of illegal drugs, the financial assistance will be suspended immediately. For the purposes of federal financial aid eligibility, the following events are not counted as convictions:

- convictions reversed, set aside, or removed from the student's record,
- convictions occurring during periods of non-enrollment,
- convictions received as a juvenile, except that the conviction is counted if the individual was tried as an adult and convicted.

Failure to answer the question automatically disqualifies students from receiving federal financial aid. Answering this question falsely could result in fines, imprisonment, or both.

More information about federal penalties and sanctions is located at <http://www.justice.gov/dea/druginfo/ftp3.shtml>

### **Penalties for Drug Convictions**

The financial aid consequences of a drug conviction vary depending on the type of crime and the number of offenses incurred by the student.

#### **Possession of Illegal Drugs**

- First Offense: Loss of eligibility for federal financial aid for one year from the date of conviction.
- Second Offense: Loss of eligibility for federal financial aid for two years from the date of conviction.
- Third and Subsequent Offenses: Indefinite ineligibility for federal financial aid, from the date of conviction.

#### **Sale of Illegal Drugs**

- First Offense: Loss of eligibility for federal financial aid for two years from the date of conviction.
- Second and Subsequent Offenses: Indefinite ineligibility from the date of conviction.

If the student was convicted of both possessing and selling illegal drugs, and the periods of ineligibility are different, the student will be ineligible for the longer period.

### **How to Reduce the Period of Ineligibility or Regain Eligibility**

The student may regain eligibility:

- The day after the period of ineligibility ends,
- When the student successfully completes a qualified drug rehabilitation program, or
- If the student passes two unannounced drug tests given by a qualified rehabilitation program.

Students denied eligibility for an indefinite period can regain it after successfully completing a qualified rehabilitation program, passing two unannounced drug tests from such a program, or if a conviction is reversed, set aside, or removed from the student's record so that fewer than two convictions for sale or three convictions for possession remain on the record. In such cases, the nature and dates of the remaining convictions will determine when the student regains eligibility.

Students who regain eligibility during the award year, should notify the financial aid office immediately so that they might receive any eligible financial aid which they are entitled to receive.

It is the student's responsibility to certify that a rehabilitation program was successfully completed, as with the conviction question on the FAFSA. The University is not required to confirm the reported information unless conflicting information is determined.

### **Qualified Drug Rehabilitation Program**

A qualified drug rehabilitation program must include at least two unannounced drug tests and must satisfy at least one of the following requirements:

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

### **Convictions for Offenses that Occurred during Enrollment**

Federal regulations require enrolled students convicted of a drug offense after receiving federal financial aid, to notify Student Financial Services immediately. The student may be ineligible for further aid in that academic year and required to pay back all federal aid received after the date of conviction. The Student Financial Services will work with the student regarding all of the available options.

#### *Institutional Sanctions for Alcohol and Drug Violations*

Any member of the University community found possessing or selling illegal drugs on University property shall be subject to discipline on a case-by-case basis.

- Discipline will be based on the seriousness of the situation.
- A case may result in dismissal from the University.
- In all cases, the University will abide by local, state and federal sanctions regarding unlawful possession of drugs and the consumption of alcohol.
- Additional state penalties and sanctions may also apply.

The University has adopted a zero-tolerance policy regarding alcohol and drug violations

# Student Right-to-Know Statistics

## Gainful Employment

To review the on-time completion rates, median loan debt of graduates, and other important consumer information for each program, please visit:

<http://west.edu/online-degree-programs>

### Student Borrowing

During the period of time spanning July 1, 2015 through June 30, 2016, 40.97% of student enrolled received federal student loans.

### Loan Default Rates

The University's loan default rate for Fiscal Year 2013 is 12.2% and the national average is 11.3%.

The University's loan default rate for Fiscal Year 2012 is 14.7% and the national average is 11.8%.

### Median Borrowing

The median borrowing for students from the University entering repayment is \$28,875. The Federal loan repayment over ten years for this amount is approximately \$296 per month. Your borrowing may be different.

## Graduation Rates

In accordance with the Higher Education Act (HEA) of 1965, as amended, each postsecondary educational institution must publish information regarding graduation rates as defined by the National Center for Education Statistics (NCES). This graduation measure includes the cohort of full-time, first-time (FTFT) degree/certificate-seeking students and tracks their completion status at 150% of the normal time to complete all requirements of their program of student. A first-time student is defined as a student who has no prior postsecondary experience attending any institution for the first time at the undergraduate level. Data are collected on the number of students entering the institution as first-time, full-time (FTFT) degree- and/or certificate-seeking undergraduate students in a particular cohort year. Graduation rates are disaggregated by race and ethnicity, gender and federal financial aid grant or loan funds. The graduation rates shown below represent students from the 2010–2011 cohort and the percentages of those students who graduated within 150 percent by Aug. 31, 2016.

The table below shows FTFT undergraduate students and is derived from the Integrated Postsecondary Education Data System (IPEDS) graduation rate survey, although shown in aggregate rather than by degree/award type. The University is a nontraditional institution that caters to a wide variety of students, including many who have previously attended another institution of higher education, and would not be classified as first-time students.

The table includes recipients of Pell Grants or subsidized loans, or neither type of aid during the 2010-2011 cohort year (September 1 - August 31).

<b>Table 1: FTFT Degree or Certificate-seeking Undergraduate Students in the 2010-2011 Cohort</b>			
	Enrolled FTFT Undergraduates	Enrolled FTFT Undergraduates Graduated Within 150% Timeframe Allowed	Graduation Percent Enrolled FTFT Undergraduates
<b>Totals</b>	<b>206</b>	<b>9</b>	<b>4%</b>
Male	138	3	2%
Female	170	6	4%
Nonresident Alien	2	0	0%
Hispanic/Latino	35	1	11%
American Indian or Alaska Native	4	0	0%
Asian	1	0	0%
Black or African American	88	0	0%
Native Hawaiian or Other Pacific Islander	0	0	0%
White	139	1	11%
Two or more races	1	0	0%
Race or Ethnicity Unknown	35	7	77%
Pell Grant Recipients	143	5	3%
Subsidized Stafford Loan Recipients who did not receive a Pell Grant	20	2	10%
Students who received neither Pell Grants or Subsidized Stafford Loan	43	2	4%

## Student Diversity

In accordance with the Higher Education Act (HEA) of 1965, as amended, each postsecondary educational institution must make available information regarding student diversity as defined by the Integrated Postsecondary Education Data System (IPEDS). Data reported are for enrolled full-time students.

Table 1 represents all enrolled students from July 1, 2015 through June 30, 2016. Of the total enrolled students, those who received Pell Grant funds during July 1, 2015 through June 30, 2016 time frame are shown in Table 2.

<b>Table 1: All Enrolled Student by Gender and Race/Ethnicity</b>		
	Total Enrolled	Percentage
Total Enrollment	1970	100%
Male	744	38.0%
Female	1,226	62.0%
Nonresident Alien	46	2.3%
Hispanic/Latino	271	13.7%
American Indian or Alaska Native	33	1.6%
Asian	25	1.2%
Black/African American	283	14.3%
Native Hawaiian or Other Pacific Islander	9	0.5%
White	926	47.0%
Two or more races	142	7.2%
Unknown	235	11.9%

<b>Table 2: Pell Grant Recipients by Gender and Race/Ethnicity</b>		
	Total Enrolled	Percentage
Pell Grant Recipients	358	100%
<b>Gender</b>		
Male	113	31.6%
Female	245	68.4%
<b>Race/Ethnicity</b>		
Nonresident Alien	0	0.0%
Hispanic/Latino	48	13.5%
American Indian or Alaska Native	7	1.9%
Asian	3	0.8%
Black/African American	76	21.2%
Native Hawaiian or Other Pacific Islander	3	0.8%
White	156	43.6%
Two or more races	18	5.0%
Unknown	47	13.2%

*Note:* Information reported on student diversity for all enrolled students is from the IPEDS 12-Month Enrollment Survey 1, July 1, 2015 to June 30, 2016 time frame. Pell recipients were those students from the 12-Month Enrollment survey who were disbursed Pell funds during the July 1, 2015 to June 30, 2016 time frame.

### **Alumni Information**

The following data represents Western International University alumni polled through the Western International University Graduation Survey between March 2013 and February 2014 to identify the impact their degree has had on their life.

<b>West Graduation Survey(459 total Survey Respondents)</b>	<b># of Survey Respondents</b>	<b>% of Survey Respondents</b>
West Alumni planning to attend graduate school in the next 6 to 12 months	114	24.83%

Where Alumni Work at Time of Survey	# of Survey Respondents	% of Survey Respondents
Legal, Business, Personnel, Consultant, Management, Other Services (Manufacturing, Real Estate, Insurance)	95	20.69%
Accounting, Finance, Banking	26	5.66%
Counseling, Social Services, Health Services	6	1.30%
Technology	23	5.01%
Federal, State, Local Government	1	.002%
Military, Transportation, Construction	16	3.48%
Human Resources	9	1.96%
Other	29	6.31%
Not reported	254	55.33%
Benefits of West Education	# of Survey Respondents	% of Survey Respondents
Promotion	136	29.62%
Pay Increase	162	35.29%
N/A	152	33.11%

### Types of Education in Which Graduates Enroll

In accordance with the Higher Education Act (HEA) of 1965, as amended, each postsecondary educational institution must make available information regarding the types of graduate and professional education in which graduates of the institution's four-year degree programs enrolled.

Approximately 11% of students who completed a bachelor's degree from Western International University between July 1, 2014 to June 30, 2015 went on to enroll in a graduate or professional program at Western International University. The most common programs students enrolled in are as follows:

- Master of Business Administration in Management
- Master of Arts in Human Dynamics
- Master of Public Administration

The data is derived from the IPEDS Completions Survey (July 1, 2014 to June 30, 2015 data) and the IPEDS Fall Enrollment Survey (August 1, 2014 to October 31, 2015 data).

### Retention Rates

In accordance with the Higher Education Act (HEA) of 1965, as amended, each postsecondary educational institution must make available information regarding retention rates of degree- or certificate-seeking first-time, full-time (FTFT) undergraduate students entering the institution. Retention rate is a measure of the rate at which students persist in their educational program at an institution, expressed as a percentage. The table shown below is the percentage of FTFT undergraduate degree-seeking students from the previous fall who were still enrolled in the next fall.



<b>Retention Rates for FTFT Bachelor's-Seeking Students</b>	
	8
Count of FTFT undergraduate students enrolled Fall 2015 (8/1/2015 to 10/31/2015) still enrolled in Fall 2016 (8/1/2016 to 10/31/2016)	6
Retention	75.0%

# Financial Aid

Western International University (West) participates in federal financial aid programs designed to give students who need or desire assistance several alternatives in financing their education. To be considered for financial aid at West, students must be accepted into an eligible program of study.

Information and/or forms may be obtained either from a student advisor or through the student portal located in MyWest under the Me tab, Financial Aid.

Students wishing to get further information on Federal Financial Aid should go to <http://studentaid.ed.gov/types> to learn about the federal programs.

## Federal Financial Aid Application Process

To begin the federal financial aid process, students must complete the Free Application for Federal Student Aid (FAFSA), available at <http://www.fafsa.gov>. This is the first step to determining a student's eligibility for federal financial aid.

Federal financial aid will be processed once the student has been granted the admissions status or provisionally admitted status into the University and an eligible program of study. Admissions and program requirements vary by state. Please refer to the University Academic Catalog (<http://west.edu/university-catalog>) for state and/or program specific information.

In addition to the FAFSA, the following forms may be completed during the federal financial aid process:

- Western International University Loan Request Form\*
- Federal Direct Loan Master Promissory Note (MPN)
- Entrance Counseling
- Financial Aid Authorization Form (if, and only if, the student chooses this option)\*

\*Forms located on the MyWest Student website

The average processing time for financial aid awards is 90 days. The University highly recommends the online financial aid application process on the MyWest site. Students have to logon to access the forms. The forms are located on the ME tab under Financial Aid.

Students qualifying for financial aid may receive a new award each academic year (refer to the *Academic Year Policy* in the financial aid appendix for more information). Therefore, the student may have eligibility assessed for grants and/or loans several times during a program of study. A student should reapply for financial aid prior to the start of each new academic year.

The University notifies students when new award year paperwork is required, provided the student is considered enrolled. Returning students may be proactive and submit completed paperwork.

## Statement of Educational Purpose

The parent or student signing a Free Application for Federal Student Aid (FAFSA) certifies the following: (1) will use federal and/or state student financial aid only to pay the cost of attending an institution of higher education, (2) is not in default on a federal student loan or has made satisfactory arrangements to repay it, (3) does not owe money back on a federal student grant or has made satisfactory arrangements to repay it, (4) will notify college if defaulting on a federal student loan and (5) will not receive a Federal Pell Grant from more than one college for the same period of time.

The parent or student, signing the Free Application for Federal Student Aid (FAFSA) agrees, if asked, to provide information that will verify the accuracy of your completed form. This information may include U.S. or state income tax forms filed or required to be filed. In addition, the parent or student certifies and understands that the Secretary of Education has the authority to verify information reported on this application with the Internal Revenue Service and other federal agencies. If the parent or student signs any document related to the federal student aid programs electronically using a FSA ID, username and password, and/or credential that certifies that he or she is the person identified by the FSA ID, username and password, and/or credential and has not disclosed that PSA ID, username and password, to anyone else.

If the parent or student purposely gives false or misleading information, that person may be fined up to \$20,000, sent to prison, or both.

## Referrals to the Office of Inspector General

Western International University is required by law to make referrals to the Office of Inspector General any time there is credible information or evidence that an applicant (student) or any other person may have engaged in fraud or other criminal misconduct in connection with the federal financial aid programs.

## Federal, State, and Institutional Financial Aid Programs

Degree-seeking students who are U.S. citizens or eligible noncitizens admitted to an eligible academic program can apply for federal financial aid as a means of assisting with financing their education. Certificate programs may also be eligible for federal financial aid. Students may also be eligible to receive funding through grant or scholarship programs in their states where available. Depending on the program, student eligibility may be need-based, non-need-based, credit based, or dependent on other specific conditions.

Students should contact a student advisor at (602) 943-2311 or (866) 948-4636 or [inquiries@west.edu](mailto:inquiries@west.edu) for additional information on financial aid programs available (<http://west.edu/contact-us>).

## General Eligibility Requirements

General eligibility requirements for federal financial aid are as follows:

- Submit a current award year Free Application for Federal Student Aid (FAFSA)
- Student must be a U.S. citizen or eligible noncitizen
- Student must have a valid Social Security number
- Student must be admitted to an eligible program
- Student must have a high school diploma or general educational development (GED) credential
- Student must meet applicable satisfactory academic progress (SAP) standards
- Student must meet enrollment status requirements
- Student must have resolved any drug conviction issue
- Student must have a timely registration for Selective Service, if required by law
- Student must not be in default on a loan made under any federal aid program

For additional eligibility requirements, go to <http://studentaid.ed.gov/eligibility/basic-criteria>

## Student/Parent Eligibility Policy

The Student Parent Eligibility Policy addresses student and parent requirements that must be met prior to the University awarding and or the student receiving federal financial aid. For additional information about Student and Parent Eligibility for Federal Student Aid read the *Student and Parent Eligibility Policy*.

## Grant Programs

Western International University participates in the following federal grant programs:

### **FEDERAL PELL GRANT**

A Federal Pell Grant, unlike a loan, does not have to be repaid. Pell Grants are awarded usually only to undergraduate students who have not earned a bachelor's or a professional degree. Pell Grants are considered a foundation of federal financial aid.

Students can receive the Federal Pell Grant for no more than 12 semesters or the equivalent:

<http://studentaid.ed.gov/sa/types/grants-scholarships/pell/calculate-eligibility>.

For more detailed information about Federal Pell Grant, visit <https://studentaid.ed.gov/sa/types/grants-scholarships/pell>

For additional information on how the University calculates and awards Pell Grants please review the *Federal Pell/Iraq and Afghanistan Grant Policy* in the Federal Aid Policies addendum.

### **FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT (FSEOG)**

The Federal Supplemental Educational Opportunity Grant (FSEOG) program is for undergraduates with exceptional financial need. Pell Grant recipients with the lowest expected family contributions (EFCs) will be considered first for a FSEOG. The FSEOG does not have to be repaid.

For more detailed information about FSEOG, visit <https://studentaid.ed.gov/sa/types/grants-scholarships/FSEOG>

For additional information on the University selection criteria and packaging philosophy for awarding campus-based funds please review the *Campus-Based Program Policy* in the Financial Aid Policy addendum.

### **IRAQ AND AFGHANISTAN SERVICE GRANT (IASG)**

A student whose parent or guardian was a member of the U.S. Armed Forces and died as a result of service performed in Iraq or Afghanistan after September 11, 2001 may be eligible to receive the Iraq and Afghanistan Service Grant.

For more detailed information about IASG, visit

<http://studentaid.ed.gov/PORTALSWebApp/students/english/IraqAfghanServiceGrant.jsp>

For additional information on how the University calculated and awards IASG grant please review the *Federal Pell/Iraq and Afghanistan Grant Policy* in the Financial Aid Policies addendum.

State - Arizona

Arizona Commission for Postsecondary Education (ACPE)

(602) 258-2435

<https://www.azhighered.gov/>

### **State Grant Programs**

Students may also be eligible to receive funding through state grant or scholarship programs in their states where available. Depending on the program, student eligibility may be need-based, non-need-based, credit-based, or dependent on other specific conditions. Contact a student advisor at (602) 943-2311 or (866) 948-4636 or <http://west.edu/contact-us> for additional information on state grant and/or scholarship programs.

The actual amount of state grants awarded to any student is contingent on the availability of funds. The University cannot guarantee any funding from the state grant sources listed, as the list is subject to change without notice based upon changes in state budgetary constraints, state law or regulation and/or University participation. Where a work or other requirement is included in order to preclude the conversion of a scholarship or grant to a loan, the University makes no representation or warranty as to whether a graduate will be able to obtain such employment or fulfill such other requirement.

For information regarding state grants offered by the University, how to apply, eligibility, application deadlines, etc., see the list of programs with respective websites and phone numbers below. For additional specific eligibility information, the institution may contact you directly when determining grant eligibility.

### **State - Arizona**

Arizona Commission for Postsecondary Education (ACPE)

(602) 258-2435

<https://www.azhighered.gov/>

## Scholarships

### Loan Information

#### Loan Origination Fees

Loan fees for Direct Subsidized Loans, Direct Unsubsidized Loans and for Direct PLUS Loans (for both parent borrowers and graduate and professional student borrowers) are set by the government and may vary by loan type. An example of a loan fee of 1.072 percent on a \$5,500 loan would be \$58.96.

