# **CONSUMER INFORMATION**

UPDATED 01 OCTOBER 2021

Prepared by:

Robert Kelley President Kelley Education Inc.

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# NOTICE OF AVAILABILITY OF INSTITUTIONAL AND FINANCIAL AID INFORMATION

Kelley Education Inc. updates its Consumer Information at least once per year in October. Information is disseminated through its Student Information System Portal, through hand-outs, through lectures & presentations, & made available through its official school websites.

# INSTITUTIONAL INFORMATION

Student applicants may view accreditation, eligibility, and certification documents upon request. Accreditation and state license information may be viewed in the reception lobbies of each of our locations. Department of Education eligibility and certification letters may be viewed upon request to the Director of Schools.

The information included within this publication is given to each enrolled student via compact disc. Additionally, you may access this consumer information for each of our schools by visiting on-line or requesting a printed version of this information. To request a paper copy of this information, please see the Contact Information for Assistance in Obtaining Institutional or Financial Aid Information in the section immediately following.

<u>Institution</u>	Exact Website Address of Consumer Information
University of Aesthetics & Cosmetology OPE ID: 04136900	http://universityofaesthetics.edu/consumer-information/
University of Aesthetics & Cosmetology OPE ID: 04137000	http://www.uofac.edu/consumer-information/
Professional Cosmetology Education Center OPE ID: 02202400	http://www.pcec.edu/consumer-information

**Overseeing service providers.** The school takes reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the customer information at issue and requires the service providers by contract to implement and maintain such safeguards.

# CONTACT INFORMATION FOR ASSISTANCE IN OBTAINING INSTITUTIONAL OR FINANCIAL AID INFORMATION

The University of Aesthetics & Cosmetology in Chicago, IL and in Downers Grove, IL and Professional Cosmetology Education Center in El Dorado, AR have designated individuals to assist prospective and enrolled students in obtaining the institutional or financial aid information required to be disclosed under HEA Sec. 485(a)(1), Sec. 485(f), [Sec.485(h)], and Sec. 485(j).

Institution	Address	Telephone	Contact	Website
University of	1357 N.	773.635.0141	ATTN: Leigh Anne	http://www.uofac.edu
Aesthetics &	Milwaukee		Kelley, Financial Aid,	
Cosmetology	Ave.		• <u>admissions@uofa</u>	
OPE ID:	Chicago, IL		<u>c.edu</u>	
04136900	60622		• <u>leighanne@uofac</u>	
			<u>.edu</u>	
University of	1037-1043	773.635.7700	ATTN: Leigh Anne	http://www.uofac.edu
Aesthetics &	Curtiss St.		Kelley, Financial Aid,	
Cosmetology	Downers		•	
OPE ID:	Grove, IL		admissions@uofa	
04137000	60515		<u>c.edu</u>	
			• <u>leighanne@uofac</u>	
			<u>.edu</u>	
Professional	460 N.	870.776.8865	ATTN: Jill Hanry,	http://www.pcec.edu
Cosmetology	Washington		Financial Aid,	
Education	Ave. El		• <u>admissions@pcec</u>	
Center OPE	Dorado, AR		<u>.edu</u>	
ID: 02202400	71730			

## STUDENT FINANCIAL AID INFORMATION

The purpose of student financial aid is to provide assistance to students who, without financial aid, would be unable to attend.

# <sup>i</sup>Need-Based and Non-Need-Based Financial Assistance Programs

There are many different types of aid available. Some of these are grants, loans, scholarships, and Veterans Benefits.

## Federal Pell Grant (PELL)

Pell grants are the foundation of federal student financial assistance to which aid from other federal and nonfederal sources might be added. These grants are generally awarded to undergraduate students and the award amounts can change yearly. Unlike loans, grants are not repaid unless, for example, you withdraw from school prior to the planned program completion date. All federal grants are awarded to students with financial need. The amount of your Federal Pell Grant depends on your cost of attendance, expected family contribution, enrollment status (full or part time) and whether you attend for a full academic year or less. For more information visit Federal Pell Grant.

# Iraq and Afghanistan Service Grant

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.

# Additional Student Eligibility Requirements:

- Must be ineligible for a Federal Pell Grant due only to having less financial need than is required to receive Pell funds, and
- Be under 24 years old, or
- Enrolled in college at least part-time at the time of the parent's or guardian's death.

The grant award is equal to the amount of a maximum Pell Grant for the award year – not to exceed the cost of attendance for that award year.

# William D. Ford Federal Direct Loan Program

Student loans, unlike grants, are borrowed money (monies) that must be repaid with interest. Loans made through this program are referred to as Direct Loans. Eligible students and parents borrow directly from the U.S. Department of Education. For more information visit <a href="William D. Ford Federal Direct Loan">William D. Ford Federal Direct Loan</a> <a href="Program">Program</a>. There are three types of loans in the program:

Subsidized Stafford Loan- A student can borrow this type of loan to cover some or all of their school expenses. The U.S. Department of Education pays the interest while you're in school at least half-time and for the first six months after you leave school (grace period). The amount of the loan cannot exceed a student's financial need. For more information visit Subsidized Stafford Loan.

*Unsubsidized Stafford Loan*- A student can borrow this type of loan to cover some or all of their school expenses. The U.S. Department does not pay interest on subsidized loans. A student is responsible for paying the interest that accrues on the loan from the time the loan is disbursed until it's paid in full. The fixed interest rate of 6.8 percent can be paid while attending school, during a period of deferment or forbearance or it can be accrued and the interest added to the principle amount of the loan. For more information visit <u>Unsubsidized Stafford Loan</u>.

**PLUS Loans**- Parents of dependent students can borrow from the PLUS Loan program. The terms and conditions of this type of loan include a requirement that the applicant not have an adverse credit history, a repayment period that begins on the date of the last disbursement of the loan and a fixed interest rate of 7.9 percent for the Direct Loan. For more information visit <u>PLUS Loans</u>.

## Veteran's Education Benefits<sup>1</sup>

The Department of Veterans Affairs administers a variety of education benefit programs. Many Veterans and active duty personnel can qualify for more than one education benefits program, including the:

- The Post-9/11 GI Bill http://www.gibill.va.gov/benefits/post 911 gibill/index.html
- Montgomery GI Bill Active Duty (MGIB-AD) http://www.gibill.va.gov/benefits/montgomery\_gibill/active\_duty.html
- <u>Montgomery GI Bill Selected Reserve (MGIB-SR)</u> http://www.gibill.va.gov/benefits/montgomery\_gibill/selected\_reserve.html
- Reserve Educational Assistance Program (REAP) http://www.gibill.va.gov/benefits/other\_programs/reap.html
- <u>Veterans Educational Assistance Program (VEAP)</u> http://www.gibill.va.gov/benefits/other\_programs/veap.html
- Educational Assistance Test Program (Section 901) http://www.gibill.va.gov/benefits/other\_programs/educational\_assistance\_test\_program.html
- Survivors' and Dependents' Educational Assistance Program (DEA) http://www.gibill.va.gov/benefits/other\_programs/dea.html

<sup>&</sup>lt;sup>1</sup> For more information, please visit: http://gibill.va.gov

- <u>National Call to Service Program</u> http://www.gibill.va.gov/benefits/other\_programs/national\_call\_to\_service\_program.html
- <u>Veterans Retraining Assistance Program</u> http://www.gibill.va.gov/benefits/other\_programs/vrap.html

# Other Programs:

- Reserve Educational Assistance (REAP)
- Survivors & Dependents Assistance (DEA)
- Veterans Educational Assistance Program (VEAP)
- Educational Assistance Test Program
- National Call to Service Program
- Veterans Retraining Assistance Program

Veterans need to be aware of a few special circumstances when completing the Free Application for Federal Student Aid (FAFSA). These circumstances include the student aid treatment of veteran's education benefits and the definition of a veteran for student aid purposes.

- <a href="http://www.finaid.org/military/vedbenefits.phtml">http://www.finaid.org/military/vedbenefits.phtml</a> are usually treated as resources, not income, for federal student aid purposes. There are, however, a few exceptions.
- <a href="http://www.finaid.org/military/combatpay.phtml">http://www.finaid.org/military/combatpay.phtml</a> can be a source of confusion on the FAFSA.
- <a href="http://www.finaid.org/military/veteranstatus.phtml">http://www.finaid.org/military/veteranstatus.phtml</a> is not necessarily the same as veteran status for VA purposes.

Our schools are approved for some<sup>2</sup> Veteran's Educational Benefits for veterans, eligible dependents of deceased or disabled veterans and active status National Guard and Reserve personnel. Any student interested in this type of benefit must verify with the school representative that the school is eligible for benefits. You can find more information on the web by visiting <a href="www.gibill.va.gov">www.gibill.va.gov</a>.

Survivors' and Dependents' Educational Assistance Program (DEA)

Of particular interest is the Survivors' and Dependents' Educational Assistance Program (DEA). It provides up to 45 months of education and training opportunities to eligible dependents of certain veterans. To be eligible, you must be the son, daughter, or spouse of a veteran who died or is permanently and totally disabled as the result of a service-connected disability, or who died while such a disability was in effect, or is MIA or captured in the line of duty by a hostile force, or is forcibly detained or interned in the line of duty by a foreign government or power. Sons and daughters must be between the ages of 18 and 26. Spousal benefits end 10 years from the date the VA finds the spouse as eligible or from the date of death of the veteran. To apply, complete VA Form 22-5490, Application for Survivors' and Dependents' Educational Assistance. For more information, call 1-888-GIBILL-1 (1-888-442-4551).

