

Consumer Information Policies and Procedures

Updated: December 2017

Student Services, Admissions and the Office of Financial Aid at Sofia University, **annually** (at the start of each academic year), will distribute to all enrolled students a notice that lists and briefly describes the following types of consumer information which Sofia will make available.

Notice of Availability of Institutional and Financial Aid Information

Sofia will annually distribute to all enrolled students a notice of the availability of the information that is required to be made available to students under the Family Educational Rights and Privacy Act of 1974 (FERPA) and under Section 485(a)(1), Section 485(f), Section 485(g), Section 485(h) and Section 485(j).

The notice will list and briefly describe the information and include a statement of the procedures required to obtain the information. For information listed in the notice that is disclosed on our website, the notice will include the exact electronic address and a statement that the school will provide a paper copy upon request.

Contact Information for Assistance in Obtaining Institutional or Financial Aid Information

Sofia will make available to prospective and enrolled students information regarding how and where to contact individuals designated to assist enrolled or prospective students in obtaining the institutional or financial aid information required to be disclosed under HEA Section 485(a)(1), Section 485(f), Section 485(h), and Section 485(j).

Student Financial Aid Information

Sofia will make available to prospective and enrolled students information about:

- All the need-based and non-need-based federal, state, local, private and institutional student financial assistance programs available to students who enroll at the school
- Terms and conditions of the Title IV, HEA loans
- Criteria for selecting recipients and for determining award amount
- Eligibility requirements and procedures for applying for aid
- Methods and frequency of disbursements of aid
- Rights and responsibilities of students receiving Title IV, HEA student Financial Aid, including criteria for continued student eligibility and standards for Satisfactory Academic Progress
- Terms of any loan received as part of financial aid package, sample loan repayment schedule, and the necessity for repaying loans

- Procedures and forms by which students apply for assistance
- A statement that enrollment in a program of study abroad approved for credit by the home school may be considered enrollment in the home school for purposes of applying for federal student financial aid
- General conditions and terms applicable to employment provided as part of financial aid package
- The exit counseling information the school provides and collects

Facilities and Services Available to Students with Disabilities

Sofia will make available to prospective and enrolled students information about facilities and services available to students with disabilities, including students with intellectual disabilities.

Price of Attendance

Sofia will make available to prospective and enrolled students information about the price of attendance, including tuition and fees, books and supplies, room and board, transportation costs, and any additional costs for a program in which the student is enrolled or expresses an interest

Refund Policy, Requirements for Withdrawal and Return of Title IV Financial Aid

Sofia will make available to prospective and enrolled students information about:

- Any refund policy Sofia must comply with for the return of unearned tuition and fees or other refundable portions of costs paid to the school.
- Requirements and procedures for official withdrawal
- Requirements for Return of Title IV, HEA grant or loan aid

Academic Program (Educational Program, Instructional Facilities, and Faculty)

Sofia will make available to prospective and enrolled students information about the academic program of the school, including:

- Current degree programs and other educational and training programs
- Instructional, laboratory, and other physical plant facilities that relate to the academic program
- Faculty and other instructional personnel
- Any plans by the school for improving the academic program [upon determination by the school that such a plan exists]

Transfer of Credit Policies and Articulation Agreements

Sofia will disclose and make available to prospective and enrolled students a statement of the

school's transfer of credit policies that includes, at a minimum:

- Any established criteria the school uses regarding the transfer of credit earned at another school
- A list of schools with which the school has established an articulation agreement

Copyright Infringement Policies and Sanctions (Including Computer Use and File Sharing)

Sofia will readily make available to current and prospective students the school's policies and sanctions related to copyright infringement, including:

- A statement that explicitly informs students that unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, may subject them to civil and criminal liabilities
- A summary of the penalties for violation of federal copyright laws
- The school's policies with respect to unauthorized peer-to-peer file sharing, including disciplinary actions taken against students who engage in illegal downloading or unauthorized distribution of copyrighted materials using the school's information technology system

School and Program Accreditation, Approval, or Licensure

Sofia will make available to prospective and enrolled students:

- Names of associations, agencies, or governmental bodies that accredit, approve, or license the school and its programs
- Procedures for obtaining or reviewing documents describing accreditation, approval, or licensing

Notice of Federal Student Financial Aid Penalties for Drug Law Violations

Sofia will provide to every student upon enrollment a separate, clear and conspicuous written notice with information on the penalties associated with drug-related offenses under existing section 484(r) of the HEA.

