The Praxis Institute Operational Manual



Policies and Procedures

The Praxis Institute

1850 SW 8th Street

Miami, Fl 33135

www.praxis.edu

Operational Manual

THESE POLICIES HAVE BEEN APPROVED AS WRITTEN

Rea My gen
Telave
Roberton

Rebeca Alfie Executive Director

Flavio Alfie VP of Academic Affairs

Gustavo Perez-Oriol Library Director Distance Education Director

Yessenia Roa PTA Program Director Faculty

Imaidy Velasco Administrative Assistant Staff

Emelda Santos Institution's Advisory Committee Member

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ACADEMICS

1

POLICY AND PROCEDURE

TITLE: Academic Honesty

PURPOSE: To establish guidelines to ensure safe, legal, and ethical performance of students in the areas of academic honesty.

RESPONSIBILITY: It is the responsibility of the Campus Director, Programs Director, and program faculty to ensure compliance with this policy.

APPLICABILITY: This policy applies to all students registered and pursuing higher education at The Praxis Institute.

POLICY: Students at The Praxis Institute are expected to act within the standards of academic honesty. Any willfully dishonest behavior is subject to disciplinary action, which may range from that which the instructor imposes relative to the specific course to dismissal from the Institute, depending on the seriousness of the act.

Dishonest academic behavior includes, but is not limited to:

Cheating – use of unauthorized notes during an examination; giving or receiving unauthorized assistance on an examination; copying from someone else's examination, term paper, homework, or report; theft of examination materials; falsification of works or records.

Plagiarism: - using the words, data or ideas of another, as one's own, without properly acknowledging their source. Students should consult the APA guidelines on proper documentation procedures.

In addition to action taken relative to the specific course, the course instructor may bring any matter related to academic honesty to the Program Director for further disciplinary action. The Director will review the case and determine if further action is to be taken.

Disciplinary action may be appealed by the affected student/s.

TITLE: Dress Code (Uniform Policy)

PURPOSE: To establish guidelines regarding dress code for class, laboratory and clinical experience.

RESPONSIBILITY:

It is the responsibility of the Program Director and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to the institution.

POLICY:

Students represent TPI and their chosen program profession at all times while enrolled at TPI. All clothing must be neat, professional in appearance, and well maintained.

- 1. All students will be required to present a clean and neat appearance. All students will dress in a manner appropriate for a professional health care environment during all classroom and laboratory activities.
- 2. The appearance of all students must generate confidence and respect from patients, families, and other visitors from the community in all clinical agencies.
- 3. All programs have chosen a specific color scrub for their students. Students are required to wear scrubs for lectures and lab classes. Days when lab experiences requires palpation, or any other learning experience that requires body part exposures, student is allow to wear appropriate lab attire to facilitate the lab learning experience.
- 4. For programs with Clinical Experiences and outside of campus labs, students will wear their designated program uniform.
- 5. Students' grooming practices must make ample provision for sanitation, safety, and comfort.

PERSONAL GROOMING

- Hair must be kept clean and neatly groomed; hair must be kept away from face and long hair must be pulled back and neatly secured.
- Face must be clean-shaven daily. Beards and mustaches are acceptable if kept clean and neatly trimmed.
- Fingernails should be well groomed, short, and clean. Length should not interfere with safe and efficient patient care. Only clear polish is allowed for adherence to proper hand washing procedures. False fingernails/overlay is not allowed.
- Brush teeth as needed to maintain oral hygiene.
- Bath or shower daily and use a deodorant.

- Strong fragrances are to be avoided.
- No exaggerated hairstyles or accessories are appropriate.

APPROPRIATE JEWELRY

- Jewelry should be minimal. If in doubt, don't wear it.
- Acceptable jewelry
 - engagement rings
 - wedding rings
 - graduation rings
 - plain gold or silver necklace no longer than 16"
 - wrist watch
- Earrings are permitted only in the ears. No loops, dangling earrings, or visible body piercing are allowed.

CLASSROOM DRESS REQUIREMENTS

1. Daily classroom attire will be a neat, well-groomed, scrub uniforms.

CLINICAL DRESS REQUIREMENTS

The dress code required for all clinical practicum and TPI sponsored program activities is determined by each academic program.

LABORATORY DRESS REQUIREMENTS

Each student will be required to have available at all times a lab uniform consisting of: For Females: Halter top, sports bra, or top which OPENS IN THE BACK, and shorts which can expose the hip joint.

For Males: Shorts which expose the hip joint.

"Cover-ups" must be worn over lab clothes. Lab attire is not allowed outside of the lab. ALL STUDENTS with loose long hair must pull it back or pin it up during lab. Fingernails MUST be trimmed short so the nail cannot be felt when you rub the tips of the fingers along your arm. When viewing the hand from the palm side, the nail should not be seen.

Students must be prepared for laboratory activities at all times. While in the laboratory, shorts and a t-shirt are acceptable. For some specific programs, all students must be prepared to expose the trunk, shoulders and hips at various times during laboratory sessions. Shorts and shirts must be in good condition and loose enough to be moved around for skin palpations and soft tissue work. When leaving the laboratory room, the student must have on appropriate attire.

TITLE:	Grade Appeal Process
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PURPOSE: To establish process for grade appeal.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Program Director and entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all registered students at The Praxis Institute.

POLICY: Students and faculty should make every effort to resolve questions about grades without seeking a formal grade appeal. Grade Appeal is a last resort.

A grade appeal will be pursued only if there is a valid basis and evidence. The responsibility for developing and presenting the case for changing a grade rests with the student making the appeal.

The process is non-judicial and the same for all students in all program.

Rights Concerning Grading Practices

At the beginning of a course, students have a right to be told what and how much work will be required and the detailed basis of grading in the course. Any modifications must be communicated clearly and in a timely manner.

Both during a course and at its end, students have a right to know how their work was evaluated and the bases for the calculating of scores and grades. The students are allowed to see their exam and/or papers and may request a re-evaluation of their exam and/or paper within one week of the grading. If an instructor is no longer available, the program director is responsible to facilitate this communication.

Faculty have a right to judge their students' academic work. Others' judgments will not be substituted.

I. What Can Be Appealed

A. Only final course grades may be appealed.

B. Grades may be appealed that are alleged to be caused by:

1) Unfair and unequal application of grading standards or applying grading criteria to one student or some students in a manner that treats them differently.

2) Unfair or unannounced alteration of assignments, grading criteria, or computational processes.

- 3) Computation dispute about calculation of a final grade.
- 4) Failure to document a finding of plagiarism that results in a punitive final grade.

Grade appeals must move through the following stages until a satisfactory resolution to the problem is reached.

1. Appeal to the Instructor

The appeal process begins with the instructor who assigned the grade. The student should meet with the instructor and attempt to resolve the dispute informally. Any such resolution of a grade appeal must be approved in writing by the Program Director.

2. Appeal to the Program Director

a. Should an informal resolution of the grade appeal be inconvenient or undesirable to either the student or the instructor, the student shall submit a written letter of appeal to the Program Director. The student's written appeal shall state the basis (or bases) of the appeal--i.e., error in computation or recording, capriciousness, or discrimination—and provide evidence in support of the appeal. The latter two of these three claims are very serious and should be undertaken only in cases where the student has considerable evidence to substantiate the claims. Appeals must be accompanied by copies of all pertinent graded work, the course syllabus, and any relevant course handouts (such as assignment prompts). The letter(s) of appeal and supporting evidence will comprise the appeal portfolio and will remain in the custody of the Program Director until the dispute is resolved, at which time all materials belonging to the student will be returned. The student should keep a copy of all appeal materials.

b. Upon receipt of the appeal letter, the Program Director will notify the instructor and provide the instructor with a copy of the materials from the appeal portfolio. The Program Director will conduct an investigation, including a review of the student's work included in the appeal portfolio and interviews of the student and the instructor, within 15 working days of the receipt of the appeal letter. The Director's ruling shall indicate either that the instructor's grade shall stand or that the instructor's grade shall be changed to a different grade. In the latter case, the Director will obtain grade-change approval from the Vice President for Academic Affairs and then submit a change of grade form to the Registrar, indicating that the grade has been changed on appeal.

3. Appeal to the Vice President for Academic Affairs

If either the student or the instructor believes that the Program Director has erred in his or her decision, the student or the instructor may submit a written appeal of the Program Director's decision to the Vice President for Academic Affairs. The letter of appeal must state specifically how the Program Director erred in his or her decision and must be accompanied by evidence to substantiate that claim. The Vice President shall investigate the charge of error and respond in writing to the student, the instructor, and the Program Department, within 15 working days of the receipt of the appeal. The Vice President's ruling shall indicate either that the instructor's original grade shall stand or that the instructor's grade shall be changed to a different grade. In the latter case, the Vice President for Academic Affairs will submit a change of grade form to the Registrar, indicating that the grade has been changed on appeal.

POLICY AND PROCEDURE

TITLE: Grade Practices

PURPOSE: To establish academic practices for grading student's performance.

RESPONSIBILITY:

It is the responsibility of the Executive Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered and pursuing higher education at The Praxis Institute.

POLICY:

The responsibility for grading and evaluating the work of students rests with the faculty. Student performance is graded as follows:

Grade	Interpretation	Grade Point Value
А	Excellent	4 Points
В	Good	3 Points
С	Average	2 Points
D	Poor	1 Point
F	Fail	0 Points
Ι	Incomplete	Not Computed
W	Withdrawn	Not Computed
Х	Audit	Not Computed
NR	Grade Not Reported by Instructor	Not Computed
Р	Pass	0 Points
NP	No Pass	0 Points
Т	Transfer Credit	Not Computed

The institution uses the following grading standards:

NON-DEGREE PROGRAMS AND GENERAL EDUCATION COURSES GRADING SYSTEM

GRADE	VALUE	POINTS	DEFINITION
Α	4	90 - 100	Excellent
В	3	80 - 89	Above Average
С	2	70 - 79	Average
D	1	60 - 69	Below Average
F	0	0 - 59	Failure

DEGREE PROGRAMS CORE COURSES GRADING SYSTEM

GRADE	VALUE	POINTS	DEFINITION
A	4	90 - 100	Excellent
B	3	80 - 89	Above Average
С	2	75 - 79	Average
D	1	60 - 74	Below Average
F	0	0 - 59	Failure

POLICY AND PROCEDURE

TITLE: Grade Reporting

PURPOSE: To ensure students receive the grade and credits earned in each course for which they enrolled, and to establish mechanism to regularly report academic performance to students.

RESPONSIBILITY:

It is the responsibility of the Executive Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all faculty members and students registered and pursuing higher education at The Praxis Institute.

POLICY:

- 1. Before the end term, grade rolls are prepared for all classes. These rolls include names of only enrolled paid students.
- 2. Each instructor assigns a grade for every student on the grade roll.
 - a. Valid Grades are A, B, C, D, F, S, P, NP, U, I, W, X, NR.
 - b. Rolls must be signed by the instructor and any erasures or corrections must be initialed.
- 3. Grade rolls are due in the registrar's office at noon two days after the last day of classes for each term.
- 4. Upon completion of final grade processing all instructors will review and confirm.
- 5. If discrepancies or errors are discovered, corrections will be immediately done.
- 6. Final grades will be available to students by the third day after the last day of classes each term.

GRADING SHEET

PROGRAM:

DATE:

TEST NAME: ______ SCHEDULE:

INSTRUCTOR:

	NAME OF STUDENT	PERCENTAGE	NOTE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			

	TEST SCORES DENTAL ASSISTANT PROGRAM				
NAME:	Start Date:	Hours: 900			
ADDRESS:	РН: ()				
	—				
SCHEDULE	DAY: MORNING: AFTERNOON:	EVENING:			
#	DESCRIPTION	DATE	GRADE	DATE	GRADE
DAP 200	ANATOMY & DIVENOLOCY				
DAP 200 DAP 200	ANATOMY & PHYSIOLOGY DENTAL ANATOMY				
DAP 200	DISEASE TRANSMISSION				
DAP 200	INFECTION CONTROL				
DAP 200	SURFACE DESINFECTION				
DAP 200	THE DENTAL EXAMINATION				
DAP 200	PAIN & ANXIETY CONTROL				
DAP 200	THE DENTAL PAT. THE D. EXAMINAT.				
DAP 200	MED. EMERGENC. IN THE D. OFFICE				
DAP 300	RADIAT.SAFETY & PROD. OF X-RAYS				
DAP 300	ORAL RADIOGRAPHY & PREVENT. CARE				
DAP 400	CORONAL POLISHING, DENTAL SEALANTS				
DAP 400	IMPRESSION MATERIALS & LAB. PROCED.				
DAP 400	PROSTHODONTICS & PERIODONTICS				
DAP 400	INST. HANDPIECES & ACCESORIES				
DAP 400	RESTORATIVES MATERIALS				
DAP 400	RESTORATIVES PROCEDURES				
DAP 400	PROSTHODONTICS				
DAP 400	PERIODONTICS				
DAP 500	ENDODONTICS & MAXILLOFACIAL SURGERY				
DAP 500	PEDIATRIC DENTRISTRY & ORTHODONTICS				
Dap 500	ORAL & MAXIOLOFACIAL SURGERY				
DAP 500	PEDIATRIC DENTISTRY				
DAP 500	ORTHODONTICS				
DAP 600	ADMINISTRATIVE PROCED.				
DPA 700	PREPARATION FOR EMPLOYMENT				
DAP 800	DENTAL EXTERNSHIP				
	GRADUATION DATE				

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	TEST SCORES - TH <u>ERAPEUTIC MASSAGE</u> PROGRAM			_PROGRAM	
NAM	Е:		Start 1	Date:	Hours : 600
ADDI	RESS:				_ID#
PHO	NE:()				
SCH	EDULE : Morning	Afternoo	n Even	ing	
#	DESCRIPTION	DATE	GRADE	DATE	GRADE
1	Introduction, Cells & Tissues				
2	Integument System				
3	Skeletal System				
4	Muscular System				_
5	Health, Hygiene & Sanitation				
6	Nervous System				
7	Endocrine System				
8	Circulatory System				
9	Respiratory System				
10	Digestive System				
11	Urinary System				
12	Reproductive System				
13	Therapeutic Massage				
14	Hydrotherapy				
15	Massage Law & Business				
16	H.I.V.,C.P.R.,& Medical Errors				
17	Allied modalities				
18	Shiatsu				
19	Evaluation Practice I				
20	Evaluation Practice II				
	Graduation Date				

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			-		
NAME:	Start Date:		Hours: 900		
ADDRESS	:	ID #			
PHONE: (
	E DAY: MORNING: () AFTER		EVENING	()	
SCHEDUL	E DAT. MORNING. () AFTER		E VENING.		
#	DESCRIPTION	DATE	GRADE	DATE	GRADE
DAP 200	Anatomy & Physiology				
DAP 200	Dental Anatomy				
DAP 200	Disease Transmission				
DAP 200	Infection Control & M. of Hazardous Mat.				
DAP 200	Surface Disinfection				
DAP 200	Clinical Dentistry & Humidity Control				
DAP 200	The Dental Patient. The Dental Exam,				
DAP 200	Medical Emergencies in the D. Office				
DAP 200	Pain & Anxiety Control.				
DAP 300	Radiation Safety & Prod. Of X - Ray				
DAP 300	Oral Radiography				
DAP 400	Prevent. Care, Coronal Polishing & Dental Sealants				
DAP 400	Instruments ,Headpieces & Accessories				
DAP 400	Restoratives Materials				
DAP 400	Restoratives Procedures				
DAP 400	Impression Materials & Lab. Procedures				
DAP 400	Prosthodontics				
DAP 400	Periodontics				
DAP 500	Endodontics				
DAP 500	Oral & Maxillofacial Surgery				
DAP 500	Pediatrics Dentistry			İ	
DAP 500	Orthodontics				
DAP 600	Administrative Procedures				
DAP 700	Preparation For Employment				
DAP 800	Dental Externship				