For more information regarding Federal Student Loan Fees and the current fee rate please visit <http://studentaid.ed.gov/types/loans/interest-rates>

#### Federal Direct Subsidized and Unsubsidized Annual and Aggregate Loan Limits

Federal Direct Subsidized and Unsubsidized Annual and Aggregate Loan Limits are as follows:

Grade Level	Dependent Undergraduate Student	Independent Undergraduate Student	Graduate/Professional Student
<b>1 (Freshman)</b>	\$5,500 – No more than \$3,500 of this amount can be subsidized loan	\$9,500 – No more than \$3,500 of this amount can be subsidized loan	<b>\$20,500 Unsubsidized Loan Only*</b>
<b>2 (Sophomore)</b>	\$6,500 – No more than \$4,500 of this amount can be subsidized loan	\$10,500 – No more than \$4,500 of this amount can be subsidized loan	
<b>3 &amp; 4 (Junior &amp; Senior)</b>	\$7,500 – No more than \$5,500 of this amount can be subsidized loan	\$12,500 – No more than \$5,500 of this amount can be subsidized loan	
<b>Maximum Total Loan Debt (aggregate loan limits)</b>	\$31,000 — No more than \$23,000 of this amount may be in subsidized loans	\$57,500 — No more than \$23,000 of this amount may be in subsidized loans	<b>\$138,500 The aggregate amounts for graduate students include loans for undergraduate study.</b>

Undergraduate certificate programs: Students in undergraduate certificate programs that are greater than an academic year cannot borrow more than the Grade Level 1 loan limits for each academic year.

Final academic years less than 24 credits (graduating students in undergraduate degree or certificate programs that are greater than an academic year): Loan limits will be prorated based on the number of credits in the final academic year divided by 24. Please note you may also receive less funding if you receive other financial aid that is used to cover a portion of cost of attendance.

\*Graduate and professional students are not eligible to receive Direct Subsidized Loans for loan periods beginning on or after July 1, 2012.

A student whose parent cannot obtain a PLUS Loan may be eligible to borrow additional unsubsidized amounts.

### **Federal Education Loan Interest Rates**

For information regarding Federal Student Loan Interest Rates please visit <http://studentaid.ed.gov/types/loans/interest-rates>.

#### Interest Rate Cap for Military Members

During military service, students who qualify under the Servicemembers Civil Relief Act may be eligible for a 6% interest rate cap on the loans you obtained before entering military service. Qualifying students must contact their loan servicer to request this benefit.

In addition, no interest is charged (for a period of no more than 60 months) on Direct Loans first disbursed on or after October 1, 2008, while a borrower is serving on Active Duty or performing qualifying National Guard duty during a war or other military operation or national emergency, and serving in an area of hostilities qualifying for special pay. Qualifying students should contact their loan servicer for eligibility details and to request this benefit.

#### Prior Federal Loans and Financial Aid History

Federal loan borrowers can check the interest rate, servicer information and other financial aid history, via the National Student Loan Data System ([http://www.nslds.ed.gov/nslds\\_SA/](http://www.nslds.ed.gov/nslds_SA/)).

### **Federal Perkins Loan Program**

A Federal Perkins Loan is a low-interest (5%) loan for both undergraduate and graduate students with exceptional financial need. Effective July 1st, 2014 the University no longer awards Perkins Loans.

For more detailed information on Perkins Loan Program, visit <http://studentaid.edu.gov/types/loans/perkins>

### **Private Student Loans**

Understand your rights and responsibilities when considering private loan options. Clear and accurate information can help you make informed choices, so you borrow only what you need and can reasonably repay.

The University encourages that private loans be considered only after all federal and state financial aid options are exhausted. Private loans are made through third-party lenders and other financial institutions and are subject to a credit review and individual lender terms and conditions. These loans are not subsidized or guaranteed by the federal government. For more information on the difference between federal and private loans, please visit <http://www.consumerfinance.gov/paying-for-college/choose-a-student-loan/>

Private student loans may be available to both students and parents who are not eligible for federal financial aid or who need assistance beyond their financial aid eligibility. The lender determines eligibility, and amounts are limited to the cost of attendance minus other aid, including discounts and any other resources received.

Students may choose to use any eligible lender that offers private loans. The University does not maintain a list of lenders that offer private loans, nor will it endorse a particular lender. Students who need a focused resource to assist in finding a private loan may choose to use the list of private loan options developed by FinAid at <http://www.finaid.org/loans/privatestudentloans.phtml>

For additional information, please review the *Private Loan Policy* in the Financial Aid addendum.

### **Federal Direct Loan Program**

Direct Loans, from the William D. Ford Federal Direct Loan Program, are low-interest loans available to eligible students to help cover the cost of higher education. Eligible students borrow directly from the U.S. Department of Education at participating schools.

For additional information on the application process for obtaining a Federal Direct Loan (DL), the applicable period of time for receiving a DL, and the maximum annual and aggregate amounts of DL a borrower may receive, please review the *Direct Loan Policy* in the Financial Aid Policies addendum.

#### Direct Subsidized Loans

Direct Subsidized Loans are for students with financial need. The University will review the results of the FAFSA and determine the amount a student can borrow. The student is generally not charged interest while enrolled in school at least half-time.

Direct Subsidized Loan Time Limitation Note: Federal regulations limit a first time borrower's\* eligibility for Direct Subsidized Loan to a period not to exceed 150 percent of the length of the borrower's educational program. Under certain conditions, first-time borrowers who have exceeded the 150 percent limit may lose the interest subsidy on outstanding Direct Subsidized Loans. For more information on Direct Subsidized Loan Time Limitation, visit:

<https://studentloans.gov/myDirectLoan/directSubsidizedLoanTimeLimitation.action>

\*Generally, a first-time borrower is one who did not have outstanding balance of principal or interest on a Direct Loan or on a FFEL Program Loan on July 1, 2013.

#### Direct Unsubsidized Loans

Direct Unsubsidized Loans are available to students with and without financial need. Like subsidized loans, the University will review the results of the FAFSA to determine the amount a student can borrow. Interest accrues (accumulates) on an unsubsidized loan, even while the student is in school, beginning on the date the loan is initially disbursed. The student can pay the interest, or can allow it to accrue and be capitalized (that is, added to the principal amount of the loan). If a student chooses not to pay the interest as it accrues, this will increase the total amount to be repaid because the student will be charged interest on a higher principal amount.

#### Terms and Conditions

Students who receive a Direct Loan are subject to the terms and conditions disclosed on the Federal Direct Loan Master Promissory Note (MPN) and the Direct Loan Disclosure Statement.

#### Borrower's Rights and Responsibilities

Students who receive a Direct Loan also have varying rights and responsibilities as described in the Borrower's Rights and Responsibilities Statement attached to the Master Promissory Note (MPN).

For more detailed information on eligibility and how to apply for the Federal Direct Loan Program, visit

<http://www.studentaid.ed.gov/types/loans/subsidized-unsubsidized>

#### **Federal Direct PLUS Loan for Parents**

Parents of dependent students may apply for a Direct PLUS Loan to help pay their child's education expenses as long as certain eligibility requirements are met. If a parent is unable to secure a Direct PLUS Loan, the dependent student may be eligible for additional unsubsidized loans.

#### Terms and Conditions

Parent(s) who receive a Direct PLUS loan are subject to the terms and conditions disclosed on the Federal Direct PLUS Loan Application and Master Promissory Note (MPN) at <https://studentloans.gov/myDirectLoan/downloadPDF.action?fileName=FDPL-MPN>.

#### Borrower's Rights and Responsibilities

Parents who receive a Direct PLUS Loan have varying rights and responsibilities as described in the Borrower's Rights and Responsibilities Statement, <http://www2.ed.gov/offices/OSFAP/DirectLoan/plusrights.pdf>, attached to the Master Promissory Note (MPN).

For more detailed information on eligibility and how to apply for the Direct Parent PLUS Loan, visit <http://www.studentaid.ed.gov/types/loans/plus>

#### **Federal Direct PLUS Loan for Graduate and Professional Degree Students**

Graduate and professional degree students can borrow a Direct PLUS Loan to help cover education expenses. Eligibility is dependent upon the applicant's credit history. If it is determined that the applicant has adverse credit history, the applicant will have the option to appeal the credit decision or to obtain an endorser who does not have an adverse credit history.

#### Terms and Conditions

Students who receive a Direct PLUS Loan for Graduate and Professional students are subject to the terms and conditions disclosed on the Federal Direct PLUS Loan Application and Master Promissory Note (MPN) at <http://www.direct.ed.gov/mpn.html>

#### Borrower's Rights and Responsibilities

Students who receive a Direct PLUS Loan have varying rights and responsibilities as described in the Borrower's Rights and Responsibilities Statement, <http://www2.ed.gov/offices/OSFAP/DirectLoan/pubs/plusrights.pdf>, attached to the Master Promissory Note (MPN).

For more detailed information on eligibility and how to apply for the Direct PLUS Loan, visit <http://studentaid.ed.gov/types/loans/plus>

## Financial Aid Awarding

For students who have completed all required financial aid materials, the University will evaluate student eligibility for federal, state, and institutional aid programs.

If a student is eligible, West Financial Aid Office calculates an estimated financial aid award and provides notification to the student. The notification includes eligibility information for each financial aid program awarded, as well as the amount and anticipated disbursement dates. This notification may be electronic. Generally, financial aid awards are divided into two payment periods; 12 credits each. Payment periods are based on individual course schedules and follow academic year requirements.

Federal Pell Grant eligibility for an undergraduate student is estimated before originating a Direct subsidized or Direct Unsubsidized Loan. In addition, a Direct Unsubsidized Loan is not originated without first determining the need for a Direct Subsidized Loan. However, if the amount of the Direct Subsidized Loan is \$200 or less and the amount can be included as part of a Direct Unsubsidized Loan, the University is not required to originate a separate Subsidized Loan.

For a dependent student, the University may originate and disburse Parent PLUS funds without determining Federal Pell Grant and Direct Subsidized Loan eligibility. For a graduate student, the University must determine maximum Direct Unsubsidized Loan eligibility before originating a Graduate/Professional PLUS Loan.

Federal Supplemental Educational Opportunity Grant (FSEOG) eligibility for undergraduate students is determined by the expected family contribution (EFC) for the current award year. Awards are made beginning with the lowest EFC until program funds are obligated.

State grant program eligibility is determined by each state authority. The University is notified of student eligibility by the state authority.

Institutional grant and scholarship eligibility determinations will vary.

### Schedule Requirements

An academic year is defined as a minimum of 24 credits and 36 weeks of instructional time. The academic year begins with the first eligible course of a degree program and ends when a student successfully completes the credits and weeks of instructional time requirements. An academic year has no calendar time constraints and continues through periods of nonattendance that are less than 180 days until both the credit and weeks requirement are met. A week of instructional time includes at least one academic-related activity for federal financial aid.

Students who take three courses at a time within an academic year may need to complete more than 24 credits to complete 36 weeks of instructional time. In addition, the academic policy of the University prohibits a student from taking more than three courses concurrently without written approval.

The University is prohibited from using federal aid to pay for auditing a course or for any course in which an assigned grade is not used in computing requirements for graduation. This includes repeats of grades D or better, unless a higher grade is required. Withdrawals and courses that are not applicable to the declared degree objective are not covered by financial aid.

## Consortium Agreements

### Verification

Institutions are required to verify information provided by students selected for verification. The Verification Policy addresses the different verification groups and types of documents acceptable to complete the verification process. For more information refer to the *Verification Policy* in the Financial Aid Policy addendum.



## Cost of Attendance

A student's cost of attendance (COA) is established for use in calculating federal financial aid eligibility and awarding financial aid for a specific period of enrollment. The University uses the same COA when awarding Pell and Direct Loans. The COA consists of various components to determine eligibility for a period of enrollment. The University reviews and, if necessary, updates each component annually, referencing Consumer Expenditure Survey, U.S. Bureau of Labor Statistics, September, 2015 and reviewing actual institutional data. The University uses estimated monthly living expenses, and an average cost of tuition. Amounts used for the 2017-2018 award year federal cost of attendance (COA) are as follows:

COA Components		Online Campus	
Credential Level	Assoc Degree	Undergrad Degree	Grad Degree
Tuition	\$6,000	\$6,000	\$8,304
Loan Fees	\$59	\$75	\$104
Living Expense per month*	\$575	\$576	\$580
Annual COA	\$11,171	\$11,187	\$13,616
*Living Expenses includes living, transportation, monthly internet, miscellaneous costs			
**Note: housing expenses for Military Basic Allowance for Housing (BAH) is reduced by 72.5%			

For more detailed information regarding actual tuition fees for programs visit <http://www.west.edu/getting-started/financing-education/tuition-a-payment-options>.

### Policy

The University uses an average monthly cost of living expense for all students based on nine months. The University COA consists of the following components:

- Tuition
- Living Expense
  - Room and Board
  - Internet and Education
  - Transportation
  - Miscellaneous (personal care expenses)
- Loan Fees

If a student is attending less than half time, the COA is made up of the following components:

- Tuition

### Tuition

The tuition component for the COA is a weighted average based on modality, certificate, and degree level. The tuition expense for the COA is an average based on modality and certificate and degree level. The University documents how tuition averages are calculated and makes this information available upon request. Exceptions include professional judgment decisions and elimination of an overaward using a student's actual tuition costs for the period of enrollment. (Refer to the *Professional Judgement* and *Overawards & Overpayments Policies* for further information). If a student's period of enrollment is less than a full academic year, costs will be adjusted to match the period of enrollment.

### Living Expense

The living expense component is a per month allowance calculated using data provided in the most recent Consumer Expenditure Survey. The University documents how living expenses components are calculated and makes this information available upon request. Students receiving military housing assistance (Basic Allowance for Housing or BAH) will have a reduction in living expenses in the amount of the room allowance (housing).

### Remaining Period of Study Less than an Academic Year (End of Program)

The end of program (EOP) COA is based on the credits required to complete the program and the weeks of instructional time, converted to months, needed to complete those credits. The months are rounded up and multiplied by the monthly living expense amount to determine the living expense component of the student's COA. The COA will not increase if a remaining period needs to be extended due to the student failing or withdrawing from a course(s) in the prorated period.

### Loan Fees

The University calculates an average loan fee per month based on credit level. The number of months used to determine the living expense component (see above) is also the number of months used to determine the loan fee component in the student's COA. The University documents how loan fee component is calculated and makes this information available upon request.

### Incarcerated Students

The COA for incarcerated students is limited to tuition. (Refer to *Student/Parent Eligibility Policy*) for further information.

## Grade Level Determination

Determination of grade level is an important part of calculating eligibility for federal and state financial aid. The University determines the student's grade level by calculating the total number of credits that have been completed as of the beginning of an academic year. For example, a student with 12 transfer credits at the start of their program at the University will be considered a grade level 1 student. After the completion of one academic year of 24 credits, the student will have a total of 36 credits complete, making the student eligible for grade level 2 loan limits for their second academic year.

The following chart illustrates the number of credits required to complete each grade level.

Grade Level	Credits Applied in Primary Program (Include Transfer Credit)
GL 1 (Freshman)	0 - 24
GL 2 (Sophomore)	25 - 48
GL 3 (Junior)	49 - 72
GL 4 (Senior)	73+

Note: A student in a two-year program cannot receive more than a grade level 2 (GL2) annual loan limit in any given year, no matter how long it takes to complete the program. A student in an undergraduate certificate program cannot receive more than grade level 1 (GL1) annual loan limit in any given year, no matter how long it takes to complete the undergraduate certificate.

For information on academic year definitions, please see the Financial Aid Awarding section.

## Conflicting Information

If the University has conflicting information concerning a student's eligibility or has any reason to believe a student's application information is incorrect, the University will resolve such discrepancies before disbursing student financial aid funds. If discrepancies are discovered after disbursing student financial aid funds, the University will reconcile the conflicting information and require the student to repay any funds for which he or she was ineligible, unless the student is no longer enrolled for the award year. Examples of conflicting information may include, but are not limited to, the following:

- Social security numbers
- Date of birth
- Legal name
- Discrepant tax data (including whether or not the student/parent was required to file a tax return)
- Household size or marital status
- Citizenship status

## Other Resources

Students are required to disclose financial assistance that will be paid by a third party on their behalf. When a portion of a student's cost of attendance is waived or paid by another source, other than federal financial aid, this is considered other resources. Examples of other resources include, but not limited to, the following:

- External grants and scholarships
- University grants and scholarships
- Tuition assistance
- Military tuition benefits
- University tuition discounts and waivers
- University administration tuition and/or student account adjustments
- Income from insurance programs that pay for the student's education
- Private loans
- Private and State grants
- Tribal aid
- Other financial assistance paid directly to the University

**Note:** Adjustments to tuition due to an approved Leave of Absence, early payment discounts and cash payments made by the student will not count as other resources.

A student must have financial need to receive all federal financial aid funds except for Direct Unsubsidized and PLUS Loans under the Direct Loan program. As such, a student's expected family contribution and other resources will be subtracted from the cost of attendance when determining eligibility for federal financial aid (Title IV). All awards, including need and non-need based aid, cannot exceed a student's annual cost of attendance.

If the University receives additional other resources that cause the student to exceed the cost of attendance, it will adjust the awards appropriately to eliminate the over-award. This may include reducing future disbursements for a second or subsequent payment period or returning awards to the funding source. Funds will be returned in the order most beneficial to the student.

## Determining Enrollment at the University

Active enrollment is determined by a student's continuous attendance at the University. A student is considered to be in continuous attendance as long as no more than 14 days exist between academically related activities. For exceptions to this 14-day requirement, please refer to Withdrawing from the University section. For additional information, please see Academically Related Activities.

Students may have one of the following active enrollment statuses based upon the academic workload for his/her program:

**Active Full-Time:** The student's required academic workload for his/her program is at least 6 credits for an academic year, the student is actively attending class and the student's official last date of attendance based on Academically Related Activities (ARAs) does not exceed 14 days. Institutionally Scheduled Breaks and Incomplete Grade Extensions are excluded from the 14 day out of attendance calculation.

**Active Less Than Half-Time:** The student's required academic workload for his/her program amounts to less than the 6 credits for an academic year, as determined by the institution. In addition, the student is actively attending class and student's official last date of attendance based on ARAs does not exceed 14 days. Institutionally Scheduled Breaks and Incomplete Grade Extensions are excluded from the 14 day out of attendance calculation.

**Note:** A student must be considered enrolled and attending the University to maintain financial aid eligibility.

### Course Attendance Policy

Since West offers non-traditional course schedules, governmental compliance requires tracking of student attendance. Student adherence with the West attendance policy is mandatory. Course attendance requirements are as follows:

1. Students must post at least one attendance within the first eight calendar days of a course.

2. Students must post at least one attendance every 14 calendar days.

Online attendance will be taken every time one of the following activities is completed by the student:

- Submitting the Knowledge Check associated with a lecture video
- Submitting weekly assignments
- Completing graded tests and quizzes

West Interactive Online course attendance will be taken every time one of the following activities is completed by the student:

- Attending a live online session
  - Submitting the alternative assignment through MyWest after viewing a recorded session
  - Submitting assignments through MyAssignments on MyWest
  - Submitting exams or quizzes through MyAssessments on MyWest
- On-campus attendance will be taken every time one of the following activities is completed by the student:
- Physically attending a class session on campus
  - Submitting assignments through MyAssignments on MyWest
  - Submitting exams or quizzes through MyAssessments on MyWest
  - Answering or replying to a discussion forum

On-campus students are responsible for documenting their attendance by signing the class roster during class. All other attendance will be captured automatically as activities are completed.

