Consumer Information Guide



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Mission Statement

"It is our sincere goal and desire to train and graduate the highest quality assistants in the country. Meridian achieves this goal by implementing only programs that are of the highest standards and adhere to published surgical assisting education guidelines. Meridian graduates are thoroughly trained in all surgical disciplines, thus providing the ability for comprehensive surgical interventions leading to the best care available for all patients."

Consumer Information Summary

Federal Regulations require Institutions to provide students with a Consumer Information Guide annually. This Consumer Information Guide will be posted on the Meridian Institute of Surgical Assisting website, or upon request in paper form. Some information may be found in Meridian Institute's catalog, or upon request in the Financial Aid Policy and Procedures manual.

Catalog

Meridian Institute's catalog can be found by visiting Meridian's website (www.meridian-institute.edu) this is made public and easy to find for prospective and current students. On the home website, anyone can also request a hardcopy of the catalog to be mailed to them.

Student Code of Conduct

The Student Code of Conduct at Meridian Institute is to give access to advance program opportunities that enable students to develop the information and abilities necessary to accomplish their professional objectives, increase their monetary value and provide a useful service to their communities. As participants of Meridian Institute, enrollees are representing Meridian Institute and assumed to conduct themselves with morale, honesty and with integrity. This needs to be demonstrated by mutual respect and civility in academic and skilled discourse.

Accordingly, students are expected to respect the rights and privileges of others and to foster an environment conducive to understanding. Students are accountable for their actions and are required to function independently, as well as collaboratively in teams, to achieve and understand objectives.

By virtue of enrollment at Meridian Institute students accept an obligation to abide by this Student Code of Conduct.

During lab week or online forum post, conduct, determined to impair, interfere or obstruct the opportunities of others to discover or that disrupts the mission, processes or orderly functions of Meridian Institute will be deemed misconduct and shall be subject to appropriate disciplinary action.

Application Process

The preceding documentation is necessary:

Complete Meridian Institute's application for the program by visit: http://www.meridian-institute.edu/registration/. This can be completed either by submitting it online or printing and faxing the completed form to (615) 499-4795.

Federal Student Aid Identification (FSA ID)

The student will create an FSA ID https://fsaid.ed.gov in which, if applicable, the student will need to link their old PIN to the newly created FSA ID. The FSA ID can only be created by the student. The student will need the FSA ID in order to electronically sign the FAFSA, master promissory note and entrance counseling.

Applying for Federal Financial Aid

The application used is the Free Application for Federal Student Aid (FAFSA). There is no cost to the student to apply for Financial Aid and Meridian Institute maintains a staff of professionals to assist students in the FAFSA process.

To fill out a FAFSA students will need their Social Security number and, if dependent, will also need their parents' social security numbers. The student will need their driver's license number (if any), W-2 forms, Federal Income Tax transcripts, bank statements, alien registration number (if the student is not a U.S. citizen), and other records.

If applying before a tax return has been completed students will have to estimate their (or their parents') income and tax information on the application. Corrections will have to be made once a student or parents completes their prior year taxes, (have and extension on file after April 15th of the current year) at a later date.

Meridian Institute highly recommends using the online application at http://FAFSA.ed.gov. This access allows students to complete, use the data retrieval tool (DRT) and electronically sign required student financial aid documents. The typical processing time for Financial Aid award is two weeks.

The following forms, in addition to the Free Application for Federal Student Aid (FAFSA), will need to be completed:

- Federal Stafford Direct Loan Master Promissory Note (MPN)
- Entrance Counseling

Net Calculator

The Net Calculator has been created to assist potential students in helping them decide the cost of the program and the amount of Aid they may be eligible for. This is a resource only, Federal Aid eligibility can only be determined only after the Financial Aid office has collected all mandatory information. Meridian Institute's Website can be found by visiting: http://web.meridian-institute.edu/calc/

Cost of Attending

Please consult Meridian Institute's catalog for cost of the program. Cost of Attendance is the bases for calculating Title IV funding. Cost of Attendance for a full academic year includes: tuition, fees, books, supplies, room and board, transportation and personal expenses for a student for a full academic year.

COA Component	Off Campus With Parents- Zero Dependents	Off Campus
Tuition	\$5,995	\$5,995
Lab Fees and Tech Fee	\$1000	\$1000
Processing Fee	\$500	\$500
Room & Board	\$5,400	\$15,132
Personal	\$3,000	\$3,624
Transportation	\$4,200	\$5,544
Miscellaneous	\$0	\$0
Computer	\$0	\$0
Student Loan Fee	1.068% Direct Stafford Loans or 4.272% Plus Loan (\$42.34)	1.068 % Direct Stafford Loans (\$72.57)
Expenses for Students With Disabilities- Case By Case	\$0	\$0
Totals:	\$20,137	\$31,868
Notes:		
Average COA Without Loan Fee	\$20,095	\$31,795
Pell COA	\$20,095	\$31,795

Program Disclosure Information

In an effort to aid you in selecting the program that best suits your needs, we have provided the following basic information about this program:

Program Level: Certificate

Program Name: Surgical First Assisting

Program Length: 648 clock hours/28 credits – 52 weeks

The following are some of the U.S. Department of Labor Standard Occupational Classification (SOC) titles and codes in which graduates of this program may find employment. Click on the link for additional information. The U.S. Department of Labor has classified the occupational title and codes of the Surgical First Assistant the same as Surgical Technologists.

29-2055.00 Surgical Technologists

The on-time graduation rate for students completing this program for the year ended 6/30/2015: 74.1%

The actual graduation rate for students completing this program is: 82.8%

The tuition and fees charged to a student for completing this program within the normal timeframe:

Tuition: \$5995.00
Lab Fee and Technology: \$1000.00
Processing fee: \$500.00
Total Program Costs: \$7495.00

The typical costs for books and supplies in this program: \$125.00

The job placement rate for students completing this program for the year ended 6/30/2015: 98.4%

The median loan debt incurred by students who completed this program for the year ended 6/30/2015: \$0.00

Title IV loans: \$6,770

Private Educational Loans: \$0.00 Institutional Financing: \$649

Financial Policies and Procedures

Finance Plans

Cash Strategy

If a student pays cash, all tuition and fees (if applicable) need to be paid in full prior to the start of the course or at the discretion of the school.

Federal Financial Aid Strategy

The Federal Financial Aid Strategy is obtainable to students receiving federal grants and/or federal loans to pay for tuition in the First Assist Program. If a student is receiving aid, the aid will go directly to the school first to pay-off any outstanding tuition. The remaining balance maybe used for any other educational expenses. If the school realizes a balance owed the student, the business office will send a check to the address that Meridian Institute has on file.

Crossover Payments

Crossover Payments apply to those students who have applied for or are currently applying for Financial Aid. Crossover Payments exists when a student crosses over from one award year to the next award year. Two payments will be disbursed each academic year, while one or two award years can occur during one Academic year. In these cases, Meridian Institute will use the award that would most benefit the student

Military or Government Billing Plan

Meridian Institute is not currently able to accept the Government Issued Bill.

Third-Party Billing Plan

Under the Third-Party Billing Plan on the behalf of the student, Meridian Institute will directly bill an approved thirty-party (i.e. employer) for a student's tuition. However, this agreement is considered as an agreement between student and the third-party.

Supplemental Funding

Private Student Loans

Private student loans are credit-based funding source supplied by outside, nonfederal lenders to pay for the price of attendance not covered by any other monetary aid. Meridian Institute does not currently work with any private sources. Meridian will supply the student with any documentation upon request.

Payment Policies

Tuition for Meridian Institute's program will be paid based on its terms and conditions. Students will not be eligible for enrollment in the First Assisting Program until the amount owed is paid in full or satisfactory payment arrangements are made.

Students are required to clear any indebtedness to Meridian Institute before grades and transcripts will be issued.

There is a \$500 fee for all payment plans over \$1000. Payment plans can by combined with financial aid, but will need to be approved by the Financial Aid Director.

Processing and Late Fees

A \$25 fee is charged for returned checks for any reason. A \$25 fee will be issued for every late payment due to declined credit card or debit card for those students set-up on a payment plan with Meridian Institute.

All tuition, fees and payment policies are subject to change.

Graduation Paperwork

A transcript and one diploma will be sent to the student upon completion of the program. Additional transcripts can be requested for a \$15.00 fee per transcript. Any charge for education verification is at the discretion of Meridian Institute. Charges and fees are subject to change.

Student Loan Code of Conduct

Meridian Institute protects students with established loan policies. Meridian Institute follows federal regulations that govern student loan requirements.

The Student Loan Code of Conduct creates and maintains uniform student loan practices that focus on the best interest of the student borrowers.

Accreditations and Approvals

A Student may request a copy of Meridian Institutes accreditation and approvals by making a written request to Meridian Institute's Program Director. Meridian Institute maintains copies of all accreditations in-house and these may be requested for viewing at any time.

Information on Student Body Diversity

Student body diversity information as to gender and ethnicity of enrolled, full-time students who receive Federal Pell Grants is for informational purposes only.

The National Center for Educational Statistics provides this information varies educational institutes, which may be viewed at http://nces.ed.gov

This information can also be found by visiting Tennessee Higher Education Commissioner's direct link: https://www.tn.gov/assets/entities/thec/attachments/1418meridian-fy14.pdf

Information on Retention Rates

The National Center for Educational Statistics provides information on Retention Rates of Educational Institutes, which may be viewed at http://nces.ed.gov. This information can also be found by visiting Tennessee Higher Education Commissioner's direct link:

https://www.tn.gov/assets/entities/thec/attachments/1418meridian-fy14.pdf

Information on Completion/Graduation Rates

The National Center for Educational Statistics provides information on Completion/Graduation Rates, which may be viewed at http://nces.ed.gov

Completion/Graduation Rate can also be found in the Academic Affairs Office of Meridian Institute or by visiting Tennessee Higher Education Commissioner's direct link:

https://www.tn.gov/assets/entities/thec/attachments/1418meridian-fy14.pdf

William D. Ford Federal Direct Loan (Direct Loan) Program

Federal Stafford Direct Loan Program

Terms and Conditions

Loans created by means of the First Assisting Program are referred to as Direct Loans (DL). Eligible students and parents borrow directly from the U.S. Department of Education. Direct Loans include, but are not limited to subsidized and unsubsidized loans. These loans are paid directly to the U.S. Department of Education.