GRADE REPORT

PROGRAM: Pharmacy Technician

DATE: _____

MODULE'S TITLE: ______ SCHEDULE: 8am – 1pm

INSTRUCTOR:

		50%	30%	10%	10%	100%
	STUDENT'S NAME	Written Exam	Lab Practice	Assignments/Projects	Professionalism /Contribution	Module's Final Grade
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						

Last Revision 3/14/2019

The Praxis Institute

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TEST SCORES – ADVANCED THERAPEUTIC MASSAGE & CLINICAL MASSAGE

NAM<u>E:</u>

Start Date:

Hours: 900

ID#

Address:

PHO² ()

SCHEDULE: () Morning () Afternoon () Evening

	DESCRIPTION	DATE	GRADE	DATE	GRADE
#					
1	Introduction, Cells & Tissues				
2	Integument System				
3	Skeletal System				
4	Muscular System				
5	Health, Hygiene & Sanitation				
6	Nervous System				
7	Endocrine System				
8	Circulatory System				
9	Respiratory System				
10	Digestive System				
11	Urinary System				
12	Reproductive System				
13	Therapeutic Massage				
14	Hydrotherapy				
15	Massage Law & Business				
16	H.I.V.,C.P.R. & Medical Errors				
17	Allied Modalities				
18	Shiatsu				
19	Evaluation Practice Massage I				
20	Evaluation Practice Massage II				
21	Deep Tissues Theory				
22	Deep Tissues Practice				
23	Neuro Muscular Therapy Theory				
24	Neuro Muscular Therapy Practice				
25					
26					
27	Clinical Rehabilitation				
28	Drainage Lymphatic				
29	Drainage Lymphatic				
30	Graduation Date				

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	TEST SCORES – ADVANCED NEURO-MUSCULAR,						
	& CLINICAL MASSAGE						
NAMI	Е:		Start	Date:	Hours: <u>300</u>		
ADDR	RESS:						
ID#							
PHON	NE: ()						
SCHE	DULE DAY: MORNING: () AI	TERNO) N:()	EVENING	:()		
Seile			, , , , , , , , , , , , , , , , , , ,		• ()		
#	DESCRIPTION	DATE	GRADE	DATE	GRADE		
#	DESCRIPTION	DAIL	GRADE	DAIL	GRADE		
Ħ	DESCRIPTION	DAIL	GRADE	DATE	GRADE		
# 1	Deep Tissues Theory	DAIL	GRADE	DATE	GRADE		
		DATE	GRADE	DATE	GRADE		
1	Deep Tissues Theory	DATE	GRADE	DATE			
<u>1</u> 2	Deep Tissues Theory Deep Tissues Practice		GRADE				
1 2 3	Deep Tissues Theory Deep Tissues Practice Neuro-Muscular Theory Neuro Muscular Practice		GRADE				
1 2 3 4	Deep Tissues Theory Deep Tissues Practice Neuro-Muscular Theory Neuro Muscular Practice Sport Massage Theory						
1 2 3 4 5	Deep Tissues Theory Deep Tissues Practice Neuro-Muscular Theory Neuro Muscular Practice						
1 2 3 4 5 6	Deep Tissues TheoryDeep Tissues PracticeNeuro-Muscular TheoryNeuro Muscular PracticeSport Massage TheorySport Massage PracticeClinical Rehabilitation						
1 2 3 4 5 6 7	Deep Tissues TheoryDeep Tissues PracticeNeuro-Muscular TheoryNeuro Muscular PracticeSport Massage TheorySport Massage PracticeClinical RehabilitationLymphaticDrainage Theory						
1 2 3 4 5 6 7 8	Deep Tissues TheoryDeep Tissues PracticeNeuro-Muscular TheoryNeuro Muscular PracticeSport Massage TheorySport Massage PracticeClinical Rehabilitation						
1 2 3 4 5 6 7 8	Deep Tissues TheoryDeep Tissues PracticeNeuro-Muscular TheoryNeuro Muscular PracticeSport Massage TheorySport Massage PracticeClinical RehabilitationLymphaticDrainage Theory						

POLICY AND PROCEDURE

TITLE: Appropriate/Acceptable Behavior Policy

PURPOSE: To establish guidelines and parameters that defines appropriate/acceptable behavior.

RESPONSIBILITY:

It is the responsibility of the Campus Director, Programs Directors, and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to the institution.

POLICY:

In preparation for a career in the health profession, students are expected to behave in a responsible appropriate manner in the classroom as well as in the clinical setting.

Faculty members have determined the following to be standards of acceptable behavior for students in the academic and clinical components of their chosen academic program.

In the classroom setting, students are expected to:

- 1. Use tact and courteous behavior towards faculty and peers.
- 2. Follow directions and complete assigned tasks.
- 3. Respect the classroom as a place of learning and avoid disruption of the learning process by not doing the following:
 - making comments unrelated to the subject matter.
 - engaging in unnecessary conversation during class.
 - leaving the classroom without permission.
 - entering the classroom after class has begun without permission of instructor.
- 4. Show respect for differences that exist in others. The Praxis Institute does not discriminate on the basis of race, creed, religion, age, handicap, or sexual preference. We expect our students to act in the same manner as the Institution they represent.
- 5. Notify instructors prior to absences or tardiness.
- 6. Attend classes on a regular basis. Repeated absence is considered unprofessional and will result in a lowering of grades. Refer to the institution's attendance policy.
- 7. Take responsibility for seeking prior approval from the faculty for borrowing items from the program and for returning them in a timely fashion. Borrowed

equipment and/ or literature must be signed out and returned as soon as possible in good condition. Please note that program's videotapes or DVD's or any audiovisual material may not be reproduced.

8. Properly maintain classrooms and laboratory areas by returning supplies and equipment to designated areas.

In the clinical setting, students are expected to:

- 1. Be punctual, dependable and adhere to scheduled assignments.
- 2. Wear appropriate professional attire/maintain appropriate hygiene.
- 3. Adhere to ethical and legal standards of practice.
- 4. Show respect for others (clients/patients, peers, clinical instructors).
- 5. Treat clients in a manner that reflects dignity, respect and value for human life.
- 6. Maintain confidentiality and use discretion when conversing with and in front of patients.
- 7. Demonstrate initiative and accept responsibility for learning.
- 8. Demonstrate active listening.
- 9. Accept criticism and respond in a manner that reflects an understanding of constructive criticism.
- 10. Express a positive attitude, which reflects cooperation and flexibility.
- 11. Maintain balance between personal and professional relationships with clients and staff.

GENERAL ATTITUDE

Each student represents the entire profession of their chosen program to the client/patient being served. Attitudes may be reflected in outward behavior such as facial expressions, actions, body language, and conversation. Students must exhibit behaviors that reflect an attitude of openness to learning and motivation to helping others. Listed below are some of the expected attitudes, with examples of the type of observable behavior that is desirable.

1. Honesty and integrity.

a. Refuses to lie, steal or deceive in any way; abides by the professions' code of ethics.

2. Punctuality.

a. Arrives on time for class, clinics and labs; completes assignments on time.

3. Cooperativeness.

a. Follows established departmental protocol and procedures; demonstrates a willingness to work well with others and is receptive to suggestions for improvement.

4. Pride in workmanship.

a. Strives for improvement in assignments and clinic; requests assistance when having difficulty in attaining the specified performance standards.

5. Mature actions.

a. Assumes responsibility and consequences for his/her actions; accepts his/her own limitations; strives to resolve personal conflicts. Students are liable for supplies checked out in his/her name.

6. Consideration for others.

a. Demonstrates by verbal and non-verbal communication thoughtful regard for the feelings and rights of other students, faculty and staff, and clinic personnel. As a future member of the health care team the student must learn to cooperate with others. Being respectful and courteous with classmates is the first step toward this goal. Students should show the proper respect and courtesy to the members of the faculty and staff. This applies whether in the classroom, in the laboratory, at the clinical facility, or anywhere on campus.

7. Concern for patients.

a. Demonstrates by verbal and non-verbal communication that the patient comes first; refrains from spoken remarks and/or facial expressions which could arouse undue concern, alarm, or embarrassment to the patients; respects patient's rights to confidentiality of personal information; refrains from referring disparagingly to the services of another health professional in the presence of a patient. The student must be prompt, courteous, and respectful **at all times.** *Patient's care must always be the primary concern.*

8. Enthusiasm.

a. Displays initiative in class, lab, and in clinical situations; volunteers to assume responsibility.

9. Ability to accept constructive criticism gracefully.

a. Strives to improve and is not defensive but receptive to suggestions for improvement.

10. Clinical decorum.

a. Focuses conversation during class and lab on information relevant to learning. Students should remember that lab and clinic are designed to be learning experiences. There should be no visiting in lab or clinic that disrupts the instructor. Remember the patient hears everything. Likewise, "chatting" with classmates can also be overheard by patients in waiting rooms and hallways. Each student is responsible for maintaining the cleanliness of his/her area and locker.

11.Loyalty.

a. Supports with words and actions the ideals and policies of the school, the program, and the profession.

12. Pride in personal appearance.

a. Maintains professional appearance and personal hygiene consistent with the institution's guidelines.

13.Tact.

a. Exercises discretion in words and actions in order to maintain good relations with patients, peers and faculty.

NOTE: The faculty reserves the right to dismiss any student for failure to display attitudes, reflected by their behavior, consistent with those listed above.

Behavior that will lead to disciplinary action to include warning, probation, suspension or dismissal from institution includes:

- 1. Financial obligations not met
- 2. Possession of / or use of drugs or alcohol.
- 3. Behaving in a manner potentially dangerous to clients, fellow students, faculty, staff and administrators.
- 4. Possession of weapons on school premises.
- 5. Defacing or destructing school property.
- 6. Sexual misconduct of any kind.
- 7. Stealing
- 8. Evidence of acting in a conspiracy or as an accomplice in a crime on school property.
- 9. Cheating (see academic honesty policy)
- 10. Any other violation or infraction to the code of conduct as determined by the Director.
- 11.Failure to achieve a C grade in any AS Core course (75%) or AS General Education course (70%).
- 12.Failure to achieve a minimal competency level of 75% on each graded assignment or exam after two attempts in any AS Core course.
- 13.Failure of clinical lab practical two times during any AS core course with a lab component.
- 14.Unprofessional or unsafe conduct in the clinical area, including but not limited to unsafe clinical practice.*
- 15.Failure to comply with rules and regulations of the program, The Praxis Institute, or affiliating agency.*
- 16.Failure to comply with professional behavior skills as outlined in the respective AS Program Student Handbook.*

*The final decision for dismissal will be made by the Program Director after consultation with the faculty, Campus Director, and Executive Director.

PROFESSIONAL BEHAVIORAL SKILLS REVIEW FORM

A Physical Therapist Assistant student is expected to demonstrate professional behavior at all times. Students will be counseled on their failure to comply with expected behaviors and professional skills. If students demonstrate unacceptable behavior or professional skills, the Values-Based Behavior for PTA will be used for remediation to identify weaknesses and document progress towards meeting expected student behavior levels. Repeated failure to comply with professional behaviors is grounds for dismissal from the PTA program. Criteria for classroom/laboratory evaluation include but are not limited to the following: Student Name:

EXPECTED STUDENT BEHAVIOR	COMMENTS
Is respectful and considerate of	
peers/faculty	
Arrives to class/lab on time and prepared	
Anives to class/lab on time and prepared	
Accepts and gives criticism in a	
constructive manner	
constructive manner	
Demonstrates professional body language	
Reports lateness and absence according to	
PTA handbook guidelines	
Adheres to PTA dress code in lecture,	
laboratory and in clinical situations	
Notifies instructor of commission/omission	
errors	
Commits no fraudulent or negligent acts	
Maintains personal hygiene	
Wantanis personar nygiene	
Manages personal affairs in a manner that	
• •	
does not interfere with professional	
responsibilities	
Demonstrates proper safety techniques in	
classroom, laboratory, and clinical settings.	
Actively participates in group discussion	
and projects	
L	

POLICY AND PROCEDURE

TITLE: Progressive Discipline

PURPOSE:

To establish a process for the faculty to address charges of academic dishonesty; unprofessional or unethical behavior, or poor academic performance, in a manner that preserves the professional integrity of the faculty member as well as the due process rights of the student.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Program Director, and Core Faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered and pursuing higher education at The Praxis Institute.

POLICY:

Progressive Discipline refers to the concept of increased severity in disciplining students who repeatedly violate rules of the program or clinical sites. Verbal or written reprimands will be given for initial and/or minor infractions of rules; if infractions are repeated, progressively harsher discipline will be imposed. Some critical situations will require immediate disciplinary measures which may involve suspension or immediate dismissal from the program.

CLASSIFICATIONS OF OFFENSES ARE:

- 1. Critical Offenses
- 2. Major Offenses
- 3. Serious Offenses
- 4. Minor Offenses

1. **Critical Offenses** are violations of program or clinical facility's rules and regulations or misconduct which may justify immediate termination.

Even if discharge is indicated, the student shall be suspended immediately (no more than 2 clinical days) while the incident is being investigated by the Program Director or Clinical Instructor and other involved adjunct faculty members.

EXAMPLES OF CRITICAL OFFENSES ARE:

- Two major violations are equivalent to one critical offense
- Physical assault on any person during clinical or class time
- Negligent acts of conduct detrimental to patient care
- Possessing, consuming, or being under the influence of intoxicants, narcotics, or non-prescribed barbiturates in class or on clinical premises
- Conviction of a felony
- Insubordinate acts or statements
- Unauthorized access or copying of records (school or clinical)

2. **Major Offenses** are lesser violations than critical offenses, but may require immediate disciplinary suspension from class or clinical for a 1st offense (one day suspension for the 1st offense).

EXAMPLES OF MAJOR OFFENSES ARE:

- Two serious violations is equivalent to one major offense
- Sleeping in class, in the laboratory or on clinical
- Refusal to work or perform an assigned task
- Negligent acts or conduct detrimental to patient care
- Verbal assault to fellow students or others
- An act of sexual harassment
- Willful or negligent damage of equipment or property
- Theft of clinical facility patient, student, visitor, or employee property

3. **Serious Offenses** do not justify immediate dismissal or suspension but may require disciplinary action in the form of a written reprimand. Documentation of disciplinary action(s) will be accumulative throughout the two years.

EXAMPLES OF SERIOUS OFFENSES ARE:

- Two minor violations will be equivalent to one serious offense
- Willful negligence
- Use of vile, profane, or abusive language
- Falsifying information or events
- Removal of hospital or clinic property from premises

4. **Minor Offenses** are lesser violations of the class or clinics' rules and regulations which may require disciplinary action in the form of a verbal or written reprimand. Verbal reprimands may be documented in the student's counseling form.

EXAMPLES OF MINOR OFFENSES ARE:

- Sharing confidential information
- Excessive breaks
- Excessive tardiness
- Failure to follow orders

- Horseplay (boisterous non-work related activities)
- Smoking, drinking, eating in non-designated areas
- Failure to notify clinical instructor (or clinical site) of absence on or before date of absence
- Poor attitude or inability to work with others
- Leaving assigned areas without authorization

PROGRESSIVE DISCIPLINE IS ADMINISTERED BY THE TYPES OF OFFENSES, AS FOLLOWS:

MINOR

1st Offense	Verbal reprimand
2nd Offense	Written Warning
3rd Offense	Suspension
4th Offense	*

SERIOUS

1st OffenseW	Titten	warning
2nd Offense	Susp	ension
3rd Offense	-	

MAJOR

1st Offense	Suspension
2nd Offense	Dismissal

CRITICAL

1st Offense.....Dismissal

COUNSELING OFFENSE FORM

This form will serve as documentation that the student has been counseled in regards to the type of offense(s) he/she has been charged with. This form will also document period of time given to correct or improve the situation.