Attendance will be recorded on the date of the activity based on Arizona time. Attendance guidelines outlined in this section present the minimum administrative requirement for a student to be eligible to receive an earned grade in a course. Instructors may refuse to confirm attendance for a student who remains for only a portion of a class meeting. Students are encouraged to retain copies of all sent items related to attendance compliance until the course is complete and grades are issued. Success in a course is based on the substance of coursework, not attendance.

### **Independent Study Attendance**

Courses completed through independent study require weekly live sessions with the assigned faculty member. These attendance contacts must be direct/live communication. Phone, fax, email, and viewing recorded sessions do not constitute attendance. It is the student's responsibility to initiate weekly contacts with the instructor for each of the scheduled weeks of the course. Students who do not fulfill Independent Study course requirements will be issued a grade of "F."

### **Academically Related Activities**

Academically related activities (ARAs) are used to determine a student's official last date of attendance and corresponding enrollment status at the University. ARAs are also used to determine the effective date of active and withdrawn enrollment statuses.

Academic attendance is captured when students complete academically related activities (ARAs). The following activities in a program applicable course will constitute an academically related activity.

- On campus course – physically attending a ground course
- On campus course and Interactive online course – posting to a discussion board
- Online course - submitting a Knowledge Check
- Interactive online course - attending a live online course
- Interactive online course - submitting an alternative assignment through MyWest after viewing a recorded session
- All courses - submitting an assignment through MyAssignments on MyWest
- All courses - submitting exams or quizzes through MyAssessments on MyWest

## Satisfactory Academic Progress

Information regarding University academic progression requirements for individual programs and information regarding the University's program and cumulative grade point average policy may be found in the University Academic Catalog at <http://west.smartcatalogiq.com/en>

### **Federal Financial Aid Satisfactory Academic Progress Policy**

The University's Federal Financial Aid Satisfactory Progress (SAP) policy determines whether an otherwise eligible student is making satisfactory academic progress in an educational program and may receive financial aid under the Title IV, HEA programs. This SAP policy does not supersede the University's academic SAP policy.

#### Policy

Students must maintain SAP throughout the duration of their academic program to be eligible for federal financial aid. SAP is assessed by *qualitative* and *quantitative* measures and is evaluated at the end of each completed payment period in the student's academic program.

#### *Qualitative Measure*

##### Grade Point Average

Undergraduate students must have an overall programmatic grade point average (GPA) of 2.0 at the end of each completed payment period, unless otherwise defined by academic policy. Graduate students must have a program GPA of 3.0 at the end of each completed payment period.

A student's overall programmatic GPA is calculated using only those grades earned at the University that are applicable to the current program of study. The overall programmatic GPA is computed by adding the program applicable cumulative grade quality points earned (calculated by multiplying the credit hours and the weight of the grade earned in the course) and dividing it by the program applicable cumulative total number of credit hours completed.

Courses from which the student withdraws are not included in the overall programmatic GPA calculation for the qualitative measurement.

#### Qualitative Exclusions

The following are *excluded* from the qualitative computation:

- Waivers
- National Testing Programs
- Courses with the following grades:
  - Audit (AU)
  - Incomplete (I)
  - Passing (P)
  - Withdrawal (W)
  - No Credit (NC)
- Assessed Credits

#### *Quantitative Measure*

Each academic program has a published standard credit load for completion. The quantitative standard will automatically be evaluated for all periods of attendance at the University, including periods the student did not receive federal financial aid.

#### *Maximum Timeframe*

The maximum timeframe to complete the program cannot exceed 150% of the published length of the program measured in credit hours attempted for undergraduate and graduate students. Progress is evaluated cumulatively at the completion of each payment period for a student's primary program of study to ensure completion of the program within the 150% maximum timeframe.

If a student cannot complete the program of study within the maximum timeframe (as determined at the end of the payment period), the student will be placed on financial aid disqualification (FD) status and will not have the ability to appeal.

#### Pace of Completion

The quantitative measure – pace is calculated using the following formula:

$$\frac{\text{Cumulative number of credit hours the student successfully completed}}{\text{Cumulative number of credit hours the student attempted}}$$

At the end of each payment period, the student's pace of completion is evaluated. Students must earn at least 67% of the credit hours attempted toward completion of the primary program of study. Credit hours taken at other institutions and accepted toward a student's primary program of study at the University are included in both attempted and completed credit hours when measuring pace of completion.

Courses from which the student withdraws are counted as attempted credit hours when calculating the quantitative measurement or program pace.

#### Included in Pace of Completion

The following are included as attempted in the pace of completion calculation:

- Assessed Credits
- W status (Withdrawal)
- Courses completed with the following grades:
  - A, B, C, D, F, IA, IB, IC, ID, and IF (+/-)

#### Evaluation

The University evaluates SAP for student's primary program of study based on a completed payment period (generally, at least 12 credit hours). As a result of the evaluation, a student is assigned a federal financial aid SAP status.

#### Financial Aid Warning

Undergraduate students who have less than a cumulative 2.0 GPA, or otherwise minimum as stated in policy and graduate students who have less than a 3.0 GPA OR who do not earn 67% of the credits they attempt (cumulatively) at the end of a completed payment period, are automatically placed on "financial aid warning" (FW) status. The University can disburse federal financial aid funds to students on financial aid warning (FW) status for one payment period.

#### Financial Aid Disqualification

If a student on FW status does not meet SAP(qualitative and/or quantitative measure) at the end of the subsequent completed payment period, the student is not eligible for additional federal financial aid and will be placed on a financial aid disqualified (FD) status. Students who are placed on FD status are ineligible for federal financial aid.

#### Financial Aid Probation

Students who are granted an appeal will be placed on financial aid probation (FP) status and will have their financial aid eligibility reinstated based on the appeal. The University can disburse federal financial aid funds to students on FP status for one probationary payment period provided all other eligibility requirements are met. The student must meet the University's SAP standards to maintain federal financial aid eligibility.

#### Student Notification

The University will notify students at any point during their enrollment if they are placed on or taken off the FW, FP, FD or Regular Student (RG) statuses, as these affect student eligibility to receive federal financial aid.

#### Student Financial Aid Appeals

*Student Financial Aid Appeals*

Students placed on FD status due to a violation of the qualitative and/or quantitative standards during the financial aid warning period, may appeal the disqualification to regain eligibility for federal financial aid. Students may do so by submitting an appeal to the West Financial Aid Office. If there are unusual circumstances that should be considered during the appeal process, federal financial aid reinstatement may be possible during a financial aid probation period.

Approval and/or reinstatement of federal financial aid eligibility are not guaranteed. The Professional Judgment team reviews all appeals on a case-by-case basis. Approval is only granted when there are significant extenuating circumstances. All decisions made by the Professional Judgment team are final.

The University will allow a student to have a maximum of two approved appeals during the time at the University. These appeals cannot be consecutive and will only be considered if unusual circumstances exist. Examples of unusual circumstances may include, but not limited to the following:

- Death of a relative
- An injury or illness of the student
- Other special circumstances

Students must explain in the appeals process why the nature and timing of their unusual circumstance(s) directly prohibited them from maintaining SAP, and what has changed in their situation that would allow them to demonstrate SAP at the next evaluation. If students have more than 12 credits remaining in their program of study, they must demonstrate they will be able to meet both the qualitative and quantitative measures. If students have 12 or less credits remaining, they must demonstrate the ability to complete the remaining credits successfully.

#### *Regaining Eligibility after Payment Period of Ineligibility*

A student who is not making SAP regains eligibility only when the student complies with the University's SAP requirements. Therefore, if a student loses eligibility for federal financial aid as a result of not meeting SAP requirements, the student must pay for the ineligible payment period using non-federal financial aid funds.

If the ineligible payment period is the second payment period of an academic year/loan period already established, any federal financial aid awarded for the second payment period will be canceled and, if necessary, returned to the funding source.

If, after the ineligible payment period, the student meets all SAP criteria, the student's borrower based academic year (BBAY) will start at the beginning of the eligible payment period following the period of ineligibility.

#### *Maximum Timeframe*

If at any time during the evaluation period it is determined a student is not going to complete the program of study within the maximum timeframe of 150% of the length of the educational program, the student becomes ineligible for federal financial aid. This determination cannot be appealed.

#### *Transfer Credits - Qualitative*

A student's program GPA is calculated using only grades earned at the University in courses that are applicable to the program. Therefore, transfer credits will not apply when calculating the student's GPA at the University. Transfer credits include all credits applied toward the completion of the student's degree program.

#### *Transfer Credits Quantitative*

Credits taken at other institutions and applied towards the student's program at the University are included in both attempted and completed hours when measuring the student's pace towards completion.

#### Program Changes

Students who change programs at the University will be re-evaluated to determine which credits apply to the new program. SAP is assessed by *qualitative* and *quantitative* measures and is evaluated at the end of each completed payment period in the student's new program.

If the five conditions of a program change are met, (refer to the *Program Changes Policy* for further information) the student's SAP status will remain as it was in the previous program because the student remains in his/her original payment period. If any one of the five conditions of a program change are not met, the student's SAP status will be set to RG (regular student) in the new program because the student is starting a new academic year and payment periods.

The University will calculate the qualitative and quantitative SAP measures based on all courses applicable to the new program. This includes those courses taken in a previous program that the student withdrew from, successfully completed, or failed.

#### *Repeat Courses*

Grades for prior attempts are excluded when calculating the qualitative component. However, credits from all attempts are included when assessing if a student meets the quantitative component. Although a student may successfully complete a course more than once, only the first passing grade is counted as a completion when calculating the quantitative component.

#### *Concurrent Enrollment*

The University will evaluate SAP for the primary program based on completed weeks and credits of a payment period, regardless of whether or not the student is enrolled concurrently. All credits completed at the University that are applicable to the primary program will apply toward the primary program's GPA.

### **Student Financial Aid Appeals**

#### Student Financial Aid Appeals

Students placed on FD status due to a violation of the qualitative and/or quantitative standards during the financial aid warning period, may appeal the disqualification to regain eligibility for federal financial aid. Students may do so by submitting an appeal to the Student Financial Services – Operations Professional Judgment (SFS-O PJ) Team. If there are unusual circumstances that should be considered during the appeal process, federal financial aid reinstatement may be possible during a financial aid probation period.

Approval and/or reinstatement of federal financial aid eligibility are not guaranteed. The Professional Judgment team reviews all appeals on a case-by-case basis. Approval is only granted when there are significant extenuating circumstances. All decisions made by the Professional Judgment team are final.

The University will allow a student to have a maximum of two approved appeals during the time at the University. These appeals cannot be consecutive and will only be considered if unusual circumstances exist. Examples of unusual circumstances may include, but not limited to the following:

- Death of a relative
- An injury or illness of the student
- Other special circumstances

Students must explain in the appeals process why the nature and timing of their unusual circumstance(s) directly prohibited them from maintaining SAP, and what has changed in their situation that would allow them to demonstrate SAP at the next evaluation. If students have more than 12 credits remaining in their program of study, they must demonstrate they will be able to meet both the qualitative and quantitative measures. If students have 12 or less credits remaining, they must demonstrate the ability to complete the remaining credits successfully.

#### **Regaining Eligibility after Payment Period of Ineligibility**

A student who is not making SAP regains eligibility only when the student complies with the University's SAP requirements. Therefore, if a student loses eligibility for federal financial aid as a result of not meeting SAP requirements, the student must pay for the ineligible payment period using non-federal financial aid funds.

If the ineligible payment period is the second payment period of an academic year/loan period already established, any federal financial aid awarded for the second payment period will be canceled and, if necessary, returned to the funding source.

If, after the ineligible payment period, the student meets all SAP criteria, the student's borrower based academic year (BBAY) will start at the beginning of the eligible payment period following the period of ineligibility.

#### Maximum Timeframe

If at any time during the evaluation period it is determined a student is not going to complete the program of study within the maximum timeframe of 150% of the length of the educational program, the student becomes ineligible for federal financial aid. This determination cannot be appealed.

#### Transfer Credits - Qualitative



A student's program GPA is calculated using only grades earned at the University in courses that are applicable to the program. Therefore, transfer credits will not apply when calculating the student's GPA at the University. Transfer credits include all credits applied toward the completion of the student's degree program.

#### Transfer Credits Quantitative

Credits taken at other institutions and applied towards the student's program at the University are included in both attempted and completed hours when measuring the student's pace towards completion.

#### Program Changes

Students who change program at the University will be re-evaluated to determine which credits apply to the new program. SAP is assessed by *qualitative* and *quantitative* measures and is evaluated at the end of each completed payment period in the student's new program.

#### Repeat Courses

Grades for prior attempts are excluded when calculating the qualitative component. However, credits from all attempts are included when assessing if a student meets the quantitative component. Although a student may successfully complete a course more than once, only the first passing grade is counted as a completion when calculating the quantitative component.

#### Concurrent Enrollment

The University will evaluate SAP for the primary program based on completed weeks and credits of a payment period, regardless of whether or not the student is enrolled concurrently. All credits completed at the University that are applicable to the primary program will apply toward the primary program's GPA.

### **Qualitative Measure and Quantitative Measure**

#### Qualitative Measure

##### Grade Point Average

Undergraduate students must have a cumulative program grade point average (GPA) of 2.0 at the end of each completed payment period, unless otherwise defined by academic policy. Graduate students must have a program GPA of 3.0 at the end of each completed payment period.

A student's cumulative GPA is calculated using only those grades earned at the University that are applicable to the current program of study. The program GPA is computed by adding the program applicable cumulative grade quality points earned (calculated by multiplying the credit hours and the weight of the grade earned in the course) and dividing it by the program applicable cumulative total number of credit hours completed.

Courses from which the student withdraws are not included in the program GPA calculation for the qualitative measurement.

#### Qualitative Exclusions

The following are excluded from the qualitative computation:

- Waivers
- National Testing Programs
- Courses with the following grades:
  - Audit (AU)
  - Incomplete (I)
  - Passing (P)
  - Withdrawal (W)
  - No Credit (NC)
  - Assessed Credits

#### Quantitative Measure

Each academic program has a published standard credit load for completion. The quantitative standard will automatically be evaluated for all periods of attendance at the University, including periods the student did not receive federal financial aid.

### Maximum Timeframe

The maximum timeframe to complete the program cannot exceed 150% of the published length of the program measured in credit hours attempted for undergraduate and graduate students. Progress is evaluated cumulatively at the completion of each payment period for a student's primary program of study to ensure completion of the program within the 150% maximum timeframe.

If a student cannot complete the program of study within the maximum timeframe (as determined at the end of the payment period), the student will be placed on financial aid disqualification (FD) status and will not have the ability to appeal.

### Pace of Completion

The quantitative measure – pace is calculated using the following formula:

Cumulative number of credit hours the student successfully completed

Cumulative number of credit hours the student attempted

At the end of each payment period, the student's pace of completion is evaluated. Students must earn at least 67% of the credit hours attempted toward completion of the primary program of study. Credit hours taken at other institutions and accepted toward a student's primary program of study at the University are included in both attempted and completed credit hours when measuring pace of completion.

Courses from which the student withdraws are counted as attempted credit hours when calculating the quantitative measurement or program pace.

### Included in Pace of Completion

The following are included as attempted in the pace of completion calculation:

- Assessed Credits
- D status (Dropped)
- W status (Withdrawal)
- Courses completed with the following grades:
  - A, B, C, D, F, IA, IB, IC, ID, and IF (+/-)

### SAP Statures

#### Evaluation

The University evaluates SAP for student's primary program of study based on a completed payment period (generally, at least 12 credit hours). As a result of the evaluation, a student is assigned a federal financial aid SAP status.

#### Financial Aid Warning

Undergraduate students who have less than a cumulative 2.0 GPA, or otherwise minimum as stated in policy and graduate students who have less than a 3.0 GPA OR who do not earn 67% of the credits they attempt (cumulatively) at the end of a completed payment period, are automatically placed on "financial aid warning" (FW) status. The University can disburse federal financial aid funds to students on financial aid warning (FW) status for one payment period.

#### Financial Aid Disqualification

If a student on FW status does not meet SAP (qualitative and/or quantitative measure) at the end of the subsequent completed payment period, the student is not eligible for additional federal financial aid and will be placed on a financial aid disqualified (FD) status. Students who are placed on FD status are ineligible for federal financial aid.

#### Financial Aid Probation

Students who are granted an appeal will be placed on financial aid probation (FP) status and will have their financial aid eligibility reinstated based on the appeal. The University can disburse federal financial aid funds to students on FP status for one probationary payment period provided all other eligibility requirements are met. The student must meet the University's SAP standards to maintain federal financial aid eligibility.

#### Student Notification

The University will notify students at any point during their enrollment if they are placed on or taken off the FW, FP, FD or Regular Student (RG) statuses, as these affect student eligibility to receive federal financial aid.

## Professional Judgment

The Professional Judgment Policy addresses the University’s treatment of a student, on a case-by-case basis, when the student has special circumstances that are not sufficiently addressed by a standard approach. Special circumstances include conditions that differentiate an individual student from a whole population of students. For more information on professional judgments, please refer to the *Professional Judgment Policy* in the Financial Aid Policy Addendum (p. **Error! Bookmark not defined.**).

## Financial Aid Disbursements

Federal Funds.

The Disbursements Policy addresses a student’s eligibility for standard, late, and post withdrawal disbursements from the University. The University may only disburse federal financial aid funds to eligible students. For more information on disbursements, please refer to the *Disbursements Policy* (p. **Error! Bookmark not defined.**) in the Financial Aid Policy Addendum.