Sofia will also provide a timely notice to each student who has lost eligibility for any grant, loan, or work-study assistance as a result of penalties under 484(r)(1) of the HEA a separate clear, and conspicuous written notice that notifies the student of the loss of eligibility and advises the student of the ways in which to regain eligibility under section 484(r)(2) of the HEA (*20 U.S.C. 1091(r)(2)*).

Vaccinations Policy

Sofia will make available to current and prospective students information about school policies regarding vaccinations.

Consumer Information on College Navigator Website

The U.S. Department of Education is required to post 26 items on the College Navigator website for each school, including a link to the school's website that provides in an easily accessible manner:

- Student activities offered by the school
- Services offered by the school for individuals with disabilities
- Career and placement services offered to students during and after enrollment
- Policies of the school related to transfer of credit from other schools

Student Body Diversity

Sofia will make available to current and prospective students information about student body diversity, including the percentage of enrolled, full-time students in the following categories:

- Male
- Female
- Self-identified members of a major racial or ethnic group
- Federal Pell Grant recipients

Net Price Calculator

Sofia will make available on our website, a net price calculator. The school may use the template provided by the U.S. Department of Education or may develop a customized version that must include, at a minimum, the same elements as the Department's version. Individual net price estimates must be accompanied by a prominent disclaimer noting that the estimate is not final, is not binding, and may change. Further, the disclaimer must note that the student must complete the Free Application for Federal Student Aid (FAFSA) to be eligible for and receive Federal student aid funds. A link to the Department's FAFSA website must be included.

Textbook Information

Sofia will disclose on our website, course schedule used for preregistration and registration purposes, the International Standard Book Number (ISBN) and retail price information of required and recommended textbooks and supplemental materials for each course listed. If the ISBN is not available, Sofia will include in the Internet course schedule the author, title, publisher, and copyright date for the textbook or supplemental material. If the school determines that the disclosure of the information is not practicable for a textbook or supplemental material, the school shall use the designation "To Be Determined."

Disbursement For Books and Supplies

Disbursement of books and supplies policy for Pell eligible students will be provided to students in their consumer information.

Voter registration Forms

Sofia will:

- Make a good faith effort to distribute a mail voter registration form (for federal elections and state elections for governor or other State chief executive) to each student enrolled in a degree or certificate program and physically in attendance at the school.
- Make the voter registration form widely available to students at the school
- Request the forms from the state 120 days prior to the deadline for registering to vote within the state.

Constitution Day

Sofia will celebrate Constitution Day to be held on September 17 of each year, commemorating the September 17, 1787 signing of the Constitution. However, when September 17 falls on a Saturday, Sunday, or holiday, Constitution Day shall be held during the preceding or following week.

Drug and Alcohol Abuse Prevention Program

Sofia will annually distribute in writing to each student and each employee:

- Standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on the school's property or as part of any of the school's activities
- Descriptions of applicable legal sanctions under state, local, and federal law
- Description of health risks
- Description of available counseling, treatment, rehabilitation, or re-entry programs
- Clear statement that the school will impose sanctions for violation of standards of conduct and a description of sanctions

Note: Students who enroll or employees who are hired after the annual distribution must receive the information.

Sofia will make available, upon request, to the U.S. Department of Education and to the public, the information distributed to students and employees and the results of a biennial review of the school's program that:

- Determines the effectiveness of the program and implements needed changes
- Determines the number of drug and alcohol-related violations and fatalities that occur on the school's campus or as part of the school's activities, and are presorted to campus officials
- Determines the number and type of sanctions that are imposed
- Ensures that sanctions are consistently enforced

Completion/Graduation and Transfer-out Rates

Sofia will annually make available to prospective and enrolled students the completion or graduation rate of certificate or degree-seeking, first-time, full-time, undergraduate students. The data are to be available by July 1 each year for the most recent cohort that has had 150 percent of normal time for completion by August 31 of the prior year.

If a prospective student requests the information, it will be made available prior to the student's enrolling or entering into any financial obligation with the school. A student shall be counted as a completion or graduation if the student earns a degree or certificate or completes a transfer-preparatory program within 150 percent of normal time for the student's program.

Note: These data are collected in the IPEDS Graduation Rate Survey (GRS).