Student will abide by all student policies, particularly regarding attendance, maintaining a passing average and following up on conferences with program staff. The student will understand that he/she is expected to pass all exams during the probationary period and thereafter.

Failure to comply with the terms can result in withdrawal of student status in this program.

STUDENT:	DATE:

TYPE OF OFFENSE BEING COUNSELED FOR:

TYPE OF DOCUMENTATION:

Verbal Warning:	Written Reprimand:
Verbal Counseling:	Class Suspension:
Clinical Suspension:	Class Dismissal:
Clinical Dismissal:	Program Dismissal:
1. Has this student been previously 2. If yes, when?	counseled? Yes () No ()
3. Was the counsel involving the sam	ne situation? Yes () No ()
4. Has the student reached the maxi	mum number of offenses?
Yes () No ()	

5. Time given to correct this situation: _____

I, ______have read and understand the counseling report filed on me for the offense(s) I have committed. I will exercise my right to appeal procedures if it is necessary.

Student's S	Signature
-------------	-----------

Counselor's Signature

Witness:

ADVISEMENT/COUNSELING FORM

STUDENT'S NAME

DATE/TIME_____

_ __

REASON FOR ADVICE OR COUNSELING:

RELEVANT FACTORS:

RECOMMENDATIONS/PLAN OF ACTION:

STUDENT COMMENTS:

STUDENTS SIGNATURE

INSTRUCTOR'S SIGNATURE

THE PRAXIS INSTITUTE MIAMI - HIALEAH CAMPUS

CODIGO DE CONDUCTA Y PROCESOS DISCIPLINARIOS

Los estudiantes deben conducirse de una manera profesional en todo momento. Lenguaje inapropiado, posesión de drogas o alcohol y comportamiento irrespetuoso puede ser motivo de expulsión. El estudiante que se conduzca de una manera perjudicial para el personal de la escuela u otros estudiantes puede ser sujeto de una advertencia inmediata, probatoria, suspensión o expulsión de The Praxis Institute por una de las siguientes razones:

- a) Falta de cumplimiento del Contrato de Enrolamiento
- b) Falta de cumplimiento de los requisitos de probatoria académica o asistencia.
- c) Incumplimiento de obligaciones financieras
- d) Ausencias excesivas
- e) Posesión o uso de drogas o alcohol.
- f) Comportamiento potencialmente peligroso para clientes, estudiantes, instructores, personal administrativo o directores.
- g) Posesión de armas en la escuela
- h) Comportamiento peligroso para la seguridad de otras personas o de las instalaciones de la institución.
- i) Daño o destrucción de la propiedad de la institución.
- j) Cualquier conducta de carácter sexual.
- k) Robo, Participación en conspiración o como cómplice en delitos contra la propiedad de la institución.
- 1) Copiarse en los exámenes (Fraude) o alterar notas de los mismos.
- m) Cualquier otra violación o infracción al código de conducta que determine el director.

Nombre y apellidos del estudiante

Firma

Fecha

Student Aca	PRAXIS INSTITUTE Idemic Counseling Forn Associates Programs	n
Student's Name:	S. Security:	
Program:		
STATUS: ()ACTIVE() GRAD.()TEL ()Re-entry	RMINATED()TRANSFERRED()	WITHDREW ()LOA(
Date of attendance completed		Number of credits
Reason		
Ri' <f'ntryn11tt>: f'.rcdit11rc.</f'ntryn11tt>	'{)gttizt>d hy the schuol:	
I request a leave absent from: For the following reason: I will return to school on:	to	
CHANGE 01 ¹ ADDRESS:		
Current Address Street:	"lew Ad	ldress
Phnne: ()	Phone: I)	
understand that regulations required that I am allowed to take multiple leaves of absence The total of all my leaves of absence may no I will not incur any additional mition charges In the event I <lo a="" fmn1="" leave="" not="" of<br="" return="">financial Aid Program within 45 days of the date I was sche 'or Federal loan borrowers: If do not return from my leave of absence will reduce my grace period.</lo>	t exceed 180 days in any 12 month period during any leave of absence, absence, any refund <luc be="" n1ade<br="" will="">edule to return.</luc>	c to the appropriate
Student Cignoture	Student Name (nigt la	st name first
Student Signature ame)	Student Name (print la	si name, misi
CHOOL USE ONLY		

THE PRAXIS INSTITUTE Student Academic Counseling Form VOCATIONAL PROGRAM						
Student's Name:Social security #:						
Program:	Start Date	Student ID:				
ENROLLMENT STATUS: () ACTIVE	() GRADUATED	() WITHDREW				
() TERMINATED() TRANSFERRED	() RE-ENROLLMEN	Γ()LOA				
() OTHERS						
Last Date of attendance	Number	of Hours completed				
REASON FOR ACTION TAKEN:						
RE-ENROLLMENT Re-entry Date: Revised Expected Graduation Date:	_					
LEAVE OF ABSENCE REQUEST: From:	То					
Reason:		_				
RETURN FROM LEAVE OF ABSENCE: Return	Date:Expecting graduation	on Date:				
REVISED EXPECTED GRADUATION DATE FOR TRANSFERRED:						
CHANGE OF ADDRESS: Current Address		New Address				
Street:	Street:					
Phone #: ()_	Phone : # : ()					
ACADEMIC PROBATION: Student placed on probation from to for <u>Failing</u> to meet minimum standards for the following reason (s):						

Check one or more	()	Failing to maintain a minimum grade of "C"
	()	Having absence/tardiness in excess of 30% of the hours
	()	Failing to abide by school rules and regulations
	()	Other:

COMMENTS:

Γ

SIGNATURES:		
Student's: _	Name (Print):	Date:
Counselor's: _	Name (Print):	Date:

TITLE: Remediation

PURPOSE: To establish criteria to govern all process of academic and practical remediation.

RESPONSIBILITY:

It is the responsibility of the Campus Director, Program Director, and entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI AS programs.

POLICY:

REMEDIATION FOR A STUDENT DURING A CORE COURSE

Any student not achieving minimal competency of 75% on any graded activity will be required to meet for remediation with the course instructor. An individualized remediation "plan for success" will be implemented. Remediation sessions must be completed before make up work or retake of exams are undertaken. Remediation sessions will be held outside of scheduled class times.

REMEDIATION FOR A STUDENT DURING A PRACTICUM

Any student receiving a "NI" (needs improvement) in a clinical skill will be counseled by a faculty member. The ACCE, AFC, or Program Director will confer with the clinical instructor responsible for the student. If the "NI" appears to be the result of a conflict with the C.I., the ACCE, AFC, or Program Director will discuss the issue with the CCCE (clinical coordinator of clinical education). If the student does not meet minimal criteria of the practicum, he/she will be given the opportunity to perfect the skill working with a faculty member and/or a student tutor. If a skill is not approved by the end of Practicum III such that the student is not entry level, the student will be required to repeat the practicum. Failure of a student to meet ANY professional standards of conduct will result in dismissal from the program.

Students are expected to accept responsibility for preparing for examinations. Any student who consistently fails written and/or laboratory practical exams will be required to attend special remediation.

REMEDIATION CONTRACT

I ______understand that a grade of 75 or better is necessary to complete course ______prior to ______in order to continue in the program.

I understand that my current grades are not at the required level to pass this course; therefore, I will attend and participate in the following remediation plan:

I understand that I will need to have an average of 75% or better on all major exams, quizzes, projects, final exam, and, where applicable, lab practical exams in order to pass this course.

I have read TPI "Dismissal," "Withdrawal," and "Readmission" Policies and understood the consequences that may arise if I fail to pass this course.

Check one:

____I will be attending the suggested remediation sessions.

____I will NOT be attending the suggested remediation sessions.

Student Signature

Instructor Signature

Program Director

Date

INDIVIDUAL LEARNING DIFFERENCES

Procedure

The Praxis Institute offers assistance to students who need individual tutoring because of academic difficulties, individual learning differences and needs.

This tutoring has to be arranged between the instructor and the Campus Director.

Classes can be offered in different schedules or assigned in advance to assist the student who needs them to overcome his/hers shortcomings.

Tutoring sessions must be documented in the Student Academic Needs Assessment Form.

THE PRAXIS INSTITUTE Student Academic Needs Assessment Form

Date	://	
From	1:	Instructor
To:		Director
Re:	Student (s):	
follo En r	wing subjects:	ance of the above-mentioned student(s) raises some concerns in the ato académico del/los estudiante(s) arriba mencionado(s) es deficiente aerias:
these	reby request they are c e shortcomings.	onsidered for a special tutoring help designed to assist in overcoming a ayuda o tutoría especial para asistirles a subsanar estas carencias.
CAN	IPUS DIRECTOR USI	ONLY:
Instr	uctor:	Date: From/to/
Sche	dule:	Number of hours to cover this class:

THE PRAXIS INSTITUTE

TITLE: Student Retention

PURPOSE: Process designed to support students academically, professionally and personally to insure their academic success and facilitate program completion.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Program Director and entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI.

POLICY:

A. Programs Directors will make every reasonable effort to inform all appropriate constituencies about the principles, aspirations, policies, and procedures outlined in this document and to solicit their cooperation in making this system effective. Students will be informed about the retention policy early in the admissions process. It is understood that a regularized system of monitoring our students' performance will require excellent liaison efforts between all Institution Departments.

B. At a designated time each semester, the Program Director will convene a meeting of the faculty to evaluate each student's progress on the basis of grade point average, faculty observations of academic performance, and progress in the didactic, lab, and field experiences, when applicable. In addition, a faculty member may request such a meeting at any time to express concern about a student's deficiencies.

C. When a concern about a student is reported, the Program Director will make a judgment about what kind of response is appropriate, within the guidelines of this policy. The most common response will be to contact other persons who have been associated with the student to ascertain whether or not other professionals have similar concerns about the student. As a result of these contacts and discussions, the Program Director will, with the combined judgment of those acquainted with the student's performance, decide whether or not further action should be taken at this time, and if so, will establish what the appropriate steps are, given the conditions of concern. In cases where student performance is deficient, the student should be informed by the Program Director about the nature of the deficiency, should be encouraged to state his or her views of the situation, and, except in extreme or dangerous circumstances, given an opportunity to improve.

Strategies or practices that yield the highest impact on retention include, but not limited to:

- 1. Tutoring
- 2. Remedial/Developmental Coursework
- 3. Learning Assistance Lab
- 4. Academic Advising
- 5. Early Warning System

Formal Proceedings

To be implemented ONLY when Denial of a Privilege is contemplated.

1. When a concern reaches a point at which the denial of a privilege is contemplated (for example, denying a practicum or internship placement), formal procedures must be initiated. At that point, the Program Director will form a committee of three faculty members--one member being outside the program--to discuss the perceived problems. Ordinarily this committee will include those persons most directly involved with the student as well as one or more persons, who will, by virtue of their previous experience in these kinds of proceedings, are able to provide continuity. If necessary, the Program Director will be designated to act to ensure that the student understands the process. This committee will meet with the student to receive his/her views concerning the academicals problem. This committee will then meet in closed session to determine what, if any, action should be taken. The plan of action may range from stipulating a plan for improvement of the student's performance to in rare and extreme cases, recommending dismissal.

2. Monitoring of Student Progress. If the committee identifies weaknesses or deficiencies which the student is required to remediate, a retention committee member will monitor the student's progress and report back to the committee about that progress. The committee will then determine what further action, if any, should be taken, after meeting with the student and discussing alternatives. Before taking any actions, the committee will consider the student's own plan for improvement.

3. In the event that a student is removed from practicum/internship, or produces an unsatisfactory performance, and wishes to have another opportunity, the student must make a formal request for such an opportunity.

Upon receiving such a request, the Program Director will establish a review committee to consider the advisability of that student being allowed to have another practicum/internship experience. When a student is involuntarily withdrawn from a practicum/internship experience, he or she will be informed in writing that if another opportunity is to be granted, it may be only after stipulated conditions are met, conditions that are judged appropriate to establish level of competency required for practicum/internship. Commonly, such conditions may include the requirement that a prescribed time period has elapsed before a student request is considered. As part of such

a request, the student must provide convincing evidence for his or her readiness to undertake, and be successful in, another attempt. That evidence will be judged by the professionals on the review committee.

4. A student may at any time appeal a decision of the committee to the School Director/Executive Director. See Policy Dealing with Academic Dishonesty and Performance Issues.

Dismissal

In the unusual case where progress is not satisfactory after remediation, the faculty will consider either suspension or termination of a student from the program. The PD will inform the student of the faculty's concern, in writing. The director will also inform the student of his or her right to petition for reinstatement. The student will in turn have an opportunity to respond in writing.

Reinstatement

Consistent with School policies, a student who has been denied continued enrollment may petition for reinstatement to the same curriculum. Petitions for readmission are heard and decided by a standing Readmission Committee. Students whose petitions are granted are readmitted on probation as a condition of readmission. In such cases, the Readmission Committee usually stipulates conditions. To regain regular status, the reinstated student must satisfy conditions described by committee.

This process is intended to:

(a) Be comprehensive as to the sources of input about each student's progress and in terms of establishing a cumulative record in cases of concern,

(b) Take a case-by-case approach and to allow for varieties of responses; and

(c) Involve collaboration in professional judgment.

TITLE: Withdrawal from Course

PURPOSE: To establish guidelines to govern procedure for course withdrawal.

RESPONSIBILITY: It is the responsibility of the Executive Director, Campus Director, and the Program Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered and pursuing an AS degree at TPI.

POLICY:

- A student may officially withdraw from any course before the tenth week of the semester and receive a "W" grade.
- A student should see his/her course instructor for advisement. Failure to officially withdraw will result in an "F" grade.
- Withdrawal may affect academic standing and financial aid.
- Withdrawal from courses will result in an interruption of curriculum sequence which requires re-admission. See re-admission policy.

TITLE: Withdrawal from Program

PURPOSE: To establish guidelines to govern procedure for program withdrawal.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Program Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered and pursuing an AS degree at TPI.

POLICY:

A student may withdraw from their chosen AS Program at any time. It is in the best interests of the student to consult with his or her advisor and their Program Director concerning withdrawal.

A letter containing reasons why the decision to withdraw was made, should be addressed to the Program Director.

It is then the student's responsibility to withdraw from all registered courses, return all library books and equipment, and clear all accounts. An exit interview will be conducted by the Program Director to assure proper advisement, documentation of student records, and plans for readmission as appropriate. In the event that a student is forced to withdraw because of a medical emergency or pregnancy, and the student is in good standing with the program (i.e. has maintained a 75% or better grade average in the program and has performed satisfactorily in Behavioral Skills), that student will be allowed readmission to the program following the re-admission policy.

STATEMENT OF WITHDRAWAL

This is to certify that	was
	Students' Name
accepted to the	Program on Date
and withdrew from the program or	nfor the following
reason(s):	
Place a check r	nark in the appropriate blank
1. Personal or health reasons 2. Financial status 3. Transferring to another program 4. Program is too intense for me 5. Violation of program rules 6. Academic failure 7. Relocating 8. Other * * If you choose OTHER, please exp	n
COMMENTS	
Student's Signature	Program Director's Signature
Date	Date

TITLE: Satisfactory Academic Progress

PURPOSE: To establish minimum academic performance level to maintain enrollment in the program.

RESPONSIBILITY:

It is the responsibility of the Program Director and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

POLICY:

STANDARDS OF SATISFACTORY ACADEMIC PROGRESS The institution expects all of its full-time and part-time students to maintain Satisfactory Academic Progress (SAP). In order to maintain SAP as established by the institution, the student must meet the following criteria:

NON-DEGREE PROGRAMS

- A cumulative academic average of "C" (70%) GPA (2.0) or better on all tests and work projects required by the program.
- Students must also maintain a cumulative average of attendance of 70% per month.