Financial Aid Disbursements		
Federal Loans	First Disbursement Eligibility	Second Disbursement Eligibility
Direct First-Time, First-Year Borrower	30 days after academic year or program start date	Successfully completes ½ weeks and credits in academic year or program and has posted attendance for the 2 <sup>nd</sup> payment period
Direct Subsequent Borrower, Parent PLUS, and Graduate/Professional PLUS	10 days after the academic year start date or 10 days after date of certification if the academic year start date is in the past	Successfully completes ½ weeks and credits in academic year or program and has posted attendance for the 2 <sup>nd</sup> payment period
Federal Grants	First Disbursement	Second Disbursement
Pell Grant Iran Afghanistan Service members Grant (IASG)	10 days after the academic year start date* or 10 days after date of certification if the academic year start date is in the past *Pell Grant disbursement for the current award year cannot be made until July 1, 2015, regardless of when the academic year starts.	Successfully completes ½ weeks and credits in academic year or program and has posted attendance for the 2 <sup>nd</sup> payment period*. *Pell Grant disbursement for the current award year cannot be made until July 1, 2015, regardless of when the academic year starts.
FSEOG	10 days after the academic year start date* or 10 days after date of certification if the academic year start date is in the past *FSEOG disbursement for the current award year cannot be made until July 1, 2015, regardless of when the academic year starts.	Successfully completes ½ weeks and credits in academic year or program and has posted attendance for the 2 <sup>nd</sup> payment period*. *FSEOG disbursement for the current award year cannot be made until July 1, 2015, regardless of when the academic year starts.
State Grants	First Disbursement	Second Disbursement
	Varies Dependent on individual state requirements	
Private Loans	First Disbursement	Second Disbursement
	Varies Dependent on private lender requirements	

Federal Financial Aid Credit Balance Policy

The Federal Financial Aid Credit Balance Policy addresses federal financial aid credit balances and how the University handles those credit balances when they occur on a student's account. Whenever the University credits federal financial aid funds to a student's account and those funds exceed the student's allowable charges, a federal financial aid credit balance occurs. The University will pay the excess federal financial aid funds directly to the student or parent as soon as possible, but no later than 14 days after the balance occurred on the student's account unless an Authorization to Hold Funds form is on file. For more information, please review the *Federal Financial Aid Credit Balance Policy* in the Financial Aid Policies appendix.

## Financial Aid Counseling

Students borrowing federal loans for the first time must complete online loan entrance counseling at the U.S. Department of Education website (<https://studentloans.gov/myDirectLoan/index.action>). Federal loans cannot be disbursed until loan entrance counseling is complete. Entrance counseling generally includes the following:

- An explanation of the use of a master promissory note (MPN)
- Importance of repayment obligation
- Description of consequences of default
- Sample repayment schedules
- Information in reference to a borrower's rights and responsibilities
- Information on the National Student Loan Data System (NSLDS), [http://www.nsls.ed.gov/nsls\\_SA/](http://www.nsls.ed.gov/nsls_SA/)
- Information on possible loss of eligibility for additional Direct Subsidized loans, including information on how a borrower's maximum eligibility period, remaining eligibility period, and subsidized usage period are determined
- The potential for a borrower becoming responsible for all accruing interest on Direct Subsidized loans during in-school periods, grace periods (for loans first disbursed on July 01, 2012 through June 30, 2014), and periods of authorized deferment
- Other terms and conditions

The goal of entrance counseling is to help the student understand what it means to borrow federal student loans. More details about entrance counseling can be viewed online at the Federal Student Aid website, <http://studentaid.ed.gov/fafsa/next-steps/entrance-counseling>

### **Federal Direct Loan Exit Counseling**

Loan exit counseling is conducted online at the U.S. Department of Education website (<https://studentloans.gov/myDirectLoan/index.action>) shortly before the student ceases at least half-time enrollment, within 30 days of completion of a program or withdrawal from the University. Exit counseling generally includes the following:

- An explanation of the use of a master promissory note (MPN)
- Importance of repayment obligation
- Description of consequences of default
- Sample repayment schedules
- Information in reference to a borrower's rights and responsibilities
- Information on the National Student Loan Data System (NSLDS), [http://www.nsls.ed.gov/nsls\\_SA/](http://www.nsls.ed.gov/nsls_SA/)
- Information on possible loss of eligibility for additional Direct Subsidized loans, including information on how a borrower's maximum eligibility period, remaining eligibility period, and subsidized usage period are determined
- The potential for a borrower becoming responsible for all accruing interest on Direct Subsidized loans during in-school periods, grace periods (for loans first disbursed on July 01, 2012 through June 30, 2014), and periods of authorized deferment
- Impact of accruing interest on the borrower's total debt
- Other terms and conditions

## Financial Aid Repayment

### Prior Federal Student Loan Deferments (Postponing Payments)

A student who is registered and attending classes at the University can postpone making payments on federal student loans from previous colleges by requesting a deferment from the loan holder or servicer. Return all deferment forms to the University Registrar Office for processing. The loan holder or servicer makes the final determination to grant a deferment request.

There are a variety of additional circumstances which allow students to postpone payments on their federal loans. Detailed information regarding deferments may be viewed at <http://studentaid.ed.gov/repay-loans/deferment-forbearance>

Receiving a deferment is not automatic. Borrowers must formally request a deferment through the procedures established by the holder of their loan(s).

### Loan Payment Calculator

Loan payment calculators may be used by students or potential students to calculate monthly payments under the different student loan repayment plans available.

The Repayment Estimator at <https://studentloans.gov/myDirectLoan/mobile/repayment/repaymentEstimator.action> allows students to estimate their payment under all available repayment plans.

#### Sample Standard Repayment Calculator Detail

Interest Rate:	6.80%	Loan Amount:	\$12,000
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With the standard plan, a fixed payment amount each month until loans are paid in full. Monthly repayments will be at least \$50, and have up to 10 years to repay.

Months in Repayment	120
Monthly Payment	\$138
Total Interest Payment	\$4,572
Total Loan Payment	\$16,572

Extended Repayment—is only available for loan amounts greater than \$30,000.

Graduated Repayment Detail—120 months starting at a payment of \$80 and a final monthly payment amount of \$239. Total interest paid would be \$5,832 for a total of \$17,832.

Payment amounts under the Pay As You Earn, Revised Pay As You Earn, Income-Based, and Income-Contingent repayment plans will be available in the Repayment Estimator after you enter your tax filing status, adjusted gross income, family size and state of residence.

### Federal Student Loan Consolidation

A Direct Consolidation Loan allows a borrower to combine multiple federal student loans into one, which results in one bill and one lender. It can also lower monthly payments by giving borrowers up to 30 years to repay their loans; however, by increasing the length of the repayment period, you will also make more payments and pay more in interest. Most federal student loans, including the following, are eligible for consolidation:

- Direct Subsidized Loans
- Direct Unsubsidized Loans
- Subsidized Federal Stafford Loans
- Unsubsidized Federal Stafford Loans
- Direct PLUS Loans
- PLUS loans from the Federal Family Education Loan (FFEL) Program

- Supplemental Loans for Students (SLS)
  - Federal Perkins Loans
  - Federal Nursing Loans
  - Health Education Assistance Loans
  - Some existing consolidation loans
- Detailed information on loan consolidation, including the pros and cons to consider, may be found at <http://studentaid.ed.gov/repay-loans/consolidation>

### **Federal Student Loan Forgiveness, Cancellation, and Discharge**

In certain situations, borrowers can have their federal student loans forgiven, canceled or discharged. Below is a list of the type of forgiveness, cancellation, and discharges available.

- Total and Permanent Disability (TPD) Discharge
- Death Discharge
- Discharge in Bankruptcy (in rare cases)
- Closed School Discharge
- False Certification of Student Eligibility or Unauthorized Payment Discharge
- Unpaid Refund Discharge
- Teacher Loan Forgiveness
- Public Service Loan Forgiveness
- Perkins Loan Cancellation and Discharge (includes Teacher Cancellation)

Detailed information on these options is available at <http://studentaid.ed.gov/repay-loans/forgiveness-cancellation>

## Leave of Absence Policy

### **Overview**

The Leave of Absence (LOA) Policy addresses the temporary interruption in a student's program of study, when the student is not in attendance at the University. The LOA Policy is applicable to all students enrolled in certificate and degree programs at the University. If a student is not actively enrolled in a program, the student is not eligible to apply for an LOA.

### **Policy**

Students may be approved by the University for multiple LOAs in a 12-month period. The total of all approved LOAs may not exceed 180 days in the 12-month period. During an approved LOA, the student is not considered withdrawn and no Return of Title IV (R2T4) calculation is required for financial aid recipients.

### **Required Documentation**

An LOA may be approved only if the University determines there is a reasonable expectation the student will return. Students must follow the University's LOA policy when requesting the LOA, by providing (on or before the start date of the LOA) a completed University LOA request form or a written, signed and dated request, including the reason for the LOA to West Financial Aid Office.

If unforeseen circumstances prevent a student from providing a request for the LOA to the campus on or before the start of the LOA, the University may grant the LOA if the campus has documented the reason and decision. The University must collect the signed LOA request form from the student later and provide it to West Financial Aid Office within a reasonable amount of time from the last date of attendance. Unforeseen circumstances may include, but are not limited to, medical and family emergencies, military, jury duty, business travel, University course cancellation and/or facility closure, and natural disasters.

If a student is out of attendance due to an unforeseen circumstance and considered an unofficial withdrawal and the University can document the reason and decision for the LOA prior to the Return of Title IV (R2T4) calculation being performed, the student will be placed on an approved LOA and no calculation will be required.

An LOA will not be approved if a student requests an LOA after 14 consecutive days of nonattendance, has a current enrollment status of unofficial withdrawal (UNW) and the request is not due to unforeseen circumstances that occurred prior to the UNW status.

If a student requests an LOA start date in the future and is officially withdrawn, unofficially withdrawn, or administratively withdrawn from the University prior to the start date of the LOA, the LOA is not valid and will be canceled.

### **Length**

In determining the length of the LOA, the LOA start date is the first day of the LOA and the LOA end date is the day before the start date of the course the student is returning to at the University. The first day of the student's initial LOA is used when determining the start date for the 12-month period. If a student is granted an LOA due to unforeseen circumstances, the beginning date of the approved LOA, as recorded by the student on the LOA form, is the date the student was unable to attend class because of unforeseen circumstance.

The course start date will cease the LOA day count; however, the University's academic system of record will use an active enrollment status effective date as determined by the date the student posts an academic related activity (ARA) in the course the student returns to at the University. NSLDS Enrollment Reporting will use the standard effective date for an active enrollment (i.e. course start date). A new LOA request form will be required for any additional LOAs.

*Note:* At the time of the LOA approval, the University will review the LOA dates requested by the student and may adjust those dates based on ARAs, class schedules, etc.

### **Extending an LOA**

A student may request an LOA extension as long as the request is made before the scheduled return date. Students must follow this policy when requesting the LOA extension, by providing on or before the scheduled end date, a written, signed, and dated request, including the reason for the LOA extension to West Financial Aid Office.

Institutionally Scheduled Breaks

### **Disbursements during an LOA**

The University may disburse Pell, IASG, and FSEOG funds to a student on an LOA during certain times of the year. Federal financial aid funds that are part of a credit balance created before the student began an LOA may be paid to the student, since those funds were disbursed before the student went on the LOA.

### **Completion of Coursework upon Return**

If a student starts an approved LOA in the middle of a course, the University must ensure no additional charges for this course are incurred when the student returns from the LOA. To ensure no additional charges for this course are incurred, the University will issue the student an LOA Credit (LOAC). This LOAC will be applied to the course scheduled after the LOA end date.

### **Failure to Return**

The University will advise the student, prior to granting the LOA, that failure to return from an LOA may affect the loan repayment terms, including the expiration of the student's grace period. If a student does not return from an approved LOA, the withdrawal date and beginning of the grace period will be the student's last date of attendance.

If the student reenters, after withdrawing from the University, the previously approved LOA days will count toward the student's LOA maximum of 180 days in a 12-month period.

## **Return of Title IV (R2T4) Policy**

The Return of Title IV Policy addresses federal financial aid recipients who withdraw from the University and are subject to a Return of Title IV (R2T4) calculation. For the purpose of R2T4 calculation requirements, a recipient is a student who has actually received federal financial aid funds or has met the conditions that entitled the student to a late disbursement of federal financial aid funds. The University is required to review the amount of federal loan and grant a student received for the payment period to determine what percentage of federal financial aid the student earned prior to withdrawal. The percentage of federal financial aid determined to be unearned for the payment period must be returned to the appropriate federal financial aid program(s). For more information, please review the entire *Return of Title IV Policy* (p. **Error! Bookmark not defined.**) in the Financial Aid Policy Addendum.





## Military Benefits

Students who are entitled to U.S. Department of Veterans Affairs (DVA) education benefits must make initial contact with a student advisor. A formal application for admission to the University should be completed before applying for DVA education benefits. Application for veteran education benefits should be sent to West's certifying official for submission to the DVA. Each Western International University program segregated by instructional modality (classroom based or distance education), requires separate State Approving Agency (SAA) approval for the training of veterans or eligible persons. A student should contact West for information on current approvals.

Western International University Veterans Affairs Office will automatically certify the courses for VA Educational Benefits unless the student communicates otherwise. Individuals will need to communicate request to not certify a course by email or phone. By submitting the request the individual acknowledges, and agrees that he/she will not receive the following VA Educational Benefits for the courses listed below and will be responsible for payment of all tuition, fees and costs. (VA33-Post 9/11 recipients further acknowledge they will contact a student advisor for payment options).

DVA education benefit eligibility and payment rates vary depending on each individual's military history and educational program being pursued. Only the DVA can determine DVA education applications eligibility. For information, a student should contact a DVA representative, toll free at (888)-GI-BILL-1 (888-442-4551) or review <http://www.gibill.va.gov>. Western International University does not participate in the DVA education advanced payment program. Visit the U.S. Department of Veterans Affairs website at <http://www.gibill.va.gov> for additional information on educational entitlements. On April 27, 2012, the President of the United States signed Executive Order 13607, Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans/Spouses, and Other Family Members. This Executive Order addresses key areas relating to Federal military and veterans educational benefits programs. Military or affiliated students may qualify for federal assistance or student loans under federal financial aid programs (Title IV).

For estimates of your total financial aid package and Title IV, please visit: <https://westshoppingsheet.regenteducation.net/>

## Credit for Prior Education and Training

Credit for prior education or training must be evaluated and reported to the U.S. Department of Veterans Affairs (DVA) prior to the start of week 25 of enrollment. The DVA may not always pay DVA education benefits after week 24 if the DVA records indicate the student has a large amount of transfer credits.

Please ensure all prior education transcripts, and Joint Services Transcripts (JST) (Army, Navy, Marine), Coast Guard Institute transcripts, or DD-295, DD-214, are submitted for evaluation in a timely manner. It is the student's responsibility to ensure that all transcripts are submitted to the University. Academic credit earned for courses appearing on an official transcript from a regionally accredited, or candidate for accreditation, college or university will be evaluated according to University policies and accepted subject to the approval of the University Registrar Office.

Transfer credits based on a different unit of credit than the one prescribed by Western International University are subject to conversion before being transferred. Only the official transcript and course evaluations performed by the University Registrar Office are final. Any preliminary reviews by campus personnel are unofficial, not binding, and subject to change.

## Military Tuition Assistance

To obtain federal military tuition assistance, visit your education or Navy College Office to receive college counseling and develop an education plan. From that point, a student can submit a military tuition assistance request; for more information, students may speak with a student advisor at (602) 943-2311 or (866) 948-4636.

A student can currently receive 100 % of federal tuition assistance from military service, with a \$250 cap per semester hour, and a \$4,500 annual limit. If a student wants to apply for military tuition assistance, a student will need to submit a completed authorization form to a student advisor at least two weeks before a course start date, and the student will need to contact their educational officer at their branch of service.

## DVA Tuition Assistance Top-Up Benefit

Active duty students requesting to use the Tuition Assistance Top-Up (TATU) benefit program should direct all questions or concerns to the Department of Veteran Affairs (DVA) at 888-GI-BILL-1 (888-442-4551) or online at <http://www.gibill.va.gov/>. Western International University VA certifying official is not involved in the processing of any TATU request.

## Readmission of Servicemembers

Any student whose absence from Western International University is necessitated because of service in the uniformed services is entitled to readmission if the following are met:

1. The student (or an appropriate officer of the Armed Forces or official of the Department of Defense) gives oral or written notice to the University Registrar Office confirming the absence from the University was necessitated by service in the uniformed services.
2. The cumulative length of the absence and all previous absences from Western International University because of service in the uniformed services does not exceed five years.

Upon receipt of deployment orders, students should be advised to notify the University Registrar Office, either orally or in writing. It is recommended that a copy of the military deployment paperwork or a signed official letter from the commanding officer be submitted to your local campus. Although this formal documentation is not required at the time of deployment, it will be necessary in order to be readmitted.

A student who submits an application for readmission to the University must provide documentation to establish that:

1. The student has not exceeded the specified service limitations; and
2. The student's eligibility for readmission has not been terminated.

The University may not delay or attempt to avoid a readmission of a student under this section by demanding documentation that does not exist, or is not readily available, at the time of readmission.

A student's eligibility for readmission to the University under this section because of a student's service in the uniformed services terminates upon the occurrence of any of the following events:

1. A separation of such person from the Armed Forces (including the National Guard and Reserves) with a dishonorable or bad conduct discharge;
2. A dismissal of such person permitted under section 1161(a) of Title 10, U.S.C.; or
3. A dropping of such person from the rolls pursuant to section 1161(b) of Title 10, U.S.

*Note:* If the student does not submit a notification of intent to reenroll within the time limits, the student is subject to the University established leave of absence policy and general practices.

## Satisfactory Academic Progress for DVA Education Benefits

Information regarding University academic progression requirements for individual programs and information regarding the University's program and cumulative grade point average policy may be found in the University Academic Catalog at <http://west.smartcatalogogig.com/en>

To receive Department of Veterans Affairs (DVA) education benefits, a student must maintain satisfactory academic progress (SAP) and conduct. Accordingly, benefits will be terminated for individuals who are disqualified, suspended or expelled from the University.

### **Academic Support**

Students are placed on Academic Support when they fall below the program GPA requirement. This status provides the student an opportunity to raise their program GPA to the required level before being placed on Academic Probation. Students will be notified by the Registrar's Office when placed on Academic Support.

Students placed on Academic Support will have two (2) courses to improve their program GPA. While on this status students will be scheduled in a single course schedule pattern. Program GPA will be re-evaluated after each completed course and the student will be removed from the Academic Support as soon as the program GPA is acceptable. Students who do not meet the program GPA requirement after two (2) courses on Academic Support, will be placed on Academic Probation.

Academic Support will be applied to students who are admitted with a GPA below program requirements.

Veterans' benefits and Financial Aid students may continue to receive funds while on Academic Support.

### **Academic Probation**

Academic Probation will occur when a student is not able to reach the program GPA minimum during Academic Support. Students will be notified by the Registrar's Office when placed on Academic Probation.

Students are allowed to complete two (2) courses on Academic Probation during which program GPA must be raised to an acceptable level. While on this status, students will be scheduled in single course schedule pattern. They may also be required to repeat courses with unacceptable grades to improve program GPA. Program GPA will be reevaluated at the end of both courses to determine if the student can be placed back in good standing. Students who do not meet the program GPA requirement at the end of Academic Probation will be Academically Suspended.

Veteran students will continue to receive DVA education benefits during the probation period. The veteran will be informed of the probation, and a notation to the student DVA file will be recorded when the probationary period commenced.

### **Academic Suspension**

Academic Suspension will result if a student fails to clear Academic Probation Status during the two (2) course probationary period. A suspended student may petition to return through the Academic Appeals Process after a period of six (6) months.