# Federal Benefits for Veterans and Dependents

Updated annually by the Department of Veterans Affairs (VA), the publication *Federal Benefits for Veterans and Dependents* contains information about education and training benefits available to veterans and eligible dependents. [VA Pamphlet 80-02-1, 114 pages, Stock Number 051-000-00225-3.] The booklet may be obtained free of charge from VA hospitals or regional offices. To request a copy, visit your nearest VA facility, call 1-800-827-1000 or write to Department of Veterans Affairs, Office of Public Affairs (80D), 810 Vermont Avenue, NW, Washington, DC 20420. It is also available for download free in PDF format from the VA's web site.

The publication can also be purchased for \$5.00 (\$6.25, international customers) from the US Government Printing Office, Superintendent of Documents, PO Box 371954, Pittsburgh, PA 15250-7954 *ThanksUSA Scholarship Program* 

ThanksUSA is a non-profit tax exempt charitable organization focused on thanking American troops. ThanksUSA sponsors a large scholarship program for children and spouses of active duty US military

<sup>&</sup>lt;sup>2</sup> VA does not grant all schools access to all programs. Check with your VA counselor for case specific information.

personnel. As many as 500 scholarships worth \$3,000 each are available for undergraduate study at accredited two and four year institutions of higher education. A minimum GPA of 2.0 on a 4.0 scale is required. Active duty US military personnel is defined as having served on active duty in the Army, Navy, Air Force, Marines and Coast Guard for at least 180 days since September 11, 2001, including all members of the Armed Forces who were killed or wounded in action. (Members of the reserves who have been activated to full-time duty and federalized members of the National Guard are eligible.) Dependent children (including adopted and stepchildren) must be age 24 and under as of the deadline. The scholarship program opens on April 1 and the deadline is May 15. Recipients are selected based on financial need, academic performance, leadership and community service. Preference is given to the families of military personnel who are wounded or killed during active duty. For more information, call 1-877-THX-USAS (1-877-849-8727), write to ThanksUSA Scholarship Program, Scholarship America, c/o Shellee Hintz, One Scholarship Way, PO Box 297, Saint Peter, MN 56082, or send email toshintz@scholarshipamerica.org.

# The Military Spouse Career Advancement Accounts (MyCAA) Program

MyCAA is a career development and employment assistance program sponsored by the Department of Defense (DoD). MyCAA helps military spouses pursue a license, certificate, certification or Associate's Degree (excluding General Studies and Liberal Arts) necessary for gainful employment in a high demand, high growth portable career field and occupation. For more information, see <a href="www.militaryonesource.mil">www.militaryonesource.mil</a>

Financial Aid available for those who qualify and may be subject to the terms of the scholarships, loans or grants applied for.

# Workforce Investment Act - IL<sup>4</sup>

The Workforce Investment Act (WIA) combines federally-funded job training programs in Illinois into a "workforce development" system where individuals can find a job or train for a new career.

The Workforce Investment Act (WIA) combines federally-funded job training programs in Illinois into a "workforce development" system where individuals can find a job or train for a new career. Services are provided through the state's one-stop delivery system, Illinois workNet<sup>TM</sup> Centers. Individuals who wish to apply for available training programs, or obtain other services, should report to the nearest Illinois workNet<sup>TM</sup> Center for assistance.

While the employment services and training programs available in each IL workNet<sup>TM</sup> Center may be somewhat different, they reflect the opportunities and needs of the <u>Local Workforce Investment Area</u> (or "LWIA"; there are 26 in Illinois), and are developed by a Local Workforce Investment Board.

### Services Available

WIA establishes three basic levels of employment and training services to eligible individuals. All adults, age 18 or older, are eligible to receive "core services". Additional "intensive services" are available to unemployed individuals who have been unable to obtain jobs through core services and those who are employed but need additional training services to reach self-sufficiency. "Training services" are also available for those who meet intensive services eligibility but were unable to find employment through those services.

# Core Services (available to all adults age 18 years or older):

- Job search and placement assistance (including career counseling)
- Labor market information (which identifies job vacancies; skills needed for in-demand jobs; and local, regional, and national employment trends)
- Initial assessment of skills and needs
- Information about and costs for local training providers
- Follow-up services to help customers keep their jobs once they are placed

<sup>&</sup>lt;sup>3</sup> At the time of this publication, the link for MyCAA on www.militaryonesource.mil was not working properly.

<sup>&</sup>lt;sup>4</sup> At the time of this publication, WIA has discontinued aesthetics as an approved program. This has been appealed and is included for reference purpose.

Intensive Services (available to eligible adults who have been unable to find work through core services, or need additional training to reach self-sufficiency):

- Comprehensive assessments
- Development of individual employment plans
- Group and individual counseling
- Case management
- Short-term prevocational services
- Out-of-area job search assistance, or relocation assistance
- Internships, literacy activities

Training Services (for those who have received "intensive services" but are still unable to find employment):

- occupational skills training
- on-the-job training
- cooperative education programs, and private sector training programs
- job readiness training
- adult education and literacy activities
- customized employer training

# Dislocated Worker and Youth Services

To be eligible for the dislocated worker program, a person must have received a lay off notice or have been laid off due to a company closure or mass layoff. Workers may also be eligible if they are currently unemployed and are unlikely to return to their prior occupation due to economic conditions in that industry.

To be eligible for the youth program, a person must be between the ages of 14 and 21, have low income, and have a substantial barrier to employment such as: deficient in basic literacy skills, school dropout, homeless, a runaway or a foster child, pregnant or parenting, an offender, or be an individual who requires additional assistance to complete an educational program, or to secure and hold employment. Services include:

- Tutoring, mentoring, study skills training, and instruction leading to completion of secondary school
- Alternative school services
- Paid and unpaid work experience (such as internships and job shadowing)
- Occupational skills training
- Leadership development
- Supportive services
- Guidance counseling
- Follow-up services

Occupational Information

Community Colleges in Illinois

Related Programs - Federal

## **Arkansas Rehab**

To achieve its mission of preparing Arkansans with disabilities to work and lead productive and independent lives, Arkansas Rehabilitation Services (ARS) provides a variety of training and career preparation programs. Services include career and technical education and training, transition from school to work or postsecondary education, on-the-job training, and ancillary support services that clients may need for successful employment. Vocational rehabilitation (VR) services include the following:

- Diagnosis and evaluation of capacities and limitations
- Guidance and counseling
- Career and technical education

- Job placement
- Physical and cognitive restorative services
- Assistive technology
- Residential career training facility and hospital
- Transition services for high school students with disabilities who are moving from high school to further education or work
- Scholarships and leadership programs for students with disabilities
- Financial assistance to kidney transplant recipients
- Community rehabilitation programs
- Supported employment services
- Supported housing

ARS is funded through a federal and state partnership with federal funding from the Rehabilitation Services Administration of the U.S. Department of Education comprising nearly 80 percent of the budget.

To learn more about our programs and services, please call our toll-free number at (800) 330-0632 or <a href="http://ace.arkansas.gov/resources/Pages/default.aspx">http://ace.arkansas.gov/resources/Pages/default.aspx</a> to locate the field office nearest you. Each field office is staffed by vocational rehabilitation counselors who can help you get started.

## **Other Grants**

# Sport Clips Scholarship

Sport Clips Scholarship is a scholarship opportunity available through AACS, which is awarding multiple \$1,000 scholarships for Cosmetology students who attend AACS member schools. Only one scholarship recipient will be chosen from an individual school per year for the program. For more information visit <a href="https://www.beautyschools.org">www.beautyschools.org</a>.

## The NCEA Esthetician Scholarship

The NCEA Esthetician Scholarship awards \$1,000 toward their education while meeting certain requirements such as financial circumstances, attendance and maintaining acceptable grades. Application deadlines are quarterly and can be found at <a href="https://www.ncea.tv">www.ncea.tv</a>.

# Joe Francis Haircare Scholarship

Joe Francis Haircare Scholarship awards \$1,000 scholarships for students enrolled or applying for enrollment to a barber or cosmetology school. Esthetician or Nail training students are not eligible. For details visit <a href="www.joefrancis.com">www.joefrancis.com</a>.

# AHBAI Scholarship

The American Health and Beauty Aids Institute or the AHBAI Fred Luster, Sr. Education Foundation offers scholarships specifically to cosmetology students. For information on the Chicago-based foundation, please visit their website atwww.ahbai.org.

# Farouk Systems USA/AACS Cosmetology Scholarship

Farouk Systems USA/AACS awards students attending AACS member schools scholarships in the amount of \$1,000 provided by Farouk Systems USA. For annual deadlines and requirements visit <a href="www.beautyschools.org">www.beautyschools.org</a>.

# Dream Shears/Trade Essentials Scholarship

Dream Shears and Trade Essentials awards multiple Cosmetology students attending AACS member schools scholarships in the amount of \$500 compliments of Dream Shears and Trade Essentials. For specific deadlines and requirements visitwww.beautyschools.org.