Disaggregated Completion/Graduation Rates:

The HEOA (Section 488(a)(3)) added a provision requiring that the completion or graduation rates must be disaggregated by:

- Gender
- Major racial and ethnic subgroup (as defined in IPEDS)
- Recipients of a Federal Pell Grant
- Recipients of a subsidized Stafford Loan who did not receive a Pell Grant
- Students who did not receive either a Pell Grant or subsidized Stafford Loan

Students are to be considered to have received a grant or loan if they received it for the period used for determining the cohort - fall term or full year.

The disaggregated rates are to be disclosed only if the number of students in each group is sufficient to yield statistically reliable information and not reveal personally identifiable information about an individual student.

Placement in Employment

Sofia will make available to current and prospective students information regarding the placement in employment of, and types of employment obtained by, graduates of the school's

degree or certificate programs. Sofia will identify the source of the placement information, and any timeframes and methodology associated with it.

Types of Graduate and Professional Education in Which the School's Graduates Enroll

Sofia will make available to current and prospective students information regarding the types of graduate and professional education in which graduates of our 4-year degree programs enroll. Sofia will identify the source of the information, and any timeframes and methodology associated with it.

Retention Rate

Sofia will make available to current and prospective students the retention rate of certificate or degree seeking, first-time, undergraduate students as reported to IPEDS. This information is collected in the IPEDS Fall Enrollments Survey. If the retention rate information is requested by a prospective student, the information will be made available prior to the student's enrolling or entering into any financial obligation with the school.

Security Reporting

Sofia will distribute, by October 1 each year, a security report or a notice of the report to all current students and employees. If the school distributes the report by posting it on the school's website, Sofia will provide a notice by October 1 that includes a statement of the report's availability, the exact electronic address, a brief description of the report's contents, and a statement that the school will provide a paper copy upon request.

Sofia will provide a notice to prospective students and employees that include a statement of the report's availability, a description of its contents, and an opportunity to request a copy. If the report is posted on Sofia's website the notice will include the exact electronic address and a statement that Sofia will provide a paper copy of the report upon request.

Sofia may combine the publication of the security report and the fire safety report if the title of the combined report clearly states that both reports are included. If the security and fire safety reports are published separately, each report must include information about how to access the other report.

The report will contain information about:

- The crime statistics required in *34 CFR 668.46(c)*
- A statement of policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement includes the school's policies concerning its response to these reports, including:
 - Policies for making timely warning reports to members of the campus

- community, as required by *34 CFR 668.46(e)*, regarding the occurrence of crimes described in *34 CFR 668.46(c)(1)*
- Policies for preparing the annual disclosure of crime statistics
 - A list of the titles of each person or organization to whom students and employees should report the criminal offenses described in *34 CFR 668.46(c)(1)* for the purposes of making timely warning reports and the annual statistical disclosure; and
 - Policies or procedures for victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics
 - A statement of policies concerning security of and access to campus facilities, including campus residences and security considerations used in the maintenance of campus facilities
 - A statement of policies concerning campus law enforcement that:
 - Addresses the enforcement authority and jurisdiction of security personnel
 - Addresses the working relationship of campus security personnel with State and local police agencies, including:
 - Whether those security personnel have the authority to make arrests; and
 - Any agreements, such as written memoranda of understanding between the school and such agencies, for the investigation of alleged criminal offenses
 - Encourages accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies, when the victim of a crime elects to, or is unable to, make such a report; and
 - Describes procedures, if any, that encourage pastoral counselors and professional counselors, if and when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for including in the annual disclosure of crime statistics
 - A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others
 - A description of programs designed to inform students and employees about the prevention of crimes
 - A statement of policy concerning the monitoring and recording through local police agencies of criminal activity by students at non-campus locations of student organizations officially recognized by the school, including student organizations with non-campus housing facilities
 - A statement of policy regarding the possession, use and sale of alcoholic beverages and enforcement of State underage drinking laws
 - A statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of Federal and State drug laws
 - A description of any drug or alcohol-abuse education programs, as required under Section 120(a) through (d) of the HEA, otherwise known as the Drug-Free Schools and Communities Act of 1989. For the purpose of meeting this requirement, the school my

cross-reference the materials the school uses to comply with Section 120(a) through (d) of the HEA