A subsidized loan is awarded based on monetary need. Borrowers will not be charged any interest before repayment begins or during deferment periods. The federal government subsidizes the interest throughout these periods.

An unsubsidized loan is not awarded based on need. Borrowers will be charged interest from the time the loan is disbursed until it is paid in full. Interest accrues even if the student is in school or in the course of other periods of non-payment. It will be added to the principal quantity and additional interest will be based on that higher amount. Borrowers can choose to pay the interest as it accrues.

The estimated award amounts will be emailed to the student with instructions on completing the MPN and Entrance Counseling. Then an official award letter is sent from Meridian Institute shortly after the student starts classes. Any adjustments and/or lapse in attendance or failure to begin class, as scheduled, may prevent the student's federal financial aid from becoming disbursed.

Loans are processed for an academic year. Meridian Institute will disburse financial aid in two installments. The first payment is disbursed within 31 days that the student starts classes; the second is disbursed at the midpoint of the student's academic year. To meet eligibility standards for second Direct Loans or Pell Grant disbursements, the student needs to successfully meet the both the mid-point for time spent in the program and clock hours earned.

Federal Stafford Direct Parent Loan for Undergraduate Student

If a student is a dependent undergraduate student, a parent could apply for a Federal Stafford Direct Parent Loan for an Undergraduate Student (PLUS). This loan assists with the student's educational expenses. The application procedure consists of completion and submission of a PLUS loan application by the student's parent.

The application procedure is completed by means of the Federal Stafford Direct Loan Program. This loan is based on credit worthiness as determined by the U.S. Department of Education. The yearly limit is equal to the Cost of Attendance (COA) minus any other financial aid received. Interest is charged on the loan from the date first disbursement is made until the loan is paid in full. The borrower can wait six months after the student graduates to start the repayments on any federal loans.

Note: Interest on the Parent PLUS loan is not subsidized. It continues to accrue even if deferred or in forbearance and is capitalized when the loan enters repayment.

Terms and Conditions

Students whose parents receive a PLUS loan are subject to the terms and conditions disclosed on the Federal Stafford Direct PLUS Loan Application and MPN.

Federal Grants

Federal Pell Grant

Pell Grants are generally awarded only to undergraduate students- -those who have not earned a Bachelors, masters, or doctorate degree. Amounts subject to annual variation.

Iraq and Afghanistan Service members Grant

Effective for the 2009-2010 award year, a student who has a Pell Grant eligible Expected Family Contribution (EFC) will be treated as a student who has a zero EFC and will be awarded the maximum amount of Grant.

If the criterion applies to the student the student is otherwise eligible:

Parent or guardian died as a result of military service in Iraq or Afghanistan following September 11,
 2001

Rights and Responsibilities of Receiving Financial Aid

In respect to Financial Aid, the student has the right to know:

- What types of programs are available. If applicable, an explanation of each and how to repay.
- The criteria and if the student qualifies.
- How aid is determined.
- How much award the student will receive.
- How and when Meridian Institute disburses the aid.
- The conditions for any loans that the student is awarded.
- The refund policies.
- All information provided to the Financial Aid Office is confidential, including all documents pertaining to financial aid.

The responsibilities of the student and recipient of financial aid are as follows:

- Student loans are borrowed money that must be repaid, with interest, just like car loans and home mortgages.
- Student loans cannot be canceled for reasons such as: the student "did not like," the education the student paid for with the loans; the student did not get a job in correlating field of study, or financial difficulty.
- Loans are legal obligations, forethought is advised when determining the amount that must be repaid, before taking out the loan.
- The maximum Stafford Loan amount the student can borrow each academic year depends on whether the student is a dependent or independent student, and if the student has any existing school loans.
- Students who demonstrate financial need are eligible for a subsidized Stafford Loan to cover some or all of that need.
- For students who are eligible for a subsidized Stafford Loan, the U.S. Department of Education pays the interest while the student is attending Meridian Institute.
- Unsubsidized Stafford Loans do not require that a student have a financial need. The borrower is responsible for paying all interest on unsubsidized Stafford Loans

Verification Requirements

The regulations include verification as part of the Federal Student Aid program requirements. The Department only requires that a portion of the FAFSA filers at Meridian Institute be verified, as selected by the Central Processing System. However, Meridian Institute also has the authority-and may be required-to verify additional students.

A federal financial aid student may be selected for verification by the U.S. Department of Education Central Processing System, following procedures established by federal regulations. Central Processing System prints an asterisk alongside the expected family contribution (EFC) on the ISIR, Student Aid Report (SAR), and/or SAR Acknowledgement to identify students selected for verification.

If the student is selected for standard verification, Meridian Institute will be advised to use the IRS Retrieval Tool, if student was eligible. If the student is ineligible, then tax transcripts must be requested directly from the IRS; if applicable, a student's parent or parents or spouse tax transcript may be needed. A signed and dated verification worksheet will also be necessary.

Additional documents might be requested through Meridian Institute to complete the verification process. A student will receive an email notification from the Financial Aid Director of verification requirements and the timelines for completion of the process.

Standard Verification Requirements:

- 1. Household size
- 2. Number in college in household
- 3. Adjusted gross income (AGI)
- 4. U.S. taxes paid
- 5. All untaxed income that is listed of the verification worksheet
- 6. High School, Home School, GED or Equivalent
- 7. Etc.

Verification applies to applicants for most Federal Student Aid programs, but it is not required if the student will only receive a parent or graduate PLUS loan or an unsubsidized Stafford loan. Yet, a student cannot avoid verification by choosing to borrow an unsubsidized loan instead of a subsidized loan. If the student tries to do this, Meridian Institute is to continue with verification.

No Federal Pell Grant or Subsidized Direct/Stafford Loan Funds will be disbursed prior to the completion of verification.

Failure to comply with the request for verification documents can result in disqualification for Federal Educational Funding.

Professional Judgment

At this time Meridian Institute does not conduct professional judgment.

Statement of Educational Purpose

Federal Student Aid is used only to pay the price of attending an institute of higher education.

Referrals to the Office of Inspector General

Meridian Institute is required by law to submit referrals to the Office of Inspector General of any circumstances of suspected fraud and abuse involving the federal financial aid programs.

How Aid Eligibility is Determined

- Student must be a U.S. citizen or eligible noncitizen.
- Student must have a valid Social Security number.
- Student must have a valid high school diploma/transcript, homeschool transcripts or GED.
- Student must be enrolled or accepted for enrollment as a regular student.
- Students must complete and submit all paperwork required by Meridian Institute and set up an initial meeting with Meridian Institute's Financial Aid Director.
- Student must have resolved any prior drug conviction.
- Males must meet Selective Service registration requirements.
- The FAFSA will help Meridian Institute access the Eligibility of Financial Aid. The Eligibility of
 Financial Aid is determined by Expected Family Contribution (EFC). EFC is an amount that is
 determined by the financial information a student provides on the FAFSA.

Validity of High School Diploma

Validity of high school diploma/transcript, GED, or homeschool transcripts will be confirmed by the Financial Aid Department at Meridian Institute. This is done by Meridian Institute's staff and cannot be appealed with the Department of Education. Without a valid high school diploma/transcripts, GED or homeschool transcripts, Meridian Institute can deny the student any Federal Financial Aid Funding.

These documents must have the High School name, address and graduation date. Documents must also include a signature by an official High School official and/or have a seal and or a stamp.

How much Financial Aid can a Student Receive?

Pell Grant

- Pell Grant award amounts can change yearly. Please consult the Financial Aid Department.
- Grant amounts depend on the student's Expected Family Contribution (EFC).
- The student may receive up to two disbursements of Pell Grants in an award Year.
- The student may not receive Pell Grant funds from more than one school at a time.
- Pell Grant amounts can change, from one award year to the next. The max amount of Pell Grant award at Meridian Institute for 2016/17 award year is \$4163.00.

Lifetime Eligibility Pell Grant Award

Pell Grants will continue to only be eligible to those students who have not received a bachelor's degree or beyond. Further, there is now a Lifetime Eligibility Pell Grant Award. Undergraduate students will exhaust their Pell Grant at 600%. At which point, the student will no longer be eligible to use this funding.

Federal Student Loans

Eligible students and parents borrow directly from the U.S. Department of Education at participating schools. Direct Loans include subsidized and unsubsidized Direct Stafford Loans.

Independent	
Subsidized	
\$ 2,520.00	4.29%
Unsubsidized	
\$ 4,320.00	4.29%

Dependent		
Subsidized		
\$ 2,520.00	4.29%	
Unsubsidized		
\$ 1,440.00	4.29%	

150% Direct Subsidized Loan Limit

Limits direct subsidized loan eligibility for first-time borrowers as of July 1, 2013. A First-time borrower, is no longer eligible for Direct Subsidized Loans, once the borrower has received Direct Subsidized Loans for a period of 150% of the length of the borrower's educational program. This can be reduced by paying on the subsidized loan.

Unless the borrower completed the program, continuing enrollment or enrollment in another undergraduate program of equal or lesser length results in the borrower losing interest subsidy benefits on outstanding subsidized loans, effective from the date of the continuing or new enrollment

State and other Private Aid

Funds are limited to students meeting criteria for the specific award.

How and When Financial Aid will be Disbursed to the Student?

Federal Student Aid reimbursement refers to the amount of aid that exceeds the allowable charges as a credit balance. Meridian Institute administrators sometimes refer to this as a refund; however, it is not the same as a refund under Meridian Institute's refund policy or a Post-withdrawal Disbursement given to a student under the Return of Title IV Funds rules.