## **OPI** Scholarships

OPI's offers multiple scholarships for Cosmetology students attending AACS member schools in the amount of \$500 each from through the Schaeffer Family Foundation. Recipients are based on an essay and one industry recommendation. For more information visit www.beautyschools.org.

## Pat Goins Memorial Scholarship - Multiple \$1,000 Scholarships

The Pat Goins Memorial Scholarship Program awards multiple \$1,000 scholarships to Cosmetology Students attending AACS member schools. For more information visit <a href="https://www.beautyschools.org">www.beautyschools.org</a>.

# Beauty Schools Marketing Group - \$2,500 Scholarship

Beauty Schools Marketing Group is offering a \$2,500 cosmetology school scholarship to help cosmetology school students live their dreams! Apply for the Beauty Schools Marketing Group scholarship at <a href="https://www.beautyschoolsdirectory.com">www.beautyschoolsdirectory.com</a>

# **Institutional Student Financial Assistance Program**

There are special situations whereby students may participate in an Institutional Student Financial Assistance Program through the institution and administered by TFC. This is a credit installment program. For more information, please see: <a href="http://www.tfctuition.com/">http://www.tfctuition.com/</a>

## TERMS & CONDITIONS OF TITLE IV, HEA LOANS

# **General Terms and Conditions**

## General Eligibility

- Be a US citizen, eligible non-citizen, national, or permanent resident of the USA
- Show financial need (based upon an analysis of you and your family's income and assets
- Have a high school diploma or General Education Development (GED) Certificate
- Have a valid Social Security number
- Be enrolled in a Title IV participating institution and attending on at least a half time basis
- Make Satisfactory Progress
- Males must register (have registered) with the Selective Service
- Fully complete a Free Application for Federal Student Aid and any requested additional information
- Sign a statement of educational purpose and a certification statement on overpayment and default (found on the Free Application for Federal Student Aid)
- Not be delinquent; in default; or owe refund of an overpayment on any grant aid

# How do I apply?

Applications for federal aid programs are made by completing a Free Application for Federal Student Aid (FAFSA) (<a href="www.fafsa.ed.gov">www.fafsa.ed.gov</a>) which collects your family's income and asset information. If you have any difficulty in accessing or understanding the FAFSA, you may make an appointment at any of our schools to have assistance in filling out the FAFSA.

# Important!

- Know your deadlines
- Use the School Code Search
- Verification. We may be asked by the Department of Education for additional, supporting information regarding your FAFSA. We will not be able to process your application without any requested documentation.

# Post-FAFSA

- Your FAFSA will be analyzed and assigned an Eligibility Index Number (EFC) which stands for Estimated Family Contribution
- You will receive a Student Aid Report (SAR).

# • An Institutional Student Information Record (ISIR) will be sent to the schools you selected *Eligibility Index Number*

Financial need is determined by an annual, congressionally approved formula applied for all financial aid applicants. To determine financial need, an index is created based upon facts about you and your family's income and assets; the size of your family; number of family members attending post-secondary school(s); and any unusual circumstances or financial hardships specific to you. This index is used to determine your financial aid assistance in meeting the cost of attending a post-secondary institution.

# **Determining Financial Need**

Financial need = Cost of Going to School less your < Expected Family Contribution >. Cost of Going to School is tuition, fees, books, supplies, equipment, and other educational costs. Expected Family Contribution is the amount that is determined to be your family's contribution to your education.

# Pell Grants

Pell Grants are awarded based upon financial eligibility<sup>5</sup> determined by your Free Application for Federal Student Aid (<a href="www.fafsa.ed.gov">www.fafsa.ed.gov</a>). To become eligible and to maintain eligibility, a student must be enrolled and meet or exceed satisfactory academic progress (SAP)<sup>6</sup> including attendance minimums.

# Federal Direct Stafford Loan

The amount of this loan, in combination with other financial aid, cannot exceed the cost of attendance as determined by the institution.

# CRITERIA FOR SELECTING RECIPIENTS & DETERMINING AMOUNT OF AWARD

# **Expected Family Contribution**

The Expected Family Contribution (EFC) is a measure of your family's financial strength and is calculated according to a formula established by law. Your family's income, family size, and the number of individuals in your family who will attend college during the year are all considered. The information you report on your Free Application for Federal Student Aid (FAFSA) or your FAFSA4caster is used to calculate your EFC. Schools use EFC to determine your federal student aid eligibility and financial aid award.

For more information, please visit: Funding Education Beyond High School: The Guide to Federal Student Aid at: <a href="http://studentaid.ed.gov/students/publications/student\_guide/index.html">http://studentaid.ed.gov/students/publications/student\_guide/index.html</a>. To request a free copy of Funding Education Beyond High School: The Guide to Federal Student Aid, call the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243).

# DETERMINING INDEPENDENT STUDENT STATUS

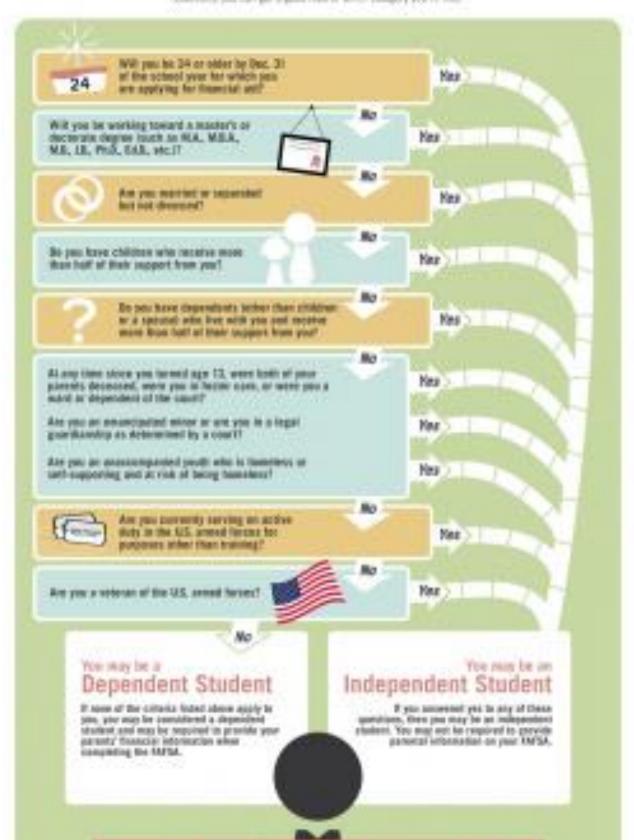
If you have a special circumstance that prevents you from providing parental information you **may** be able to submit your FAFSA. However, your FAFSA will be incomplete. You must contact the financial office at your college and provide them with documentation to verify your situation.

<sup>&</sup>lt;sup>5</sup> All grants and loans are considered estimated until the student establishes enrollment.

<sup>&</sup>lt;sup>6</sup> See Satisfactory Academic Progress in this document.

# Do I Have to Provide My Parents' Information on the Free Application for Federal Student Aid (FAFSA")?

All applicants for flotted student sid are consistent either "Indipondent" or "Sepandent" Department absolute and required to reclude information about their parents or the PAPSA. Or intowering a Non-constitute, one can get a pant lines of which company you fit into.



# FREQUENCY OF DISBURSEMENTS

When financial aid is awarded, it is awarded for the academic year. The financial aid award is required to be split equally between two parts of the academic year. Financial aid is paid to a student's account when the following conditions are met during each payment period. Once determined, Credit Balances are issued by check to the student's address on file and mailed via USPS.

- 1. The student is determined to be eligible and is awarded.
- 2. Loan funds have been received from the lender.
- 3. The student has achieved the appropriate number of hours.
- 4. The student is determined to be maintaining Satisfactory Academic Progress.
- 5. The disbursement date for the term has been reached.

We continue to release funds throughout the term to student accounts as students are awarded and as funds arrive from the lenders.

## RIGHTS & RESPONSIBILITIES OF STUDENTS RECEIVING TITLE IV

## RIGHTS

Students receiving financial aid have the right to:

- Accept or decline any of your financial aid award(s).
- Know what financial assistance is available, including all federal, state, and institutional aid programs.
- Know the procedures and deadlines for submitting applications for each financial aid program (including federal, state, and institutional aid programs).
- Know how your financial aid awards were calculated, the criteria to receive each award, and how the funds will be distributed or disbursed.
- Know the school policy on enrollment, attendance and good academic standing.
- Seek financial aid counseling.
- Know the consequences of defaulting on a student loan.
- Know that the information you give to the Student Financial Aid Office will be treated confidentially as mandated by the Family Educational Rights and Privacy Act (FERPA).
- Know information regarding a loan lender, interest rate, the total amount to be repaid, deferment
  options, repayment procedures, and the length of time you have to repay the loan, and when
  repayment begins.
- Submit a request to review extenuating circumstances<sup>7</sup>, requesting reconsideration of your financial aid eligibility if you or your family's financial conditions change.
- Submit an Academic Progress Appeal if you do not meet the Standards of Satisfactory Academic Progress.
- Know the refund and the Federal Return to Title IV policies.