Upon approval to return, students are subject to the academic and university polices in effect at the time of re-enrollment. The student must achieve an acceptable program GPA within two (2) courses. Students will be scheduled in courses applicable to their program and may be required to repeat courses with unacceptable grades. While on this status, students will be scheduled in single course schedule pattern.

Students need to work closely with a student advisor during this two (2) course return period. Students who succeed in raising their program GPA will be placed back in good standing. Students who fail to achieve the required program GPA will be academically dismissed from the University.

Veteran students will not be eligible for DVA educational benefits after suspension. The DVA and student will be notified of the suspension.

# Institutional Policies

## Determining Enrollment at the University

Active enrollment is determined by a student's continuous attendance at the University. A student is considered to be in continuous attendance as long as no more than 14 days exist between academically related activities. For exceptions to this 14-day requirement, please refer to Withdrawing from the University section. For additional information, please see Academically Related Activities.

Students may have one of the following active enrollment statuses based upon the academic workload for his/her program:

**Active Full-Time:** The student's required academic workload for his/her program is at least 6 credits for an academic year, the student is actively attending class and the student's official last date of attendance based on Academically Related Activities (ARAs) does not exceed 14 days. Institutionally Scheduled Breaks and Incomplete Grade Extensions are excluded from the 14 day out of attendance calculation.

**Active Less Than Half-Time:** The student's required academic workload for his/her program amounts to less than the 6 credits for an academic year, as determined by the institution. In addition, the student is actively attending class and student's official last date of attendance based on ARAs does not exceed 14 days. Institutionally Scheduled Breaks and Incomplete Grade Extensions are excluded from the 14 day out of attendance calculation.

**Note:** A student must be considered enrolled and attending the University to maintain financial aid eligibility.

### Institutional Break

West's winter break is an institutional break during which attendance requirements are suspended. Typically, students' next attendance must be completed within 14 calendar days. Therefore, attendance calculations are stopped on the first day of the break and resumed after the last day of the break. The calendar days of the institutional break are not included in the attendance calculation.

Students who have courses during December-January are able to post academic activities during the winter break. Those activities will be captured, but not recorded for attendance requirement calculations. Thus, students are required to post attendance prior to and after the winter break. If you have any questions about the winter break or maintaining attendance, please contact a student advisor.

### Course Attendance Policy

Since West offers non-traditional course schedules, governmental compliance requires tracking of student attendance. Student adherence with the West attendance policy is mandatory. Course attendance requirements are as follows:

1. Students must post at least one attendance within the first eight calendar days of a course.
2. Students must post at least one attendance every 14 calendar days.

Online attendance will be taken every time one of the following activities is completed by the student:

- Submitting the Knowledge Check associated with a lecture video
- Submitting weekly assignments
- Completing graded tests and quizzes

West Interactive Online course attendance will be taken every time one of the following activities is completed by the student:

- Attending a live online session
- Submitting the alternative assignment through MyWest after viewing a recorded session
- Submitting assignments through MyAssignments on MyWest
- Submitting exams or quizzes through MyAssessments on MyWest
- Answering or replying to a discussion forum

On-campus attendance will be taken every time one of the following activities is completed by the student:

- Physically attending a class session on campus
- Submitting assignments through MyAssignments on MyWest
- Submitting exams or quizzes through MyAssessments on MyWest
- Answering or replying to a discussion forum

On-campus students are responsible for documenting their attendance by signing the class roster during class. All other attendance will be captured automatically as activities are completed.

Attendance will be recorded on the date of the activity based on Arizona time. Attendance guidelines outlined in this section present the minimum administrative requirement for a student to be eligible to receive an earned grade in a course. Instructors may refuse to confirm attendance for a student who remains for only a portion of a class meeting. Students are encouraged to retain copies of all sent items related to attendance compliance until the course is complete and grades are issued. Success in a course is based on the substance of coursework, not attendance.

### **Independent Study Attendance**

Courses completed through independent study require weekly live sessions with the assigned faculty member. These attendance contacts must be direct/live communication. Phone, fax, email, and viewing recorded sessions do not constitute attendance. It is the student's responsibility to initiate weekly contacts with the instructor for each of the scheduled weeks of the course. Students who do not fulfill Independent Study course requirements will be issued a grade of "F."

### **Academically Related Activities**

Academically related activities (ARAs) are used to determine a student's official last date of attendance and corresponding enrollment status at the University. ARAs are also used to determine the effective date of active and withdrawn enrollment statuses.

Academic attendance is captured when students complete academically related activities (ARAs). The following activities in a program applicable course will constitute an academically related activity.

- On campus course – physically attending a ground course
- On campus course and Interactive online course – posting to a discussion board
- Online course - submitting a Knowledge Check
- Interactive online course - attending a live online course
- Interactive online course - submitting an alternative assignment through MyWest after viewing a recorded session
- All courses - submitting an assignment through MyAssignments on MyWest
- All courses - submitting exams or quizzes through MyAssessments on MyWest

## **Student Financial Responsibilities and Options**

Once a student is admitted to a program, Western International University offers a variety of payment options to manage his or her education investment. Available payment options allow students flexibility in meeting their individual needs. It is the student's responsibility to select a primary payment option. Each payment option requires the completion of specific forms and adherence to payment guidelines. The primary payment option will be selected with the completion of the Student Finance Agreement. Failure to select a payment option, or maintain the requirements of a payment option, will default the account to a Cash Payment option.

Students may update their primary payment option provided they are in compliance with their current payment option. The student will need to complete a new Student Finance Agreement and any other required paperwork.

Students are ultimately responsible for all services rendered by Western International University, regardless of payment option. Students with outstanding balances will not be able to receive grades, transcripts, or diplomas, or register for courses. Failure to comply with this financial agreement may result in administrative withdrawal, no course credit, referral to collections, and an unfavorable credit reference.

Western International University may assess reasonable collection and attorney's fees incurred to collect any delinquent balance.

## Tuition and Fees

Type of Fee	Amount	Amount Active Military
Curriculum Tuition Per Credit		
Undergraduate- Online	\$250	\$250
Graduate- Online	\$350	\$250

### Payment Plans

The following payment options are available to students:

#### Cash Payment Option

Cash Payment option students are required to pay all tuition and fees by the 25th of month prior to the class start. Students who have not paid tuition prior to the first week of class may not be allowed to attend the course. Payment may be made using cash, check, or credit or debit card. Credit cards accepted include American Express, Discover Card, MasterCard, and Visa.

#### Tuition Reimbursement Option

The Tuition Reimbursement option is available to students whose employers have an approved written reimbursement policy. Tuition will be deferred for 60 calendar days from the course start date.

Students must submit a credit card and authorization to charge automatically to secure the deferment. Debit cards may not be used under the Tuition Reimbursement Plan. The student's credit card will be charged 60 calendar days after the course start date. Tuition is deferred for a maximum of two courses per session.

#### Third Party Billing Option

The Third Party Billing option is available to students who request Western International University to bill approved employers, the military, or another agency directly for the cost of tuition. The University has several approved employers; each has its own specific requirements. Students may contact a student advisor for further information.

Approved company tuition vouchers or letters of credit must be received by the University five (5) days prior to the first week of class for each course, if applicable. The student's account may be placed on financial hold should the appropriate documentation not be received prior to the course start date. Any portion of tuition or fees not paid for under the third party billing agreement must be paid by the student prior to the first week of class for each course.

This program does not relieve students of their financial obligation to the University. Students retain full responsibility for ensuring that all tuition and fees are paid in full and in a timely manner.

#### Financial Aid Option

Students may be eligible for the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG) Programs, and/or Federal Direct Loans (Subsidized and Unsubsidized, and PLUS Loans). All students seeking federal financial aid benefits must be admitted to a financial aid eligible degree or certificate program.

In order to be eligible for tuition deferment under the Financial Aid option, at least 50% of a student's annual tuition must be funded through federal financial aid benefits, and the student must have completed the financial aid application process.

To begin the federal financial aid process, students must complete the Free Application for Federal Student Aid (FAFSA), available at <http://www.fafsa.gov>. This is the first step in determining a student's eligibility for federal financial aid. Federal financial aid will be processed once a student has been admitted into the University and an eligible program of study. In addition to the FAFSA, the following forms may be completed during the federal financial aid application process: 1) Loan Request Form, 2) Federal Direct Loan Master Promissory Note (MPN), 3) Entrance Counseling, 4) Financial Aid Authorization Form (if, and only if, the student chooses this option). All forms are located on the MyWest Student website. Students who do not qualify for enough financial aid to cover the full cost of tuition required to complete the academic year are responsible for the portion not covered prior to the first week of the course.

In order to continue tuition deferment beyond the first course after being admitted, the student must provide the University all documents required to complete the certification of federal financial aid funds. Failure to submit these documents, or to qualify for federal financial aid, will default the student to the Cash Payment option and any outstanding balances incurred will be due immediately.

Students must reapply for funding every 24 credits on this plan. To prevent interruption to their educational program, students must begin the reapplication process at least 60 days before the end of their academic year.

Failure to reapply in a timely manner may result in the student defaulting to the Cash Payment option.

This program does not relieve students of their financial obligation to the University. Students retain full responsibility for ensuring that all tuition and fees are paid in full and in a timely manner. Students are responsible for any tuition or fees not covered by financial aid funding.

#### Veterans Educational Assistance

Formal application for admission to the University should be completed before applying for Veterans Educational Assistance. Each West program, course, and location requires separate Arizona Department of Veterans' Services approval for the training of veterans. Students should contact the campus for information on current approved programs.

Application for VA benefits should be sent to the campus for submission to the Department of Veterans' Affairs with enrollment certification. West does not participate in the Department of Veterans' Affairs advance pay program. VA benefit eligibility and assistance rates vary depending on each individual's military history and the educational program being pursued. Only the Department of Veterans' Affairs can determine a VA applicant's eligibility.

To contact a Department of Veterans Affairs representative, students may call toll free (888) 442-4551.

To avoid overpayments, VA educational benefit recipients should promptly report any changes in enrollment or dependency status to the VA Administrator at the University and the Department of Veterans' Affairs.

The University is required to notify the Department of Veterans' Affairs within 30 days of a change in student status during previously certified periods of enrollment.

Changes include withdrawal, reduction in training time, and unsatisfactory academic progress or conduct. Upon receipt of the notice, the Department of Veterans' Affairs is required to take prompt and aggressive action to recover benefit overpayments.

#### Multiple Tuition Discount Policy

For instances in which a student may qualify for multiple tuition discounts, the discount that provides the greatest benefit to the student will be applied to the tuition amount.

#### **Institutional Refund Policy**

All fees are nonrefundable.

Students have the right to a full refund of any monies paid, including application and materials fee – if applicable – if they withdraw within three (3) business days after signing the Enrollment Agreement. Refunds will be paid no later than thirty calendar days after a receipt of a written request of cancellation.

Students are eligible for a tuition refund under the following conditions:

- For a student in a Provisionally Admitted (PV) status, withdrawal from the required introductory course after only attending during the first two course weeks: Refund 100% of tuition paid.
- For all other students, withdrawal from a course after only attending during the first course week: Refund 100% of tuition paid.

Tuition paid for a course from which the student withdraws during the refund period will remain on account to apply to the next course taken.

All requests for refunds must be submitted in writing to the University. The University requires 30 days for processing.

#### Military Tuition Assistance Refund Policy

Students using Military TA will have tuition refunded using the University's Military Institutional Refund Policy.

- Withdrawal from a course after only attending during the first course week (12.5% complete) of a 3 credit course= Refund 100% of tuition paid. Withdrawal from a course after only attending during the first and second course week (25% complete) of a 3 credit course= Refund of 75% of tuition paid.
- Withdrawal of a course after only attending during the first, second and third course week (37.5% complete) of a 3 credit course= Refund of 62.5% of tuition paid.
- Withdrawal from a course after only attending during the first, second, third and fourth course week (50% complete) of a 3 credit course= Refund of 50% of tuition paid.
- Withdrawal from a course after only attending during the first, second, third, fourth and fifth course week (62.5% complete) of a 3 credit course= Refund of 37.5% of tuition paid.

Please note: Weeks six, seven and eight are nonrefundable.

Tuition Assistance Program funds will be returned directly to the Military Service, not to the Servicemember.

### **State-Specific Refund Policy**

If a student attends a class and resides in one of these states, the state-specific refund policy will be applied. In the event that there is a conflict in the policies, the state policies, as outlined below, will supersede the general University policy, unless the University policy is more beneficial to the student.

All requests for refund must be submitted in writing to the University. The University requires 30 days for processing. All fees are nonrefundable.

#### **Arizona**

Students in the State of Arizona, will have tuition refunded using the University's Institutional Refund Policy with the following exception:

- Students have the right to a full refund of all monies paid, including application and materials fee - if applicable - if they withdraw within three (3) business days after signing the Enrollment Agreement.

#### **Online**

The refund policy of the state where online campus students reside will be used to calculate their refund amount. The refund policy of the state where local campus students attend class will be used to calculate their refund amount.

## **Student Code of Conduct**

Students are expected to conduct themselves ethically, honestly, and with integrity as responsible members of the University's academic community. This requires the demonstration of mutual respect and civility in academic and professional discourse.

By virtue of membership in the University's academic community, students accept an obligation to abide by the Student Code of Conduct. West students are expected to uphold the image and reputation of the University. Behavior, either on or off campus, that is determined to impair, interfere, or obstruct the opportunities of others to learn or that disrupts the mission, processes, or orderly functions of the University will be deemed misconduct and shall be subject to appropriate disciplinary action.

Misconduct, for which students are subject to disciplinary action under the Student Code of Conduct includes, but is not limited to, the following academic and non-academic violations:

1. Actions, oral statements, and written statements that threaten or violate the personal safety of any faculty members, staff members, or other students.
2. Obstruction or disruption of teaching or other components of the academic process, administration, or University activity.
3. Harassment that has the effect of creating a hostile or offensive educational environment for any student, faculty, or staff member.
4. Sex discrimination/harassment that has the effect of creating a hostile or offensive educational environment for any student, faculty, or staff member. This includes, but is not limited to, sex discrimination, sexual harassment, unwelcome conduct of a sexual nature, unwelcome sexual advances, requests for sexual favors, and other verbal and nonverbal, or physical conduct of a sexual nature including sexual violence.
5. Stalking, persistently pursuing another person that has the effect of imposing unwelcomed contact and/or communication.



6. Theft of University property or of property of a member of the University community on campus.
7. Willful, wanton, or reckless damage to University premises or property, or the property of a member of the University community.
8. Failure to comply with published University policies or reasonable directives of university officials while performing their duties.
9. Failure to conform to University guidelines regarding use of university computer or communication systems, authorized use of University equipment, intellectual property, or information systems.
10. Sharing student credentials, including online login information, with any person other than West Student Technical Support.
11. Unlawful manufacture, distribution, dispensation, or use of alcohol and/or controlled substances on the University premises or during University activities; participation in any University activity while under the direct or residual influence of any controlled substance, alcohol, or misused or overused legal drugs.
12. Possession, use, sale, or distribution of any firearms, fireworks, explosives, illegal drug paraphernalia, dangerous weapons, or any other materials/substances prohibited by law on University premises or at University sponsored events (not applicable to law enforcement officers required to carry firearms at all times).
13. Unauthorized use of the University's name or logo that is the property of the University.
14. Violation of local, state, or federal statutes or University regulations.
15. Hazing (any action that recklessly or intentionally endangers the mental or physical health or safety of a student for the purpose of admission or initiation into or affiliation with a University-sanctioned organization.)
16. Falsification, alteration, or invention of information, including, but not limited to, any third party document used to apply for financial aid, transfer credits, diplomas, transcripts, or lying during University investigation.

#### **Conduct Review Process**

1. All charges alleging violations of West's Code of Conduct are subject to a fair and impartial process to determine whether or not a violation has occurred. Depending on the severity of the charge, a violation may result in a warning or review through the following process.
2. Charges related to student records should be submitted to the attention of the Associate Registrar.
3. Charges alleging violations of West's Code of Conduct, unless related to sex discrimination/harassment, must be submitted in writing to the attention of the Associate Registrar, Director of Faculty Services or designee.
4. An alleged violation of West's Code of Conduct that relates to sex discrimination/harassment shall be forwarded to the University's Title IX Coordinator, Dr. Christopher Davis or designee:

4025 S. Riverpoint Parkway  
Mailstop CF-SX01  
Phoenix, AZ 85040  
(602) 429-1112

#### **Investigation**

1. Allegations will be investigated in a prompt and reasonable manner.
2. Relevant evidence may include, but not be limited to, pertinent documents and statements from witnesses. Title IX investigations will be conducted within sixty (60) days barring any unusual complexity.
3. While an alleged violation is under investigation, a student may be removed from class, campus-sanctioned events, and other University functions.

#### **Notification**

1. A student who is charged with a violation of West's Code of Conduct will be notified of the specific charge(s) in writing by a Charging Letter sent via Certified Mail, Return Receipt Requested, or comparable means, and given ten (10) business days to submit a written response to the designated University official.

2. Failure of a student to respond to the Charging Letter will result in suspension from the University following completion of the current course if the student is then actively attending classes and is not subject to immediate suspension.
3. In those instances where the University determines the conduct does not warrant a Charging Letter, it may choose to issue a Warning Letter and/or provide counseling to the student. NOTE: A Warning Letter is not appealable.
4. In Title IX cases, the complainant(s) shall be notified of the conduct procedures and notified of when and if a Charging Letter or warning is sent to the respondent(s).

### **Student Response**

1. A student response acknowledging guilt will be sent to the Associate Registrar or designee, who will determine the appropriate sanctions.
2. In Title IX cases, a student response acknowledging guilt will follow the Title IX committee process outlined below.
3. A student response denying the charge(s) will follow the committee process outlined below.

### **Disciplinary Review**

1. In cases not involving allegations of sex discrimination/harassment, the University Academic Council Review Committee (UACRC) will convene to review the file and make findings and recommendations to the Associate Registrar, or designee, who has the ultimate authority to accept, reject, or modify the recommendations and render a decision. The decision shall be sent via Certified Mail, Return Receipt Requested, or comparable means.
2. The UACRC shall use the preponderance of the evidence standard of proof (more likely than not) to weigh the evidence and make a recommendation to the Associate Registrar, or designee about whether a violation occurred and what sanction, if any, is warranted.
3. In cases involving sex discrimination/harassment, the Title IX committee, who will be comprised of at least three impartial individuals who have no prior involvement with the parties or the investigation, will convene to review the file and make a determination. Opposing parties will be afforded the opportunity to speak at the committee which will be facilitated by an impartial administrator from the university and present written witness statements for inclusion in the Title IX Case Packet. Students are entitled to have third parties present during the committee process.
4. The Title IX Committee shall use the preponderance of the evidence standard of proof (more likely than not) to weigh the evidence and make a recommendation to the Title IX coordinator or designee about whether a violation occurred and what sanction, if any, is warranted.
5. In accordance with the requirements under the Higher Education Opportunity Act (HEOA), upon written request, West will disclose to an alleged victim of a crime of violence or a non-forcible sex offense the results of any disciplinary hearing conducted by the Institution against the student who is the alleged perpetrator of the crime or offense.
6. If the alleged victim is deceased as a result of the alleged crime or offense, West will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.
7. In accordance with the requirements under the HEOA, in cases of an alleged sex offense, both the accuser and the accused will be informed of the committee determination involving an alleged sex offense, including any sanction that is imposed.