- A statement of policy regarding the school’s programs to prevent dating violence, domestic violence, sexual assault, and stalking, as defined in *34 CFR 668.46(a)*, and of procedures that the school will follow when one of these crimes is reported. The statement must include:
 - A description of the school’s educational programs and campaigns to promote the awareness of dating violence, domestic violence, sexual assault, and stalking, as required by *34 CFR 668.46(j)*
 - Procedures victims should follow if a crime of dating violence, domestic violence, sexual assault, or stalking has occurred, including written information about:
 - The importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order
 - How and to whom the alleged offense should be reported
 - Options about the involvement of law enforcement and campus authorities, including notification of the victim’s option to:
 - Notify proper law enforcement authorities, including on-campus and local police
 - Be assisted by campus authorities in notifying law enforcement authorities if the victim so chooses
 - Decline to notify such authorities
 - Where applicable, the rights of victims and the school’s responsibilities for orders of protection, “no-contact” orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court or by the school
 - Information about how the school will protect the confidentiality of victims and other necessary parties, including how the school will:
 - Complete publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifying information about the victim, as defined in Section 40002(a)(20) of the Violence Against Women Act of 1994 (*42 U.S.C. 13925(a)(20)*)
 - Maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the school to provide the accommodations or protective measures
 - A statement that the school will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the school and in the community
 - A statement that the school will provide written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures. Sofia will make such accommodations or provide such protective measures if the victim

- requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement
 - An explanation of the procedures for school disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking, as required by *34 CFR 668.46(k)*
 - A statement that, when a student or employee reports to the school that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the school will provide the student or employee a written explanation of the student's or employee's rights and options as described in *34 CFR 668.46 (b)(11)(ii) through (vi)*
- A statement advising the campus community where law enforcement agency information provided by a State under section 121 of the Adam Walsh Child Protection and Safety Act of 2006 (*42 U.S.C. 16921*), concerning registered sex offenders may be obtained, such as the law enforcement office of the school, a local law enforcement agency with jurisdiction for the campus, or a computer network address
- A statement of policy regarding emergency response and evacuation procedures, as required by *34 CFR 668.46(g)*
- A statement of policy regarding missing student notification procedures, as required by *34 CFR 668.46(h)*

Timely Warning and Emergency Notification:

Sofia will, in a manner that is timely and that withholds as confidential the names and other identifying information of victims, as defined in section 40002(a)(20) of the Violence Against Women Act of 1994 (*U.S.C. 13925(a)(20)*) and that will aid in the prevention of similar crimes, report to the campus community on the following crimes:

- Criminal homicide
 - Murder and non-negligent manslaughter
 - Negligent Manslaughter
- Sex Offenses
 - Rape
 - Fondling
 - Incest
 - Statutory rape
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson
- Arrests and referrals for disciplinary actions, including:
 - Arrests for liquor law violations, drug law violations, and illegal weapons

- possession
 - Persons not included in *34 CFR 668.46(c)(1)(ii)(A)* who were referred to campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession
- Hate crimes, including:
 - The number of each type of crime in *34 CFR 668.46(c)(1)(i)* that are determined to be hate crimes
 - The number of the following crimes that are determined to be hate crimes:
 - Larceny-theft
 - Simple assault
 - Intimidation
 - Destruction/damage/vandalism of property
 - Dating violence, domestic violence, and stalking as defined in *34 CFR 668.46(a)*
- Crimes that are reported to campus security authorities as defined under the school's statement of current campus policies pursuant to *34 CFR 668.46(b)(2)* or local police agencies
- Crimes that are considered by the school to represent a threat to students and employees
- The school is NOT required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor
- If there is an immediate threat to the health or safety of students or employees occurring on campus, as described in *34 CFR 668.46(g)(1)*, Sofia will follow its emergency notification procedures. A school that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, Sofia will provide adequate follow-up information to the community as needed

Emergency Response and Evacuation Procedures:

Sofia will include a statement of policy regarding emergency and response evacuation in the annual security report. This statement will include:

- The procedures the school will use to immediately notify campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus
- A description of the process the school will use to:
 - Confirm that there is a significant emergency or dangerous situation as described in *34 CFR 668.46(g)(1)*
 - Determine appropriate segment(s) of campus community to receive a notification
 - Determine the content of the notification
 - Initiate the notification system
- A statement that the school will (w/o delay and taking into account the safety of the community) determine the content of the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency

- A list of the titles of the person or persons or organization or organizations responsible for carrying out the actions described in *34 CFR 668.46(g)(2)*
- The school's procedures for disseminating emergency information to the larger community
- The school's procedures to test the emergency response and evacuation procedures on at least an annual basis, including:
 - Tests that may be announced or unannounced
 - Publicizing its emergency response and evacuation procedures in conjunction with at least one test per calendar year
 - Documenting, for each test, a description of the exercise, the date, time, and whether it was announced or unannounced

Security Report - Programs to prevent dating violence, domestic violence, sexual assault, and stalking Policy

As required by *34 CFR 668.46(b)(11)*, Sofia will include in its annual security report a statement of policy that addresses the school's programs to prevent dating violence, domestic violence, sexual assault, and stalking.

The statement will include:

- A description of the school's primary prevention and awareness programs for all incoming students and new employees, which will include:
 - A statement that the school prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking, as those terms are defined in *34 CFR 668.46(a)*
 - The definition of "dating violence," "domestic violence," "sexual assault," and "stalking" in the applicable jurisdiction
 - The definition of "consent," in reference to sexual activity, in the applicable jurisdiction
 - A description of safe and positive options for bystander intervention
 - Information on risk reduction
 - The information described in *34 CFR 668.46(b)(11) and (k)(2)*
- A description of the school's ongoing prevention and awareness campaigns for students and employees, including information described in *34 CFR 668.46(j)(1)(i)(A) through F*

Other required information:

- Sofia will ensure that the proper implementation of *Awareness programs, Bystander intervention, Ongoing prevention and awareness campaigns, Primary prevention programs, and Risk reduction* is done according to the definitions outlined in *34 CFR 668.46(j)(2)(i)-(v)*

- The school's programs to prevent dating violence, domestic violence, sexual assault, and stalking will include, at a minimum, the information described in *34 CFR 668.46(j)(1)*

Institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault or stalking and Information for Crime Victims about Disciplinary Proceedings

As required in *34 CFR 668.46 (b)(11)(vi)*, Sofia will include in its annual security report a clear statement of policy that addresses the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking as defined in *34 CFR 668.46(a)* that:

- Describes each type of disciplinary proceeding used by the school; the steps, anticipated timelines, and decision-making process for each type of disciplinary proceeding; how to file a disciplinary complaint; and how the school determines which type of proceeding to use based on the circumstances of an allegation of dating violence, domestic violence, sexual assault, or stalking
- Describes the standard of evidence that will be used during any institutional disciplinary proceeding arising from an allegation of dating violence, domestic violence, sexual assault, or stalking
- Lists all of the possible sanctions that the school may impose following the results of any institutional disciplinary proceeding for an allegation of dating violence, domestic violence, sexual assault, or stalking
- Describes the range of protective measures that the school may offer to the victim following an allegation of dating violence, domestic violence, sexual assault, or stalking

Provides that the proceedings will:

- Include a prompt, fair, and impartial process from the initial investigation to the final result
- Be conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability
- Provide the accuser and the accused with the same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice
- Not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding; however the school may establish restrictions regarding the extent to which the advisor may participate in the proceedings, as long as the restrictions apply equally to both parties

Sofia will provide simultaneous notification, in writing, to both the accuser and the accused, of:

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

Privacy of Student Records – family Educational Rights and Privacy Act (FERPA)

Sofia will annually provide a notice to all enrolled students about:

- The right to review their educational records, to request amendment of records, to consent to disclosures or personally identifiable information, and to file complaints with the U.S. Department of Education
- Procedures for reviewing educational records and requesting amendment of records
- If applicable, information about the school's policy regarding disclosures to school officials with a legitimate educational interest in the educational records.

In order to disclose directory information without prior consent, Sofia will provide to students a notice of directory information that includes:

- The types of information the school has designated as directory information
- The student's right to refuse to allow any or all such information about the student to be designated as directory information, and the time period the student has for notifying the school in writing

Gainful Employment (GE)

Sofia will disclose, for each of their GE Programs, certain information about the programs to prospective students. Sofia will include the information required in promotional materials it makes available to prospective students and on its Web site. The regulations also provide that Sofia will "Use the disclosure form issued by the Secretary to provide the information ... when that form is available" (*34 CFR 668.6(b)(2)(iv)*). Schools are responsible for meeting these disclosure requirements each year using the Department's form.