- Recent unemployment or change in income of a family member(s) reported on the FAFSA
- Unusually high child care costs
- Substantial changes in assets, household size or student status
- Out of pocket medical/dental bills not covered by insurance or included in itemized deductions
- Roth IRA rollovers included in the respective year's tax formula
- Override of a student's dependency status determined by the FAFSA

<sup>&</sup>lt;sup>7</sup> Circumstances that can be considered include but are not limited to:

• Know that we apply the applicable refund policy to all terminations or any reason, by either party, including student decision, course and /or program cancellation, or institution closure.

Note: Financial aid administrators are given the authority (by the Higher Education Act of 1965) to use professional judgment in reviewing requests by students to consider special or extenuating circumstances that are not reflected on the FAFSA or included in the standard Cost of Attendance. Revision<sup>8</sup> of a student's estimated Cost of Attendance to include educational costs not already incorporated Circumstances not allowed by Federal regulation to be considered include vacation expenses, tithing, credit card expenses/debt, and standard living expenses such as rent, utilities, and allowances.

## RESPONSIBILITIES

Students receiving financial aid are responsible for:

- Completing all applications and forms accurately and on-time.
- Re-applying for financial aid each year.
- Providing requested documentation and information in a timely manner and keeping copies for your own records.
- Reading and understanding all materials sent to you
- Completing pre-loan counseling prior to receiving the first disbursement and exit counseling prior to graduation or leaving school.
- Repayment of all loans in accordance with the terms of your promissory note. You are responsible for notifying your lender if any of the following occurs before your loan is repaid: change of address, graduation, withdrawal, name change, or transfer to another institution.
- Requesting personal assistance if you have questions or don't understand the information provided to you.
- Knowing the financial aid information provided to you.
- Notifying the institution of any name or address changes.
- Knowing and complying with the rules governing your financial aid awards.
- Compliance with institution policies on refunds and Federal Return to Title IV Aid should you withdraw from the institution (either officially or unofficially).
- Notifying the institution of any financial awards you receive from outside resources (including scholarships, grants, Veteran's Benefits, tuition waivers, or other educational/tuition assistance) not already reported on your Financial Aid Award Notification.
- Maintaining Satisfactory Academic Progress.
- Using financial aid for educational expenses incurred while enrolled.
- Repayment of any over-award of financial aid.

## **VERIFICATION**

The U.S. Department of Education created the Verification Process to confirm the accuracy of information provided on the FAFSA. By federal regulation, Kelley Education Inc. is responsible for conducting the verification process on behalf of the U.S. Department of Education.

<sup>&</sup>lt;sup>8</sup> A request for professional judgment must be submitted with the proper form(s); documentation required for verification (signed tax return, verification worksheet) and supporting the circumstance(s). Review is done on a case-by-case basis only and the decision by the financial aid administrator is final. Approval of the request does not guarantee additional financial aid eligibility. Please contact OSFA for more information.

If you are selected for verification, you cannot be awarded any federal student aid until the verification process is completed including transmitting to and receiving any necessary corrections from the U.S. Department of Education. Further, we employ a third party servicer, GEMCOR Inc., to assist us in the verification process.

Your Student Aid Report (SAR) may indicate your FAFSA was selected for Verification with an asterisk "\*\*." Kelley Education Inc. follows a Verification Process established and managed by GEMCOR Inc.

### VERIFICATION PROCESS

Verification of FAFSA information will generally be required by FAFSA applicants who are required by IRS rules to file a federal tax return and either do not or cannot use the IRS Data Retrieval Process. Verification will be required from:

• Parents of Dependent Students

-or-

• Independent Students

Important Note! Using the IRS Data Retrieval Process may significantly speed up the FAFSA process. Further Verification may require a worksheet to be completed. This worksheet will require you to complete, sign, attach any required documents, and submit the form and required documents to your financial aid representative.

## **VERIFICATION NOTIFICATION**

You will be notified by any of the following methods: in-person, e-mail, or phone call. Remember, once selected, you may not receive FSA until the Verification Process is completed.

## ACCEPTABLE VERIFICATION DOCUMENTATION

A signed copy of the student's or parent's federal income tax return is no longer acceptable as verification documentation. To verify the federal income tax return entered on the FAFSA you must"

• Use the IRS Data Retrieval Tool (if eligible) to verify

-or-

• Send us an IRS Tax Return Transcript <a href="http://osfa.uga.edu/taxreturn.html">http://osfa.uga.edu/taxreturn.html</a> of the tax year Important Note! If you choose to provide an IRS transcript, the IRS will only provide one tax transcript per tax year. Please make copies!

# IRS EXTENSION AND VERIFICATION

IRS extensions do not eliminate the requirement to provide the requested tax return documentation. The Verification Process cannot be completed and the student's eligibility for federal student aid cannot be determined until all requested acceptable documentation has been received and processed.

## DEADLINE AND CONSEQUENCES

The application processing cycle is 18 months. As an example, the 2021-2022 award year, FAFSA applications can only be accepted on or after January 1, 2021 and not past June 30, 2022.

- Corrections must be received and accepted before midnight (central time) on September 23.
- For students who have been selected for Verification, Institutions must have a valid output document (Verification Correct and Complete) no later than 120 days after the last day of enrollment or September 27 (in the example above, 2021).
- To give subsidized Title IV aid to a student, the institution must have a valid output document while the student is still enrolled for the award year (or in the timeframe the student qualifies for a late disbursement under 34 CFR 668.164(g)(4)(i) but no later than September 27 (as above in the example).

## NOTIFICATION OF AWARD CHANGES

Upon receiving a valid output document, students will be notified in-person, by email, or by phone.

## SAMPLE LOAN REPAYMENT SCHEDULE

Below is a sample loan repayment grid showing the monthly payments and total amounts repaid. The minimum payment for Stafford loan is \$50.00 per month, for Perkins Loan \$40.00 per month

Standard Repayment Plan at 8.25% Interest				
Loan Amount	Number of Payments	Monthly Payment	Interest Charges	Total Repaid
2,600.00	65	\$50.00	\$628.42	\$3,228.42
4,000.00	120	\$50.00	\$1,827.30	\$5,827.30
7,500.00	120	\$91.99	\$3,538.80	\$11,038.80
10,000.00	120	\$122.65	\$4,718.00	\$14,718.00
15,000.00	120	\$183.98	\$7,077.60	\$22,077.60

# NECESSITY FOR REPAYING LOANS

Student loans are real loans and it is imperative that you pay them back. The following is directly from the Department of Education's website:

http://studentaid.ed.gov/PORTALSWebApp/students/english/repaying.jsp#default

If you default, it means you failed to make payments on your student loan according to the terms of your promissory note, the binding legal document you signed at the time you took out your loan. In other words, you failed to make your loan payments as scheduled. Your school, the financial institution that made or owns your loan, your loan guarantor, and the federal government all can take action to recover the money you owe. Here are some consequences of default:

- National credit bureaus can be notified of your default, which will harm your credit rating, making it hard to buy a car or a house.
- You will be ineligible for additional federal student aid if you decide to return to school.
- Loan payments can be deducted from your paycheck.
- State and federal income tax refunds can be withheld and applied toward the amount you owe.
- You will have to pay late fees and collection costs on top of what you already owe
- You can be sued.

For more information and to learn what actions to take if you default on your loans see the <u>Department of Education's Default Resolution Group Web site</u>.

# STUDY ABROAD

Our institutions do not participate in any programs which approved for study abroad.

Our institutions do not have any financial aid conditions or terms applicable to employment.

# **EXIT COUNSELING**

Our institutions provide to every student borrower of loans under the Federal Direct Loan program, exit counseling information whenever the student ceases enrollment. If the student does not appear for exit counseling, we will mail the Exit Counseling Guide for Direct Loan borrowers. Additionally, borrowers can find additional information: <a href="http://www.nslds.ed.gov/nslds\_SA/">http://www.nslds.ed.gov/nslds\_SA/</a> and <a href="http://studentaid.ed.gov/PORTALSWebApp/students/english/repaying.jsp">http://studentaid.ed.gov/PORTALSWebApp/students/english/repaying.jsp</a>

- The exit counseling packet will provide information on:
- average anticipated monthly repayment amounts
- repayment plan options
- · options to prepay or pay on shorter schedule
- debt management strategies
- use of Master Promissory Note
- the seriousness and importance of the student's repayment obligation
- terms and conditions for forgiveness or cancellation
- rights and responsibilities of students under Title IV, HEA loan programs
- terms and conditions for deferment or forbearance
- consequences of default
- options and consequences of loan consolidation
- tax benefits available to borrowers

## WRIGHT INTERNATIONAL STUDENT SERVICES (WISS)

For all borrowers, upon graduation or withdrawal, we provide Wright International Student Services with:

- SSN
- Address
- Date of Birth
- Last Day of Attendance
- Name
- Telephone
- Servicer of the Loan
- Number of Loans Outstanding

WISS then tracks the account to help keep it out of default. This additional service is available at no additional cost to the student.

## PANAM COLLECTS

Pan Am Collections, Inc. (PAC) is a full service collection agency that works as a debt collector for Kelley Education Inc. For more information, www.panamcollects.com

## FINANCIAL RECOVERY SYSTEMS

FRS, Financial Recovery Systems, is a full service collection agency that works as a debt collector for Kelley Education Inc. For more information, Financial Recovery Systems is located at 2010 Crow Canyon Place, Suite 310 San Ramon, CA 94583. (Toll-Free) 800.280.4377 (Fax) 925.498.2524.