### **Sanctions**

1. If a violation is found, disciplinary sanctions shall be based on the seriousness of the situation and may include, but are not limited to, documented counseling by a University staff member, loss of academic credit, action plan (must be approved by the Office of Dispute Management), suspension, and/or expulsion. Students are responsible to pay for courses interrupted by the Conduct Review Process if the investigation results in a sanction.
2. A recommendation of expulsion by the decision maker shall be reviewed by the West Executive Review Committee and the Office of Dispute Management before that sanction is communicated to the student.

### **Appeals**

1. In those instances where students are found to be in violation of West's Code of Conduct, they may appeal the decision to the Executive Review Committee (ERC) within ten (10) days of receiving the notice. The ERC is comprised of the Provost, the Vice President of Operations, and the Registrar (or their respective designees).
2. In Title IX cases, opposing parties shall be afforded the opportunity to appeal within ten (10) days of receiving notice of the outcome; if an appeal is filed, each party shall receive notice of the other party's appeal.

3. The decision of the ERC is final and shall be communicated directly to the student and the campus, except in the case of a decision by the ERC supporting a campus recommendation of expulsion. If the sanction against the student is expulsion, the review of the appeal shall be conducted by the University President. The decision of the University President is final and will be communicated directly to the student and administration.
4. In Title IX cases, opposing parties will be notified of the ERC decision.

#### **Academic Violations**

- Plagiarism – Representing the words or ideas of another as one’s own or unlawful use or acquisition of copyrighted works.
- Copyright Infringement – Acquisition or use of copyrighted works without appropriate legal license or permission. This includes illegal peer-to-peer file sharing.
- Cheating – Intentionally using or attempting to use unauthorized materials, information, or study aids in any academic exercise.
- Submitting work that had been prepared for a different course.
- Facilitating Academic Dishonesty by intentionally or knowingly helping or attempting to help another student violate academic integrity.

#### **Conduct Review Process**

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4025 S. Riverpoint Parkway  
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Phoenix, AZ 85040  
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2. The UACRC shall use the preponderance of the evidence standard of proof (more likely than not) to weigh the evidence and make a recommendation to the Associate Registrar, or designee about whether a violation occurred and what sanction, if any, is warranted.
3. In cases involving sex discrimination/harassment, the Title IX committee, who will be comprised of at least three impartial individuals who have no prior involvement with the parties or the investigation, will convene to review the file and make a determination. Opposing parties will be afforded the opportunity to speak at the committee which will be facilitated by an impartial administrator from the university and present written witness statements for inclusion in the Title IX Case Packet. Students are entitled to have third parties present during the committee process.
4. The Title IX Committee shall use the preponderance of the evidence standard of proof (more likely than not) to weigh the evidence and make a recommendation to the Title IX coordinator or designee about whether a violation occurred and what sanction, if any, is warranted.
5. In accordance with the requirements under the Higher Education Opportunity Act (HEOA), upon written request, West will disclose to an alleged victim of a crime of violence or a non-forcible sex offense the results of any disciplinary hearing conducted by the Institution against the student who is the alleged perpetrator of the crime or offense.
6. If the alleged victim is deceased as a result of the alleged crime or offense, West will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.
7. In accordance with the requirements under the HEOA, in cases of an alleged sex offense, both the accuser and the accused will be informed of the committee determination involving an alleged sex offense, including any sanction that is imposed.

### **Sanctions**

1. If a violation is found, disciplinary sanctions shall be based on the seriousness of the situation and may include, but are not limited to, documented counseling by a University staff member, loss of academic credit, action plan (must be approved by the Office of Dispute Management), suspension, and/or expulsion. Students are responsible to pay for courses interrupted by the Conduct Review Process if the investigation results in a sanction.
2. A recommendation of expulsion by the decision maker shall be reviewed by the West Executive Review Committee and the Office of Dispute Management before that sanction is communicated to the student.

### **Appeals**

1. In those instances where students are found to be in violation of West's Code of Conduct, they may appeal the decision to the Executive Review Committee (ERC) within ten (10) days of receiving the notice. The ERC is comprised of the Provost, the Vice President of Operations, and the Registrar (or their respective designees).
2. In Title IX cases, opposing parties shall be afforded the opportunity to appeal within ten (10) days of receiving notice of the outcome; if an appeal is filed, each party shall receive notice of the other party's appeal.

3. The decision of the ERC is final and shall be communicated directly to the student and the campus, except in the case of a decision by the ERC supporting a campus recommendation of expulsion. If the sanction against the student is expulsion, the review of the appeal shall be conducted by the University President. The decision of the University President is final and will be communicated directly to the student and administration.
4. In Title IX cases, opposing parties will be notified of the ERC decision.

## Student Grievance

Grievances, other than non-discrimination or harassment, must be submitted in writing to the Office of Dispute Management (ODM), which will determine the appropriate course of action or render a decision.

### Financial Grievance

Student requests for finance related policy exceptions must be submitted through a student advisor within six (6) weeks from the disputed charge date. Grievances relating to financial aid, account balances, or collections must be reviewed by University management before being submitted to ODM. All requests must include relevant documentation and supporting statements. When such a grievance is received by ODM, the student will be provided guidance to file an appeal to be reviewed by the Financial Executive Review Committee (FERC) for a final decision if it cannot be resolved informally.

Please contact:

Office of Dispute Management  
4025 S. Riverpoint Parkway  
Mailstop CF--SX01  
Phoenix, AZ 85040  
(602) 557.3391

FormalGrievanceODM@west.edu

### Student Grade Appeal

Students must initiate all inquiries regarding a final course grade within six (6) weeks of the end of the course. Students must first contact the faculty member involved to attempt to resolve the issue. The faculty member is required to review grade calculations for accuracy and respond to student inquiries in writing within ten (10) days of the request with a summary of the grade calculation. Every reasonable attempt should be made by both parties to resolve the issue at this level. The instructor's decision is final.

If the instructor does not respond to the student within ten (10) days, the student may contact his/her Academic Counselor to initiate a formal appeal. Appeals must include a letter summarizing the request, all relevant supporting materials, and documentation of attempts to reach the faculty. No grade appeals will be considered if not submitted within six (6) weeks of the course end date.

Grade disputes that are based on alleged discrimination (as defined under the heading Nondiscrimination Policy and Harassment Policy) are reviewed as non-grade-related grievances and should be submitted accordingly.

### Student Appeals

Students may submit requests for exception to University policy in writing through an Advisor for submission to Student Appeals, for determination of the appropriate course of action or rendering of a decision. Certain University policies, such as academic statuses and program deadlines, may not be appealed. It is incumbent upon the student to submit all relevant information and supporting materials with the initial appeal. All appeals must be initiated within published time frames.

Transfer credit appeals must include course materials for courses in question. Advisors can provide students further information regarding submission of Student Appeals. Students will receive a written response within two (2) weeks of appeal submission.

In all cases of administrative and academic student appeals, if the issue cannot be resolved after exhausting the University's procedures, students may file an external complaint. Students must contact the State Board for further details.

## Leave of Absence Policy

This policy is applicable to all students who are actively enrolled in degree programs at Western International University.

Students may be approved by the University for multiple LOAs in a 12-month period. The total of all approved LOAs may not exceed 180 days in the 12-month period. During an approved LOA, the student is not considered withdrawn and no Return of Title IV (R2T4) calculation is required for financial aid recipients.

### Required Documentation

An LOA may be approved only if the University determines there is a reasonable expectation the student will return. Students must follow the University's LOA policy when requesting the LOA, by providing (on or before the start date of the LOA) a completed University LOA request form or a written, signed and dated request, including the reason for the LOA to West Financial Aid Office. If unforeseen circumstances prevent a student from providing a request for the LOA to the campus on or before the start of the LOA, the University may grant the LOA if the campus has documented the reason and decision. The University must collect the signed LOA request form from the student later and provide it to West Financial Aid Office within a reasonable amount of time from the last date of attendance. Unforeseen circumstances may include, but are not limited to, medical and family emergencies, military, jury duty, business travel, University course cancellation and/or facility closure, and natural disasters. If a student is out of attendance due to an unforeseen circumstance and considered an unofficial withdrawal and the University can document the reason and decision for the LOA prior to the Return of Title IV (R2T4) calculation being performed, the student will be placed on an approved LOA and no calculation will be required. An LOA will not be approved if a student requests an LOA after 14 consecutive days of nonattendance, has a current enrollment status of unofficial withdrawal (UNW) and the request is not due to unforeseen circumstances that occurred prior to the UNW status. If a student requests an LOA start date in the future and is officially withdrawn, unofficially withdrawn, or administratively withdrawn from the University prior to the start date of the LOA, the LOA is not valid and will be canceled.

### Length

In determining the length of the LOA, the LOA start date is the first day of the LOA and the LOA end date is the day before the start date of the course the student is returning to at the University. The first day of the student's initial LOA is used when determining the start date for the 12-month period. If a student is granted an LOA due to unforeseen circumstances, the beginning date of the approved LOA, as recorded by the student on the LOA form, is the date the student was unable to attend class because of unforeseen circumstance.

The course start date will cease the LOA day count; however, the University's academic system of record will use an active enrollment status effective date as determined by the date the student posts an academic related activity (ARA) in the course the student returns to at the University. NSLDS Enrollment Reporting will use the standard effective date for an active enrollment (i.e. course start date). A new LOA request form will be required for any additional LOAs.

Note: At the time of the LOA approval, the University will review the LOA dates requested by the student and may adjust those dates based on ARAs, class schedules, etc.

### Extending an LOA

A student may request an LOA extension as long as the request is made before the scheduled return date. Students must follow this policy when requesting the LOA extension, by providing on or before the scheduled end date, a written, signed, and dated request, including the reason for the LOA extension to West Financial Aid Office.

### Institutionally Scheduled Breaks

If a student submits an LOA request with a start date being the same day as the start of an institutionally scheduled break or a start date that falls within an institutionally scheduled break, the University will update the LOA start date to the first day after the institutionally scheduled break ends.

If a student's LOA is scheduled to end on or within an institutionally scheduled break, the University will update the LOA return date to the start date of the course that is scheduled to begin after the institutionally scheduled break, as long as the student is registered for a course set to begin when the institutionally scheduled break ends.

If a student's LOA request completely overlaps an institutionally scheduled break, all days of the institutionally scheduled break and the LOA days will count toward the length of the LOA and apply toward the maximum of 180 days in a 12-month period. The University will not allow a student to take two consecutive LOAs separated by an institutionally scheduled break.

### Disbursements during an LOA

The University may disburse Pell, IASG, and FSEOG funds to a student on an LOA during certain times of the year. Federal financial aid funds that are part of a credit balance created before the student began an LOA may be paid to the student, since those funds were disbursed before the student went on the LOA.

### **Completion of Coursework upon Return**

If a student starts an approved LOA in the middle of a course, the University must ensure no additional charges for this course are incurred when the student returns from the LOA. To ensure no additional charges for this course are incurred, the University will issue the student an LOA Credit (LOAC). This LOAC will be applied to the course scheduled after the LOA end date.

### **Failure to Return**

The University will advise the student, prior to granting the LOA, that failure to return from an LOA may affect the loan repayment terms, including the expiration of the student's grace period. If a student does not return from an approved LOA, the withdrawal date and beginning of the grace period will be the student's last date of attendance.

If the student reenters, after withdrawing from the University, the previously approved LOA days will count toward the student's LOA maximum of 180 days in a 12-month period.

## **Withdrawal from the University**

### **Overview**

The Withdrawal Policy addresses the process the University has in place to determine when a student has withdrawn from a program of study.

### **Official Withdrawal**

Students who provide official notification of the intent to withdraw from the University may complete the Official Withdrawal form or notify West Student Advisement and Registrar offices to be considered officially withdrawn.

#### **Withdrawal Date**

The withdrawal date for an official withdrawal is the last date of academic attendance or attendance at an academically related activity determined from University attendance records. This date will always be earlier than or equal to the date the student notifies the University of his/her withdrawal.

#### **Date of Determination**

The date of determination (DOD) for students who officially withdraw from the University is the latter of the student's withdrawal date or the date of notification. The University will return the amount of federal financial aid funds for which it is responsible no later than 45 days after the date the University determines the student has withdrawn. (See *Return of Title IV Policy* in the Financial Aid Policy appendix for further information)

### **Rescission of Official Withdrawal**

Students who rescind their intent to withdraw by must provide an electronic or written statement to the University stating their intent to participate in academically related activities (ARAs) and complete the payment period.

Students may rescind the intent to withdraw by complete the Return After Withdrawal form. Rescissions may be requested up until the time a Return of Title IV (R2T4) calculation has been completed. The student may also submit an electronic or written statement to the University stating his/her intent to return to the University, remain in academic attendance and continue to participate in ARAs through the end of the payment period.

If a student subsequently withdraws after rescinding the intent to withdraw, the withdrawal date is the last date of academic attendance or attendance at an academically related activity determined from University attendance records.

The date of determination (DOD) for students who rescind their intent to withdraw and subsequently withdraw from the University without official notification is no greater than 15 days after the student's official last date of academic attendance or attendance at an academically related activity determined from University attendance records.

*Note: Please refer to the last section of this policy for discussion on academic related activities that occur during an institutionally scheduled break.*

### **Unofficial Withdrawal**

Students who do not provide official notification to the University of their intent to withdraw are considered unofficial withdrawals after 14 days of consecutive nonattendance at an ARA.

Students on institutionally scheduled breaks will not have the days of the break count toward the 14 days of consecutive nonattendance at an academically related activity. The following are the different types of institutionally scheduled breaks at the University:

- Holidays
- Inclement Weather
- Administrative
- Emergency Closures

#### Withdrawal Date

The withdrawal date for students who ceases attendance at the University, including a student who does not return from an approved leave of absence (LOA), is the last date of academic attendance or attendance at an academically related activity determined from University attendance records.

In the case of a student who has received an approved LOA, the University will review the student record on or after the originally approved return date. The University review will determine if the student reentered as scheduled, or did not reenter as scheduled and must be withdrawn for the purposes of the Return of Title IV (R2T4) calculation and deferment processing.

#### Date of Determination

The date of determination (DOD) for students who unofficially withdraw from the University is no greater than 15 days after the official last date of attendance; or when a student fails to return from an approved LOA. The University will return the amount of federal financial funds for which it is responsible, no later than 45 days after the date the University determines the student has withdrawn. (See Return of Title IV Policy in the Financial Aid Policy appendix for further information) *Note: Please refer to the last section of this policy for discussion on academic related activities that occur during an institutionally scheduled break.*

#### **Administrative Withdrawals**

Students who are withdrawn from the University for failure to meet admission, academic, financial, or code of conduct policies are considered administrative withdrawals.

#### Withdrawal Date

The withdrawal date for students who are administratively withdrawn is the last date of academic attendance or attendance at an academically related activity that occurred prior to the decision to administratively withdraw the student.

#### Date of Determination

The date of determination (DOD) for students who are administratively withdrawn from the University is the date the University determines the withdrawal. The University will return the amount of federal financial aid for which it is responsible, no later than 45 days after the determination of the administrative withdrawal. (See *Return of Title IV Policy* in the Financial Aid Policy appendix for further information) *Note: Please refer to the last section of this policy for discussion on academic related activities that occur during an institutionally scheduled break.*

#### **Academic Related Activities that Occur During an Institutionally Schedule Break**

The University does not recognize any ARA that occurs during an institutionally scheduled break as attendance for federal financial aid purposes only.

#### Withdrawal Date

If a student posts an ARA during an institutionally scheduled break, the University will look for the most recent ARA that occurred prior to the start of the institutionally scheduled break. This date will be used as the withdrawal date for Title IV purposes.

#### Date of Determination

The DOD for students who post academic related activities during an institutionally scheduled break will be no greater than 15 days after the end date of the institutionally scheduled break. For example: A student attends class on December 19th. An institutionally scheduled break occurs December 20 – January 4. The student posts an ARA on December 29th, which is during the scheduled break. The DOD is January 19th (the 15th day after the end date of the institutionally scheduled break).



# Consumer Policies

## FERPA

University student records are confidential for all schools receiving funding under programs administered by the U.S. Department of Education in accordance with the Family Educational Rights and Privacy Act (FERPA). Generally, information pertaining to a student record is not to be released to a third party without written consent via a FERPA Release form, judicial order, or a lawfully issued subpoena.

### **Access to Education Records**

FERPA regulations require the University to comply with the students' right to inspect and review their academic records by responding within 45 days from the time the University receives a written request to access their records.

However, the University Registrar Office will respond to student's requests to review their records within 14 days from receipt of the request. Students should submit their request to the University Registrar Office and specify the record(s) they wish to inspect or have a copy.

*Note:* Under FERPA, a student is defined as an individual who is attending or has attended an educational institution. Students with at least one positive attendance posted are considered a student.

Education records are defined as all records, files, documents and materials containing information directly related to a student; and maintained by an educational institution.

The following are not education records:

- Personal records maintained by an individual; must be kept in the sole possession of the individual and are not accessible to others.
- Records of the law enforcement unit of an educational institution
- Personnel records; records related to a person as an employee not used for any other purpose.
- Medical records
- Records created after the student is no longer a student; alumni records.

### **Releasable Information – Directory**

In compliance with FERPA, a University designated representative without prior written or authorized electronic consent of the student, a judicial order, or a lawfully issued subpoena can release the following education record information, provided the student does not have a FERPA hold on record.

- Student name
- Home address
- Email address
- Home telephone number
- Year of birth
- Dates of admission
- Dates of attendance
- Program of study
- Degree completion date and type
- Student current enrollment status
- Most recent previous institution attended and degree
- Grade level

- Photographs
- Honors and awards received
- Participation in officially recognized activities

*Exception:* If a student submits written request via a *FERPA Disclosure Prevention Request* form that directory information not be released to a third party, **NO INFORMATION CAN BE RELEASED**, absent a judicial order or a lawfully issued subpoena. A *FERPA Disclosure Prevention Request* is valid unless rescinded.

To remove a *FERPA Disclosure Prevention Request*, the student must complete and submit a *FERPA Disclosure Prevention Rescind* form to the University Registrar Office. To remove previously authorized parties from his record, the student should submit the *FERPA Release Rescind* form to the University Registrar Office.

### **Information Not Released – Non-Directory**

In compliance with FERPA, the following student information must **not** be released by the University without prior written or authorized electronic consent of the student, a judicial order, or a lawfully issued subpoena. The student's signature on the written request is verified before processing the request.