Meridian Institute may pay a credit balance to a student by issuing a check payable to the student. Meridian Institute is considered to have issued the check on the date that it:

- Mails the check to the student or parent; or
- Notifies the student that the check is available for immediate pickup, and provides the specific location.

When Meridian Institute pays a student his or her credit balance with a direct disbursement, Meridian Institute will pay the student within the 14-day's from the disbursement date. Meridian Institute can, within that 14-day period, do a number of things, including sending a notice to the student that his or her money is available. Meridian Institute is considered to have met the 14-day requirement to give the student his or her credit balance as long as the Institute's process complies with the regulation. That is, Meridian Institute must be able to give the student a check when the student comes to the office within the 14-day timeframe. If, within the 14-day period, a student is told to come to the business office to pick up his or her credit balance, the student will leave the business office with the funds in some form (e.g., a check or cash) and not be told that a check will be mailed to him or her. Meridian Institute may hold the check for up to 21 days after the date it notifies the student. If the student does not pick up the check within this 21-day period, the institution must immediately mail the check to the student or parent, or return the funds to the appropriate FSA program.

Refund Policy

(POLICY DATE: March 24, 2003; Revised: August 1, 2014)

The official start date will be first of the month following the month in which the student signs the Enrollment Agreement if openings permit. If openings are unavailable the student will start in the earliest month available, following the month in which the student signs the enrollment agreement, in which openings do exist

You, the student, may cancel your enrollment any time prior to your start date for a full refund of all tuition and fees paid.

Once you have enrolled in the SFA Online Program and you determine that it is necessary to withdraw, you should immediately notify the Program Director, in writing, via the U.S. Postal Service, or E-mail. Part of the fees you have paid may be refundable. The tuition refund amount shall be determined as follows:

If you withdraw from the program:	Tuition Refund Amount:
Prior to start date	100% refund
Within two weeks of the start date	80% refund **
Within three weeks of the start date	60% refund **
Within four weeks of the start date	40% refund **
5 weeks or more after the start date	0% refund **

Refunds will be issued within 45 days from the date of determination.

A student's last day of attendance is the last day of academic activity and considered the official withdraw date.

Meridian Institute of Surgical Assisting date of determination of a student is (whichever is sooner):

- The date that the school is first notified of student's intent to withdraw
- The postmark of the withdrawal letter

Financial Aid Recipients:

Repayment calculation of unearned aid is used to determine any refund. As a result, any students who received federal funds will be required to repay any aid that is determined to be "unearned." The unearned repayment calculation is performed utilizing the federal government's repayment worksheet. The amount of assistance earned is determined on a prorated basis. For example, if the student completed 30% of the period, they earned 30% of the financial assistance that was originally awarded. Once the student has completed more than 60% of the program, the student earns all of the assistance they were scheduled to receive for the period.

Meridian Institute of Surgical Assisting will repay the amount on the student's behalf to the appropriate federal and institutional program(s), and will bill the student's account within 45 days of the student's date of determination. An invoice reflecting these charges will be sent to the student upon completion of the Repayment Calculation of Unearned Aid.

Return to Title IV Policy

Withdrawal Process

The student will contact the Dean of Academics to request an official withdraw. If unofficial, the Dean will determine if the student must withdraw. The Dean will then send an official letter via email and USPS recognizing this withdraw, which will include the effective date.

Repayment to Federal and Institutional Programs

Federal regulations and Institutional policy require that the following aid programs be subject to the repayment calculation if the student did not attend 60% or more of the term:

- Federal Direct Loans (Unsubsidized and Subsidized)
- Federal Pell Grant

Repayment Calculation of Unearned Aid as a Result of an Official Withdrawal

As a result of a withdrawal, students who received Federal funds will be required to repay aid determined to be "unearned." The unearned repayment calculation is performed utilizing the federal government's repayment worksheet. Book/s cost will be included in R2T4 calculation. If money needs to be returned, Meridian Institute has 45 days to return funds to the Department of Education. The amount of assistance earned is determined on a prorated basis. For example, if the student completed 30% of the period, they earned 30% of the financial assistance that was originally awarded. Once the student has completed more than 60% of the program, the student earns all of the assistance they were scheduled to receive for the period.

Student Fails to Earn a Passing Grade in any Class, but Completed the Period

For Financial Aid purposes, when a student fails to earn a passing grade in any of his or her classes but completed the 52-week period by completing all 12 online didactics of the program the student is considered to have completed the period. The student will not be considered a withdrawal, but will be documented as a fail. No R2T4 will be completed. Per approval by the Dean of Academics the student may be eligible to file an extension or re-enroll in order to successfully complete the program.

Student Notification of Repayment to Federal Programs

Meridian Institute will repay the amount on the student's behalf to the appropriate federal and institutional program(s), and will bill the student's account within 45 days of the student's date of determination. An invoice reflecting these charges will be sent to the student upon completion of the Repayment Calculation of Unearned Aid.

Non-Attendance

Financial Aid is awarded under the assumption that the student will attend for the entire term in which Federal assistance was disbursed.

When the student has failed to earn a passing grade in at least one class, Federal regulations require that Meridian Institute determine whether the student established eligibility for funds disbursed by attending at least one class or participating in academic-related activity. If the Office of Financial Aid cannot demonstrate

that the student attended Meridian Institute, all Financial Aid must be repaid to the Federal and institutional programs. The student's account will be charged and the student will be responsible for any balance due. If the student can prove to have attended and met satisfactory academic requirements in a class or academic-related activity past the 60% date, then the student will not have to return any Financial Aid. The student's account will be updated, and the student will be responsible for any other charges that may have been applied to their account.

Examples of Meridian Institute academic-related activities are:

- Exams or quizzes
- Computer-assisted instruction
- Academic advising or counseling
- Online based forum
- Completion of an academic assignment
- Lab Attendance
- Externship cases completed

Once grades are posted for the student who receives all-fail grades, Meridian Institute will return all unearned aid back to the Federal Government and the student's account card will be charged. Meridian Institute will mail a notification letter with the repayment amount(s) to the student's permanent address. The student's account will be updated, and the student will be responsible for any balance due. A statement reflecting these charges will be sent to the student.

Students who are able to verify attendance beyond Meridian Institute's records may submit supporting documentation to Meridian Institute. The student must submit supporting documentation within 30 days from the last date of academic activity. Recalculations for aid eligibility will not be performed for documentation received after that date.

Documentation Not Acceptable as Proof of Participation

A student's self-certification of attendance that is not sufficient evidence of attendance.

Additional Loan Information to Consider When Withdrawing

The federal repayment calculation also has additional loan amounts that the student may be responsible for and need to return directly to the U.S. Department of Education. If the student withdraws within six months of the start date, the loans will go into repayment. The student must contact the U.S. Department of Education or his/her lender(s) to make payment arrangements.

Overpayment of Federal Grant Funds Owed by Student

Federal regulation provides that 50% of the unearned amount of all federal grants are protected by the federal calculation. Any grant amount subject to repayment will be billed to the student's account as an overpayment. Upon receipt of payment from the student, Meridian Institute will return the funds to the appropriate grant program(s).

Loan Repayment and Counseling

Loan Repayment

Loan repayment will start six months after the student graduates or withdraws.

A borrower must repay his or her loan, plus interest, within 10 years. This repayment period never includes authorized periods of deferment, forbearance, or cancellation.

Calculating the payment amount

Each of the borrower's payments must sufficiently cover the interest accruing between payments to ensure that the loan is repaid in 10 years. Meridian Institute calculates the correct payment amount by multiplying the principal by the appropriate constant multiplier. Finaid also has a calculator on their website http://www.finaid.org/calculators/loanpayments.phtml.

Loan Counseling

Before a first-time Stafford Loan borrower takes out a loan, Meridian Institute must ensure that entrance counseling is individually conducted, by visiting www.studentloans.gov. Exit counseling must also be provided upon leaving (graduate or withdraw) Meridian Institute. Loan counseling is particularly important because new students often have little or no experience with repayment and managing school loan debt. If the entrance counseling was unable to be completed by using studentloan.gov, the student and, if applicable, the parent will need to complete a paper entrance counseling form and return back to Meridian Institute. Entrance counseling is required on plus loans, it is important that students and parents both understand how a plus loan works and the repayment criteria. NOTE: EFFECTIVE 03/20/2015 PLUS LOANS WHOSE PARENT'S ARE DENIED, BUT THEN OBTAIN AN ENDORSER, OR AN OVERIDE ARE REQUIRED TO COMPLETE ENTRANCE COUNSELING. MERIDIAN INSTITUTE REQUIRES COMPLETION OF ENTRANCE COUNSELING ON ALL PLUS LOANS TAKEN OUT BY A PARENT.

Meridian Institute will ensure that the students and, if applicable, parents receive comprehensive entrance and exit counseling regardless of the counseling methods. The student completes the Exit Counseling online, by visiting www.studentloans.gov. The Financial Aid Director notifies students to complete this no earlier than 30 days prior to their graduation date, or once the Financial Aid Director learns of the withdrawal of a student.

Entrance Counseling

Loan Entrance Counseling is required prior to securing student loans. Loan entrance counseling is available online at the U.S. Department of Education web site, http://studentloans.gov. The interview includes the following:

- An explanation of the use of a Master Promissory Note (MPN).
- Importance of repayment obligation
- Explanation of consequences of default
- Sample of repayment schedules
- Data in reference to a borrower's rights and responsibilities
- Other terms and conditions

Exit Counseling

Loan exit counseling is available online at the U.S. Department of Education's website:

National Student Loan Database (NSLDS) web site, http://studentloans.gov loan exit counseling is required once program is complete. The interview consists of the following:

- An explanation of the use of a MPN
- Significance of repayment obligation
- Explanation of consequences of default
- Sample repayment schedules
- Data in reference to a borrower's rights and responsibilities
- Other terms and conditions

Terms and Conditions for Federal Loan Deferment

Under certain circumstances, the student can receive periods of deferment or forbearance that allow the student to postpone loan repayment. These periods do not count towards the length of time the student has to repay the student loan. The student cannot get a deferment or forbearance for a loan that is already in default.