# **DRUG & ALCOHOL PREVENTION**

Kelley Education Inc. publishes its DAAPP Disclosure for Employees & Students for DFSCA Compliance on 01 October 2021 on its official school websites & makes these available via print.

The Drug-Free Schools and Campuses Regulations (345 CFR Part 86) of the Drug-Free Schools and Communities Act (DFSCA) require an institution of higher education to certify implemented programs to prevent the abuse of alcohol and use or distribution of illicit drugs by students and employees on its premises and as part of any of its activities.

As a requirement of the Drug Free Schools and Campuses Act, we must annually distribute the following in writing to all students and employees:

- Standards of conduct that clearly prohibit the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;
- A clear statement that the institution will impose sanctions on students and employees and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct;
- A description of the health risks associated with the use of illicit drugs and abuse of alcohol;
- A description of the legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol; and
- A description of any drug or alcohol counseling, treatment, or rehabilitation or reentry programs that are available to employees or students.

Additionally, Kelley Education Inc. conducts a review of its Drug & Alcohol Prevention program(s) through a biennial review.

The law further requires that the institution conduct a biennial review of its program with the following objectives:

- Determine the effectiveness of the policy and implementing changes to the alcohol and other drug programs if they are needed;
- To ensure that the sanctions developed are enforced consistently
- The number of drug- and alcohol-related violations and fatalities occurring on the campus or as part of their activities that are reported to campus officials; and
- The number and types of sanctions on students or employees as a result of such violations or fatalities.

This DAAPP is reviewed through a Biennial Review process.

# NOTICE OF FEDERAL STUDENT FINANCIAL AID PENALTIES FOR DRUG LAW VIOLATIONS

Federal law provides that a student who has been convicted of an offense under any federal or state law involving the possession or sale of a controlled substance during a period of enrollment for which the student was receiving financial aid shall not be eligible to receive any federal or institutional grant, loan, or work assistance during the period beginning on the date of such conviction and ending after the interval specified in the following table.

If convicted of an offense involving:

Possession of a Controlled	Ineligibility Period
Substance	

First Offense	1 year
Second Offense	2 years
Third Offense	Indefinite
Sale of a Controlled Substance	Ineligibility Period
Sale of a Controlled Substance First Offense	Ineligibility Period  2 years

A student whose eligibility has been suspended based on a conviction for possession or sale of a controlled substance may resume eligibility before the end of the ineligibility period if:

- A. the student satisfactorily completes a drug rehabilitation program that:
  - 1. Complies with the criteria prescribed in the federal regulations; and
- 2. Includes two unannounced drug tests;

B. the student successfully passes two unannounced drug tests conducted by a drug rehabilitation program that complies with the criteria prescribed in the federal regulations; or

C. the conviction is reversed, set aside, or otherwise rendered nugatory.

# CONSUMER INFORMATION FOR STUDENT ATHLETES

# STUDENT RIGHT-TO-KNOW ACT

Kelley Education Inc., its University of Aesthetics & Cosmetology in Chicago, IL and in Downers Grove, IL and Professional Cosmetology Education Center in El Dorado, AR are committed to providing its students, their families, and their campus communities, full disclosure of all consumer information as required by state and federal laws and regulations. The laws are intended to satisfy students' right to know and to give students the opportunity to make fully informed choices regarding the institution they elect to attend. The information below should be read and understood. If you need clarification or additional information, please let a school official know.

This information is updated regularly & published on the internet. Further, it is our policy to update this annually following the Annual Security Report. We publish an Annual Notice of Available Consumer Information to serve as official notification to all students that this electronic version that this information is available on your school's official website.

## The Student Right-to-Know Act

The Student Right-to-Know Act was enacted in 1990 by federal law. The law requires institutions that receive Title IV HEA student financial aid to collect, report and/or disclose graduation rates for full-time, first-time, degree-seeking undergraduate students and students receiving athletically related student aid.

# **CLERY/CAMPUS SECURITY ACT**

# FAMILY POLICY COMPLIANCE OFFICE (FPCO) HOME

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

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

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

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

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

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

Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, inclusion in a PTA bulletin, student handbook, or newspaper article) is left to the discretion of each school.

For additional information, you may call 1-800-USA-LEARN (1-800-872-5327) (voice). Individuals who use TDD may call 1-800-437-0833.

### RECORDKEEPING

Source: Federal Student Aid Handbook, Volume II, Privacy of Student Information (FERPA Rules) The Family Educational Rights and Privacy Act (FERPA) sets limits on the disclosure of personally identifiable information from school records, and defines the rights of the student to review the records and request a change to the records.

With exceptions such as those noted in this section, FERPA generally gives postsecondary students the right

to review their education records.

- to seek to amend inaccurate information in their records, and
- to provide consent for the disclosure of their records.

These rules apply to all education records the school keeps, including admissions records (only if the student was admitted) and academic records as well as any financial aid records pertaining to the student. Therefore, the financial aid office is not usually the office that develops the school's FERPA policy or the notification to students and parents, although it may have some input.

# STUDENT'S & PARENTS' RIGHTS TO REVIEW EDUCATIONAL RECORDS

A school must provide a student with an opportunity to review his or her education records within 45 days of the receipt of a request. A school is required to provide the student with copies of education records, or make other arrangements to provide the student access to the records, if a failure to do so would effectively prevent the student from obtaining access to the records. While the school may not charge a fee for retrieving the records, it may charge a reasonable fee for providing copies of the records, provided that the fee would not prevent access to student records.

While the rights under FERPA have transferred from a student's parents to the student when the student attends a postsecondary institution, FERPA does permit a school to disclose a student's education records to his or her parents if the student is a dependent student under IRS laws.

Note that the IRS definition of a dependent is quite different from that of a dependent student for FSA purposes. For IRS purposes, students are dependent if they are listed as dependents on their parent's income tax returns. (If the student is a dependent as defined by the IRS, disclosure may be made to either parent, regardless of which parent claims the student as a dependent.)

# PRIOR WRITTEN CONSENT TO DISCLOSE THE STUDENT'S RECORDS

Except, under one of the special conditions described in this section, a student must provide written consent before an education agency or school may disclose personally identifiable information from the student's education records. The written consent must—

- state the purpose of the disclosure,
- specify the records that may be disclosed,
- identify the party or class of parties to whom the disclosure may be made, and,
- be signed and dated.

If the consent is given electronically, the consent form must—

- identify and authenticate a particular person as the source of the electronic consent, and
- indicate that person's approval of the information contained in the electronic consent.

The FERPA regulations include a list of exceptions where the school may disclose personally identifiable information from the student's file without prior written consent. Several of these allowable disclosures are of particular interest to the financial aid office, since they are likely to involve the release of financial aid records.

## DISCLOSURES TO SCHOOL OFFICIALS

Some of these disclosures may be made to officials at your school or another school who have a legitimate interest in the student's records. Typically, these might be admissions records, grades, or financial aid records.

Disclosure may be made to:

- other school officials, including teachers, within the school whom the school has determined to have legitimate educational interests.
- to officials of another postsecondary school or school system, where the student receives services or seeks to enroll.

If your school routinely discloses information to other schools where the student seeks to enroll, it should include this information in its annual privacy notification to students. If this information is not in the annual notice, the school must make a reasonable attempt to notify the student at the student's last known address.

## DISCLOSURES TO GOVERNMENT AGENCIES

Disclosures may be made to authorized representatives of the U.S. Department of Education for audit, evaluation, and enforcement purposes. "Authorized representatives" includes employees of the Department—such as employees of the Office of Federal Student Aid, the Office of Postsecondary Education, the Office for Civil Rights, and the National Center for Education Statistics—as well as firms that are under contract to the Department to perform certain administrative functions or studies. In addition—

Disclosure may be made if it is in connection with financial aid that the student has received or applied for. Such a disclosure may only be made if the student information is needed to determine the amount of the aid, the conditions for the aid, the student's eligibility for the aid, or to enforce the terms or conditions of the aid.

A school may release personally identifiable information on an F, J, or M nonimmigrant student to U.S. Immigration and Customs Enforcement (formerly the Immigration and Naturalization Service) in compliance with the Student Exchange Visitor Information System (SEVIS) program without violating FERPA.

# DISCLOSURES IN RESPONSE TO SUBPOENAS OR COURT ORDERS

FERPA permits schools to disclose education records, without the student's consent, in order to comply with a lawfully issued subpoena or court order.

In most cases, the school must make a reasonable effort to notify the student who is the subject of the subpoena or court order before complying, so that the student may seek protective action. However, the school does not have to notify the student if the court or issuing agency has prohibited such disclosure. A school may also disclose information from education records, without the consent or knowledge of the student, to representatives of the U.S. Department of Justice in response to an *ex parte* order issued in connection with the investigation of crimes of terrorism.

# DOCUMENTING THE DISCLOSURE OF INFORMATION

Except as noted below, school must keep a record of each request for access and each disclosure of personally identifiable student information. The record must identify the parties who requested the information and their legitimate interest in the information. This record must be maintained in the student's file as long as the educational records themselves are kept.