ASSOCIATE DEGREE PROGRAMS

- All tests in program's <u>core courses</u> must be successfully completed with a grade of 75% or better. If an AS program student fails a lab test in program core course, they will be given one make up test opportunity. Students must complete the re-test with a 75% or better.
- The Associate degree programs of Occupational Therapy Assistant, Physical Therapist Assistant and BIOMED requirements for SAP are outlined in the OTA Program, PTA Program, and BIOMED Program Policies Manual.

In addition, to attendance standards relating to SAP, students are also required to adhere to certain other general institutional policies relating to attendance and tardiness. Student grades and attendance will be monitored every month. Compliance with standards for satisfactory academic progress will be assessed at the mid-point of the program or the mid-point of the academic year, whichever is shorter. Students in programs longer than one academic year in length will be assessed for satisfactory progress at the mid-point and at the end of each academic year.

Federal regulations stipulate that the maximum timeframe for degree completion cannot exceed 150% of the published length of the academic program. All transfer credit hours are used to calculate the student's remaining eligibility for SAP purposes. Once a student reaches the maximum timeframe, the student is no longer eligible for financial aid.

To ensure students will graduate within the maximum time frame for completion of the educational program, a student must successfully complete at least 67% of all hours attempted.

Withdrawals and F's will be counted as hours attempted but not completed if they occur after the add/drop period has ended. Initial and repeated courses count as hours attempted each time the course is taken.

The pace at which student must progress through his/her educational program to ensure completing the program within the maximum timeframe is as follows:

• 540 Hours Program

Day Schedule - 20 hours/week

- Timeframe for completion 6 months
- Maximum 150% Timeframe 9 months (720 Hours)

Evening Schedule - 16 hours/week

- Timeframe for completion 8 months
- Maximum 150% Timeframe 12 months (768 Hours)

• 750 Hours Program

Day Schedule - 20 hours/week

- Timeframe for completion 9 months
- Maximum 150% Timeframe 14 months (1120 Hours)

Evening Schedule – 16 hours/week

- Timeframe for completion 14 months
- Maximum 150% Timeframe 21 months (1344 Hours)

• 900 Hours Program -

 $Day \; Schedule - 20 \; hours/week$

- o Timeframe for completion 11 months
- Maximum 150% Timeframe 17 months (1360 Hours)

Evening Schedule – 16 hours/week

- o Timeframe for completion 14 months
- Maximum 150% Timeframe 21 months (1344 Hours)

• PTA AS Program –

1st Semester – 15 Credits

- 2nd Semester 18 Credits
- 3rd Semester 16 Credits

4th Semester – 12 Credits

5th Semester – 12 Credits

- Timeframe for completion 20 months
- Maximum 150% Timeframe 30 months

• OTA AS Program –

1st Semester – 15 Credits

- 2nd Semester 16 Credits
- 3rd Semester 12 Credits
- 4th Semester 16 Credits
- 5th Semester 16 Credits
 - Timeframe for completion 20 months
 - Maximum 150% Timeframe 30 months

Biomed AS Program-

- 1st Semester 15 Credits
- 2nd Semester 12 Credits
- 3rd Semester 12 Credits
- 4th Semester 12 Credits
- 5th Semester 12 Credits
 - \circ Timeframe for completion 20 months
 - o Maximum 150% Timeframe 30 months

Student must complete the program within one and one half $(1\frac{1}{2})$ times the length of the program.

Students must demonstrate progression toward degree or certificate completion. All students must have successfully completed at least 67% of all clock or credit hours attempted. The percentage is calculated by dividing the number of completed clock or credit hours by the number of attempted clock or credit hours.

• Attempted hours are defined as any course that the student is enrolled in after the add/drop period expires.

• Courses attempted include any course in which grades of A, B, C, D, F, W, I*, P, NP, and T are given.

• Successfully completed hours are defined as the number of hours in which a student received a grade of A, B, C, D, or P.

• *Incompletes are counted as attempted, but not completed. After an incomplete class (I) is converted into a grade, the grade will then be counted in the GPA calculation and the completion rate.

 \succ (Note: For concepts of SAP calculation, a course with a letter grade of "D" or higher is considered an attempted and completed course).

• All transfer credits count as both attempted and completed units.

• For AS degree granting programs, course incompletes or withdrawals will affect pace of completion as course completion is a requirement for progression on the curriculum. Course withdrawals or repetitions do not affect GPA.

Termination of Financial Aid

Termination of financial aid indicates that the student is no longer eligible for any type of financial aid and occurs for the following reasons:

• Student did not meet all SAP requirements.

• Student has reached their maximum timeframe to complete degree or certificate.

Students who are terminated are not eligible to receive financial aid. Students will be notified in writing of their termination and that they lost eligibility for financial aid.

SAP Appeal Policy

The basis on which a student may file an appeal, or the institution extends a special judgment, includes: the death of a relative, an injury or illness of the student, or other special circumstances. For sake of interpretation, circumstances related to an outbreak of COVID-19 falls under special circumstances on this policy. Therefore, circumstances related to the outbreak of COVID-19 includes, but not limited to:

- Illness of a student or family member,
- Compliance with a mandated or required self quarantine period,
- Disruption of the sequence and continuity of the curriculum/program,
- Any general disruption resulting from such an outbreak.

TITLE: Laboratory Policy

PURPOSE: To establish acceptable behavior to be display during lab courses, infection control processes, and other academic parameters as pertaining to lab courses.

RESPONSIBILITY:

It is the responsibility of the Program Director and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled in the AS programs at TPI.

POLICY:

Lab Grading Procedures:

Laboratory evaluations are required to ensure each student possesses a level of acceptable skill when performing clinical related techniques prior to beginning a clinical experience.

- 1. The student must achieve all skill competencies to pass the course.
- 2. The instructor will assign a time for student to be tested.
- 3. The student must satisfactorily perform all critical elements in order to pass each individual skill.
- 4. The student will be provided with **one** opportunity to retest the skill should he/she fail to meet the designed criteria for the specified skill on the first trial.

Lab Safety:

Laboratory safety is a collaborative effort between the Institute, the faculty and the student body. Program faculty and students are all responsible to ensure safe operation of equipment by doing the following:

- 1. Visually inspect equipment for damage and current inspection label. If inspection label is not current, inform lab instructor or program director.
- 2. If inspection label is not current DO NOT USE equipment.
- 3. Pre-check equipment prior to use.
- 4. Any real or potential equipment safety concerns discovered by students should be immediately reported to Program Faculty member and should be labeled and taken out of use until deemed safe.
- 5. All equipment and supplies should be returned to their storage areas at the end of the lab session.
- 6. Equipment user manual are kept in the Program Director's Office

If a piece of equipment fails or malfunctions:

- 1. Attend to the immediate needs of the subject.
- 2. Report the incident to the lab instructor or Program Director
- 3. Assist lab instructor in completing the incident report.
- 4. Remove the equipment from the area and label it as OUT OF SERVICE.
- 5. Program Director will contact BioMed Company for inspection of equipment.

Lab Use:

The use of lab equipment is restricted to the Program faculty and the students enrolled in the Program. Use of equipment by any other individual is expressly prohibited and may result in disciplinary action.

- 1. Students have access to the lab during the program regular scheduled hours. Students must check out the lab key from the director's office by showing their ID.
- 2. During lab courses and practice students are expected to conduct themselves as though they are in the clinical setting. Inappropriately loud talking or joking, horseplay, use of foul language or other disruptive behavior will cause the student to be dismissed from the lab and will result in disciplinary action.
- 3. Students are not to use any lab equipment until instructed in its application by the lab instructor.
- 4. Students using the lab to practice **may not** bring children, family members, or friends with them.
- 5. Students must follow the safety protocols indicated for each piece of equipment.
- 6. Students are only authorized to use modality equipment or work with volunteers/models in the presence of an instructor or lab assistant. It is advised that student utilize open lab time when an instructor is readily accessible to oversee practice.
- 7. All volunteers/models must sign an informed consent that indicates that the sole purpose of the experience is for education and instruction. *Such form must be on file with the lab instructor prior to volunteer participation*. (See Informed Consent for Educational Lab Demonstration Policy).
- 8. No lab equipment or supplies may be removed from the lab.
- 9. Treatment equipment, tables and chairs used should be properly stored before leaving.
- 10.Hydrocollator will be cleaned once every six months and should be filled with water at the end of the lab session.

11.NO FOOD OR BEVERAGES are allowed in lab room during class or during open lab time.

Lab Infection Control

1. Lab should be kept clean at all times. Dirty linens and equipment should be properly stored before leaving the room.

- 2. Mats and plinths should be wiped down with a bactericidal agent at the end of each lab session.
- 3. Linen that is not soiled should be refolded and replaced in the linen case. Soiled linen should be placed in the hamper. If a bag is full, place a new bag in the hamper. To keep laundry costs to a minimum, students should conserve laundry by doing the following during lab courses:
 - a. Place towels, pillowcases, and sheets that have come in contact with hair and skin in the dirty laundry bin.
 - b. Towels, pillowcases, and sheets that were used for positioning may be folded and returned to the clean laundry section to be used again.
 - c. Towels used to wrap a paraffin hand which is covered in plastic wrap/aluminum foil, may be used again if clean.
- 4. Faculty members are responsible for assuring the infection control policies are enforced in their laboratory.

TITLE: Informed Consent for Educational Lab Demonstration

PURPOSE: Establish procedure to obtain informed consent from clinical models prior lab demonstration

RESPONSIBILITY:

It is the responsibility of the program faculty to ensure compliance

with this policy.

APPLICABILITY:

This policy applies to all clinical models participating in lab educational demonstrations.

POLICY:

Prior to beginning the lab educational demonstration, all clinical models will complete and sign the Informed Consent for Educational Lab Demonstration form.

Attached

Informed Consent for Educational Lab Demonstration

I______, hereby agree to participate in the scheduled lab demonstration. I understand that this is solely for educational demonstration purposes. I confirm that I have disclosed all pertinent medical information and can safely participate in this demonstration. I also understand that all medical information provided will be treated as confidential as dictated by HIPAA and will be used for educational purpose only. I release the instructors and The Praxis Institute from any liabilities.

Participant:	Date:	
	_	
Witness:	Date:	

TITLE: Course Audit

PURPOSE: To establish mechanisms to govern process for course audit.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Financial Aid Coordinator, Registrar, Program Director, and Faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to AS Programs and its student body.

POLICY: TPI allows students to audit courses for which they are academically prepared or to address specific or unusual educational circumstances. Students do not receive either credit or a grade for courses they have audited. Title IV Financial aid funds cannot be applied to audited courses.

- 1. Students must declare themselves as an "audit student" at the time of registering for a course and cannot change their status after the third class meeting.
- 2. Audit students pay a 50% per credit hour for a course taken under the audit option.
- 3. Audit students are subject to all appropriate policies, like any other student enrolled in a TPI class.
- 4. A course may be audited only one time.
- 5. Students auditing a course must complete the same work and tests than regularly enrolled students.
- 6. Audit students will be given a notation of X at the end of the course and will not receive an evaluation, course grade, or credit for the course.
- 7. There is no option available for a student to request credit for a course that has been audited.

TITLE: Post Practical Exam Written Reflection

PURPOSE: Establish procedure to provide student with opportunity to reflect on the learning process and experience after a practical exam.

RESPONSIBILITY:

It is the responsibility of program Core Faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to AS Programs and their student body.

POLICY: After the practical examination and debriefing session have been concluded, student will complete a post-practical exam written reflection. Aim of reflection is to increase students self-efficacy for clinical situation depicted during the practical exam, as well as, to help student articulate and solidify the new shaped frame of the clinical experience learned during the practical and debriefing session.

Attached

Post-Practical Exam Written Reflection

Name_____Date____

1. Based on your performance, discuss performance elements that were positive.

2. Based on your performance, discuss performance elements that need to be changed in order to improve future performance.

TITLE: Non-Degree Programs Clinical Rotation

PURPOSE: To establish process to inform students enrolling in applicable nondegree programs of the required 120 hours of clinical practice.

RESPONSIBILITY:

It is the responsibility of the Programs Directors and admission department staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to applicable Non-Degree Programs.

POLICY:

APLICACION DE ADMISION INSTRUCCION ROTACION CLINICA

Como parte de las 900 horas del programa que eligió, es mandatorio que usted complete sus horas practicas, a través de su coordinador se le dará una ubicación, a la cual deberá asistir regularmente por el periodo de tiempo programado.

La asistencia diaria durante este periodo, le dará una óptica profesional de sus funciones en su futuro trabajo una vez que se integre a la vida laboral.

Como parte del entrenamiento la escuela establece que el día viernes de cada semana, deberá entregar una forma la cual recibirá previamente con su debida instrucción. Esta forma es la constancia de su asistencia y tendrá que tener una descripción de las actividades realizadas los días asistidos, firmados por el supervisor y por el estudiante.

Es absolutamente responsabilidad de usted la entrega de los reportes como respaldo de sus horas asistidas a la práctica.

De no completar sus horas prácticas o la escuela no tener ninguna constancia de su asistencia, o en el caso de que no pudiera asistir por alguna razón que lo justifique con aceptación de la escuela, lamentablemente se aplicara nuestra política de baja para el estudiante en cuestión.

Y como prueba	de que la escuela le ha	informado y usted ha aceptado	nuestros términos, se firma la
presente el dia:	del mes	del Año	<u>.</u> .

Oficial de Admisión

Estudiante

TITLE: Non-Degree/Occupational Program's Hours and Weeks

PURPOSE: Document the required amount of hours/weeks for completion of the non-degree occupational programs.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Registrar to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI non-degree occupational programs.

POLICY:

Program	Shift	Hours	Weeks
Pharmacy Technician	Morning	900	45
Pharmacy Technician	Evening	900	56
Advanced Therapeutic	Morning	750	38
Massage & Clinical			
Massage			
Advanced Therapeutic	Evening	750	47
Massage & Clinical			
Massage			
Therapeutic Massage	Morning	540	27
Technician			
Therapeutic Massage	Evening	540	34
Technician			
Dental Assistant	Morning	900	45
Dental Assistant	Evening	900	56
Patient Care Technician	Morning	750	38
Patient Care Technician	Evening	750	47

Occupational Program's Hours/Weeks

TITLE: Recording Phone Calls, Conversations, and Lectures

PURPOSE: To establish guidelines to ensure legal and ethical compliance of students and staff in regards to recording phone calls, conversations, and lectures.

RESPONSIBILITY: It is the responsibility of the Campus Director, Programs Directors, programs faculty, staff, and student body to ensure compliance with this policy.

APPLICABILITY: This policy applies to all institutional employees as well as students registered and pursuing higher education at The Praxis Institute.

POLICY:

The institution adheres to the State Law, its definition and penalties, as written in FL Stat $\S 934.03$.

The institution also establishes that with the consent of the professor, students are allowed to record in-class lectures/presentations, but the recording device must be turned-off during breaks and once the lecture/presentation has concluded. A violation to this policy is considered grounds for disciplinary actions including dismissal from the program. Furthermore, violation of this policy could potentially impact Professional Ethics which could lead to disciplinary actions that may impact state certification or licensure.

ADMINISTRATION

TITLE: Communication and Grievance Policy

PURPOSE: To establish guidelines and parameters for communication and grievance process.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Program Director, and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to the institution.

POLICY:

A student who wishes to discuss an issue of academic or professional concern should adhere to the following procedure:

- 1. The student should first have a discussion with the instructor who is responsible for the course in which there is a concern. Most circumstances that arise can be and should be addressed with the instructor who is directly involved. Rarely, will situations occur that require more than a calm, open, and professional discussion between the student and his/her instructor.
- 2. However, if the student does not believe that the issue has been resolved in a reasonable and satisfactory way, the student may discuss his/her concern with the program director. The program director will attempt to gather all necessary information from all available sources in order to determine the appropriate resolution of the problem.

If another faculty member is contacted before the student addresses the concern with the instructor in question, the student will be referred, immediately, back to the instructor for the appropriate discussion/resolution.

In the event a satisfactory resolution is not achieved at this level, and the decision rendered still disputed by the student, the student should bring the matter to the institution Executive Director.