- Place of birth\*
- Month and day of birth\*
- Social Security Number or Student ID Number\*\*
- Grades
- GPA
- Course schedules
- Employment information
- Academic performance
- Admission information
- Academic Information
- Financial and accounting information
- Gender\*
- Race\*
- Ethnicity\*
- Citizenship\*
- Country of origin\*

\*Although this information may be disclosed without prior written consent according to FERPA, the University policy is to maintain the confidentiality of this student information. The University will notify students to provide contact information directly to a third party when this information is requested.

\*\*Student IDs, SSNs, or PINs should not be released to a third party, unless it is necessary to perform a required task (e.g. Student Financial Agreement, FBI Request, etc.). These non-directory identifiers should not be released or verified, even with a signed FERPA release form, in order to avoid the risk of personal identity theft.

*Note:* Non-directory information can only be released to third parties via telephone or in-person if the student has provided written or authorized electronic consent including a security word. If the student does not complete the release information, including security word, information is not released via telephone or in-person. In-person requests also require a photo ID to validate identity.

Western International University students who are minors and/or dependents are protected by FERPA. All third party inquiries, including parents, require a *FERPA Release Form* on file unless the third party meets one of the definitions under FERPA allowing access without prior written or authorized electronic consent from the student (e.g., power of attorney, etc.).

**Exception: The University can release information to school officials with legitimate educational interest. The University can release information under the following conditions:**

- School officials[1] with legitimate educational interest
- Person or company with whom the University has contracted as its agent to provide a service instead of using University employees or officials.
- Other schools a student seeks or intends to enroll
- Specified officials for audit and evaluation purposes
- Appropriate parties in connection with financial aid to a student
- Organizations conducting 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
- State and local authorities, pursuant to state law
- U.S. Immigration and Customs Enforcement (formally Immigration and Naturalization Service (INS)), in compliance with the Student Exchange Visitor Information System (SEVIS) program.
- Under Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA PATRIOT ACT) of 2001, Section 507 amends FERPA and allows institutions to disclose—without consent or knowledge of the student—PII (Personally Identifiable Information) from the student's education records to the Attorney General of the United States or to his designee in response to an ex parte order in connection with the investigation or prosecution of terrorism crimes specified in 2332b(g)(5)(B) or an act of domestic or international terrorism as defined in section 2331 of title 18 United States Code. Institutions that, in good faith, produce information from education records in compliance with an ex parte order issued under this amendment "shall not be liable to any person for that production."
- Under the Campus Sex Crime Prevention Act, institutions may disclose information concerning registered sex offenders who are required to register under the Violent Crime Control & Law Enforcement Act.
- The institution may disclose the results of a disciplinary proceeding if the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and found to violate the institution's policies and procedures with respect to the allegation. Disclosures can only be made if the institution determines the student violated policies and such disclosures must only include student name, violation committed, and sanction imposed against the student.
- The institution must disclose, upon written request, to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the institution against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased because of the crime or offense, the institution must provide the results of the disciplinary hearing to the victim's next of kin, if so requested.
- The disclosure is to organizations conducting studies for, or on behalf of, educational agencies or institutions.
- If a student initiates legal action against an educational institution, the institution may disclose to the court, without a court order or subpoena, the student's education records that are relevant for the institution to defend itself.
- The disclosure is to parents of a dependent student as defined in section 152 of the Internal Revenue Code of 1986.

*A school official has a legitimate educational interest if:*

- *Performing a task specified in his/her job description/contract*
- *Performing a task related to a student's education*
- *Providing a service or benefit relating to the student or student's family*
- *Representing a school in which a student seeks to enroll*
- *Disclosing information to federal and state authorities auditing compliance of federal or state-support programs*
- *Disclosing information in connection with financial aid, if the information is necessary for such purposes as to determine eligibility for aid, amount of aid, conditions for aid, or enforce terms and conditions of the aid.*

- *Disclosing information to state and local officials to whom this information is specifically allowed to be disclosed pursuant to state laws if the allowed disclosure concerns the juvenile justice system and the system's ability to effectively serve the student whose records are released*
- *Performing studies on behalf of educational institutions*
- *Disclosing information to accrediting organizations carrying out their accrediting functions*
- *Complying with a judicial order or lawfully issued subpoena; provided notification to the student is made before complying with the subpoena*

[1] A school official is defined as:

1. A person employed by the University in an administrative, supervisory, academic, research, or support staff position.
2. A person employed by or under contract to the University to perform a task.
3. A person serving on an institutional governing body or committee.

The University can disclose personally identifiable information (PII), directory, and non-directory, without student consent if the disclosure meets one of the following conditions:

- This disclosure is to other school officials whom we determine have legitimate educational interest.
- The disclosure is to officials of other schools where the student seeks or intends to enroll.
- The disclosure is, subject to requirements of 34 CFR §99.35, to authorized representatives of the Comptroller General of the United States, Secretary, or state and local educational authorities.
- The disclosure is in connection with financial aid [2] the student has applied for or received, if the information is necessary for such purposes as to determine the following:
  - eligibility for aid,
  - amount of aid,
  - conditions for aid, or
  - enforce terms and conditions of the aid.

Students requesting demographic or PII on other Western International University students for survey/research purposes must be approved.

The University shall retain a record of student information disclosed to a third party if recordation is required pursuant to FERPA. This information is made on University computer system containing dates, names, and reasons for release. Students shall have reasonable access to their educational records and may request to review and challenge the contents, which they feel to be inaccurate, misleading, or otherwise in violation of their privacy or other rights.

[2] Financial aid means a payment of funds (or a payment in kind of tangible or intangible property to the individual) that is conditioned on the individual's attendance at an educational agency or institution [authority: 20 U.S.C.1232g (6)(1)(0)]

### **Student Right to Access**

Student wishing to review their educational records shall submit a written request to the University Registrar Office specifying the records to be reviewed. Only records covered by the Family Educational Rights and Privacy Act will be made available. If necessary, the University Registrar Office will work with a campus designee so that the student can review the record.

FERPA regulations require the University to comply with the students' right to inspect and review their academic records by responding within 45 days from the time the University receives a written request to access their records. However, the University Registrar Office will respond to student's requests to review their records within 14 days from receipt of the request. Students should submit their request to the University Registrar Office and specify the record(s) they wish to inspect or have a copy.

Students who wish to review their records at the campus location must present photo identification before access to educational records is allowed. For copies of records from the student's file, students must fill out and submit the "Student Request for Information from Files" form. Distance education students must submit a written or authorized electronic request specifically outlining which record they would like to review. Upon verification, the records will be released.

A designated University official must be present when students wish to review their records at the campus location. This includes documents on file (e.g. WIN/eXp) or student history notes that do not reference other student information.

**Note: Students may not inspect and review the following, absent a judicial order or legally issued subpoena:**

- Confidential letters and recommendations for which they have waived their rights of inspection
- Educational records containing information about more than one student (access is permitted only to that part of the record concerning the inquiring student).
- Records of instructional, supervisory, administrative, and certain educational personnel, which are in possession of the originator
- Records connected with an application to attend the University if the application was denied.

**Procedure**

Students alleging their University records are inaccurate or misleading, or who allege violations of FERPA, may present their challenges to the University Registrar Office.

Students have the right to correct record keeping errors, but not to seek to overturn administration decisions and/or assessments. The University Registrar Office shall review students' challenges and, when appropriate, amend students' records accordingly. Students will be notified within 14 days of the University Registrar Office actions and based on the action may request a formal hearing.

- Student must submit request for amendment in writing to the University Registrar Office identifying the specific portion of his/her record s/he wants changed and why s/he believes it's inaccurate or in violation of his/her privacy. The University Registrar Office will respond to the request within 14 days.
- If the University denies the request to change the record, the University Registrar Office will notify the student within 14 days of the decision and advise him/her of his/her right to challenge the information.
- Students' request for a formal hearing must be made in writing and submitted to the Vice President of University Operations. The University Registrar Office will arrange for a hearing, and notify the student within 14 days from the receipt of the request of the date, place, and time of the hearing. A hearing panel appointed by the University Registrar Office shall represent the University. The panel shall consider all relevant evidence supporting students' allegations of inaccurate or misleading information in students' records. Decisions of the panel will be final.
- The University will provide a written decision within 14 days of the hearing based on evidence presented at the hearing and will include a summary of evidence presented and the rationale for the decision.
- If the University decides that the challenged information is not misleading, inaccurate, or in violation of the student's privacy rights, it will notify the student within 14 days of his/her right to place in the record a statement commenting on the challenged information or a statement of reasons for disagreeing with the decision.
- The statement will be maintained as a part of the student's record as long as the contested portion is maintained. If the University discloses the contested portion of the record, it must also disclose the statement.
- If the University decides the information is inaccurate or in violation of the student's right of privacy, it will amend the record and notify the student within 14 days, in writing, that the record has been amended.

Western International University cannot deny students access to their records

Copies do not need to be provided, unless by not providing copies, the student's rights are denied.

The University reserves the right to deny transcripts or copies of records not required to be made available by FERPA in any of the following situations, absent a judicial order or legally issued subpoena:

- Student has an unpaid financial obligation with the University. Exception: The University will issue transcripts for students who have filed for bankruptcy provided that Western International University obtains a copy of the bankruptcy petition filed with the courts.

*Note:* For a period of 25 years following the death of a student, education records of deceased students may only be released to the executor of the estate (written authorization required) or immediate family members (notarized affidavit required) defined as: spouse or legally recognized domestic partner, parents, children (over the age of 18), and siblings.

An education record is released pursuant to judicial orders or lawfully issued subpoenas, but usually only after the student is given reasonable notification of the University's intent to comply before release of records unless the issuing agency has ordered that it not be disclosed. Inquiries regarding FERPA and requests for non-release may be addressed to:

Western International University Registrar Office  
1601 West Fountainhead Parkway  
Tempe, AZ 85282  
(602) 943-2311  
Fax (602) 383-2210

Students have the right to file a complaint with the FERPA office in Washington, D.C., inquiries should be directed to:

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202-5920

## Solomon Act

Western International University complies with the Solomon Act, which provides certain information to military recruiters. Information that may be released includes the following:

- Student name
- Home address
- Email address\*
- Telephone listing
- Age (Date of Birth)
- Place of birth\*
- Level of education
- Academic major
- Degrees received\*
- Most recent educational institution attended\*

\*This information may be released only when available. No information will be released if the student has a FERPA hold on record.

## Student Loan Code of Conduct

We protect our students with established loan policies. Western International University follows federal regulations that govern student loan requirements.

The Student Loan Code of Conduct (<http://west.edu/student-loan-code-conduct>) creates and maintains uniform student loan practices that focus on the best interest of the borrowers (our students). It also manages relationships between school employees, learning institutions, lender advisory board members, and student loan organizations.

Students are encouraged to review the Student Loan Code of Conduct at <http://west.edu/student-loan-code-conduct>, to learn about requirements governing loan regulations. If you have any questions about this document, please email Western International University: [PLL@phoenix.edu](mailto:PLL@phoenix.edu).

## Consumer Privacy

Summarized below are key elements of our Privacy Policy. To read our full Privacy Policy ("Policy") click here (<http://west.edu/privacy-policy.html#full-version>).

### **Scope of Privacy Policy**

This policy covers website visitors, current and prospective students, and any other user of services through our Sites, including any websites or mobile applications operated by us or on our behalf.

This policy applies to both online and offline collection, storage, processing, and transfer of Personal Information. However, certain University Sites or services may be subject to additional privacy policies (collectively "Additional Policies").

### **Information We Collect**

We collect various types of Information through our Sites and other websites where you can express interest in our services, over the phone, and in person where print materials may be used to collect information from you. Some information is collected automatically through various web and internet technologies, including social networking tools used by the University to foster communication and collaboration among members of our community. Other information is collected when you provide it in response to an advertisement, a survey, or a request for information; apply for admission or financial aid; register for classes; order educational or other products and services; set up a social network or other Site profile; or use one of our career resources, learning assessments, or other interactive tools. We may also obtain information from other sources and combine that with Information we collect about you.

### **Information Uses**

We will not sell, rent, or lease your personal information to others except as provided in this policy. We may collect, use, and disclose personal information for the following purposes:

- to determine your admissibility and to register you for your selected educational programs
- to provide requested products and services
- to respond to your inquiries and provide customer support
- to administer promotions in which you have indicated an interest
- for our internal marketing purposes, which includes, but is not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you
- for fostering communication and collaboration among members of your University community through social networks
- for sharing with our educational partners or business associates who are performing services on our behalf
- to analyze how sites and services are being accessed and used
- for investigation of information security and information asset protection related incidents
- to test, correct and improve our content, applications and services
- to develop new applications, products, services
- for online behavioral advertising purposes
- to improve site and service performance and delivery
- to prevent potentially illegal activities (including illegal downloading of copyrighted materials in accordance with our Copyright Infringement Policy)
- to investigate suspicious information that denotes illegal activity such as financial aid fraud
- to analyze academic and learning outcomes and preferences
- to analyze risk and business results
- to obtain payment for services that we provide to you
- to provide you with information concerning arrangements and other options for the repayment of funds loaned to you for your education
- to maintain business records for reasonable periods
- to enforce our Terms of Use

- to provide educational partners, business associates or unrelated entities in connection with the contemplated or actual reorganization, merger, acquisition, financing, insuring, sale or other disposal of all or part of our business or assets, including for the purpose of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In the event of any actual reorganization, merger, or acquisition such information may be transferred as part of the transaction to the acquirer
- and/or as may be required or permitted by legal, regulatory, industry self-regulatory, insurance, audit, or security requirements applicable to the University, Apollo Education Group, or educational partners or our business associates.

### Your Rights and Choices

#### Marketing Communications

If you do not wish to receive marketing email communications from us, you may express your choice where indicated on the applicable email or other communication, or click here: <http://mailout.westerninternationalu.net/webdocs/WIU-Unsubscribe-Email.html>.

If you do not wish to receive marketing telephone calls or mailings, you may express your choice to opt-out by emailing [privacy@apollo.edu](mailto:privacy@apollo.edu).

Under California's Shine the Light law, Cal. Civ. Code § 1798.83, we provide California residents the ability to opt out of disclosures to educational partners for direct marketing purposes. To opt out of these disclosures at no cost, email [privacy@apollo.edu](mailto:privacy@apollo.edu).

### Do Not Track and Online Behavioral Advertising

Western International University does not itself respond to web browser-based DNT signals.

We or our business associates may use data collected on this Site for online behavioral advertising purposes, e.g., to customize ads to you on other websites as you browse the web. If you do not want your browsing behavior on the Sites to be collected for online behavioral advertising purposes, visit [https://info.evidon.com/pub\\_info/2688?v=1](https://info.evidon.com/pub_info/2688?v=1).

#### Other Collection, Use, and Disclosure

You may be able to opt-out of our collection, use, and disclosure of your personal information in other situations subject to applicable contractual, academic, legal or technical restrictions and reasonable notice. Note that if you opt-out of certain uses of your Personal Information, we may no longer be able to provide certain products or services. For more information on your ability to opt-out, email [privacy@apollo.edu](mailto:privacy@apollo.edu).

### Other Important Information

We will take commercially reasonable measures to secure and store your information to protect against the loss, misuse, and alteration of the information under our control. We utilize industry standard security measures when accepting your credit card Information during your registration or other transaction you have initiated with us, as well as whenever we ask you to login to any of our sites.

If you subsequently become a student, your educational records are subject to the U.S. Federal Family Educational Rights and Privacy Act (FERPA), state laws and University policies.

To obtain a copy of the "Students' Rights to Privacy and Access to Educational Records" policy, click here: <http://west.edu/sites/default/files/West-Consumer-Information-Notice.pdf>. You may also contact us via one of the below methods:

**Phone:** (866) 948-4636

**Email:** [inquiries@west.edu](mailto:inquiries@west.edu)

**Mail:** Western International University

Attn: Registrar's Office

1601 W. Fountainhead Parkway

Tempe, AZ 85282

Western International University may update this policy or revise it from time to time. If you are concerned about how your Personal Information is used or disclosed, you should contact us as described below or check the <http://www.west.edu/privacy-policy> website periodically to obtain a current copy of our Privacy Policy.



## Dispute Resolution

The following policy and procedures are to be used to mutually resolve disputes by and between students and the University. The policy and procedures as set forth herein are effective for students currently enrolled in the University as of July 1, 2016, or who enroll in the University on or after July 1, 2016. Students are encouraged to first bring the concerns outlined below to the attention of the appropriate individual/department, as set forth in Step One below.

In connection with the University policies identified in Steps One, Two and Three below, this policy is intended to address disputes between a student and the University and create a framework by which a student and the University can resolve all such disputes. The University strongly recommends utilization of the resources identified in Steps One, Two and Three to resolve such disputes. None of these steps, however, precludes any student from seeking other forms of resolution, including in a court of law.

### **STEP ONE: INTERNAL RESOLUTION**

Students should first attempt to resolve any dispute or issue by contacting the following individuals/departments, and utilizing the process set forth in the corresponding section(s) of the Academic Catalog, as referenced below. Please note that the information provided below represents only the initial contact with whom such disputes should be reported. Students should carefully consult the Academic Catalog to gain a fuller understanding of the processes associated with reporting and resolving disputes related to these subject matters.

- A. Allegations of sex discrimination or sexual harassment: Chris Davis, Provost and Title IX Coordinator. See Nondiscrimination Policy and Harassment Policy in Academic Catalog.
- B. Allegations concerning all other forms of discrimination: Senior Director of Academic Operations, Associate Registrar, or their respective designee. See Nondiscrimination Policy and Harassment Policy in Academic Catalog.
- C. Student Code of Conduct Violations (other than sex discrimination and sexual harassment): Registrar. See Student Code of Conduct section in Academic Catalog.
- D. General Student Grievances (other than sex discrimination and sexual harassment): Office of Dispute Management. See General Student Grievances section in Academic Catalog.
- E. Student Grievances relating to financial aid, account balances, or collections: University Management. See General Student Grievances section in Academic Catalog.
- F. Academic Issues: Student Appeals. See Student Appeals Section in Academic Catalog.
- G. Grade Disputes: Course Faculty, Student Advisor or designee. See Grade Disputes section in Academic Catalog.

### **STEP TWO: MEDIATION**

If a dispute is not resolved as a result of Step One, all parties are encouraged to participate in a formal mediation session facilitated by a professional, neutral mediator. Mediation is not mandatory but is strongly encouraged as an effective way to resolve disputes.

The physical location for the mediation shall be mutually selected by the parties. If the parties elect mediation, the costs associated with the mediation shall be paid by the University. Both the student and the University shall submit in writing to the other the name(s) of one or more professional, neutral mediators as a potential mediator in the matter. The parties will exercise their best efforts to agree on the selection of a mediator. If the parties cannot agree on the selection of a mediator, then the parties can submit the matter to the American Arbitration Association (AAA) for the purpose of having a neutral mediator appointed in accordance with AAA's mediation rules.