## FERPA RESPONSIBILITIES AND STUDENT RIGHTS

A school is required to-

- Annually notify students of their rights under FERPA;
- Include in that notification the procedure for exercising their rights to inspect and review education records; and
- Maintain a record in a student's file listing to whom personally identifiable information was disclosed and the legitimate interests the parties had in obtaining the information (does not apply to school officials with a legitimate educational interest or to directory information).
- Student has the right to—
- Inspect and review any education records pertaining to the student;
- Request an amendment to his/her records; and
- Request a hearing (if the request for an amendment is denied) to challenge the contents of the education records, on the grounds that the records are inaccurate, misleading, or violate the rights of the student.

## RIGHTS UNDER FERPA

The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

• The right to inspect and review the student's education records within 45 days of the day the Institution receives a request for access.

A student should submit to the registrar, dean, head of the academic department, or other appropriate official, a written request that identifies the record(s) the student wishes to inspect. The Institution official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the University official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed. The right to request the amendment of the student's education records that the student believes is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA. A student who wishes to ask the University to amend a record should write the Institution official responsible for the record, clearly identify the part of the record the student wants changed, and specify why it should be changed.

If the Institution decides not to amend the record as requested, the Institution will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

The right to provide written consent before the University discloses personally identifiable information from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

The Institution discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by the Institution in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the Institution has contracted as its agent to provide a service instead of using University employees or officials (such as an attorney, auditor, or collection agent); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the Institution.

The student has the right to file a complaint with the U.S. Department of Education concerning alleged failures by the Institution to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-5901

# RECORD KEEPING AND ACCESS

- All files are the property of Kelley Education Inc.
- We do not copy; we do not fax, and we do not electronically scan files and their contents to persons or entities except as identified above.
- Files are kept for a minimum of 5 years.
- Students are encouraged to keep their own records of attendance and grades. It is the student's responsibility to maintain THEIR copies of important documents: Enrollment Agreements, Financial Aid documents, written requests, SAP reports, etc.

A school representative must be present during the review of the files; their intent is to clarify questions concerning these records.

# SAFEGUARDING CUSTOMER INFORMATION

# STUDENT INFORMATION SECURITY POLICY

## PURPOSE OF POLICY

The purpose of the Student Information Security Policy is to provide a written understanding of the expectation of confidentiality & safeguarding of confidential student information.

Technology changes on a daily basis. It allows students, faculty and staff work faster & more efficiently. Safeguarding information is becoming increasing difficult.

To protect the information of students, faculty, staff, alumni & others, Kelley Education Inc. has developed policies and processes to help classify, find and secure information in compliance with state and federal regulations.

## KEI COMMUNITY

The Kelley Education Inc. ("KEI") community are employees, vendors, & 3<sup>rd</sup> Party Servicers hired to perform essential operations & may be provided access to "confidential student information."

# CONFIDENTIAL INFORMATION

Confidential Information is any information that is not publicly available.

## 5 PHASES OF PROTECTING DATA

- 1. Identification. We have created a policy to determine what information is confidential. Please see the Data Classification & Usage policy which organizes data into 4 categories.
- 2. Rules. To learn how to use & store data that is restricted use, please see the Data Classification & Usage Policy.
- 3. Reviewing Data Collection. Kelley Education Inc. is working on developing Data Privacy Assessments to ensure that sensitive information is being handles correctly.
- 4. Retention & Destruction. To protect data, Kelley Education Inc. has created a Retention & Destruction Policy.
- 5. Awareness & Training. To understand threats, we will be updating our in-house training to share best practices.

# POLICY PRINCIPLES

- 1. All Confidential Student Information is the property of KEI
- 2. Confidential Student Information is to be used only by those who have been given access
- 3. Confidential Student Information is to be used only to perform assigned duties
- 4. Confidential Student Information is to be safeguarded against loss, theft, or negligent handling
- 5. Confidential Student Information may not be used for profit or gain
- 6. Confidential Student Information is not to be shared with anyone not authorized to receive or to view it
- 7. Confidential Student Information will not be disclosed except in matters related to its accrediting body, legal or judicial, or government department. In all such cases Confidential Information will not be disclosed without the approval of the President or Director of Schools.

Any person or company that violates this policy will be subject to disciplinary action which may include termination & other disciplinary action as allowed by law.

# APPROVAL & REVISIONS

Approved by: Robert Kelley on 29 September 2021.

## EMPLOYEE CONFIDENTIALITY POLICY

## **PURPOSE**

In accordance with the trust placed in its employees by Kelley Education Inc., all employees are responsible for maintaining the confidentiality of sensitive data; including but not limited to personal confidential information about individuals who enrolled or work at its schools.

# **EMPLOYEES**

For the purposes of this policy, Kelley Education employees include educators, administrative staff, student educators, contract or, if applicable, casual employees.

## **SCOPE**

Kelley Education Inc. maintains a number of policies to protect information. In accordance with these policies, all employees must protect sensitive information by using information only for approved purposes, controlling its dissemination, and reducing to the extent reasonably possible the risk of its unauthorized use or disclosure.

Additionally, Kelley Education Inc. employees may have access to other kinds of sensitive information that is protected by Federal, state, or local laws and regulations.

# **DISCIPLINE**

Kelley Education Inc. employees are required to comply with all applicable laws and regulations and College policies. The failure to comply with policies or applicable laws & regulations regarding the use and safeguarding of sensitive information, or to protect other sensitive information not specifically covered by such policies, laws, or regulations, may result in disciplinary action. Disciplinary action may include termination of employment or enrollment at Kelley Education Inc.

## KEI DATA CLASSIFICATION & USAGE POLICY

# **PURPOSE**

The purpose of this policy to classify types of information & usage according to levels of confidentiality.

## **APPLICABILITY**

This Policy applies to all employees, vendors, 3<sup>rd</sup> Party Servicers & those to whom confidential information has been entrusted by Kelley Education Inc. ("KEI").

In information security, we classify data according to its level of confidentiality if it security is breached. In doing so, KEI hopes to determine security processes & controls to safeguard confidential information. KEI has organized data into 4 classifications.

- 1. Restricted Use
- 2. Confidential
- 3. Internal Use Only
- 4. UnRestricted

# **RESTRICTED USE DATA - DEFINED**

Restricted Use Data is data including Personally Identifiable Information (information which could identify an individual); financial information, health related information, & biometric data. Restricted Use Data requires the highest level of security. Examples include, but are not limited to:

- Social Security Numbers
- Tax Returns
- Driver License Numbers
- Financial Account Numbers

### RESTRICTED USE DATA – USAGE RULES

- 1. Safeguarding Restricted Use Data will always be safeguarded.
- 2. Digital Storage Digital Restricted Use Data will be stored in institutionally supported applications residing in contracted server service except for data required for critical business purposes in an approved 3<sup>rd</sup> Party application.
- 3. Digital Access Access to electronic data shall only be through an authenticated process & only by those granted access.
- 4. Hard Copy Storage Hard copies shall be stored in locked rooms.
- 5. Hard Copy Access Hard copy access is by authorized access only.
- 6. Additional Copies Additional storage or copying (either electronic or hard copy) is not allowed except as required for compliance purposes.
- 7. Transmission Transmission must be encrypted or via secure transmission.
- When stored in the cloud, Restricted Use data will require multi-factor authentication. Employees
  with access to Restricted Use data in the cloud will also be required to install software that can
  monitor the activity on Restricted Use data in motion or at rest.
- Electronic and hard copy data shall be destroyed in accordance with KEI's Data Retention and Destruction Policy, and shall be rendered unreadable in paper or electronic form. All departments shall have policies in place and periodically review electronic storage areas and their hard copy storage areas to insure that data is being destroyed in a timely and effective manner.

# CONFIDENTIAL

This includes data protected by state or federal law, contractual agreements and proprietary information against unauthorized use, disclosure, modification and destruction. Confidential data includes the following:

- Student records, including date of birth, place of birth, mother's maiden name, official grades recorded on a student's permanent record, academic information, race, judicial information and other information relative to a student's permanent record (i.e. official grades, judicial records, etc.).
- Human Resources data including employment records, salary, benefits, personnel evaluations, date of birth, place of birth, mother's maiden name, race and other records pertaining to personnel files (i.e. payroll reports, yearly merit increase data, etc.).
- Academic Affairs information relating to non-public research and promotion and tenure files (i.e. notes relating to tenure decisions).

- Alumni or donor information, including date of birth, place of birth, mother's maiden name, donation amount and assets (i.e. Daily Giving Reports, Donor Profiles, etc.).
- Corporate records including Board of Trustee minutes, Board of Trustee votes and other confidential information dispersed at Board meetings and/or shared with Board members.
- Sensitive Personal Information including credit checks, criminal background checks, visa numbers, sexual behaviors and criminal convictions (i.e. CORI/SORI reports).
- Information security data, including administrator passwords used by Information Technology staff and other data associated with security-related incidents occurring at KEI.
- Research data involving human subjects that are subject to the Common Rule (Federal Policy for the Protection of Human Subjects, 46 CFR 101 et seq).