However, in the event that a student has exercised the channels available within the institution to resolve the concern(s), and the problem has not been resolved to the student's satisfaction; the student has the right and is encouraged to contact:

Council on Occupational Education (COE), CAPTE, or ACOTE.

Steps to follow:

- 1. Contact COE and/or CAPTE for PTA program and/or ACOTE for OTA program via written letter. Phone complains will be logged along with a request for a written follow-up letter.
- 2. Written letter must include the following:
 - a. Nature of the problem
 - b. Date(s) that the problem occurred
 - c. Name(s) of individual(s) involved in the problem (staff, faculty or student)
 - d. Copies of documentation regarding the problem **FACTS, NO RUMORS = SOLUTIONS**
 - e. Evidence that the institution grievance procedure was followed prior to contacting COE, CAPTE or ACOTE
 - f. Sign letter

Send letter to:

- Council on Occupational Education 41 Perimeter Center East, NE, Suite 640 Atlanta, GA 30346 Telephone: (770) 396-3898
- CAPTE PTA Program Students Only 1111 North Fairfax Street, Alexandria, Virginia 22314 Telephone: 703-706-3245 email: <u>accreditation@apta.org</u> website: <u>http://www.capteonline.org</u>.

TITLE: Communication with Faculty

PURPOSE: To establish guidelines to govern the mechanisms for students to communicate with faculty.

RESPONSIBILITY:

It is the responsibility of the Programs Directors and entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered in TPI.

POLICY:

Good communication is important at all levels. The student is encouraged to always go through proper channels to resolve any academic question.

Office hours are posted on the faculty office door. Students should use these times for discussion about class, lab procedures, or academic concerns.

Instructor's emails and mobile numbers are available to students or included in courses' syllabus. Students are encouraged to communicate with faculty via text, phone call, or email. Expectations are that all communication with faculty must be done in a professional, respectful, and appropriate manner.

TITLE: Complains Outside of Due Process (Public Comment)

PURPOSE: To establish guidelines and parameters for complains outside of due process.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Programs Directors, and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI and all institutional constituents.

POLICY:

Complaints which fall outside of due process will be handled on an individual or case by case basis. Retaliation following complain submission is absolutely prohibited. Upon receiving the informal or written complaint, the Executive Director, Campus Director, or Program Director will assimilate the information presented and respond accordingly depending upon the nature of the complaint. With respect to employers of graduates and/or the general public, the institution may seek consultation from the Advisory Board and forward to the Executive Director. All complaint records will be maintained and held in a locked file cabinet located in the Executive Director's office. Records of complaints, including the nature and disposition of the complaint; will be kept for 3 years.

Attached

PROBLEM RESOLUTION FORM

The Problem Resolution Form will be used for handling complaints that fall outside the realm of due process, such as complaints from clinical education sites, employers of graduates, and the public. This form will be kept as a record of any complaint about the program falling outside the realm of due process, including the nature of the complaint and the disposition of the complaint.

Person(s) Filing Co	mplaint:							
Contact made by	phone	fax	e-mail	visit	letter			
Parties involved: 1)								
2)								
4)								
5)								
Nature of the Proble								
Fact Finding Other person's input	t:							
Data to verify comp	laint:							
Suggested steps for 1) 2) 3) 4)	resolution:							
Info provided to:		(On: (date)	by	phone	fax	e-mail	visit
Signature of person	filing compl	aint:						
Print name:								
Results (include date	e of resolutio	on):						
Signature of person	completing f	form:						

TITLE: Course and Professor's Evaluation

PURPOSE: To establish guidelines regarding courses' and professors' evaluation mechanisms.

RESPONSIBILITY:

It is the responsibility of the Campus Director and Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all TPI programs courses and faculty.

POLICY:

NON-DEGREE PROGRAMS

No less than twice a year, students will assess the institution, program and instructor's teaching performance. Instructor will assign a student from each course that will distribute, collect and return all completed forms to the Administrative Representative in a sealed envelope. Instructor is expected to leave the room while the students complete the evaluation form. Forms will be tallied by the registrar's office and results reported to program directors and administration.

A.S. PROGRAMS

The week prior last week of each semester, students will assess the course and the professor's teaching performance. Professor will assign a student from each course that will distribute, collect and return all completed forms to the Administrative Representative in a sealed envelope. Professor is expected to leave the room while the students complete the evaluation form. Forms will be tallied by program directors and results reported to administration.

Attached

THE PRAXIS INSTITUTE

Student Body Survey/Encuesta del Cuerpo Estudiantil

Instructor's Name: Nombre Del instructor:

Program/Programa:

Date/Fecha:

Student's feedback is an important instrument in measuring quality at our institution. Your cooperation is necessary to maintain our standards; grade the quality of our facilities; and the efficiency of our instructors and staff. Please take a moment to provide us with your comments. **THANK YOU!**

La opinión del estudiante es nuestra mejor herramienta para evaluar la calidad de la institución. Su cooperación es necesaria para mantener estos parámetros; calificando la calidad de nuestras instalaciones, la eficiencia de nuestros instructores y personal. Por favor tome unos minutos para proveernos sus comentarios. **GRACIAS!**

-	s Improvement F - Poor e Mejorar Pobre	
	Circular un Circle O	
 El Instructor demuestra conocimiento del tema. The instructor shows proficiency and relevance of the 	e subject.	C D F
2. El instructor cubre los objetivos del programa. The instructor covers the program objectives.	A B C	C D F
 Los cursos están actualizadas y bien preparadas. The courses are updated and well prepared. 	A B C	C D F
4. El lugar de estudio es apropiado para su aprendizaje. The place of study is conducive to the learning proce	ss. A B C	C D F
5. Los equipos de aprendizaje funcionan adecuadamente The learning equipment is in working conditions.	e. A B C	C D F
6. Los materiales para las prácticas son suficientes.You are supplied with the required materials for prac	tice. A B C	C D F
7. Fue atendido cortésmente en el proceso de registració You were shown courtesy in the registration process.		C D F
 Fue atendido cortésmente en el proceso de registració You were shown courtesy in the registration process 		C D F
 9. Como usted categorizaría los siguientes departan servicios al estudiante? How would you rank the following studen departments? 		
a. Admisiones Admissions Department	A B C	C D F

b. Ayuda Financiera	Α	B	С	D	F
Financial Aid Department					
c. Registraduria/Registrar	Α	B	С	D	F
d. Biblioteca/Library Services	Α	B	С	D	F
e. Asistencia Laboral	Α	B	С	D	F
Job Placement Services					

10. Le informaron que existe un departamento de asistencia laboral para ayudarlo cuando termine el programa?

Were you informed that there is a job placement department to help students when they finish the program?

SI/YES____ NO____

11. El programa que usted eligió, cumple sus expectativas? Did the program you chose meet your expectations?

SI/YES____ NO____

Comentarios/Comments:

12. Usted recomendaría la institución a otras personas? Will you recommend the institution to other people?

SI/YES____

Comentarios/Comments:_____

Last Revision - 02/2018

NO

The Praxis Institute

THE PRAXIS INSTITUTE CLASSROOM STUDENT FEEDBACK SURVEY

Course Number	
Year/Term	

This survey gives you the opportunity to express your views on how this course is being taught. Since the school and your instructor are very interested in your opinion, please read each item carefully. This survey is *anonymous* and individual responses will be kept *confidential*. Because we want to ensure the anonymity of your responses, your instructor will leave the room after the instructions/directions on how to complete the form have been read. One student will be selected to handle the answer sheet after they have been completed, and only this student will do so until they are returned for processing. After the term is over, your instructor will also be made available to students.

<u>Preferably complete form using a pencil</u>. Write the course number and the year/term on the top of this form. Before you begin, read each statement carefully and decide how you want to respond before you mark the answer. Make only one mark for each item.

Use the following scale to respond to the items below:

4= You **STRONGLY AGREE** with the statement as it applies to this instructor.

3= You **AGREE** more than you disagree with the statement as it applies to this instructor.

2= You **DISAGREE** more than you agree with the statement as it applies to this instructor.

1= You STRONGLY DISAGREE with the statement as it applies to this instructor.

0= This statement **DOES NOT APPLY** to this instructor or you are **UNABLE TO COMMENT**.

CLASSROOM STUDENT FE	DBA	ACK S	URV	EY	
Statement					
1. The instructor encourages me to learn.	4	3	2	1	0
2. The instructor helps me to see the purpose of this cou	4	3	2	1	0
3. The instructor explained the course requirements and	4	3	2	1	0
learning outcomes clearly.					
4. The instructor informs me regularly about how I'm d) 4	3	2	1	0
in this course					
5. The instructor treats me with respect.	4	3	2	1	0
6. The instructor is available for individual help during) 4	3	2	1	0
hours or by appointment.					
7. The instructor creates an atmosphere that encourages	4	3	2	1	0
to learn.					
8. The instructor makes this course interesting.	4	3	2	1	0
9. The methods used by the instructor to teach this class	4	3	2	1	0
helped me to better understand and learn the course mat					
10. The instructor's assignment helps me learn the mate	4	3	2	1	0
11. The instructor makes good use of class time.	4	3	2	1	0
12. The instructor discussed the grading policy at the	4	3	2	1	0
beginning of the term.					
13. The examinations are graded fairly.	4	3	2	1	0
14. The instructor responds effectively when asked ques	4	3	2	1	0
about the subject matter of this course.					
15. The instructor is prepared for class.	4	3	2	1	0
16. Classroom space and resources are adequate for cou	4	3	2	1	0

learning experience.

- 1. How would you describe your ideal professor? Paint as clear a picture for us as possible.
- 2. Using the description of the ideal professor you provided above how does the professor for this course measures up to that description? What can he/she does to enhance his/her teaching practice?

- 3. If you could put one question on a course evaluation what would it be and why would you ask it?
- 4. If you were the president of your college or university, what method(s) would you use to evaluate the teaching performance of college professors?

Please provide any other comments you may want to share with us:

Thank you!

TITLE: Drug-Free Organization

PURPOSE: To establish parameters to ensure a drug-free workplace and educational environment.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted into the program and employees as well.

POLICY:

Smoking is strictly prohibited in all institutional facilities.

The use of alcohol in any form and the illegal use of drugs are strictly forbidden, regardless of location.

Violators will be subject to disciplinary action, by the appropriate governing body.

TITLE: Emergency Phone Calls

PURPOSE: To establish systems to diminish class interruptions and control unnecessary disruptions to the learning process, while ensuring students receive notifications of true emergency situations.

RESPONSIBILITY:

It is the responsibility of the Programs Directors and the entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered at TPI.

POLICY:

*Messages or phone calls for students are on an emergency basis only.

The following is a list of suggestions to make contacting student as easy as possible. Students should

1. Tell babysitters and family members what days and times they are scheduled to be in the classroom, the lab area, and or clinical rotations.

TITLE:Non- Discrimination / Equal Opportunity

PURPOSE: To establish guidelines to govern the administrative and academicals operation of the institution in regards to non-discriminatory practice.

RESPONSIBILITY: It is the responsibility of the Executive Director to ensure compliance with the policy.

APPLICABILITY: This policy applies to all students (potential and registered), employees, applicants for school admission and employment opportunities, as well as participants in institutionally sponsored activities.

POLICY:

TPI is committed to a policy of non-discrimination. This institution provides educational programs, activities, and employment to individuals without regard to the person's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age, disability or genetic information.

The operation of its student aid programs is free from discrimination as required by Federal Law. In addition, the institution endeavors to remove barriers and provide educational and employment opportunities for handicapped persons.

This policy of non-discrimination applies to all students, employees, applicants for admission, employment and all participants in institutionally sponsored activities.

TITLE: Student Confidentiality

PURPOSE: To establish procedures to ensure student confidentiality.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and the Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all TPI registered students and employees.

PROCEDURE:

Faculty will take special precautions to ensure all communication regarding student academic and clinical performance is kept private and confidential. Examinations and student immunization records are maintained in locked file cabinets in the record department offices.

The institution maintains the confidentiality of student educational records and such nondirectory information may be released only with the students' written request. However, information may be released to the following:

- Officials of other institutions in which students seek to enroll.
- Persons or organizations providing students financial aid.
- Accrediting agencies carrying out their accreditation function.
- Persons in compliance with a judicial order.
- Persons in an emergency in order to protect the health or safety of students or other persons.
- Clinical Sites where the student is assigned for practice.

Health and counseling records may be provided to physicians and licensed psychologists of the students' choosing. Faculty and staff access to student educational records for administrative reasons is allowed provided that such persons are properly identified and can demonstrate a legitimate educational and professional interest in the material.

The definition of "Student" under FERPA refers to a person who either has reached the age of 18 or who is attending an institution of post-secondary education. At the post-secondary level parents have no inherent rights to inspect student records; this right is limited solely to the student. It is the institution's policy to release academic or financial information to parents and/or guardians of students (whether or not the student has reached the age of 18) only upon the student's written authorization. The student may complete a "Student Information Release" (FERPA waiver).

STUDENT INFORMATION RELEASE FORM

ATTENTION: THIS FORM WILL NOT BE ACCEPTED TO REQUEST TRANSCRIPTS.

Submit form to Registrar's Office.

IMPORTANT: **The Praxis Institute** protects the confidentiality of the education records of current and former students. This policy is in compliance with the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended.

NAME:		<u></u> SS	#:
ADDRESS:			
CITY:	STATE:	ZIP:	PHONE:
SCHOOL:		STUDENT ID	
I give permission for TPI to only release my academic information, etc.).	y: (Specify inform	nation to be relea	sed, i.e., financial, account,
OR			
Semester(s):			
(If no semester specified, release is in effect	t for all semesters)).	
to:			
(name of person/institution to whom the info	ormation will be r	eleased)	
for:			
(state purpose)			
In order to assure your privacy, please creat will know. Be creative and provide a passworemember and <i>ONLY</i> share it with those me inquiries which are not in person and anyon this password. My password is:	ord that is not obv entioned above. The you have given p	vious to others. M his password mu permission to acc	Iake it something you can st be used when making all
Signature / Date			

TITLE: Student's Rights and Responsibilities

PURPOSE: The purpose of the Student Rights and Responsibilities Policy is to enumerate the essential provisions relating to how students may participate responsibly in the program and academicals setting.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Program Director, and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered at TPI.

POLICY:

The right to learn depends upon appropriate opportunities and conditions in the classroom, on the campus, and in the larger community. Students should exercise their rights with responsibility. Discrimination on the basis of person's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age, disability or genetic information is prohibited by the Institution.

A. Right of Access to Higher Education

Within the limits of its resource and facilities, The Praxis Institute is open to all persons who are qualified according to its admission policies. Admission to Institution credit study is open to all high school graduates; persons with state-issued high school equivalency diplomas; home-educated students who have completed a home education program evidenced by a signed affidavit from their parent or legal guardian stating that the student completed a home education program; and other special categories. A record of good conduct (Criminal Background Check) is required, as well as official transcripts of previously completed educational work, and related documentation necessary to complete an application for admission.

1. Admissions – There may be circumstances (e.g., criminal record, falsifying admissions records), where an individual may be denied admission to The Praxis Institute. When questions of admissibility arise, the individual's application is reviewed by the registrar and a recommendation is made to the program director whose decision is final on behalf of the Institution. Each student, during the process of applying for admission to the Institution. Students are required to comply with all policies and procedures of the Institution, including, but not limited to the Student Code of Professional Conduct. Students are required to keep the Institution informed of their current mailing address. The Institution meets all notice requirements to students by sending notices to the last mailing address provided by the student to the Registrar's/Admissions Office.

2. Psychologically Unfit Students - Students admitted to The Praxis Institute who, because of their action on campus, give reasonable cause to believe that they may represent a danger to themselves or others, or who demonstrate by their performance that they are not qualified to attend institution, may be denied further enrollment at the institution. The process by which the Institution would make such a decision involves a carefully delineated and comprehensive examination of all issues relating to that individual student's observed behavior. This would include consultation with a number of professional members of the staff at the Institution.