A deferment is a period of time during which no payments are required. To qualify for a deferment the student must meet specific eligibility requirements. Interest does not accrue on subsidized Stafford Loans during a deferment period. However, the student is responsible for paying the interest that accrues on unsubsidized Stafford Loans during a deferment period, capitalization will occur at the end of the deferment. The most common loan deferment conditions are enrollment at an Institute at least half-time, inability to find full-time employment (up to three years), economic hardship (for up to three years), and military service.

Borrower's Rights

The student has the right to know the details of their loan. Many of the pertinent information will be covered during the completion of entrance counseling and exit counseling. Below is what the student should expect to receive from either Meridian Institute, the lender, or the Direct Loan Servicing Center:

- The full amount of the loan and the current interest rate;
- The date the student must start repayment;
- A complete list of any charges a student must pay (loan fees) and information on how those charges are collected;
- Information about the yearly and total amount that can be borrowed;
- An explanation of default and its consequences; and
- An explanation of available options for consolidating the loans and a statement that the student can prepay their student loan (s) at any time without a penalty.

Grace Period

The student has a set period of time after graduating or leaving Meridian Institute before he/she must begin repayment on a Stafford Loan. This period of time is called a grace-period.

- The student will receive a grace period before the repayment period begins on a Stafford Loans.
- The student's grace period will be six months.
- If the student is called to active military duty for more than 30 days then the grace period will be delayed.

Loan Repayment Schedule

The student should expect to receive a repayment schedule from the lender or the Direct Loan Servicing Center that states:

- When the first payment is due;
- The number and frequency of payments;
- The amount of each payment.

Constitution Day

At Meridian Institute, we feel it is important to recognize Constitution Day. Every year our students receive an email reiterating the importance of this day. Below is an example of what we share with our students on a yearly basis:

The Constitution of the United States, the foundation of our country, was signed after four months of discussions on September 17, 1787 in Philadelphia. It was ratified after three quarters of the states approved it in 1788. As a condition of its acceptance, the first 10 Amendments, known as the Bill of Rights were added to establish the individual liberties and rights of American citizens, and prevent acts of tyranny by the federal government. The constitution is an evolving document and has 27 Amendments today.

Textbook and Supply Information

The Surgical First Assisting Online Program is a computer based program. Each student is required to have access to a computer and an internet connection on a regular basis. Testing, Quizzing, and grading are completed online. There are a total of five books that will be used throughout the course. Four of the books will be sent to the student prior to their start date, three of which will be on a CD. All costs of textbooks are included in the price of tuition with the exception of Alexander's Care of the Patient in Surgery, 15th edition, by Jane C. Rothrock. ISBN 978-0-323-08942-5, estimated cost: \$125.00. The book charges are non-Institutional charges and will not show up on student account card. We recommend the purchase of book from amazon: http://www.amazon.com/Alexanders-Care-Patient-

<u>Surgery%2015e/dp/0323089429/ref=sr 1 1?ie=UTF8&qid=1407421245&sr=8-1&keywords=9780323089425</u>

Availability of General Education Diploma (GED) Program

The American Counsel of Education provides testing for the General Education Diploma. The GED cannot be taken online, but only at provided test centers. For more information visit:

>a<a href="http://www.acenet

Satisfactory Academic Progress Policy

(Revised November 1, 2013)

Federal regulations require that students receiving Federal financial aid must make satisfactory progress as defined by the college. Meridian Institute of Surgical Assisting has elected to apply the standards set forth below to **all students** including those students who received aid from any of the U.S. Department of Education Title IV programs.

Meridian Institute of Surgical Assisting is required to measure each student's satisfactory academic progress. All students must continue to meet Satisfactory Academic Progress (SAP) standards during their enrollment.

SAP is measured at the end of the six-month period of enrollment. The student's academic progress is measured in two components:

Qualitative and Quantitative Measures of Academic Progress

Qualitative Measures of Academic Progress

The qualitative measures of academic progress is based on achieving a C or better on course/class and an 80% on the Applied Science Lab final examination. Students must maintain a 2.0 GPA. Students must pass all lab skills and complete 140 cases of the clinical externship with an overall good rating on the Meridian established Likert scale.

Quantitative Measures of Academic Progress

All students must make arrangements to, and attend the Applied Science Lab within the initial 26 weeks of enrollment. Students must have completed all three phases with a 52 week period of enrollment.

Remedial Coursework

If a student receives a failing grade for any given academic module, they will work with the instructor utilizing a customized remedial training program. Clear objectives will be outlined for the student to achieve success and be removed from remedial training. The following actions will take place concerning remediation.

If the student defers the remediation, they will be withdrawn from the surgical assisting program. If the student successfully completes the requirements and pass the module, they will be removed from remediation.

If the student fails the class a second time they will be required to retake the class and enrolled in the appropriate class.

If the student fails to pass all the skills in the Applied Science Lab, they will be given one on-one remediation training during the lab. If the student does not progress to a point where they can pass all the skills requirements of the lab, they will be required to repeat the lab at another date.

If the student fails to score an 80% on the Applied Science Lab final exam, they will be provided on-site remediation on the day of the exam. The student will be required to retake the exam within two weeks after the remediation. If the student fails to pass the Applied Science Lab final retake, they will be required to attend the lab again.

Maximum Time Frame:

The student may not exceed 150% of the published length of the program. Federal regulations allow financial aid recipients to receive financial aid for a maximum number of attempted clock hours. If at any point in time it is determined that a student cannot complete their program of study within 150% of the program length, the student will be ineligible for additional financial aid.

Effect on Student not completing the course within the specified timeframe;

The policy below will outline the procedure and general effects in the event that any student does not finish the SFA ONLINE PROGRAM within the allotted time frame.

<u>ALL</u> STUDENTS ARE ALLOTED 52 WEEKS TO COMPLETE ALL THREE PHASES OF THE SFA ONLINE PROGRAM FROM THEIR INITIAL START DATE*, IN ACCORDANCE WITH MERIDIAN'S GRADING POLICY.

* The start date is considered to be the first of the month following the month in which the student signs the Enrollment Agreement if openings permit. If openings are unavailable the student will start in the earliest month available, following the month in which the student signs the enrollment agreement, in which openings do exist. All students will be notified by the Director of Student Affairs via email when they are 60 days away from their completion date. Students will receive an additional email notification when they are 30 days out from their completion date.

In the event that a student does not complete the program in the allotted 52 WEEK time frame they **may** be eligible for a one-time six-month extension**. The final approval for the extension is at the discretion of the Program Director and will involve a \$250.00 extension fee.

** Extensions will only be granted in extenuating circumstances as determined by the Program Director. NOTE: EXTENSIONS WILL ONLY BE GRANTED ONE TIME FOR A PERIOD OF SIX MONTHS.

If the student does not apply for **or** is not granted an extension and fails to complete the program within the 52 WEEK time frame they will be terminated from the program.

Students who receive an "I", "F", "W", "WF", or "U" grades in courses attempted will become ineligible for financial aid for those particular courses. Students must retake and pass these courses in order to graduate and become eligible for financial aid for these courses. Any student who receives, "I", "F", "W", "WF", or "U" in phase III and is on an extension will still be considered as completion of the enrollment period for financial aid purposes.

Repeat courses will be counted in attempted clock/credit hours. (Note: ALL courses attempted and earned, except audited courses, count in total clock/credit hours attempted.)

Conditions for reinstatement;

If the student does not apply for **or** is not granted an extension within the final 30 days of their allotted program completion time, fails to complete the program at the end of 12 months or at the end an extension period if given, they will be dropped from the course and must re-enroll. Credit will be given for classes already **completed**.

If the student re-enrolls they will be given credit for work already completed, but **must** finish any uncompleted classes, labs, or clinical externship requirements in 52 week period. All current tuition and fees will be applied and **must** be paid by the re-enrolling student for any uncompleted portion of the program. There is a \$250.00 re-enrollment fee that maybe waived at the discretion of the school. The re-

enrolled student will be considered a NEW student and will be subject to all academic and financial policies pertaining to all new students. Any monies owed to the institution prior to re-enrollment must be paid before the re-enrollment process may begin. If the student cannot afford to pay in full at the time, there is a payment plan available for re-enrolling students with a fee of \$500.00.

Financial Aid Warning: Warning status will be assigned to a student who fails to meet progress standards at the conclusion of an evaluation period. A student assigned a Financial Aid Warning will be notified by email. This will delay all financial aid disbursement until the student regains satisfactory academic progress.

All Students who are entitled to a reimbursement of Federal Financial Aid will be given the following statement:

Dear Student,

The second disbursement of Federal Financial Aid will not be received to the school until the mid-point has been met. The mid-point has been defined as enrollment of six months into Meridian Institute of Surgical Assisting Program, completion of half the credit hours which includes completion of the one week Science Lab, in which you may have to pay for any travel/lodging expenses incurred during the trip to Nashville. Half the credits may not be completed before eight months. This means Meridian will not receive a student's second disbursement no earlier than eight months.

Furthermore, understand that any Federal Aid will be received by the school in two disbursements. Any award that is over the amount of tuition will not be reimbursed to you until the entirety of the tuition is paid in full, which will not be until the second disbursement.

No award due to the student will be released by Meridian Institute until the mid-point is met.

If I have any further questions I will contact Robyn Johnson, Director of Financial Aid,

Robyn.Johnson@Meridian-Institute.edu, (615) 678-8196 ext 13

A student who is placed on financial aid and academic on warning must do the following to regain satisfactory academic progress.

1. A letter with detailed explanation:

- a. Explain why the student failed to complete the academic progress requirements and what has changed in the student's situation that would allow the student to demonstrate satisfactory academic progress.
- b. Describe the student's educational objectives.
- c. Provide a schedule to indicate how these objectives will be achieved.
- **2. Documentation:** Submit third party documentation (if applicable) supporting the reason(s) why the student failed to maintain academic progress; i.e., a letter from a mental health professional or police officer, medical or legal documentation, death certificate, etc.
- **3. Academic Plan:** Students are required to complete an *Academic Plan* with an academic advisor.