# RULES FOR USAGE OF CONFIDENTIAL DATA

Confidential data shall be stored in institutionally supported applications located in KEI contracted Cloud services' Data Center, institutionally supported shared drives, or approved third party hosted applications. Confidential data can be stored on Institute-owned laptop or desktop computers, but **shall not be** copied to non-KEI computers, USB devices or other portable media. Hard copy data shall be maintained in as few receptacles and rooms as business dictates. Copies of this data shall not generally be made unless business requires it.

To this end, employees are permitted to store data on institutionally-owned laptop or desktop computers and shared drives; however, the dissemination of this data shall be done securely. Data shall not be transferred via e-mail unless encrypted. If data is transmitted on a recurring basis to external vendors, it is preferable to send this data through secure transmissions such as secure FTP (SFTP).

Electronic data shall be destroyed in accordance with KEI's Data Retention and Destruction Policy, and shall be rendered unreadable in paper or electronic form. All departments shall have policies in place and periodically review electronic storage areas and their hard copy storage areas to ensure that data is being destroyed in a timely and effective manner.

**Internal Use Only:** This includes information that requires protection from unauthorized use, disclosure, modification, or destruction, but is not subject to any of the items listed in the Restricted Use or Confidential definitions above. Internal Use Only data includes:

- Student ID
- Data related to KEI operations, finances, legal matters, audits, or other activities that are not public in nature, but not classified as Restricted Use or Confidential.
- Faculty grade worksheets (i.e. Excel files used to track student grading prior to submitting to the Registrar's Office).
- Personal white page, business white page or professional employment information for students, alumni or donors. This includes name, business name, business address, home address, e-mail, cell phone numbers, business phone numbers, home phone numbers, occupations and titles, but not classified as Restricted Use or Confidential.
- Personal white page information for faculty and staff. This includes home address, cell phone, home phone, home fax and personal e-mail, but not classified as Restricted Use or Confidential.
- Personal characteristics such as gender, height, weight, marital status, nationality, personal interests, photographs and names of children and other demographic information that is not classified as Restricted Use or Confidential.
- Internal KEI data, the distribution of which is limited by intention of the author, owner, or administrator, but not classified as Restricted Use or Confidential.

## RULES FOR USAGE OF INTERNAL USE DATA

Internal Use data can be stored in institutionally supported applications located in a KEI contracted Cloud service, institutionally supported shared drives, third party hosted applications and laptop or desktop computers (both KEI issued and personally owned). This data can be copied to smartphones, USB devices or other portable media. Hard copy data shall be maintained in as few receptacles and rooms as business dictates. Copies of this data shall not generally be made unless business requires it.

To this end, employees are permitted to transmit this data via unencrypted e-mail. Electronic data can be destroyed using traditional application delete functionality. Hard copy information can be destroyed in accordance with an employee's personal or departmental policy.

## UNRESTRICTED

This includes data that can be disclosed to any individual or entity inside or outside of KEI. Security measures may or may not be needed to control the dissemination of this type of data. Unrestricted data includes:

- a. Content and images on KEI's public web sites
- b. Publicly released press statements
- c. School catalog
- D. Business White Page information for faculty and staff, unless otherwise restricted. This includes name, title, department, office location, office phone and e-mail.

# RULES FOR USAGE OF UNRESTRICTED DATA

All information, whether in paper or electronic form, can reside in the public domain and is available to all students, faculty and staff; but, it is subject to KEI's Acceptable Usage Policy and federal copyright laws.

## POLICY ENFORCEMENT

Any person that violates any of the policies found in this policy will be subject to the same disciplinary actions as outlined in KEI's Confidentiality Agreement.

# **RISK ASSESSMENT**

Kelley Education Inc. identifies reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assesses the sufficiency of any safeguards in place to control these risks. At a minimum, the school's risk assessment includes consideration of risks in each relevant area of operations including:

- Employee training and management
- Information systems, including network and software design, as well as information processing, storage, transmission, and disposal
- Detecting, preventing, and responding to attacks, intrusions, or other systems failures

## SAFEGUARDS TESTING/MONITORING

Kelley Education Inc. has implemented information safeguards to control the risks it identifies through risk assessment, & tests or otherwise monitors the effectiveness of the safeguards' key controls, systems, and procedures.

### **EVALUATION & ADJUSTMENT**

Kelley Education Inc. evaluates & adjusts its information security program in light of the results of the required testing and monitoring, as well as for any material changes to its operations or business arrangements or any other circumstances that it has reason to know may have a material impact on its information security program.

### **OVERSEEING SERVICE PROVIDERS**

Kelley Education Inc. safeguards requires service providers by contract to implement and maintain such safeguards.

## APPROVAL AND REVISIONS

**Policy Category**: Institutional Risk & Compliance

**Policy Approved By:** Approved by Kelley Education Inc.

Policy Reviewed Annually By: Robert Kelley

**Related University Policies**: None **Last Modified**: 29 September 2021

## FIRE SAFETY REPORTS & STUDENT HOUSING

### FIRE SAFETY REPORT AND FIRE LOG

Our schools do not provide on-campus housing; therefore, in accordance with Department of Education and HEOA Sec.488 (a)(1)(E) amended HEA Sec.485(a)(1) U.S.C. 1092(a)(1)): added HEA Sec.485(a)(1)(T). HEOA Sec.488 (g) amended HEA Sec.485 (20 U.S.C. 1092): added HEA Sec.485 (i), we do not distribute a Fire Safety and Fire Log.

# MISREPRESENTATION TO SCHOOL OFFICIALS

A misrepresentation is a false statement of a material fact made by one party which affects the other party's decision.

Examples of fraud or criminal misconduct:

- False claims of independent status;
- False claims of citizenship;
- Use of false identities;
- Forgery of signatures or certifications; and
- False statements of income

Individuals who knowingly and willfully makes a false statement or representation for the purpose of obtaining a benefit or payment shall be guilty of a felony, and on conviction thereof shall be punished by a fine, by imprisonment, or by both.

Kelley Education Inc. has developed & applies an adequate system to identify & resolve discrepancies in the information that is received from different sources with respect to a student's application for financial aid under Title IV, HEA programs. Kelley Education Inc. obtains & reviews:

- All student aid applications, need analysis documents, Statements of Educational Purpose, Statements of Registration Status, and eligibility notification documents
- Any documents, including any copies of State & Federal income tax returns, that are normally collected to verify information received from the student or other sources; and
- Any other information normally available regarding a student's citizenship, previous educational experience, documentation of a social security number, or other factors relating to a student's eligibility for funds under the Title IV, HEA programs.

## SAFEGUARDS AGAINST INSTITUTIONAL MISREPRESENTATION

## INSTITUTIONAL INTEGRITY

To avoid any misrepresentation, the greater purpose of providing this Consumer Information, Enrollment Agreement, Annual Security Report, and School Catalog is to provide you, the prospective student, state agencies, our accrediting commission, and the Secretary of Education with accurate and timely information regarding the cost, aid, programs of study, transferability of credit, and job placements. This helps the prospective student compare and make an informed decision. Additionally, Kelley Education Inc. strives to:

- Keep tuition commensurate with what graduates are able to earn.
- Find new ways to offer career resources before and after graduation.
- Have realistic discussions with students about income expectations.
- Help you understand your loan commitment and monthly loan re-payments.

## AVOIDING MISREPRESENTATION IN RECRUITING PRACTICES

All information provided to prospective students meets and/or exceeds the standards of our accreditation and is supported by our records.

## STATE AUTHORIZATION

The Department of Education has clarified rules regarding state processes for approval and monitoring of postsecondary institutions. The Higher Education Act (HEA) requires state authorization of postsecondary institutions for programs to be eligible to participate in federal student aid. Leading the country, Illinois and Arkansas have ensured that our schools are state authorized.

## HIGH SCHOOL DIPLOMAS

Regulations require Kelley Education Inc. to have procedures in place to evaluate the validity of a student's high school diploma if the school or the Department of Education questions the validity of the diploma. Kelley Education Inc. has such a policy in place.

# FINANCIAL AID ELIGIBILITY STANDARDS: SATISFACTORY ACADEMIC PROGRESS

Kelley Education Inc. has an established Satisfactory Academic Progress policy which it follows with each student. This policy is to ensure that all students, whether or not they are receiving federal student aid, meet the academic and attendance requirements.

# CODE OF CONDUCT FOR EDUCATIONAL LOANS

We are required by the Department of Education to develop, publish, and enforce a code of conduct. The Higher Education Opportunity Act (HEOA) set the code of conduct into law on August 14, 2008. Below applies to all officers, employees, and agents of our institution.

## BAN ON REVENUE SHARING

Neither Kelley Education Inc. nor any of their officers, employees or agents will enter into revenue-sharing arrangements with any lender or servicer which is define by the Higher Education Opportunity Act of 2008, amending the Higher Education Act of 1965, Pub. L. # 110-315 (2008), (HEOA) s any arrangement between a school and a lender that results in the lender paying a fee or other benefits, including a share of its profits, to the school, or its officer, employees or agents, as a result of out institution recommending lender to its students or families of those students.