B. Academic Responsibility

1. Academic – The professor in the classroom and in conference will encourage free discussion, inquiry and expression where relevant and appropriate to the educational objectives of the course. It is the responsibility of the instructor to present in writing to each class the educational objectives and the criteria to be used in evaluating student success in that class. It is the responsibility of students to avail themselves of knowledge of these objectives and criteria. The professor will not grade the student on opinions expressed, unless such evaluation is specifically related to course requirements.

2. Protection of Freedom of Expression – Students will be free to state reasoned exception to the data or views offered in any course of study and to reserve judgment about matters of opinion. They are, however, responsible for learning the substance of any course of study for which they are enrolled.

3. Protection against Improper Academic Evaluation – Students will have protection through orderly procedures against unfair academic evaluation. A student's grade will be based solely on academic achievement, unless otherwise specified by the professor in writing at the first class meeting. Students may appeal grades received by following the grade appeals policy.

4. Academic Dishonesty – Students are expected to conduct their academic affairs in a forthright and honest manner. In the event that students are suspected of classroom cheating, plagiarism or otherwise misrepresenting their work, they will be subject to procedural due process. The specific steps involved are outlined in Policy for Dealing with Academic Dishonesty.

5. Standards of Academic Performance (SAP) – The Institution have established Standards of Academic Performance which are applicable to all students. Failure to maintain satisfactory academic progress will result in warning, probation, suspension, or dismissal from the Institution.

6. Additional Rights of Appeal – Student requests for exceptions to the financial and withdrawal policies of the Institution due to extenuating circumstances may be submitted in writing for a case-by-case consideration.

C. Student Records

The Praxis Institute has a procedure concerning the manner, in which a student's permanent educational record is handled and disclosed, as delineated in Policy on Student Confidentiality.

D. Student Affairs

1. Freedom of Association – Students bring to campus a variety of interests previously acquired and develop many new interests as members of the academic community. They will be free to organize and join student clubs or organizations to promote their common interests, as long as they do not disrupt the Institution, or violate its rules and regulations.

a. The Institution establishes the following procedure for the recognition of student organizations.

b. Advisors are required for recognized student organizations; each organization will be free to choose its own advisor from the faculty or administrative work groups. A recognized club or organization may lose its official recognition and be suspended if actions of its officers or members, or activities of the organization as a whole, violate Institution Policy and Procedures.

2. Freedom of Inquiry and Expression – Students and student organizations will be free to examine and to discuss all questions of interest to them and to express opinions publicly and privately. They will always be free to support causes by orderly means which do not disrupt the operation of the institution.

3. Uses of Facilities – Provided that they are used in a manner appropriate to the academic community and in compliance with Institution Procedures, the Facilities and Services of the Institution will be open to all of its enrolled students.

4. Student Publications – Student publications constitute one of the strongest means of encouraging an atmosphere of responsible discussion and intellectual exploration on the institution.

5. Distribution of Literature – It is the intent of the Institution to provide for the exchange of written thoughts and ideas in an orderly fashion and without disruption to the Institution.

6. Visiting Speakers – The Institution establishes that all guest lecturers and guest speaking must be approved by the Program Director or Executive Director.

7. Grievance Procedure for Alleged Discrimination or Harassment-Students who believe that they have been discriminated against have a formal grievance process available, which is described on Communication and Grievance Policy.

E. Discipline

The Executive Director of The Praxis Institute is responsible at all times for the maintenance of the orderly functioning of the Institution and will take necessary actions to prevent any interference with such orderly operation. The Executive Director delegates authority for the maintenance of the orderly functioning of each campus to the campus director and other appropriate Institution employees. The campus director has charged the programs director and faculty with implementation of the student disciplinary procedures and maintenance of student discipline records. Due process and proper procedural safeguards will be observed to insure that students' rights are protected.

DERECHOS Y RESPONSABILIDADES CHECKLIST

Yo entiendo que tengo derecho a lo siguiente: (inicialice cada línea)

____Información escrita de las obligaciones de mi préstamo y mis derechos y responsabilidades como deudor.

____A un periodo de gracia y la explicación de lo que esto significa.

_____A una detallado informe, recibida antes de comenzar a pagar mi préstamo, que incluye información sobre las tasas de interés, gastos, el balance que debo, y el numero de pagos.

A postergar los pagos por ciertos y definidos periodos, si califico y si lo solicito.

____A una tolerancia especial para postergar o reducir los pagos si califico y lo solicito.

A anticipar el pago de mi préstamo totalmente o parcialmente en cualquier momento sin ninguna penalidad por hacerlo.

_____A una copia de mi contrato de préstamo (promisoria note) ya sea antes o al momento que la primer parte de mi préstamo es transferido a la escuela.

À la documentación donde consta que el monto total de mi préstamo(s) ha sido recibido por la escuela.

Yo entiendo que soy responsable de:

_____Asistir al asesoramiento final: antes de graduarme o de abandonar la escuela antes de llegar a la mitad del programa.

Pagar mi préstamo aunque no haya completado mi programa académico (bajo ciertas

Circunstancias), no estoy satisfecho con la educación que he recibido, o no puedo conseguir empleo luego de graduarme.

_Notificar la institución y al Direct Loan Servicing Center si yo:

____me mudo/ cambio mi dirección.

____cambio mi nombre.

____abandono la escuela o paso a ser un estudiante de menos de medio tiempo.

me trasfiero a otra escuela.

dejo de matricularme o volver a matricularme por el periodo por el cual el préstamo fue solicitado.

la fecha de graduación proyectada, cambia.

____me gradúo.

____hacer los pagos mensuales de mi préstamo (s) luego de abandonar la escuela, salvo que haya solicitado una postergación de los mismos o una tolerancia especial de los pagos.

a notificar al U.S. Department of Education's Loan Servicing Center de cualquier circunstancia que pudiera modificar mi elegibilidad para posponer los pagos ya otorgada.

Yo, he recibido los materiales que se refieren al asesoramiento de comienzo para el préstamo subvencionado y préstamo no subvencionado para deudores. Yo he leído y comprendido mis derechos y responsabilidades como deudor. Yo también comprendo que este préstamo tiene como condición la obligación de asistir a clases y obtener un progreso académico satisfactorio cumpliendo así con la política de mi escuela.

Yo comprendo que voy a recibir un préstamo del gobierno federal que debe ser pagado.

Nombre del estudiante

Seguro Social

Firma del Estudiante

Fecha

TITLE: New Graduate Survey

PURPOSE: To establish appropriate procedures to obtain information and data from AS programs graduates for program assessment.

RESPONSIBILITY:

It is the responsibility of the Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all AS programs graduates.

POLICY:

Three to five months post graduation AS programs' students will be ask to complete a program satisfaction survey that will also compile information regarding employment finding and licensure test success. Data gathered will be analyzed for program assessment purposes.

Attached

Graduate Survey

1. Please enter your name and employer in the space below

Name_____

Employer _____

2. How many months have you worked as a PTA, OTA, or BioMed Tech?

3. How long have you worked at your current job?

4. Current employment setting:

	i.	Acute Care	
	ii.	Outpatient	
	iii.	Home Health	
	iv.	Rehabilitation Center	
	V.	SNF/LTAC	
	vi.	Extended Care	
	vii.	School District	
	viii.	Other	(please specify)
~			
5.	Passed licensu	re exam on first trial?	YesNo - (Only applicable for PTA/OTA)

If no, how many trials before passing?

6. Please use the following scale to rate how your chosen AS program at The Praxis Institute prepared you to enter the work place. Rate the program as it existed at the time you graduated by using the rating scale below for each item.

A. I am satisfied with how the program prepared me in regards to my:

	Strongly Disagree	Disagree	Somewhat Disagree	Agree	Strongly Agree
Content Knowledge					
Professional Behavior					
Technical competency as a generalist					
Documentation Skills					
Verbal/Nonverbal communication skills					
Response to supervision					
Ability to implement a comprehensive Tx. Pla	in 🗆				
Ability to practice in a safe manner.					
Ability to practice in an ethical/legal manner					
Ability to understand my role in the Health Care delivery system					
Understanding of what it means to be a life-lo learner	ng 🗆				

B. Looking back I was satisfied with:

	Strongly Disagree	Disagree	Somewhat Disagree	Agree	Strongly Agree
Admission criteria for the program					
Resources for the program (#faculty, space, Equipment, learning tools)					
Teaching effectiveness of the program facul	ty 🗆				
Program curriculum content					
Program curriculum sequence					
Clinical educational experience					
Overall educational experience					

7. If you are not employed at this time, what do you think has been the biggest factor in not finding a job?

8. Please suggest any continuing education topics that you feel would be helpful to you and that you would most likely attend.

9. Additional Comments:

TITLE: Employer Survey

PURPOSE: To establish appropriate procedures to obtain information and data from employers for program assessment.

RESPONSIBILITY:

It is the responsibility of the AS Programs Directors and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all employers in the community that provide employment to licensed graduates from AS programs.

POLICY:

Upon receiving notification of the place of employment of a program graduate, employer will be provided with a survey form to evaluate level of satisfaction with graduate performance and to rank his/her performance.

Data gathered will be analyzed for program assessment purposes.

Attached.

Employer Survey

 Ou Ho Rei SN Ex Scl Oth 	ute Care tpatient me Health habilitation Center F/LTAC tended Care nool District		specify)
110 ((11411) 1 1	Full Time	-	-	(As Needed)
Do you provi	de orientation to the Yes No		ess to new hires?	
	of 1 to 5 where 5 is ibutes in TPI gradu		ow the employer r	ranks the strength of the
5 Highly Satisfied	4 Moderately Satisfied	3 Satisfied	2 Moderately Unsatisfied	1 Unsatisfied
Clinical I	Knowledge		Professional Behavior	
Technica	l competency		Documentation Skills	
Commun	ication skills		Response to supervisio	n
Ability to	implement a comprehen	sive treatment plan		
Ability to	practice in a safe manne	r	Ability to practice in a	n ethical/legal manner
Ability to	ounderstand professional	role	Autonomy	
Overall satisf	action with graduat	tes' quality of w	ork (circle one):	
5	4	3	2	1
Highly Satisfied	Moderately Satisfied	Satisfied	Moderately Unsatisfied	Unsatisfied
Likelihood of	employer to contin	ue to employ TI	PI graduates (circl	le one):
	Very	likely	Likely Un	likely

What areas of weakness could you identify on the TPI graduate(s)? Please list:

On a scale of 1 to 5, how does the TPI graduate fair against graduates from other accredited programs that are similar to ours?

1	2	3	4	5
Weak		Fair		Strong

Overall perception of TPI educational program. Please comment:

TITLE: Program Budget Process

PURPOSE: Establish an operationally systematic process for the development of the programs budget

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all academic programs.

POLICY: Budgeting process for the institution and programs begins in January of each calendar year by assessing costs and spending priorities for the upcoming academic year. A budget forecast is prepared by the program director to include salary projections, projected capital equipment acquisitions, repairs/maintenance, fixed and variable expenses; as well as revenue projections.

This preliminary forecast is evaluated by the Board and Executive Team sometime during the spring months. Input and recommendations are based on past financial performance and cost of living increases.

The budget approved by the board takes effect on May 1st of the new academic year. Once actual enrollment numbers are known, the Executive Team and Board may adjust or amend the budget.

TITLE: Institutional Assessment Plan

PURPOSE: To establish mechanisms to ensure an ongoing assessment process exists and is executed.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Programs directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

The Praxis Institute (TPI) is committed to standards of excellence in the delivery of education and its operation. In order to fulfill this commitment, the academic, clinical, administrative, and professional staff will continuously demonstrate a constant endeavor to promote the delivery of quality education.

The Praxis Institute, with input from students, graduates, clinical instructors, the Advisory Boards and other stakeholders, as appropriate, will continually assess the institution's effectiveness in meeting its mission and goals. This includes assessment of: institutional and program policies and procedures; mission, philosophy, goals and objectives.

This assessment plan shall assist the institution and program administration in their efforts to assure compliance with standards of excellence by identifying areas of deficits and working towards improving them.

The ultimate goal of the assessment plan is to objectively and systematically monitor and evaluate the quality and appropriateness of the educational services, continually pursue opportunities to improve them, and resolve identified problems. This plan will incorporate all the operational aspects in an effort to promote coherence and quality throughout its totality.

The ultimate responsibility for establishing and supporting the assessment plan rests with the institution's administrative team and the advisory board. However, responsibility for the implementation of the respective program's assessment plans rest with the programs directors and faculty.

The plan for assessment is a highly structured, multi-layered and integrated process, which attempts to take advantage of existing processes and course embedded assignments

when possible. The assessment plan includes both direct and indirect assessment methods that are triangulated to determine how well the institution is meeting its goals, and by extension its mission, and to guide decisions related to changes in curriculum, policy or program management. The assessment plan is divided into three categories to best evaluate various components of the institution. The three categories of assessment include: 1) Cyclical Assessment, 2) Focused Reviews and 3) Occurrence/Event Generated Assessment.

TITLE: Photography Consent Form

PURPOSE: To establish procedures to obtain student's consent for institution to use any image (photo or video), where student is, for purpose of publicity or marketing.

RESPONSIBILITY:

It is the responsibility of the Campus Director, Programs Directors, and admission department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI.

POLICY:

During the admission process, student will complete and sign the photography consent form. Completed form will become part of student's permanent file.

Attached.



Dear student:

Please be advice that during the length of the program you might be photographed, videotaped or interviewed at school events for the purpose of school marketing, i.e. newspaper, brochures, videos, television, internet, school website and/or social media.

Please indicate below your authorization.

Yes	No	
Signature	Date	

Estimado estudiante:

Por este medio les informamos que en el periodo del programa usted puede ser seleccionado para ser fotografiado, filmado o entrevistado en varios eventos de la escuela con motivos de promoción, i.e., periódicos, brochures, videos, televisión, internet, página oficial de la escuela, o social media.

Por favor indicar su autorización.

_____ Si

____ No

Firma

Fecha

TITLE: Daily Recaps

PURPOSE: To establish mechanisms to ensure ongoing monitoring of daily miscellaneous income received by the administrative assistant.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Director to comply with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

Daily, at the start of each day, the administrative assistant will complete the daily recap of receipts form documenting all receipts received and processed from previous day. Form will be submitted to the campus director for reconciliation and confirmation.

Attached.

THE PRAXIS INSTITUTE DAILY RECAP OF RECEIPTS

		DATE:			
¥ Name	Description	Receipt #	Number	Amount	F.O.P.
1					_
2					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13				-	
15					
16					
17				<u> </u>	
18					
19					-
20					
21					
Total				\$-	
Total Amount Receipts	\$-	Total Visa		\$-	Total cash
		Total Amex		\$-	Total Check
		Total Credit	Card	\$-	Total Deposit
		Total FA Cr	edit	\$ -	
	RECE			•	Total GC
	FROM	TO	AMOUNT	1	
GRADUATION	0	0	\$ -]	
SERVICE	0	0	\$-]	
TUITION	0	0	\$-		
SEMINAR	0	0	\$ -		received:
PRODUCT	0	0	\$ -		
REVIEW	0	0	\$ -		
CONFERENCE	0	0	\$ -		
MISCELLANEOUS	0	0	\$ -		

-

-

-

-

TITLE: Mission Statement

PURPOSE: To set procedure for providing the mission statement for The Praxis Institute

RESPONSIBILITY:

It is the responsibility of the Executive Director to disseminate this information to each area under his/her direction. It is the responsibility of all personnel to adhere to this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

The mission of <u>The Praxis Institute</u> is to provide quality training to the community leading to employment. Thereby, enabling students to engage in a mutually beneficial and supportive process.

We further believe that the primary goal of our institution is to offer programs with the necessary skills compatible with the needs and demands of today's competitive job market.