Notification of Status: The Office of Academics will notify students and the Financial Aid office when students are on *Warning, Academic Plan* status. However, it is the student's responsibility to know their academic progress status, academic plan, and how it affects financial aid eligibility.

Remediation

(Revised September 18, 2015)

All students must achieve a minimum GPA of 70% for each module. If the students fails to achieve a 70% he/she will be given the opportunity to retake the lowest scored exam of that module in order to bring the grade to a GPA of 70%. In the event the GPA is still not attained after a second attempt, the student will be withdrawn from the class.

- a. If a student fails a module, the instructor will contact the student within 24 hours to discuss the module and to provide remediation.
- b. Remediation will require the student to review the information that will be pertinent to the quiz in which they scored the lowest. This remediation must begin within 48 hours of failure notification and completed within 14 days of start.
- c. The student and instructor will communicate through email, any concerns that they have about the material.
- d. The instructor will address any concerns during a scheduled telephone call. Additional calls can be scheduled as required.
- e. This remediation will be documented on an advisement form and placed in the student's academic file and a copy will be emailed to the student with an email verification from the student saying they received the advisement.
- f. Once the remediation has taken place the student will be allowed to retake the lowest scored guiz in order to bring their GPA up to 70%.
- g. The highest score allowed for the retake quiz is 80% no matter how high the student may score.
- h. If the student does not pass the remediated quiz or their grade does not bring their GPA up to 70% they will be required to retake and pass the class in order to continue with their program. If they refuse remediation or to retake the class they will be withdrawn from the program.
- i. If the student passes the remediation and their GPA is 70% or higher they will be enrolled into the next available class start.

Applied Science Lab -- Failed Exam Procedure

(Revised September 18, 2015)

The Applied Science Lab -- Failed Exam Policy is in place to fully explain the step-by-step procedure when a student fails the Applied Science Lab exam.

- Students must score 80% or higher to pass the lab final exam.
- If a student does not pass the lab final exam they will be given the opportunity to retake the exam one time.
- The student will be provided remediation at the end of their lab. Remediation will be documented and a copy will be placed in their academic file. If the student refuses remediation they will be withdrawn from the surgical assisting program.
- Upon successful remediation the student will be informed to provide the name address, phone number and email address of the OR Director, Hospital Educator or individual that will be designated as the proctor for the make-up exam. The proctor cannot be a staff nurse, surgical assistant or surgical technologist. The student must provide this information within two business days after remediation. Failure to provide this information or to communicate with the Clinical Director or Academic Dean as to why the information has not been forwarded will result in a failing grade.
- Once contact information for the exam proctor has been provided the Clinical Director will send the exam and directions to the proctor via Fed Ex and a tracking number will be used to identify when the exam is received by the proctor. The exam must be sent within 24 business hours of receipt of the proctor information. The proctor should be emailed with the tracking information and expected arrival date.
- The exam should be taken as soon as possible, however, the student has up to 5 business days from the time the proctor has received the exam. If more than 5 business days are required the student should contact the Clinical Director or Academic Dean. The proctor will be required to send the exam back to Meridian when the exam has been completed.
- The exam will be graded and the student will be informed of their score. If the student passes the retake exam, they will then be permitted to begin their externship.
- If the student does not pass the retake final exam, they will be required to repeat the Applied Science Lab. If they refuse to attend the lab a second time they will be withdrawn from the surgical assisting program.

Academic Department – Make-Up Work Policy

(Revised: September 17, 2015)

The Make-Up Work Policy is in place to provide uniformity between each student. This policy provides guidelines and procedures that will be followed concerning a student that does not complete their assigned work on time.

Discussion Questions

- Discussion questions are assigned to be completed on specific days.
- The initial post to a discussion question requires a minimum of a 50 word post.
- There are three additional posts required to be made to fellow students. These posts must be a minimum of 25 words.
- If a student does not make the required number of posts with the correct word count by the due date, they will be required to go back and make the posts before they can move on to their next week's work. No credit will be awarded for late posts.
- There will be an additional post required for the following week's discussion if a student fails to complete the previous discussion correctly.
- Students that do not provide the correct word count for a discussion reply will be allowed to make additional comments to the post to meet the word count requirements.

Exams

- 1. Students are given ample access to tests with assigned due dates and are expected to complete their test in accordance with that date.
- 2. If a student does not take the test in accordance to the due date they will be notified by their instructor that they will only receive their recorded score if it is below 80%. Any student scoring higher than 80% will have their score reduced to meet the 80% score.
- 3. If a student does not take the test by the due date they will be notified by the instructor and have 24 hours to take the test. If they do not take the test in the required time they will receive a "0" for the test. A score of 80% is the highest score a student can receive if they take the test after the due date.

Student Leave of Absence Policy

Revised: September 11, 2015

Students are not normally allowed to take an official "leave of absence" during the course of the SFA Online Program. However, **if** an exception to Meridian Institute's policy is made, the leave of absence can be no longer than 90 days or extended to the next class start not to exceed Department of Education standards and must be approved by the Dean of Academics. If the student is receiving federal financial aid funds, the following federal guidelines will apply:

Federal Leave of Absence Policy:

A student who takes an approved leave of absence is not considered to have withdrawn from the school. For federal financial aid programs, a leave of absence must meet the following guidelines.

Condition for Leave of Absence Approval:

- Student must submit a written request for the leave of absence.
- According to the US department of Education the leave of absence cannot exceed 180 days.
- The school does not charge the student for the leave of absence.
- The school will not disburse any financial aid on a student while they are on a leave of absence.

If a student's leave of absence is **not** approved, and the student fails to show academic progression the student is considered to have withdrawn from Meridian Institute, and the federal refund requirements apply.

These leave of absence requirements also affect a student's in-school status for the purposes of deferring federal student loans. A student on an approved leave of absence is considered to be enrolled at the school and would be eligible for an in-school deferment for his/her federal student loan. A student who takes an unapproved leave of absence or fails to return to school at the end of an approved leave of absence is no longer enrolled at the school and is **not** eligible for an in-school deferment of his/her loans.

Student Excused Absence Policy

Weekly attendance in the online classroom is required for the entire enrollment period. Online participation and attendance is required according to the academic calendar for each student. This calendar is provided in the Canvas Learning Management System.

The student:

- 1. Is required to login a minimum of three (3) times during the week to complete the discussion question requirement and to take the online quiz.
 - Initial discussion reply
 - Reply to additional students
 - Quiz completion
- 2. Will complete the assigned work on the required date.
- 3. If quizzes are not completed by the assigned date, the student will have 24 hours to complete the quiz but will only receive a maximum grade of 70% for their work unless they meet the requirements of an excused absence.
- 4. If the discussion question requirements are not met the student will receive a "0" for the discussion question.
 - Discussion requirements include the student's initial post and replies to three student's posts for a total of four posts per discussion question.
- 5. Students not completing the discussion question, discussion replies or quiz on time will receive a reduced grade. If a student does not make-up the missed work, this will be considered as an unexcused absence and will received an unexcused absence for each assignment not completed.
 - Initial discussion question post equals one absence.
 - Reply to students post equals one absence.
 - Not completing the quiz on time equals one absence
 - i. <u>Example:</u> If a student does not complete a quiz in the required time frame, the student will receive an absence for that day.
 - ii. <u>Example:</u> If a student does not make their initial discussion question post for a question they will receive an absence for that day.
 - iii. <u>Example:</u> If a student does not reply to three other students comments they will receive an absence for that day
- 6. Students will not be allowed to have more than 3 unexcused absences in a class. If the student exceeds 3 absences in a class they will be placed in attendance warning status for the next scheduled class. If the student has any unexcused absences during the time they are in warning status, they may be required to repeat the class. If the student does not have any unexcused absences during the period they are in warning status, they will be removed from attendance warning status.

Substance Abuse Policy

Meridian Institute is committed to providing a safe environment and fostering the well-being and health of its students. This commitment is jeopardized when any student or employee illegally uses drugs or alcohol on campus, comes to Meridian Institute or works under the influence of drugs or alcohol or possesses, distributes or sells drugs on campus. Therefore, Meridian Institute maintains a drug-free and alcohol-free environment.

Policy:

It is the policy of Meridian Institute to strictly prohibit the unlawful possession, use, distribution, or manufacture of illegal or illicit drugs, controlled substances, and alcohol by a student or employee on any property owned or controlled by Meridian Institute. All students and employees, whether on or off campus, must adhere to local and federal laws concerning alcohol and drugs and are expected to conduct themselves in a manner consistent with Meridian Institute's expectations set forth in policies, rules, and procedures.

Standard of Conduct:

It is a violation of Meridian Institute's policy for any student or employee to possess, sell, trade, or offer for sale illegal drugs or any controlled substance or otherwise engage in the illegal use of drugs. It is a violation of Meridian Institute's policy for anyone to report to Meridian Institute or work under the influence of illegal drugs, controlled substances, or alcohol.

Violations of this policy are subject to disciplinary action up to and including expulsion and termination of employment. Meridian Institute of Surgical Assisting will impose the appropriate sanction(s) on any student or employee who fails to comply with the terms of the policy. Potential disciplinary sanctions for failure to comply with the terms of this policy may include one or more of the following:

- Expulsion
- Suspension
- Criminal Prosecution
- Warning
- Reprimand

Available Drug and Alcohol, Counseling, Treatment, Rehabilitation Programs

Meridian Institute does not provide drug or alcohol treatment or rehabilitation programs. Counseling services staff will refer students and employees to appropriate community treatment centers.

Sexual Misconduct Policy and Procedure

Policy Overview:

Meridian Institute of Surgical Assisting is committed to creating and maintaining an educational environment free from sex discrimination. Meridian Institute will respond promptly and effectively to reports of sexual misconduct and will take appropriate action to prevent, to correct and when necessary, to discipline behavior that violates this policy.