# BAN ON GIFTS AND INCENTIVE COMPENSATION

Financial Aid Officer (or employees who otherwise have responsibilities with respect to education loans or financial aid) will not accept gifts from any lender, guaranty agency or loan servicer. This prohibition is not limited just to those providers of Title IV loans but includes lender of private educational loans as well. The law does provide for some exceptions related to specific types of activities or literature including:

- Brochures or training material related to default aversion of financial literacy.
- Food, training or informational material a part of training as long as that training contributes to the professional development of those individuals attending the training.
- Entrance and Exit counseling as long as the institution's staff are in control and they do not promote the services of a specific lender.
- Philanthropic contribution from a lender, guarantee agency or loan servicer unrelated to education loans.

## BAN ON CONTRACTING ARRANGEMENTS

No Financial Aid Officer (or employees who otherwise have responsibilities with respect to education loans) will accept any fee, payment or financial benefit as compensation for any type of arrangement or contract to provide services to or on behalf of a lender relating to education loans.

# PROHIBITION AGAINST STEERING BORROWERS

Financial aid Officers (or employees who otherwise have responsibilities with respect to education loans) will not steer borrowers to particular lenders, or delay loan certifications. This prohibition includes assigning any first-time borrower's loan to a particular lender as part of the award packaging or other methods.

### PROHIBITION ON OFFERS OF FUNDS FOR PRIVATE LOANS

Financial Aid officers or employees at our institution will not request or accept any agreement of or offer of funds for private loans. This includes any offer of funds for loans to students at the institution, including funds for an opportunity pool loan, in exchange for providing concessions or promises to the lender for a specific number of loans, or inclusion on a preferred lender list.

# BAN ON STAFFING ASSISTANCE

No Financial Aid Officer or employees at our institution will not request or accept any assistance with call center staffing or financial aid office staffing. However, HEOA does not prohibit schools from requesting or accepting assistance from a lender related to:

- Professional development training for financial aid administrators.
- Providing educational counseling materials, financial literacy materials, or debt management
  material to borrowers, provided that such materials disclose to borrowers the identification of any
  lender that assisted in preparing or providing such materials.
- Staffing services on a short-term, nonrecurring basis to assist the school with financial aid related functions during emergencies, including State-declared or federally declared natural disasters, and other localized disasters and emergencies identified by the Secretary.

# BAN ON ADVISORY BOARD COMPENSATION/RECRUITER COMPENSATION

Institution employees will not receive anything of a value from a lender, guarantor, or group in exchange for servicing on an advisory board. They may, however, accept reimbursement for reasonable expenses incurred while servicing in this capacity.

## **SANCTIONS**

Employees that violate this Code of Conduct will be disciplined in a manner consistent with our institution policies and procedures. Disciplinary action may include termination of employment.

## PREFERRED LENDER LISTS

Kelley Education Inc. does not have any specific lenders for private education loans or for Title IV, HEA loans.

# PREFERRED LENDER ARRANGEMENTS

Kelley Education Inc. does not have any specific lenders for private education loans or for Title IV, HEA loans.

## PRIVATE EDUCATION LOANS

Kelley Education Inc. does not have any specific lenders for private education loans or for Title IV, HEA loans.

### ANNUAL REPORT ON PREFERRED LENDER ARRANGEMENTS

Kelley Education Inc. does not have any specific lenders for private education loans or for Title IV, HEA loans.

## PRINCIPLES OF EXCELLENCE

Kelley Education Inc. educational institutions are participating in the Principles of Excellence program and agree to the following guidelines:

- Provide students with a personalized form covering the total cost of an education program.
- Provide educational plans for all military and Veteran education beneficiaries.
- End fraudulent and aggressive recruiting techniques and misrepresentations.
- Accommodate Service members and Reservists absent due to service requirements.
- Designate a point of contact to provide academic and financial advice.
- Ensure accreditation of all new programs prior to enrolling students.
- Align institutional refund policies with those under Title IV, which governs the administration of federal student financial aid programs.

# LOAN DISCLOSURES

## ENTRANCE COUNSELING FOR STUDENT LOAN BORROWERS

- Your guaranteed student loan is a serious obligation; therefore, it is important that you understand your rights and responsibilities involved in this transaction. Your responsibilities are summarized below:
- I understand that I may be subject to prosecution under the provisions of the United States Criminal Code if I deliberately make any false statements on my loan application or use the loan proceeds for purposes other than approved educational expenses.
- I understand that I must sign a Selective Service Registration Compliance Statement at the school I am attending.
- I understand that as an independent student that I may borrow a total amount up to \$3,500 in subsidized loan and \$6,000 in unsubsidized loan for a first year undergraduate study. 2nd year would be \$3,000 in subsidized loan and \$4,000 in unsubsidized loan. As a dependent student I may borrow a total amount up to \$3,500 in subsidized loan and \$2,000 in unsubsidized loan for a

first year undergraduate study. 2nd year would be \$3,000 subsidized and \$1,333 unsubsidized loan. I understand that these loan amounts may differ accordingly to the program of study.

- I understand that I must return to my original lender to apply for additional loans.
- I understand that all borrowers, regardless of personal or family income, are subject to a Needs Analysis.
- I understand that my lender will deduct two non-refundable fees from the proceeds of my loan:
- A Federal Origination Fee
- A state Insurance Premium not to exceed 5% of the principal amount borrowed.
- I understand that if the amount of my loan is greater than \$1,000, and covers an enrollment period greater than six months, I may receive the proceeds in more than one installment.
- I understand that my signature on the application/promissory note establishes my personal responsibility for repayment of this loan.
- I understand that I must without exception, notify my lender if I fail to enroll or cease to be enrolled,
  - transfer to another school, or change my enrollment status, name or permanent address.
- I understand that I will have a grace period of 6 months after I cease to be enrolled at an eligible institution before I must begin payment. (Students who borrow at 7% are entitled to a grace period of 9 months).
- I understand that my lender will provide me with a repayment schedule before my repayment period begins.
- I understand that I must make monthly payments of no less than \$50 over a repayment period between 5- 10 years at my lenders option.
- I understand that my payments may be made to other than my original lender if my loan(s) are sold to a secondary market.
- I understand that making my scheduled payments promptly will help me establish a favorable credit rating, but if I fail to repay my loan as scheduled:
- I may seriously injure my credit rating and jeopardize my future ability to borrow.
- I may face default and the legal action deemed necessary by the State of Illinois.
- I understand that my loan obligation will be cancelled only if I die or become permanently and totally disabled.
- I understand that I may go online to: <a href="http://www.ed.gov/offices/OSFAP/DirectLoan/student.html">http://www.ed.gov/offices/OSFAP/DirectLoan/student.html</a> to complete my entrance counseling.

# EXIT COUNSELING FOR STUDENT LOAN BORROWERS

After you graduate or drop from our school, it is your responsibility to adhere to the following regarding your loans:

- I understand that if I change my address or name, I must notify the Lender within 10 days
- I understand that if I meet certain requirements, I have the right to defer payments on my loan(s). These deferment provisions are set forth under the section titled Deferent in my Promissory Note. I understand that if I default on my loan(s), I lose these rights.
- I understand that if I am temporarily unable to make payments, I may request my Lender to grant me a forbearance which can be:
- A short period of time in which I make no payments, or
- A longer period of time for making payments, or
- A different repayment schedule than was first given to me.
- I know that it is up to the Lender whether to grant this request and I recognized the importance of requesting forbearance before my payments are overdue.
- I understand that if I have borrowed student loans from more than one lender, I can explore loan consolidation or refinancing.

I acknowledge that all of the material covered on this acknowledgement form was explained to
me. I know that I am responsible for repaying my student loans and may go online to:
<a href="http://www.ed.gov/offices/OSFAP?DirectLoan/student.html">http://www.ed.gov/offices/OSFAP?DirectLoan/student.html</a> for further exit counseling.

# STUDENT LOAN INFORMATION PUBLISHED BY THE DEPARTMENT OF EDUCATION

To obtain copies of publications please contact the Education Publications Center (ED Pubs).

www.EDPubs.gov

Toll-free phone #: 877-4-ED-Pubs (877-433-7827)

TTY/TDD toll-free number: 877-576-7734

FAX: 703-605-6794

e-mail: edpubs@inet.ed.gov

mail: ED Pubs

U.S. Department of Education

P.O. Box 22207

Alexandria, VA 22304

For multiple copies of publications contact the Government Printing Office at (202) 512-1800

# NATIONAL STUDENT LOAN DATA SYSTEM (NSLDS

Kelley Education Inc. hereby informs you whether you are a potential student, student, or parent of a student that enters into an agreement regarding a Title IV, HEA loan that the loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guaranty agencies, lenders, and institutions determined to be authorized users of the data system.

To access the site, visit\_www.nslds.ed.gov.

# PRIVATE EDUCATION LOAN DISCLOSURES (INCLUDING SELF-CERTIFICATION FORM)

When an institutional loan is offered, the student borrower is provided a packet of information from the Financial Aid office. This informational packet includes all necessary loan disclosure documents, promissory notes and a self-certification form.

If the student requires an institutional payment plan, Kelley Education Inc. works with TFC Credit Corporation, PO Box 579 San Ramon, CA 94583-0579. For more information, please ask your admissions representative, financial aid representative, or the Director.

<sup>&</sup>lt;sup>i</sup> HEA Institutional Disclosure Requirements Reference Number 3.1 "Need-Based and Non-Need-Based Federal, State, Local, Private, and Institutional Student Financial Assistance Programs"