The mediator shall schedule the mediation as expeditiously as possible. All parties will have the opportunity to attend and participate in the mediation. Any party may be represented by counsel of his or her choosing, at his or her own expense. The mediator shall direct how the mediation will be conducted. As with all mediations, any resulting resolution must be mutually agreed to by the parties, which shall constitute a final and binding resolution of the matter.

### **STEP THREE: BINDING ARBITRATION**

If a dispute is not resolved as a result of Steps One and Two, all parties are encouraged to participate in binding arbitration as an alternative to resolving the dispute in a court of law. Arbitration is not mandatory but is strongly encouraged as an effective way to resolve disputes.

If the parties mutually agree to binding arbitration as the method to resolve their dispute, the following shall apply:

1. The parties shall select the neutral arbitrator and/or arbitration sponsoring organization by mutual agreement. If the parties cannot mutually agree to an arbitrator and/or arbitration sponsoring organization, the arbitration will be held and the arbitrator selected under the auspices of the American Arbitration Association ("AAA"). Except as provided in this Agreement, the arbitration shall be held in accordance with the then current Consumer Arbitration Rules of the AAA ("AAA Rules"). The AAA Rules are available by navigating to the "Rules and Procedures" section of [www.adr.org](http://www.adr.org), or by requesting a hard copy from the University Legal Department, currently at 4025 S. Riverpoint Parkway, Mail Stop: CF-KX01, Phoenix, Arizona 85040.
2. In arbitration, the parties will have the right to conduct adequate civil discovery, bring dispositive motions, and present witnesses and evidence as needed to present their cases and defenses, and any disputes in this regard shall be resolved by the arbitrator. The arbitrator may award any party any remedy to which that party is entitled under applicable law, but such remedies shall be limited to those that would be available to a party in his or her individual capacity in a court of law for the claims presented to and decided by the arbitrator, and no remedies that otherwise would be available to an individual in a court of law will be forfeited by virtue of this Agreement. The arbitrator shall apply the substantive law of the state in which the claim arose, or federal law, or both, as applicable to the claims asserted. The arbitrator is without authority to apply any different substantive law.
3. Each party will pay the fees for his, her or its own attorneys, subject to any remedies to which that party may later be entitled under applicable law. The University shall initially bear the administrative costs associated with the conduct of the Arbitration, subject to: (1) a one-time payment by the student toward these costs equal to the filing fee then required by the court of general jurisdiction in the state where the student in question attended the University (if the student is financially unable to pay a filing fee, the student will be relieved of the obligation to pay the filing fee); and (2) any subsequent award by the arbitrator in accordance with applicable law. In the event the law (including the common law) of the jurisdiction in which the arbitration is held requires a different allocation of arbitral fees and costs, then such law will be followed.
4. The Federal Rules of Evidence shall apply. The arbitrator shall have jurisdiction to hear and rule on pre-hearing disputes and is authorized to hold pre-hearing conferences by telephone or in person, as the arbitrator deems necessary. The arbitrator shall have the authority to entertain a motion to dismiss and/or a motion for summary judgment by any party and shall apply the standards governing such motions under the Federal Rules of Civil Procedure and applicable federal common law.
5. The arbitrator will issue a decision or award in writing, stating the essential findings of fact and conclusions of law. Except as may be permitted or required by law, as determined by the arbitrator, neither a party nor an arbitrator may disclose the existence, content, or results of any arbitration here under without the prior written consent of all parties. A court of competent jurisdiction shall have the authority to enter a judgment upon the award made pursuant to the arbitration.

## Non-discrimination Policy

Western International University does not discriminate on the basis of race, age, color, national origin, gender, gender identity, sexual orientation, religious preference, disability, or veteran status in its educational programs, activities, or employment practices. The University complies with Title IX of the Education Amendments of 1997, Titles VI and VII of the Civil Rights Act of 1964 and regulations, and Section 504 of the Rehabilitation Act of 1973.

Conduct deemed to be in violation of this policy is prohibited and will not be tolerated by Western International University. Retaliation, in any form, against the person raising such a concern will also not be tolerated by the University.

### Policy Violation Procedures

Students, faculty, or staff alleging harassment must present their grievance within six (6) weeks after the incident that gave rise to the allegations.

1. Allegations of sex discrimination must be presented to Christopher Davis, Ph.D., Provost and Title IX Coordinator:

4025 S Riverpoint Parkway  
Mailstop DB-A101  
Phoenix, AZ 85040  
(602) 429-1099  
TitleIX@west.edu

- a. The Title IX Coordinator or their designee will manage efforts to conduct a prompt, thorough, and impartial investigation and make a determination on whether the party presented a factual connection between the allegation of discrimination and the alleged actions.

- b. If the Title IX Coordinator finds that there is a factual connection between the allegation of discrimination and the alleged actions, then one of the following procedures will be followed:
    - i. If the accusation is against a faculty member, then the Faculty Code of Conduct procedures apply.
    - ii. If the accusation is against a student, then the Student Code of Conduct procedures apply.
    - iii. If the accusation is against an employee, then the Title IX Coordinator or their designee will contact Human Resources, and Human Resources policies for processing claims of discrimination will be followed.
  - c. In instances where it is determined that a formal process is not appropriate, the student, faculty, or employee may be warned or counseled regarding the allegation.
  - d. Timeframe for Conducting Title IX complaints:
    - i. Investigation – A prompt, thorough, and impartial investigation will be conducted within 60 days barring any unusual complexity.
    - ii. Opposing parties will receive notice of the outcome of the complaint within 30 days of the close of the investigation.
    - iii. Opposing parties shall be afforded the opportunity to appeal within 10 days of receiving notice of the outcome.
2. All other discrimination claims must be presented to the Provost or their respective designee.
- a. Provost or their respective designee will conduct a prompt, thorough, and impartial investigation and make a determination on whether the student presented a factual connection between the allegation of discrimination and the alleged actions.
  - b. If the Provost or designee finds that there is a factual connection between the allegation of discrimination and the alleged actions, then one of the following procedures will be followed:
    - i. If the accusation is against a faculty member, then the Faculty Code of Conduct procedures apply.
    - ii. If the accusation is against a student, then the Student Code of Conduct procedures apply.
    - iii. If the accusation is against an employee, then the appropriate campus director or their designee will contact Human Resources, and Human Resources policies for processing claims of discrimination will be followed.
  - c. In instances where it is determined that a formal process is not appropriate, the student, faculty, or employee may be warned or counseled regarding the allegation.

## Harassment Policy

It is the policy of Western International University that the employment and educational environment at all campuses is free of all forms of improper or unlawful harassment including sexual harassment or sexually offensive conduct. Faculty, staff, or student conduct that violates this policy includes, but is not limited to, the following:

1. Unwelcome or unwanted sexual advances
2. Requests for sexual favors
3. Any overt or subtle suggestion that a grade or other academic achievement is dependent upon granting sexual favors or submitting to sexual requests
4. Unwelcome physical contact, including patting, pinching, hugging, kissing, fondling, etc.
5. Offensive conduct, verbal or written, including sexually explicit jokes, comments, innuendo, or other tasteless action that would offend a reasonably sensitive person
6. The displaying of sexually offensive pictures, posters, illustrations, or objects
7. Slurs, jokes, or ridicule based on race, ethnic or national origin, religion, gender, or disability

In addition to sexual harassment or discrimination, it is illegal and against the policies of the University for any employee, faculty member, or student to harass another employee, faculty member, or student based on ethnicity, race, national origin, religion, sex (including pregnancy or parenting), sexual orientation, gender identity, age, disability, veteran status, or any other category protected by federal, state, or local law. Such harassment and/or discrimination may include derogatory remarks, epithets, offensive jokes, the display of offensive printed or visual material, or offensive physical actions that unreasonably interfere with an individual's work or classroom performance or create an abusive work or classroom environment.

Conduct deemed to be in violation of this policy is prohibited and will not be tolerated by the University. Retaliation, in any form, against the person raising such a concern will also not be tolerated by the University.

### **Policy Violation Procedures**

Students, faculty, or staff alleging harassment must present their grievance within six (6) weeks after the incident that gave rise to the allegations.

1. Allegations of sexual harassment must be presented to Christopher Davis, Ph.D., Provost and Title IX Coordinator:

4025 S Riverpoint Parkway  
Mailstop CF-SX01  
Phoenix, AZ 85040  
(602) 429-1099  
TitleIX@west.edu

a. The Title IX Coordinator or their designee will manage efforts to conduct a prompt, thorough, and impartial investigation and make a determination on whether the party presented a factual connection between the allegation of harassment and the alleged actions.

b. If the Title IX Coordinator finds that there is a factual connection between the allegation of harassment and the alleged actions, then one of the following procedures will be followed:

i. If the accusation is against a faculty member, then the Faculty Code of Conduct procedures apply.

ii. If the accusation is against a student, then the Student Code of Conduct procedures apply.

iii. If the accusation is against an employee, then the Title IX Coordinator or their designee will contact Human Resources, and Human Resources policies for processing claims of discrimination will be followed.

c. In instances where it is determined that a formal process is not appropriate, the student, faculty, or employee may be warned or counseled regarding the allegation.

d. Timeframe for Conducting Title IX complaints:

i. Investigation – A prompt, thorough, and impartial investigation will be conducted within 60 days barring any unusual complexity.

ii. Opposing parties will receive notice of the outcome of the complaint within 30 days of the close of the investigation barring any unusual complexity.

iii. Opposing parties shall be afforded the opportunity to appeal within 10 days of receiving notice of the outcome.

2. All other harassment claims must be presented to the Associate Registrar, or respective designee.

a. Associate Registrar, or respective designee will conduct a prompt, thorough, and impartial investigation, and make a determination on whether the student presented a factual connection between allegation of harassment and alleged actions.

b. If the appropriate director/associate director or designee finds that there is a factual connection between the allegation of harassment and the alleged actions, then one of the following procedures will be followed:

i. If the accusation is against a faculty member, then the Faculty Code of Conduct procedures apply.

ii. If the accusation is against a student, then the Student Code of Conduct procedures apply.

iii. If the accusation is against an employee, then the appropriate campus director or their designee will contact Human Resources, and Human Resources policies for processing claims of harassment will be followed.

c. In instances where it is determined that a formal process is not appropriate, the student, faculty, or employee may be warned or counseled regarding the allegation.

## Copyright Infringement

### Copyright Law

Copyright is a form of legal protection provided by United State law (Title 17 U.S.C. §512(c)(2)) that protects an owner's right to control the reproduction, distribution, performance, display and transmission of a copyrighted work.

The public, in turn, is provided with specific rights for "Fair Use" of copyrighted works. Copyrighted works protect "original works of authorship" and include:

- Books, articles and other writings
  - Songs and other musical works
  - Movies and Television productions
  - Pictures, graphics and drawings
  - Computer software
  - Pantomimes and choreographic works
  - Sculptural and architectural works
- Specific information on copyright law and fair use may be found at the following sites:
- The U.S. Copyright Office: <http://www.copyright.gov>
  - The Electronic Frontier Foundation fair use frequently asked questions (FAQ): [http://w2.eff.org/IP/eff\\_fair\\_use\\_faq.php](http://w2.eff.org/IP/eff_fair_use_faq.php).

### Copyright Infringement

The copyright law provides the owner of copyright in a work the exclusive right:

- To reproduce the work in copies;
- To prepare derivative works based upon the work;
- To distribute copies of the work to the public by sale or other transfer of ownership, or by rental, lease, or lending;
- To perform the work publicly;
- To display the copyrighted work publicly;
- In the case of sound recordings, to perform the work publicly by means of a digital audio transmission. The copyright law states that "anyone who violates any of the exclusive rights of the copyright owner ...is an infringer of the copyright or right of the author".

Generally, under the law, one who engages in any of these activities without obtaining the copyright owner's permission may be liable for infringement.

## Peer-to-Peer File Sharing

Peer-to-Peer (P2P) file-sharing is a general term that describes software programs that allow computer users, utilizing the same P2P software, to connect with each other and directly access digital files from one another's hard drives. Many copyrighted works may be stored in digital form, such as software, movies, videos, photographs, etc. Through P2P file sharing, it has become increasingly easy to store and transfer these copyrighted works to others thus increasing the risk that users of P2P software and file sharing technology will infringe the copyright protections of content owners.

If P2P file-sharing applications are installed on your computer, you may be sharing someone else's copyrighted materials without realizing that you are doing so. As a user of the West network, it is important that you recognize the legal requirements of the files that you may be sharing with others. You should be very careful not to download and share copyrighted works with others.

The transfer and distribution of these works without authorization of the copyright holder is illegal and prohibited.

### Violations and Penalties under Federal Law

In addition to University sanctions under its policies as more fully described below, 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. For "willful" infringement, a court may award up to \$150,000 per work infringed. A court can, in its discretion, also assess costs and attorneys' fees. For details, see Title 17, United States Code, Sections 504, 505.

Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to \$250,000 per offense.

University Plans to Effectively Combat Unauthorized Distribution of Copyrighted Material

### **Student Sanctions**

As a student, your conduct in University classrooms and on websites is subject to and must fully conform to the Student Code of Conduct policy, the Acceptable Use policy, and any other applicable University policies.

The University may monitor traffic or bandwidth on our networks utilizing information technology programs designed to detect and identify indicators of illegal peer-to-peer file sharing activity. In addition to, or as an alternative, the University may employ other technical means to reduce or block illegal file sharing and other impermissible activities.

West will also provide for vigorous enforcement and remediation activities for those students identified through the University Digital Millennium Copyright Act (DMCA) policy as potential violators or infringers of copyright.

Disciplinary sanctions will be based on the seriousness of the situation and may include remediation based on a comprehensive system of graduated responses designed to curb illegal file sharing and copyright offenses through limiting and denial of network access or other appropriate means. These sanctions may be in conjunction with additional sanctions through the Student Code of Conduct, its Acceptable Use Policy and any other West policy applicable to the particular situation.

Students who are subject to professional codes of conduct that apply to their enrollment at the University shall be sanctioned according to the requirements of the respective code.

### **Education and Awareness**

West uses a variety of means to inform our students, faculty, and other network users about copyright laws and West's response to copyright infringement claims:

- West informs its campus community through our Consumer Information Guide and other periodic communications, that unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, may subject students and faculty to civil and criminal liabilities and the extent of the possible liabilities;
- The Consumer Information Guide is available on our website, <http://west.edu/sites/default/files/West-Consumer-Information-Notice.pdf>, provided to potential students and employees, and emailed annually to current students, faculty, and employees.

### **Legal Sources for Online Music and Videos**

The following links are online sources that provide information on legal access to copyrighted music and videos:

- EDUCAUSE, an association of colleges and universities, maintains a list of legal media sources, <http://www.educause.edu/legalcontent>.
- Motion Picture Association of America (MPAA)-provides a list of legal motion picture and video sources, <http://wheretowatch.org/>.
- The Recording Industry Association of America (RIAA) provides a list of legal music sources, [http://www.riaa.com/toolsforparents.php?content\\_selector=legal-music-services](http://www.riaa.com/toolsforparents.php?content_selector=legal-music-services).

## **Digital Millennium Copyright Act**

The University computer networks, including its online library and classroom environment are critical assets. Accordingly, Western International University respects the rights of the copyright owners and expects its faculty, staff, students, and other network users to comply with the U.S. copyright laws. Federal law prohibits the reproduction, distribution, public display or performance of copyrighted materials over the Internet without permission of the copyright owner, except in compliance with fair use or other copyright applicable statutory exceptions. For more information on copyright law, please refer to the University's Copyright Infringement and Peer-to-Peer File Sharing Policy.

In addition to sanctions that may be applicable under the University Student Code of Conduct Policy, the Acceptable Use of Computing Resources Policy or other policies, Western International University may terminate the network accounts or access to users who have repeatedly infringed on the copyrights of others. Western International University, in compliance with the federal Digital Millennium Copyright Act (DMCA), has established a mandated process for receiving and tracking alleged incidents of copyright infringement.

The University has designated an agent who will investigate notices of alleged copyright infringement and take appropriate actions. Such actions may include terminating repeat infringers accounts under the Digital Millennium Copyright Act (DMCA). The copyright infringement notices must be given in writing, preferably by email, or by U.S. mail to the agent listed below:

Western International University  
Attn: Copyright Agent  
Subject: Copyright Compliance  
4025 S. Riverpoint Pkwy., CF-K612  
Phoenix, AZ 85040  
Email: CopyrightAgent@apollo.edu

If a valid DMCA notification is received, the University will respond under this process by taking down the infringing content found on our networks. On taking down content under the DMCA, the University will take reasonable steps to contact the owner of the removed content so that a counter notification may be filed. Upon receiving a valid counter notification, the University will generally restore the content in question, unless the University receives notice from the notification provider that a legal action has been filed seeking a court order to restrain the alleged infringer from engaging in the infringing activity.

Please note that the DMCA provides that you may be liable for damages including costs and attorneys fees if you falsely claim that someone is infringing on your copyright. Alternatively, you can also be liable for damages including attorneys' fees if you materially misrepresent that an activity is infringing on the copyright of another. Therefore, the University recommends contacting an attorney if you are unsure whether your work or the work of another is protected by copyright laws.

### **Filing Notice of Alleged Infringement**

Following is the process for filing a notification under the DMCA. Notice must be given in writing to the designated agent as specified above and contain the following information:

- Identify in sufficient detail the copyrighted work that you believe has been infringed upon; for example, describe the work that you own.
- Identify the material that you claim is infringing on your copyright and provide detailed information reasonably sufficient to locate the infringing item; for example, provide the link to the infringing material.
- Provide a reasonably sufficient method of contacting you: phone number, address and email address.
- If possible, when reporting infringement, provide any information that allows the University to notify the alleged infringing party of notice of the alleged infringement.
- The following statement must be included in your notice: "I have a good faith belief that the use of the copyrighted materials described above and contained on the service is not authorized by the copyright owner, its agent, or by protection of law."
  - The following statement must be included in your notice: "I swear, under penalty of perjury, that the information in the notification is accurate and that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed."
  - The notice must be signed.

### **Filing Counter Notification of Alleged Infringement**

The person or provider of the alleged infringing material may present a counter notification pursuant to the DMCA. Upon proper counter notification, the University may reinstate the removed content. Notice must be given in writing to the designated copyright agent as specified above and contain the following information:

- Identify the material that has been removed. This may include providing the location or the URL when possible.

- Provide your name, address telephone number and email address if available.
- Provide a statement that you consent to the jurisdiction of Federal District Court for the judicial district in which you reside, or for any address outside the United States, for any judicial district, in which the service provider may be found and that you will accept service of process from the person who provided notification to the University of the alleged infringement or an agent of such person.
- Provide the following statement: "I swear, under penalty of perjury, that I have a good faith belief that the material identified above was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled."
- The notice must be signed.

Upon receiving a valid counter notification, the University will provide the person who filed the original notification with a copy of the counter notice and inform them that the material will be reinstated or access to it restored between 10 and 14 business days following receipt of the counter notice, pursuant to the DMCA unless the University receives notification that legal action to seek a court order restraining the alleged infringer from further engaging in the infringing activity has been filed.