The Sexual Misconduct Policy and Procedure (hereafter referred to as Policy) will cover procedures of complaints of alleged sexual assault, dating violence, sexual harassment and stalking.

This Policy applies to employees and current students who are associated with Meridian Institute.

Definitions

Abuse: intentionally or recklessly causing or attempting to cause bodily injury, or placing another person in reasonable apprehension of imminent serious bodily injury to himself or herself, or another.

Bystander Intervention: someone who intervenes as an outsider at the time of the occurrence.

Complainant: an individual who files a Sexual Misconduct complaint with Meridian Institute's officials against a current student or employee.

Consent: clear, knowing, and voluntary approval given by words or demonstrated positive actions to engage in sexual activity. This decision must be made voluntarily and actively by all participants in a positive manner which is mutually agreed upon sexual activity.

Consent cannot be given when a person is incapacitated. A person cannot consent if he or she is unconscious or coming in and out of consciousness. A person cannot consent if he or she is under the threat of violence, bodily injury or other forms of coercion. A person cannot consent if his/her understanding of the act is affected by a physical or mental impairment.

Dating Violence: is defined as abuse committed by a person who is or has been in a social relationship or a romantic or intimate nature with the victim.

Employee: includes faculty and staff that are part-time or full-time employees who work on Meridian Institute's campus. Contract employees are not considered under "employee".

Incapacitation: is defined as the physical and/or mental inability to make informed, rational judgements. States of incapacitation include, but are not limited to, unconsciousness, sleep, and blackouts. Where alcohol, drugs or other medications are involved, incapacitation is defined with respect to how the alcohol or other drugs consumed affects a person's decision-making capacity, awareness of consequences, ability to make fully informed judgments, and inability to communicate. Being intoxicated by drugs, alcohol or other medications does not absolve one's responsibility to obtain consent. The factors to be considered when determining whether consent was given include whether the accused knew, or whether a reasonable person should have known, that the complainant was incapacitated.

Prevention: Intervention to stop the behavior.

Respondent: a "Respondent" is an individual who has been accused of committing sexual misconduct by the report or filing of a formal or informal complaint.

Result: the final determination by the school or judge, due to the findings between the respondent and complainant.

Risk Reduction: actively taking steps to reduce the likelihood a behavior will happen.

Sexual Assault: occurs when physical sexual activity is engaged without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat, or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol. Or taking advantage of the other person's incapacitation.

Sexual Exploitation: non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other improper purpose.

Sexual Harassment: is unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal or physical conduct of a sexual nature such as the unwelcome touching of a person's body. Forms can include stalking, engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others. Sexual harassment also includes sexual jokes and/or innuendos of a sexual nature.

Sexual harassment may occur in hierarchical relationships, between peers, or between individuals of the same sex or opposite sex. To determine whether the reported conduct constitutes sexual harassment, consideration shall be given to the record of the conduct as a whole and to the totality of the circumstances, including the context in which the conduct occurred.

Sexual Misconduct: a broad term including, but not limited to, committing a Sexual Act without Consent, Sexual Exhibitionism, Sexual Exploitation, or Sexual Harassment. This may include sexually based violence that may be physical, emotional, financial and/or abusive. Sexual Misconduct can occur between strangers or acquaintances, including people involved in an intimate or on-going sexual relationship. Sexual Misconduct can be committed by men or women, and it can occur between people of the same or different sex.

Stalking: is behavior in which a person repeatedly engages in conduct directed at a specific person that places that person in reasonable fear of his or her safety or the safety of others.

Student: a current student who is actively enrolled at Meridian Institute.

Prevention and Risk Reduction

Sexual misconduct is a problem at many Universities. Schools country-wide are working collaboratively to ensure the campus community is aware of how sexual misconduct impacts our community.

When people talk about what you can do to stop sexual misconduct, he or she often uses the word "prevention." While we would all like to prevent sexual violence, it is helpful to understand the difference between *prevention* and *risk reduction*.

Prevention is intervention to stop the behavior.

Risk reduction is actively taking steps to reduce the likelihood a behavior will happen.

People can prevent sexual assault by not sexually assaulting someone else, or by intervening when an acquaintance is potentially going to engage in non-consensual behavior.

Risk reduction is making decisions that will increase the odds of keeping you and your friends safe, like staying in groups when you're going out, drinking responsibly and communicating clearly.

To be clear, if a person drinks too much, or is not among a group of friends, and is assaulted, they are not responsible for the assault. *Regardless of what someone is wearing or how much they drank, that person is not asking to be assaulted, nor are they the cause of the assault.*

Preventing sexual violence is only accomplished by teaching potential perpetrators not to commit the crime. However, it is important to teach potential victims risk reduction strategies to lower the likelihood that they will become targets of the crime.

Prevention, Education, and Training

Meridian Institute disseminates this policy to current students and employees. As a distance education program Meridian Institute does not provide online training in prevention of sexual misconduct; however, Meridian Institute will provide any resources per request by a student. Meridian Institute does conduct an in-house annual training for their employees conducted on October 1st of each year.

POLICY

Meridian Institute prohibits sexual misconduct as it both violates the law and Meridian Institute's policy. Meridian Institute will respond promptly and effectively to reports of Sexual Misconduct and will take appropriate action to prevent, correct and, when necessary, discipline behaviors that violate this Policy.

Prohibited Acts

This Policy covers unwelcome conduct of a sexual nature. This policy prohibits sexual harassment and sexual misconduct as defined above by an employee and/or current student.

Consensual Relationships

Because of unique situations that exist among current students, faculty and staff, relationships in the workplace and on campus should at all times remain professional. In particular, due to the professional power differential between faculty and students, faculty is encouraged to maintain a professional relationship with current students.

Gender Identity, Gender Expression, or Sexual Orientation Discrimination

Harassment that is not sexual in nature but is based on gender, gender identity, gender expression, sex- or gender- stereotyping, or sexual orientation also is prohibited by Meridian Institute. This type of harassment may limit or deny a person's ability to participate in or benefit from Meridian Institute's educational programs, employment, or services. While discrimination based on these factors may be distinguished from sexual harassment, this kind of harassment may contribute to the creation of a hostile work or academic environment. Thus, in determining whether a hostile environment due to sexual harassment exists, Meridian Institute may take into account acts of discrimination based on gender, gender identity, gender expression, sex- or gender stereotyping, or sexual orientation.

Dissemination of the Policy

During orientation, new students and new employees both will be directed to our website where the policy can be found in our consumer guide. The policy will also be located in the hard copy of the Financial Aid Policy and Procedures manual which will be available upon request.

Period of Limitations

A complaint of sexual misconduct should be filed as soon as possible and within 180 days after the alleged unlawful discriminatory practice. A delay in filing a complaint may compromise the subsequent investigation, particularly if neither the complainant nor the respondent is employed by Meridian Institute, or enrolled as a student at that time.

Reporting Sexual Misconduct

Any member of the Meridian Institute may report conduct that may constitute as sexual misconduct to any supervisor or Title IX Officer. Supervisors are responsible for promptly forwarding such reports to the Title IX Officer or directly to the President. Any supervisor, or reporting official, responsible for reporting or responding to sexual misconduct who knew about the incident and took no action to stop it, or failed to report the prohibited act may be subject to disciplinary action. Sexual misconduct should be reported within 180 days of its occurrence; however, complaints reported after 180 days will still be investigated.

When a student reports sexual misconduct to the supervisor he, or she, should direct the student to complete a Sexual Misconduct Complaint form by request from the Title IX coordinator, or any Meridian Institute staff member. The student must be aware of the supervisor's obligation to report the names of the alleged perpetrator and student involved in the alleged sexual misconduct, as well as relevant facts regarding the alleged incident (including the date, time, and location), to the Title IX coordinator or other appropriate officials.

Confidentiality

In the course of complaint investigation, Meridian Institute will make reasonable efforts to maintain confidentiality of the complaints. All parties of the complaint will be asked to assist in treating the complaint confidentially; however, there can be no guarantee of confidentiality and anonymity based upon

the course and scope of the compliant investigation, and the institution may share information where necessary to provide accommodations or protective measures.

Even if the complainant requests confidentiality or asks that the complaint not be pursued, Meridian Institute will take all reasonable steps to investigate and respond to the complaint to the extent possible consistent with the alleged victim's wishes. Meridian Institute will notify the alleged victim that the failure of the alleged victim to pursue a complaint may limit Meridian Institute's ability to fully address the matter.

Protective Measures

If at any point during the complaint, investigative or disciplinary processes, the Title IX Coordinator reasonably believes that a respondent who is a member of Meridian Institute (1) poses a substantial threat of harm to any student or employee, (2) threatens or endangers Meridian Institute, (3) or disrupts the stability and continuance of normal Meridian Institute's operations and functions, the Title IX Coordinator may take actions such as the following:

- 1) For Student Respondents:
 - a. If occurrence happens during lab, respondent will be required to be separate from complainant. This includes not working at the same station in the pig lab, and a record of different hotels during their stay. Staff will work appropriately to separate complainant and respondent during the one week lab, and may request that one reschedule his or her lab.
- 2) For Employee Respondents:
 - a. Take reasonable, appropriate, and necessary action to restrict communication with complainant.
 - b. Reassign or place employee on administrative leave

Filing of False Reports

Any individual who (1) knowingly files a false complaint, (2) knowingly provides false information to Meridian Institute's officials, or (3) intentionally misleads the Meridian Institute's officials who are involved in the investigation or resolution of a complaint may be subject to disciplinary action.

Duty to Cooperate

All current students and employees whose assistance is needed in the investigation of a complaint or in the course of disciplinary action will be required to cooperate with the Title IX coordinator and any other parties who are duly authorized to investigate or to discipline. Persons who are accused of having engaged in sexual misconduct will be entitled to such cooperation, when necessary, to obtain witnesses in any formal disciplinary proceedings that may be initiated. Where necessary, adjustments will be made to work schedules, classroom schedules, and other academic or employment obligations.