The following is a summary of the information that must be disclosed by Sofia for each of its GE Programs. Sofia must review the final regulations as published in the *Federal Register* to ensure that they are in compliance with this and all other gainful employment requirements:

- The name and U.S. Department of Labor's Standard Occupational Classification (SOC) code of the occupations that the program prepares students to enter, along with links to occupational profiles on the U.S. Department of Labor's O*NET Web site or its successor

site.

- The on-time graduation rate for students completing the program.
- Normal time to complete the program (in weeks, months or years).
- The tuition and fees Sofia charges a student for completing the program within normal time.
- The typical costs for books and supplies (unless those costs are included as part of tuition and fees), and the cost of room and board, if applicable.
- The job placement rate for students completing the program , if required by the state or accreditor.
- The median loan debt incurred by students who completed the program (separately by Title IV loans, private loans, and institutional debt).
- Other information the Secretary provided to Sofia about the program.

Student Loan Information Published by the U.S. Department of Education

Sofia is required to provide information published by the U.S. Department of Education to students at any time that information regarding loan availability is provided. The publication includes information about rights and responsibilities of students and schools under Title IV, HEA loan programs.

National Student Loan Data System (NSLDS)

Sofia enters into agreements with a potential student, student, or parent of a student regarding a Title IV, HEA loan and is required to inform the student or parent that the loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guaranty agencies, lenders, and schools determined to be authorized users of the data system.

Entrance Counseling for Student Loan Borrowers

Prior to the first disbursement, Sofia will provide to a first-time borrower of a Federal Direct Loan (other than consolidated or Parent PLUS loans) comprehensive information on the terms and conditions of the loan and of the borrower's responsibilities. The information is to include:

- The effect of the loan on the eligibility of the borrower for other forms of aid
- An explanation of the use of the Master Promissory Note
- The seriousness and importance of the students' repayment obligation
- Information on the accrual and capitalization of interest
- Borrowers of unsubsidized loans have the option of paying interest while in school
- Definition of half-time enrollment and the consequences of not maintaining half-time enrollment
- Importance of contacting appropriate offices if student withdraws prior to completion of program of study

- Sample monthly repayment amounts
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower complete program or completes within regular time for completion, is unable to obtain employment upon completion, or is otherwise dissatisfied with or does not receive the educational or other services the borrower purchased from the school
- Consequences of default
- Information about the NSLDS and how the borrower can access the borrowers records
- Name and contact information for individual the borrower may contact with questions about the borrower's rights and responsibilities or the terms and conditions of the loan

Exit Counseling for Student Loan Borrowers

Sofia will provide counseling to borrowers of loans under the Federal Direct Loan, or Perkins Loan programs (other than consolidated or Parent PLUS loans) shortly before the student borrower ceases at least half-time study at the school. The counseling will provide information on:

- Average anticipated monthly repayment amount
- Repayment plan options
- Options to prepay or pay on shorter schedule
- Debt Management Strategies
- Use of Master Promissory Note
- The seriousness and importance of student's repayment obligation
- Terms and conditions for forgiveness or cancellation
- Copy of information provided by the U.S. Department of Education
- Terms and conditions for deferment or forbearance
- Consequences of default
- Options and consequences of loan consolidation
- Tax benefits available to borrowers
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes program or completes within regular time for completion, is unable to obtain unemployment upon completion, or is otherwise dissatisfied with or did not receive the educational or other services the borrower purchased from the school
- Availability of the Student Loan Ombudsman's office
- Information about NSLDS. The U.S. Department of Education is required to provide a disclosure form for students and prospective students about NSLDS

Code of Conduct for Education Loans

Sofia will prominently publish on the school's website a code of conduct that prohibits a conflict of interest with the responsibilities of an agent of the school with respect to FFELP or private education loans. All agents with responsibility for loans must be informed annually of the provisions of the code. The code of conduct will prohibit:

- Revenue-sharing arrangements with any lender
- Receiving gifts from a lender, a guarantor, or a loan services
- Contracting arrangement providing financial benefit from any lender or affiliate of a lender
- Directing borrowers to particular lenders, or refusing or delaying loan certifications
- Offers of funds for private loans
- Call center or financial aid office staffing assistance
- Advisory board compensation