TITLE: Parking Permit

PURPOSE: To establish mechanisms to distribute parking permits decals and establish procedures for parking system.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY: All students upon registering at TPI will receive a parking decal, the parking agreement form to read, agree, and sign.

Attached.

"THE PRAXIS INSTITUTE"
PARKING AGREEMENT
1850 SW. 8 th St. 4 th Floor <u>Miami, Fl. 33135</u>
lombre y Apellido:
rograma:
urno: () Mañana () Tarde () Noche
Parking Permit No.

Por la presente tomo conocimiento que mientras este cursando mi programa podre estacionar mi carro solamente en el sótano del edificio (garaje) en espacios que no estén reservados para las oficinas e instructores y en el lote ubicado en las esquinas de SW 9 St. y SW 18 Ave. (1801 SW 9 St.) asignado en su totalidad a la escuela menos dos parqueos reservados para la brigada 2506. El parqueo de mi vehículo lo hare a mi propio riesgo utilizando un solo lugar y sin bloquear a otros. En ningún caso The Praxis Institute será responsable por daños o robos que pudiera sufrir mi carro y/o los objetos depositados en el. A su vez recibo el permiso de parqueo el que deberá ser exhibido en el cristal delantero de mi vehículo.

Firma Del Alumno:

Fecha:

THE PRAXIS INSTITUTE

TITLE: Students Recruiting Plan

PURPOSE: To establish a recruitment plan to maintain and increase campuses enrollment.

RESPONSIBILITY:

It is the responsibility of the Executive Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

As part of the institution policies, all the recruitment activities used must be truthful and ethical, avoid any false or misleading impressions of the institution, its programs, services or employment, and must be in compliance with State and Federal regulations.

The institution feels that it is of prime importance the development of a plan of action to increase the campuses enrollment.

The following steps are currently in effect, or will be taken in the future, as part of the plan:

- 1. Mass mailing of academic program's brochures
- 2. Open House" invitations
- 3. Television promotions
- 4. Newspaper and magazine ads
- 5. Health & Fitness Expo, Congresses, and Expo-Fairs
- 6. Community Services

TITLE: Program of Public Information and Community Relations

PURPOSE: To establish mechanisms to enhance public awareness and provide services to aid the community.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

The purpose of the public information and community relations program at The Praxis Institute is:

- 1- To enhance public awareness of the career opportunities in the occupational fields of the academic programs that comprises the institution's catalog.
- 2- To provide services to aid the community.
- 3- For growth and development of the institution we plan:
 - a) To invite professionals and organizations to hold seminars and conferences at the school campuses.
- 4- To offer "Open House" activities at school facilities and demonstrate our programs.
- 5- To document all student/institution participation in community relations activities.

In order to increase the public awareness of the institution, our staff and students will participate in civic, professional, and educational activities, since it is an important part of the institution's program.

The institution will make its facilities available to any high school that has students interested in classroom observation.

The institution will offer free services to elderly people incapable of paying for their services.

The administrators, staff and faculty will be available and ready to provide help to the community who serves. The institution plans to continue and increase involvement and participation in community relations.

TITLE: Procedures for Documenting Activities of the Institution

PURPOSE: To establish procedures for documentation of institution activities where the public is involved.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Student Services to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

Every activity of the institution is documented by using the Public Information Form. This form contains information about the date of the activity, its description, location, participating students and institution's staff involvement. Corresponding photos, brochures, and other pertinent exhibits will be attached to form.

All Public Information Forms, with its corresponding attachments, will be filed in chronological order in the Registrar's office.

Attached.



PUBLIC INFORMATION TO COMMUNITY RELATION

DATE: _____

DESCRIPTION OF ACTIVITY:

LOCATION:

INSTITUTION'S STAFF/STUDENTS INVOLVED



TITLE: Massage Services by Students

PURPOSE: To establish procedures to govern the provision of massage services to clients performed by students.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Directors, and Massage Program Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the Massage Programs.

POLICY:

Prior to providing massage services to any client, students providing service and client receiving service will complete, sign, and date the release form.

Attached.



MASSAGE SERVICES BY STUDENTS

Course:	Date:	-
Customer Name:		
Treatment:		-
Student's Name:		-
Instructor's Name:		
	Release Form	
I, the undersigned,	, residing at, about to receive services in The Praxis Ins	

been advised that the aforementioned services shall be performed during practice by either students and/or graduate students of the said institution to another student or to a third party. Hereby I release the said Institute, its students, graduate students and/or Instructors, from any and all claims arising out of and in any way connected with the performance of the aforementioned services, and/or sexual/physical abuse.

THIS RELEASE FORM MUST BE SIGNED BY THE PARENT OR GUARDIAN IF THE PATRON BEING SERVED IS UNDER 21 YEARS OF AGE.

The Praxis Institute is not liable for any loss or damage to the customer's/student's property.

Yo, el abajo firmante,______, con domicilio en: ______, previo a recibir servicios en The Praxis Institute, y habiendo sido informado/a que los servicios mencionados anteriormente serán ejecutados por estudiantes y/o estudiantes graduados de dicho Instituto entre sí en sus prácticas o a terceros, LIBERO de toda responsabilidad a la institución, sus estudiantes, estudiantes graduados y/o Instructores de cualquier reclamación relacionada con la ejecución y resultado del o los servicios mencionados anteriormente, y/o abuso sexual o físico.

SI EL CLIENTE ES MENOR DE 21 ANOS DE EDAD ESTA FORMA DEBE SER FIRMADA POR EL PADRE O GUARDIAN DEL MENOR.

The Praxis Institute no es responsable por cualquier pérdida o daño sobre la propiedad del cliente/estudiante.

Customer Signature:

Student Signature:

TITLE: Family Right and Privacy Act - Release of Information Form

PURPOSE: To establish procedures for student to gain access to confidential information, protected by FERPA, contained in his/her student file.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Directors, and Registrar to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered at TPI.

POLICY:

Prior gaining access to the confidential information, protected by FERPA, included in his/her file, student will complete, sign, and date the Release of Information Form. Registrar office will not grant access without the form fully executed.

Attached.



RELEASE OF INFORMATION FORM

I understand that I have the right to gain access to my records according to the institution's policy on "FAMILY RIGHT AND PRIVACY ACT" in my student file.

I,	, hereby request access to the
following information:	
Student's Signature	Institution Officer's Signature
Date	Date

POLICY AND PROCEDURE

TITLE: Procurement Standards

PURPOSE: To establish procedures to guide procurement processes that comply with the established "Uniform Guidance".

RESPONSIBILITY: It is the responsibility of the Campus Director, and Executive Director to ensure compliance with this policy.

APPLICABILITY: To all procurement process.

POLICY: Praxis Institute implements this policy in order to comply with the procurement requirements ($2 \ CFR \ 200.318 - 326$) of the Office of Management and Budget's "Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards," commonly known as "Uniform Guidance." Uniform Guidance focus on ensuring full and open competition and increased transparency in the procurement process.

PROCEDURE:

Procurement practice is guided by the principles delineated in the <u>Uniform Guidance</u>. For details we recommend reading the sections of <u>Uniform Guidance</u> available here:

(https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200)

§ 200.318 General procurement standards.

(a) The Non-Federal entity must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this section, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in $\frac{88200.318}{200.326}$.

(b) Non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

(c)

(1) The Non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. No employee, officer, or

agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

(2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

(d) The Non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

(e) To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the Federal Government, the non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services. Competition requirements will be met with documented procurement actions using strategic sourcing, shared services, and other similar procurement arrangements.

(f) The Non-Federal entity is encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

(g) The Non-Federal entity is encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

(h) The Non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. See also $\S 200.214$.

(i) The Non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

(j)

(1) The Non-Federal entity may use a time-and-materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time-andmaterials type contract means a contract whose cost to a non-Federal entity is the sum of:

(i) The actual cost of materials; and

(ii) Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

(2) Since this formula generates an open-ended contract price, a time-andmaterials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the non-Federal entity awarding such a contract must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls. (k) The Non-Federal entity alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction.

[85 FR 49543, Aug. 13, 2020, as amended at 86 FR 10440, Feb. 22, 2021]

§200.319 Competition

(a) All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

- (1) Placing unreasonable requirements on firms in order for them to qualify to do business;
- (2) Requiring unnecessary experience and excessive bonding;
- (3) Noncompetitive pricing practices between firms or between affiliated companies;
- (4) Noncompetitive contracts to consultants that are on retainer contracts;
- (5) Organizational conflicts of interest;

(6) Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and

(7) Any arbitrary action in the procurement process.

(b) The non-Federal entity must conduct procurements in a manner that

prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

(c) The non-Federal entity must have written procedures for procurement transactions. These procedures must ensure that all solicitations:

(1) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and

(2) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

(d) The non-Federal entity must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the non-Federal entity must not preclude potential bidders from qualifying during the solicitation period.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.320 Methods of procurement to be followed.

The non-Federal entity must use one of the following methods of procurement.

(a) Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not

exceed the micro-purchase threshold (§200.67 Micro-purchase). To the extent practicable, the non-Federal entity must distribute micro- purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

(b) Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

(c) Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in paragraph (c)(1) of this section apply.

(1) In order for sealed bidding to be feasible, the following conditions should be present:

- (i) A complete, adequate, and realistic specification or purchase description is available;
- (ii) Two or more responsible bidders are willing and able to compete effectively for the business;

and

(iii) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(2) If sealed bids are used, the following requirements apply:

(i) Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids, for state, local, and tribal governments, the invitation for bids must be publicly advertised;

(ii) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;

(iii) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;

(iv) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and

(v) Any or all bids may be rejected if there is a sound documented reason.

(d) Procurement by competitive proposals. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost- reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

(1) Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;

(2) Proposals must be solicited from an adequate number of qualified sources;

(3) The non-Federal entity must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;

(4) Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and

(5) The non-Federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other

types of services though A/E firms are a potential source to perform the proposed effort.

(f) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

(6) The item is available only from a single source;

(7) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;

(8) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or

(9) After solicitation of a number of sources, competition is

determined inadequate.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19,

2014]

§200.323 Contract cost and price.

(a) The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals.

(d) The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.

§200.326 Contract provisions.

The non-Federal entity's contracts must contain the applicable provisions described in Appendix II to Part 200—Contract Provisions for non-Federal Entity Contracts Under Federal Awards.

APPENDIX II TO PART 200—CONTRACT PROVISIONS FOR NON-FEDERAL ENTITY CONTRACTS UNDER FEDERAL AWARDS

In addition to other provisions required by the Federal agency or non-Federal entity, all contracts made by the non-Federal entity under the Federal award must contain provisions covering the following, as applicable.

(A) Contracts for more than the simplified acquisition threshold currently set at \$150,000, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

(B) All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.

(c) Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

(D) Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions

Applicable to Contracts Covering Federally Financed and Assisted Construction"). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland "Anti-Kickback" Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

(E) Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

(F) Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of "funding agreement" under 37 CFR §401.2 (a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that "funding agreement," the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements," and any implementing regulations issued by the awarding agency.

(G) Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended—Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

(H) Debarment and Suspension (Executive Orders 12549 and 12689)—A contract award (see 2 CFR 180.220) must not be made to parties listed on the governmentwide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

(I) Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)—Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.

(J) See §200.322 Procurement of recovered materials.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75888, Dec. 19, 2014]

*Source:

(https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200)

Attached

Key Sections of Uniform Guidance Related to Procurement

Note: The following are sections of the Uniform Guidance which relate to procurement. It is not the Uniform Guidance in its entirety, nor is it a complete list of sections related to procurement.

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APPENDIX II TO PART 200—CONTRACT PROVISIONS FOR NON-FEDERAL ENTITY CONTRACTS UNDER FEDERAL AWARDS

2 CFR Part 200 Subpart A

DEFINITIONS

§200.22 Contract.

Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward (see §200.92 Subaward).

§200.23 Contractor.

Contractor means an entity that receives a contract as defined in §200.22 Contract.

§200.67 Micro-purchase.

Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Micro-purchase procedures comprise a subset of a non-Federal entity's small purchase procedures. The non-Federal entity uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The micro-purchase threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions). It is \$3,000 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

§200.88 Simplified acquisition threshold.

Simplified acquisition threshold means the dollar amount below which a non-Federal entity may purchase property or services using small purchase methods. Non-Federal entities adopt small purchase procedures in order to expedite the purchase of items costing less than the simplified acquisition threshold. The simplified acquisition threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions) and in accordance with 41 U.S.C. 1908. As of the publication of this part, the simplified acquisition threshold is \$150,000, but this threshold is periodically adjusted for inflation. (Also see definition of §200.67 Micro-purchase.)

§200.92 Subaward.

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

§200.93 Subrecipient.

Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

2 CFR Part 200 Subpart D

PROCUREMENT STANDARDS

§200.317 Procurements by states.

When procuring property and services under a Federal award, a state must follow the same policies and procedures it uses for procurements from its non-Federal funds. The state will comply with §200.322 Procurement of recovered *materials* and ensure that every purchase order or other contract includes any clauses required by section §200.326 Contract provisions. All other non-Federal entities, including subrecipients of a state, will follow §§200.318 General procurement standards through 200.326 Contract provisions.

§200.318 General procurement standards.

(a) The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this part.

(b) Non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

(c)(1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

(2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

(d) The non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. (e) To foster greater economy and efficiency, and in accordance with efforts to promote costeffective use of shared services across the Federal Government, the non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.

(f) The non-Federal entity is encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

(g) The non-Federal entity is encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

(h) The non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. See also §200.212 Suspension and debarment.

(i) The non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

(j)(1) The non-Federal entity may use a time and materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract whose cost to a non-Federal entity is the sum of:

(i) The actual cost of materials; and

(ii) Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

(2) Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the non-Federal entity awarding such a contract must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

(k) The non-Federal entity alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.319 Competition.

(e) All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

(1) Placing unreasonable requirements on firms in order for them to qualify to do business;

- (2) Requiring unnecessary experience and excessive bonding;
- (3) Noncompetitive pricing practices between firms or between affiliated companies;
- (4) Noncompetitive contracts to consultants that are on retainer contracts;
- (5) Organizational conflicts of interest;

(6) Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and

(7) Any arbitrary action in the procurement process.

(f) The non-Federal entity must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

(g) The non-Federal entity must have written procedures for procurement transactions. These procedures must ensure that all solicitations:

(1) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and

(2) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

(h) The non-Federal entity must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the non-Federal entity must not preclude potential bidders from qualifying during the solicitation period.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.320 Methods of procurement to be followed.

The non-Federal entity must use one of the following methods of procurement.

(e) Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§200.67 Micro-purchase). To the extent practicable, the non-Federal entity must distribute micropurchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

(f) Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

(g) Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in paragraph (c)(1) of this section apply.

(1) In order for sealed bidding to be feasible, the following conditions should be present:

(i) A complete, adequate, and realistic specification or purchase description is available;

(ii) Two or more responsible bidders are willing and able to compete effectively for the business; and

(iii) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(2) If sealed bids are used, the following requirements apply:

(i) Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids, for state, local, and tribal governments, the invitation for bids must be publicly advertised;

(ii) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;

(iii) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;

(iv) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and

(v) Any or all bids may be rejected if there is a sound documented reason.

(h) Procurement by competitive proposals. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

(1) Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;

(2) Proposals must be solicited from an adequate number of qualified sources;

(3) The non-Federal entity must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;

(4) Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and

(5) The non-Federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

(i) [Reserved]

(j) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

(1) The item is available only from a single source;

(2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;

(3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or

(4) After solicitation of a number of sources, competition is determined inadequate.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

(b) The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

(c) Affirmative steps must include:

(1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;

(2) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

(3) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;

(4) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;

(5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

(6) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

§200.322 Procurement of recovered materials.

A non-Federal entity that is a state agency or agency of a political subdivision of a state and its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an

affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.323 Contract cost and price.

(a) The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals.