Prohibition on Retaliation

Retaliation against any person for filing, supporting, providing information, or for cooperating in a sexual misconduct investigation in good faith in connection with a complaint of sexual misconduct is strictly

prohibited. Additionally, retaliation in the form of harassment, intimidation, threats, or coercion, or in the form of any materially adverse harm that would dissuade a reasonable student or employee from filling a harassment complaint or participating in a harassment investigation is strictly prohibited. Any person who feels he or she has been subjected to retaliation should make a report to the Title IX coordinator.

Procedures for Sexual Misconduct Claims

Meridian Institute will make every effort to adhere to prescribed time frames of the informal and formal resolution process. However, in the event that individuals involved are unavailable or other unanticipated occurrences occur, the Title IX coordinator, with the concurrence of the president, may adjust the time frames. Any changes will be immediately communicated to the complainant and respondent by the Title IX coordinator and, where possible, their needs will be accommodated. Time frames may also be extended upon the mutual agreement of the parties. Working days are those on which the offices of the Meridian Institute are open for business. Extensions will not exceed the bounds allowed by applicable law and regulations. All notifications to respondent and complainant will be done simultaneously and in a timely manner.

Informal Investigation and Resolution Procedures

- 1. Individuals who believe they have been subjected to sexual misconduct should report the incident promptly to their immediate supervisor, Academic Dean, Vice President or President.
 - The department involved to whom the complaint was made may be asked to assist in the informal investigation.
- 2. The alleged victim may elect to resolve his or her complaint through the informal resolution process if a) the respondent agrees to such resolution, b) the Title IX coordinator determines the informal resolution is an appropriate mechanism for resolving the complaint, and c) the complaint does not involve sexual assault.
- 3. Interviews of the respondent and complainant may be conducted during the informal and formal process.
- 4. Title IX Coordinator may conduct mediation between respondent and complainant in an informal resolution.
 - a. If mediation is to occur, the respondent and complainant are given timely and equal access to information that will be used during informal and formal disciplinary meetings and hearings.
- 5. There is to be no communication between respondent and complainant during the time of investigation, prior to mediation
- 6. Under no circumstances may legal counsel speak on behalf of respondent or complainant during the informal resolution or during mediation.

7. If, following investigation, an informal resolution of the matter that is satisfactory to the complainant, the person against whom the complaint is made (respondent), and Meridian Institute (represented by the Title IX coordinator) is reached, it shall be considered closed and all parties involved shall be so advised in writing by the Title IX coordinator or President. If a satisfactory resolution has not been reached within 10 working days from the date of the complaint, the complainant, respondent, or Meridian Institute may initiate formal complaint investigation procedures.

Formal Investigation and Resolution

If the sexual misconduct complaint has not been resolved through informal procedures and the complainant, respondent, or Meridian Institute wishes to pursue the matter further, the party wishing to pursue the matter must file a written complaint. The written complaint must be filed with the Title IX coordinator within three working days of the termination of the informal procedures

Respondents Acknowledgment of Responsibility Prior to Investigation

At any time prior to the date of his or her designated investigation, the respondent may elect to acknowledge his or her actions and take responsibility for the alleged sexual misconduct. In such situation, the Title IX Coordinator will propose sanction(s). If the victim and the respondent agree to such proposed sanction(s), then the complaint will be resolved without a hearing and without any further rights of appeal by any party. If either the victim or the respondent objects to such proposed sanction(s), then members of the Title IX Coordinators investigative team, excluding those members who participated in the initial investigation, will convene for the exclusive purpose of determining a sanction.

The Formal Investigation and Resolution Process

- 1. If the Title IX Coordinator determines that an investigation should be conducted, the Title IX Coordinator will assign the case to an investigative team made up faculty of and staff at Meridian Institute who will conduct an investigation and will share the names and contact information of the investigative team with the alleged victim and the respondent. If the respondent is a faculty member, at least one of the Title IX Coordinators on the investigative team will be a faculty member, if available and he or she does not have a conflict with either the respondent or complainant. If the respondent is a staff member, at least one of the Title IX Coordinators on the investigative team will be a staff member, if available and he or she does not have a conflict with either the respondent or complainant. The size of the investigative team will generally depend on the scope of the allegations. Within three days of such appointment, any member of the investigative team, the alleged victim, or the respondent may identify to the Title IX Coordinator, in writing, any real or perceived conflicts of interest posed by assigning such investigators to the matter. The Title IX Coordinator will carefully consider such statements and will assign a different member to the investigative team if it is determined that a material conflict of interest exists.
- 2. Upon receipt of the complaint, the investigative team will promptly begin the investigation, which will include conducting interviews with the complainant, the alleged victim (if not the complainant), the respondent, and third-party witnesses and summarizing such interviews in written form.

Throughout the investigation, the investigative team will remain neutral. The Title IX Coordinator should obtain, where applicable and where possible, the written consent of any third-party witnesses to the disclosure, as contemplated by this Policy, of any personally identifiable information contained in the complaint, the investigative report, and/or any other documents, the disclosure of which is contemplated by these Procedures, in order to further the resolution of the complaint.

a) Presence of an Advisor or Support Person. Both the alleged victim and respondent are permitted to have an advisor or support person present during their respective hearings. Advisors must be a faculty, administrator, staff or student member of Meridian Institute. The role of an Advisor is to support the respondent or witness throughout the process, and provide advice and consultation to the student. An advisor may communicate with a party privately, but he or she may not address the Hearing Panel, cross-examine witnesses, or have any other speaking role. An advisor or support person must maintain confidentiality regarding any and all communications exchanged pursuant to these Procedures.

Outcome

If the investigative team finds grounds to believe that the conduct constitutes a violation of the Sexual Misconduct Policy, or any other policy as defined in Meridian Institute's catalog, then the Title IX Coordinator will determine and document the appropriate sanction(s) of the respondent. Each party will be promptly notified of the sanction(s) in writing.

Sanctions

Sanctions for a finding of responsibility depend upon the nature and gravity of the misconduct, any record of prior discipline for sexual misconduct, or both. Sanctions may include, without limitation, withholding a promotion or pay increase, reassigning employment, terminating employment, temporary suspension without pay, compensation adjustments, expulsion or suspension from Meridian Institute, disciplinary probation, mandated counseling and/or educational sanctions deemed appropriate by the Title IX Coordinator. If the respondent is a faculty member, the Title IX Coordinator will consult with the Dean of Academics and President of Meridian Institute before a final sanction is issued. If the respondent is a student, the Title IX Coordinator will consult with the Dean of Academics and President of Meridian Institute before a final sanction is issued.

The Title IX Coordinator will determine sanctions, giving consideration to whether a given sanction will (a) bring an end to the violation in question, (b) reasonably prevent a recurrence of a similar violation, and (c) remedy the effects of the violation.

Appeal Process

Sexual misconduct appeal requests must be submitted through Meridian Institute's Grievance Policy, subpolicy "Appeal Routes."

Documentation

Meridian Institute will retain all records and documentation related to Title IX investigations (including, but not limited to the written complaint, notifications, investigative report, any written findings of fact, petitions for appeal, and any written communication between the parties) for at least seven years. Documentation pertaining to terminations, expulsions, or educational sanctions may be retained indefinitely.

Medical Assistance and Treatment

In the event medical assistance and/or treatment is needed, local options for medical care include the St. Thomas Hospital listed below. For safety and well-being, immediate medical attention is encouraged. If an evidence collection kit needs to be completed, it is important to be examined as soon as possible, ideally within 72 hours. The hospital will arrange for a specific medical examination at no charge. In order to best preserve evidence, it is recommended that the complainant not bathe, shower, douche, eat, drink, smoke, brush teeth, urinate, defecate or change clothes before that exam. Even if any of these actions have taken place, the complainant is still encouraged to have prompt medical care as evidence may still be recoverable.

Obtain Emotional Support

Nashville Sexual Assault Center can provide emotional response. If a student has returned to a different city, it is recommended that he or she contact Meridian Institute or the National Domestic Violence Hotline assist in finding a nearby counseling location. Local and National resources:

St. Thomas West Hospital

4220 Harding Pike Nashville, TN 37205

Local Law Enforcement Agencies can be reached by calling 911.

Nashville Sexual Assault Center 1-800-879-1999 http://www.sacenter.org/

National Sexual Assault Hotline 800-656-4673

National Domestic Violence Hotline 800-799-7233

Meridian Institute of Surgical Assisting Crime Report

The school is committed to providing students with a safe environment in which to learn and keep parents and students well-informed about campus security. To that end, and in accordance with the Crime Awareness and Campus Security Act of 1990, the institution collects campus crime statistics and prepares a report for distribution to all students, employees and applicants for enrollment or employment. It is hoped that Meridian Institute of Surgical Assisting's comprehensive policy will help combat violence in the workplace and on campus.

Because Meridian Institute is a distance education program, we distribute the annual campus security report to all current students and employees directly by email. In addition, the report is provided upon request to all prospective students and prospective employees and can be found anytime on Meridian Institute's website through the consumer guide. Such individuals are informed of the report's availability and given the opportunity to request a copy. The complete Campus Security, Crime Awareness and Drug Free Workplace Policy is distributed after its revision each September 1st, if the policy information has been changed.

Campus Security, Crime Awareness, Drug Free Workplace Report

In accordance with the Crime Awareness and Campus Security Act 1990, Meridian Institute collects campus crime statistics and prepares this report for distribution to all current and prospective students and employees.

- 1. Campus is defined as "any building or property owned or controlled by the school within the same contiguous geographic area and used by the school in direct support of or related to its educational purposes." The campus includes the facilities located at 1507 County Hospital Road, Nashville, Tennessee 37218. There are no buildings or properties owned or controlled by campus student organizations which are recognized by this institution.
- 2. The report is disseminated annually in September to all current and prospective students and employees if there are any crime updates. In addition, the report is provided to all individuals during enrollment or employment orientation which is conducted with each start class or upon hiring of a new employee. At that time students and employees review the report and receive a description of the campus security procedures and further information regarding the prevention of crimes.
- 3. No student will have access to the campus facilities, other than the parking area, at any time unless supervised by a staff member. Any off campus events which are sponsored by the school are supervised by campus employees. Thus, the school will monitor and report any criminal activity at such evens to local law enforcement authorities should they occur,
- 4. The campus does not employ campus security officials. The security of the campus is the direct responsibility of each employee and the campus administrator, No such individuals have the authority to make arrests.
- 5. All individuals are encouraged and requested to report immediately any known criminal offense or other emergency occurring on campus to the school administration office. All individuals are also encouraged to promptly report all crimes to appropriate police agencies. The campus administrator will report all known criminal offenses to local law enforcement authorities upon receiving the report or upon obtaining knowledge of any criminal offense.
- 6. All students and employees are encouraged to be responsible for their own security and the security of others.

- 7. There are no buildings or properties owned or controlled by the school's student organization which are recognized by the institution. There are no off-campus housing facilities.
- 8. The school will provide timely warning to the campus community of any applicable crimes that have been reported to the campus administration or local police agencies that are considered to represent a continuing threat to students and/or employees.
- 9. Statistics concerning the number of arrests for on-campus crimes of murder, forcible and no-forcible sex offenses, domestic violence, dating violence, stalking, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft and violations of liquor laws, drug abuse, weapons possession during the calendar years 2011, 2012, 2013, 2014 are listed below:

Type of Crime Number of Occurrences Number of Arrests

Murder:	0
Sex Offenses (Forcible/non-forcible):	0
Domestic Violence:	0
Dating Violence:	0
Stalking:	0
Sexual Assault:	0
Robbery:	0
Aggravated Assault:	0
Burglary:	0
Motor Vehicle Theft:	0
Weapons Possession:	0
Liquor Law Violations:	0
Drug Abuse Violations:	0

There were no crimes of murder, forcible rape, or aggravated assault that show evidence of prejudice based on race, religion, sexual orientation, or ethnicity as prescribed by the Hate Crimes Statistics Act (28 U.S.C. 534).

- 10. In the event a sex offense occurs on campus, the accuser has the option to and should take the following steps:
 - a. Report the offense to Title IX coordinator or any other faculty or staff with Meridian Institute.
 - b. Preserve any evidence as may be necessary to prove criminal sexual assault.
 - c. Request assistance, if desired, from school administration in reporting the crime to local law enforcement agencies.
 - d. Report the crime to local law enforcement agencies.
 - e. Review Meridian Institute's Sexual Misconduct Policy.
 - f. Contact an appropriate agency in the community for counseling or other services that may be needed.
- 11. The school does not provide living situations during enrollment. The school will change a victim's academic situation after the alleged sex offense if requested by the victim, and the change is reasonable available.
- 12. The only on-campus services available to victims of sex offenses are described in this report and in Meridian Institute's Sexual Misconduct Policy. There are no on-campus counseling, mental health or other student services available.

- 13. On campus disciplinary action in cases of alleged sexual assault will be based on findings by the Title IX Coordinator and law enforcement, facts pertaining to the crime, and other related mitigating circumstances provided that:
 - a. The accuser and the accused may have others present during the campus disciplinary proceeding; and
 - b. Both the accuser and the accused shall be informed of the final determination of the disciplinary proceeding and any sanction(s) imposed against the accused.
- 14. Possible sanctions may follow a final determination regarding rape, acquaintance rape, or other forcible or non-forcible sex offense vary depending upon the final determination and may include expulsion.

For all sexual misconduct related incidents student and employee should reference Meridian Institute's Sexual Misconduct Policy and Procedure found in the consumer guide online or per request.

- 15. Drug Abuse is prohibited at all times by students and employees on the school property or as part of any of its activities. Drug abuse is defined as: "The unlawful manufacture, distribution, possession or use of illicit controlled substances, including alcohol."
- 16. Meridian Institute prohibits possession, use and sale of alcoholic beverages, enforces the state underage drinking laws and state and federal drug laws.
- 17. There is no on-campus drug or alcohol counseling, treatment, or rehabilitation programs available. Off-campus services regarding Drug Abuse Information and Treatment, Crisis Intervention, sexual violence, counseling and mental health include:
 - Substance Abuse, David Lawrence Center: 239-455-8500
 - Depression counseling, Elizabeth Steinman: 239-298-1638
 - National Domestic Violence Hotline: 1-800-799-SAFE (7233)
 - National Institute on Drug Abuse Hotline: 1-800-622-HELP
 - National Institute on Drug Abuse Workplace Helpline: 1-800-843-4971
 - National Clearing house for Alcohol and Drug Information: 1-301-468-2600
 - Network of Colleges & Universities Committed to the Elimination of Drug & Alcohol Abuse: 1-202-357-6206
 - The Center for Substance Abuse Treatment and Referral Hotline (800-622-Help)
 - The Center for Substance Abuse Prevention Helpline (800-967-5752)
 - Nashville Sexual Assault Center 1-800-879-1999 http://www.sacenter.org/
 - National Sexual Assault Hotline 800-656-4673
 - National Domestic Violence Hotline 800-799-7233
- 18. Penalties to be imposed on students and employees for drug abuse violations occurring in the workplace include:
 - Notification of the abuse to the proper authorities;
 - A Leave of Absence from enrollment/employment during which time the individual must consider the responsibilities of his/her enrollment/employment, become free from any dependencies and prove it, and certify that if he/she is reinstated that he/she will no longer participate in abuse activities affecting performance;

• Expulsion or termination will be considered based on the circumstances surrounding the violation.

19. Any action taken by Meridian Institute against a violation of the drug-free workplace policy will occur immediately upon administration obtaining such information. Meridian Institute will notify the Department of Education within 30 days of an employee or student being involved in any criminal drug statute conviction for violation occurring in the workplace

Prevention and Risk Reduction

Sexual misconduct is a problem at many Universities. Schools country-wide are working collaboratively to ensure the campus community is aware of how sexual misconduct impacts our community.

When people talk about what you can do to stop sexual misconduct, he or she often uses the word "prevention." While we would all like to prevent sexual violence, it is helpful to understand the difference between *prevention* and *risk reduction*.

Prevention is intervention to stop the behavior.

Risk reduction is actively taking steps to reduce the likelihood a behavior will happen.

People can prevent sexual assault by not sexually assaulting someone else, or by intervening when an acquaintance is potentially going to engage in non-consensual behavior.

Risk reduction is making decisions that will increase the odds of keeping you and your friends safe, like staying in groups when you're going out, drinking responsibly and communicating clearly.

To be clear, if a person drinks too much, or is not among a group of friends, and is assaulted, they are not responsible for the assault. *Regardless of what someone is wearing or how much they drank, that person is not asking to be assaulted, nor are they the cause of the assault.*

Preventing sexual violence is only accomplished by teaching potential perpetrators not to commit the crime. However, it is important to teach potential victims risk reduction strategies to lower the likelihood that they will become targets of the crime.

Prevention, Education, and Training

Meridian Institute disseminates this policy to current students and employees. As a distance education program Meridian Institute does not provide online training in prevention of sexual misconduct; however, Meridian Institute will provide any resources per request by a student. Meridian Institute does conduct an in-house annual training for their employees conducted on October 1st of each year.

Copyright Policy

Meridian Institute takes the copyright policy serious. We respect authors, owners, and publishers.

Copyright Law

Copyright is often a type of legal protection supplied by U.S, law, Title 17 U.S.C. §512(c) (2), that protects an owner's right to control the reproduction, distribution, performance, display and transmission of a copyrighted work. The public, in turn, is supplied with distinct rights for fair use of copyrighted works.

Copyrighted works safeguard original works of authorship and contain:

- Books, articles and other writings
- Songs as well as other musical works
- Movies and television productions
- Photos, graphics and drawings
- Pc software
- Pantomimes and choreographic works
- Sculptural and architectural works

Distinct details on copyright law and fair use may be found at the following internet sites:

The U.S. Copyright Office: http://copyright.gov

Copyright Infringement

The copyright law offers the owner of copyright work the exclusive rights to the following:

- Reproduce the work in copies
- Prepare derivative works based upon the function
- Distribute copies of the work to the public by sale or other transfer of ownership, or by rental, lease, or lending
- Perform the function publicly
- Display the copyrighted function publicly
- Perform the function publicly by indicates of a digital audio transmission within the case of sound recordings

The copyright law states, "anyone who violates any of the exclusive rights of the copyright owner is an infringer of the copyright or appropriate of the author."

Normally, under the law, a person who engages in any of these activities without obtaining the copyright owner's permission could be liable for infringement.

Violations and Penalties under Federal Law

Anyone found to have infringed a copyrighted work will face penalties. Such penalties may include: expulsion, suspension, criminal prosecution, warning and/or reprimand by Meridian Institute. In addition, any person found liable for civil copyright infringement may be ordered to pay either actual damages or statutory damages affixed at not less than \$750 and not more than \$30,000 per function infringed. For willful infringement, a court might award up to \$150,000 per work infringed. A court can, in its discretion, also assess costs and attorneys' fees. For details, see Title 17, United States Code, and Sections 504, 505. Willful copyright infringement may also result in criminal penalties, such as imprisonment of up to five years and fines of up to \$250,000 per offense.

Meridian Institute respects the rights of the copyright owners and expects its faculty, staff, and students, to comply with the U.S. copyright laws.

Federal law prohibits the reproduction, distribution, public display or performance of copyrighted materials over the internet without permission of the copyright owner, except in compliance with fair use or other copyright applicable statutory exceptions.

Family Educational Rights and Privacy Act (FERPA)

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 on 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;
- 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.

Or you may contact the following address:

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202-8520

Voter Registration

Meridian Institute encourages everyone to vote. Registration can be found in the Financial Aid Office or online at http://www.usa.gov/Citizen/Topics/Voting/Register.shtml. Students will be excused from class to vote. Please contact the Dean of Academics to be excused.