(b) The non-Federal entity must negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

(c) Costs or prices based on estimated costs for contracts under the Federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the non-Federal entity under Subpart E—Cost Principles of this part. The non-Federal entity may reference its own cost principles that comply with the Federal cost principles.

(d) The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.

§200.324 Federal awarding agency or pass-through entity review.

(a) The non-Federal entity must make available, upon request of the Federal awarding agency or pass-through entity, technical specifications on proposed procurements where the Federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition. This review generally will take place prior to the time the specification is incorporated into a solicitation document. However, if the non-Federal entity desires to have the review accomplished after a solicitation has been developed, the Federal awarding agency or pass-through entity may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.

(b) The non-Federal entity must make available upon request, for the Federal awarding agency or pass-through entity pre-procurement review, procurement documents, such as requests for proposals or invitations for bids, or independent cost estimates, when:

(1) The non-Federal entity's procurement procedures or operation fails to comply with the procurement standards in this part;

(2) The procurement is expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation;

(3) The procurement, which is expected to exceed the Simplified Acquisition Threshold, specifies a "brand name" product;

(4) The proposed contract is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or

(5) A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.

(c) The non-Federal entity is exempt from the pre-procurement review in paragraph (b) of this section if the Federal awarding agency or pass-through entity determines that its procurement systems comply with the standards of this part.

(1) The non-Federal entity may request that its procurement system be reviewed by the Federal awarding agency or pass-through entity to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews must occur where there is continuous high-dollar funding, and third party contracts are awarded on a regular basis;

(2) The non-Federal entity may self-certify its procurement system. Such self-certification must not limit the Federal awarding agency's right to survey the system. Under a self-certification procedure, the Federal awarding agency may rely on written assurances from the non-Federal entity that it is complying with these standards. The non-Federal entity must cite specific policies, procedures, regulations, or standards as being in compliance with these requirements and have its system available for review.

§200.325 Bonding requirements.

For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold, the Federal awarding agency or pass-through entity may accept the bonding policy and requirements of the non-Federal entity provided that the Federal awarding agency or pass-through entity has made a determination that the Federal interest is adequately protected. If such a determination has not been made, the minimum requirements must be as follows:

(a) A bid guarantee from each bidder equivalent to five percent of the bid price. The "bid guarantee" must consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of the bid, execute such contractual documents as may be required within the time specified.

(b) A performance bond on the part of the contractor for 100 percent of the contract price. A "performance bond" is one executed in connection with a contract to secure fulfillment of all the contractor's obligations under such contract.

(c) A payment bond on the part of the contractor for 100 percent of the contract price. A "payment bond" is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

§200.326 Contract provisions.

The non-Federal entity's contracts must contain the applicable provisions described in Appendix II to Part 200—Contract Provisions for non-Federal Entity Contracts Under Federal Awards.

SUBRECIPIENT MONITORING AND MANAGEMENT

§200.330 Subrecipient and contractor determinations.

The non-Federal entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. Therefore, a pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. The Federal awarding agency may supply and require recipients to comply with additional guidance to support these determinations provided such guidance does not conflict with this section.

(a) *Subrecipients*. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. See §200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

(1) Determines who is eligible to receive what Federal assistance;

(2) Has its performance measured in relation to whether objectives of a Federal program were met;

(3) Has responsibility for programmatic decision making;

(4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and

(5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

(b) *Contractors*. A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See §200.22 Contract. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds:

(1) Provides the goods and services within normal business operations;

(2) Provides similar goods or services to many different purchasers;

(3) Normally operates in a competitive environment;

(4) Provides goods or services that are ancillary to the operation of the Federal program; and

(5) Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

(c) Use of judgment in making determination. In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the

characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

APPENDIX II TO PART 200—CONTRACT PROVISIONS FOR NON-FEDERAL ENTITY CONTRACTS UNDER FEDERAL AWARDS

In addition to other provisions required by the Federal agency or non-Federal entity, all contracts made by the non-Federal entity under the Federal award must contain provisions covering the following, as applicable.

(K) Contracts for more than the simplified acquisition threshold currently set at \$150,000, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

(L) All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.

(M) Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

(N) Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction"). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland "Anti-Kickback" Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

(O) Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a

standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

(P) Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of "funding agreement" under 37 CFR §401.2 (a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that "funding agreement," the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements," and any implementing regulations issued by the awarding agency.

(Q) Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended—Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

(R) Debarment and Suspension (Executive Orders 12549 and 12689)—A contract award (see 2 CFR 180.220) must not be made to parties listed on the governmentwide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

(S)Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)—Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.

(T)See §200.322 Procurement of recovered materials.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75888, Dec. 19, 2014]

POLICY AND PROCEDURE

TITLE: Online Instructor Response Time

PURPOSE: To delineate and establish the minimum allowed time for an instructor to respond to a student online request, inquiry, question, or comment.

RESPONSIBILITY: It is the responsibility of every faculty member delivering a fully online, hybrid, or blended course, Director of Distance Education, VP of Academic Affairs, and Executive Director to ensure compliance with this policy.

APPLICABILITY: All Praxis Institute faculty member delivering a fully online, hybrid, or blended course.

POLICY: Because the classroom for an online course is the web-based learning platform students need to clearly know when they can communicate with their instructor. Providing this information helps students and the instructor in a variety of ways.

- Community and solid teacher-student relationships are essential to learning. Most students learn the most and can learn most easily when they are part of a learning community that exchanges ideas and dialogues about course content. And they become engaged and connected to a course when they believe their instructors care about their learning. Both community and teacher-student relationships are built through communication.
- Clear expectations are also important for student learning and for the effective and efficient management of a course by the instructor. If students don't know what is expected of them, how can they meet course objectives? And if they don't know what to expect from their instructors, how can they effectively communicate with them? Providing students with clear expectations about how and when the instructor will communicate with them and when they can expect the instructor to respond when they contact him/her keeps everyone on the same page and usually helps avoid miscommunication.

In fully online or blended courses, there is no true "start" and "stop" time concerning classwork. When an email is sent to an instructor or an assignment is submitted, it can be tempting for students to expect an immediate response or grade (after all, many activities that take place on the Internet are immediate). Therefore, setting expectations early is important. When a student sends a message to the instructor, do they know when to expect a response? Do students know how and when they will receive feedback about their submitted work? Clearly stating when and how students should expect to hear from the instructor since the start of the course sets clear expectations and reduces confusion from day one.

PROCEDURE:

- 1. Praxis establishes a period of 24-48 hours as the minimum allowed time for an online instructor to respond to a student online request, inquiry, question, or comment, excluding weekends.
- 2. ALL classes' syllabi will include a section with a clear statement about professor response time expectation.
 - a. Here is a suggested syllabi statement:

"Please adhere to the following guidelines: Always use Praxis' domain email for course issues, questions, or inquiries. Be sure to insert your name in the first line of your e-mail and in any attached document. As per institution policy, please allow 24-48 hours for a reply. If you have not received a response from me in 48 hours send another request or text me at [phone number here]. When texting please include your full name, use full sentences, and avoid slang terms. If I notice that my reply will be too long, I may ask you to call me, but <u>always text first</u> and wait for a reply."

ADMISSIONS

POLICY AND PROCEDURE

TITLE: Advisement and Testing

PURPOSE: Establish services to provide student support that will help them in satisfying their educational objectives.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Admission's Department Staff, Programs Directors, and entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered and pursuing higher education at The Praxis Institute.

POLICY:

During enrollment at The Praxis Institute, students are encouraged, and sometimes required, to see an advisor when they encounter academic problems or contemplate a change in educational goals. In addition to helping students chart their educational and professional careers, advisors work with students to resolve problems affecting academic performance. Students may be referred for testing or to community agencies when appropriate, as a means to aid decision-making.

POLICY AND PROCEDURE

TITLE: How to Apply

PURPOSE: To establish application and admission procedures.

RESPONSIBILITY: It is the responsibility of the Campus Director, Programs Directors, and Admissions Office to ensure compliance with this policy.

APPLICABILITY: This policy applies to all students.

POLICY:

A. The application for admission should be completed prior to the beginning of the term of enrollment. A \$100.00 non-refundable application fee is charged for processing a student's first application.

B. Official transcript(s) from the applicant's high school, institution or other postsecondary educational institution are required.

C. High school equivalency diploma or certificate holders should provide the original document and score report (which will be returned). In Florida, this certificate is the General Education Development Diploma.

D. Follow the steps below to begin the application and admission process:

a. Meet with the program director or faculty member and review admission requirements and the Selective Admission process.

b. Establish a target year to begin the technical coursework.

Application Process

Complete an Admission packet and submit it to the admissions office nine to ten months before year in which student wish to begin taking the AS technical courses.

□ Follow all of the directions on the Admissions packet – Incomplete packets will be returned to the applicant.

□ The admission packet will be reviewed.

Questions regarding status of packet should be directed to the Admissions office.

Admission Process

Receive admission letter from the Admissions office.

□ Follow all listed steps to hold position in the program by the date indicated on the acceptance form.

□ For AS Programs - Attend mandatory orientation, which will be scheduled prior to the start date.

□ Complete all health information and clinic observation prior to the start of the semester.

Candidates applying to AS programs need to be aware that AS programs may receive more applicants than can be accepted, so the admissions process is a selective and a competitive one. Student is encouraged to follow the application procedures carefully and be sure that all information in application file is complete to assure that application will be considered.

Failure to submit all necessary admissions credentials, transcripts or certifications will prevent registration, release of grades, transcripts or enrollment certification.

POLICY AND PROCEDURE

TITLE: Recruitment and Admission Process

PURPOSE: To set out the framework within which the Institution will operate in this area.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Program Director, Admission Department and entire faculty to ensure compliance with this policy.

APPLICABILITY: Entire organization

POLICY:

"Institution recruitment practices are as distinctive as the scope and breathe of the more than 3,200 accredited institutions and universities in the United States. With more than 2.5 million students matriculating to a institution campus for the first time each year, the role and responsibility of admission and enrollment personnel in higher education has become increasingly critical to the success of the institutions and the experience of the student." – Source: www.stateuniversity.com

The Institution has committed itself to operate its admissions and recruitment process in a way that is transparent and justifiable with procedures that are fair, clear, explicit and consistently applied for all students on all programs.

1. Roles and Responsibilities

Overall responsibility for the Institution's admissions and recruitment activity lies with the Executive Director

All Institution departments have a role and responsibility in relation to the recruitment and successful admission of students. The general precepts are outlined in this document with more detailed information in the associated procedures documents.

Whether students are recruited centrally through the admissions department or by those in the department with delegated responsibility, it will be clear which member of the Institution's staff is responsible for each part of the admissions process. All involved with the admissions process will have been adequately trained to undertake their role

2. Promotion, Recruitment and Selection

All application forms used within the Institution have to be approved by the Executive Director and the Governing Board.

All Institution marketing material will be accurate, kept up to date, be available at the correct point of the recruitment cycle and formats accessible to enquirers and applicants. The purpose of this material is to assist enquirers and applicants in their decision-making process.

Academic departments (either individually or collectively) will give enquirers/applicants the opportunity to:

- Visit the Institution campus where they will be taught
- Know the cost of their chosen program and sources of financial support

Selection policies and procedures will be clear to enquirers/applicants and followed fairly, courteously, consistently and expeditiously.

Applicants will be given the opportunity to gain feedback concerning the result of their application.

The Institution's admissions processes will be set within fully documented operational procedures which are readily accessible to all those involved in the process. These will include:

- Indicating who is responsible for each stage of the admissions process
- Procedures for the efficient and timely handling of applications. Applicants should have an indication of how long the process is going to take
- Operating within the Institution's confidentiality statement

Among the strategies utilized by the institution we'll find:

- Visits to High Schools in Primary Markets
- Hosting Campus Visits with prospective students
- Institution Fairs
- Alumni referrals
- Marketing materials

3. Information for Applicants

Applicants must know the obligations placed on them if they get accepted into a program at the Institution. This information must be available by the time an offer of acceptance is made.

The Institution reserves the right to revoke an offer of acceptance if:

• information provided by an applicant proves to be false ;

• if an applicant is shown to have been involved in activity that is not compatible with being a student on the program for which the applicant has applied.

Significant changes to advertised programs (between an offer being made and registration) must be conveyed to applicants as a matter of priority.

Academic departments (either collaboratively or individually) will explain to applicants the specific arrangements to complete admission process and enrolment.

POLICY AND PROCEDURE

TITLE: Transfer of Credits

PURPOSE: Establish criteria for the acceptance of credits earned in other higher education institutions.

RESPONSIBILITY:

It is the responsibility of the Executive Director, the Admission representative, the Program Director and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all potential candidates applying to be admitted

to TPI.

POLICY:

The Praxis Institute (TPI) awards transfer credit according to the guidelines established. The institutions reserves the right to accept or reject credits earned at other institutions of higher education. In general, it is the institutions policy to only accept general education credits earned at institutions fully accredited by their regional accrediting association for colleges and universities, provided that such credits have been earned through university-level courses appropriate to the associate degree program at TPI.

PROCEDURE:

- 1. The basic policy regarding the acceptance of courses by transfer is to *only* allow credit for general education courses completed with satisfactory grades (C or better) in other accredited colleges provided the courses correspond in time and content to the equivalent courses offered as part of the program.
- 2. For international students only official transcripts in conjunction with official report from a state approved evaluative agency may be used to evaluate and/or award credit.
- 3. Course work that is more than five years old will not be considered for credit transfer.
- 4. TPI reserves the right to test proficiency of any student in course work transferred from other institutions and to disallow credit in courses in which the student cannot demonstrate acceptable proficiency.
- 5. TPI does not grant credit for professional certificate programs, life/work experience, or portfolios work.
- 6. The following items are among other circumstances in which credit is NOT granted:
 - Remedial Courses

- Courses with essentially non-academic contentVocational courses
- Non-credit courses
- Learning support courses

TITLE: Student Transferring between AS Programs within the institution

PURPOSE: Establish criteria for the acceptance of student transferring between AS programs within the institution.

RESPONSIBILITY:

It is the responsibility of the Admissions Office, Programs Directors, and faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students in AS programs.

POLICY:

Transferring between AS programs within the institution is only allowed between programs at the same degree level (associate). Any student from within the institution that desires to enter into a new AS program must apply for admission, follow the admission process and satisfy admission requirements. No credit transfer will be considered in-lieu of program's core technical courses.

TITLE: Acknowledgement of Expired Documents (Health Insurance or PPD Test) in Student's File

PURPOSE: To establish mechanisms to enforce student accountability for timely submission and maintaining paperwork current in students' file.

RESPONSIBILITY:

It is the responsibility of the Programs Directors, and ACCE/AFC to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the PTA/OTA Programs and its student body.

POLICY: Student acknowledges and accepts full academic responsibility for late submission of required documents that are not current or have expired (Health Insurance or PPD Test). Failure to submit paperwork will preclude the student to advance within the program, be placed in a clinical site or complete a clinical rotation, even if the student is in good academic stand.

ACCE/AFC and PD will notify the student of the incomplete file. Student will sign acknowledgment form.

Attached

Acknowledgement of expired documents necessary for Clinical Rotation

I ______acknowledge that my student file contains critical documents that have expired. This paperwork is necessary for the completion of the upcoming clinical rotation. I also confirm that the program director, and/or ACCE/AFC notified me of the incomplete file.

I understand and accept the potential risk of not being able to progress within the program or complete the clinical rotation if updated documents are not submitted by

Student's Signature

ACCE/AFC Signature

Witness

TITLE: Student Confidentiality

PURPOSE: To establish procedures to ensure student confidentiality.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all TPI program's registered students.

PROCEDURE:

Faculty will take special precautions to ensure all communication regarding student academic and clinical performance is kept private and confidential. Examinations and student immunization records are kept in students' file in registrar's office.

TITLE: Institution's General Admission Requirements

PURPOSE: To establish process to govern admission procedures

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

PROCEDURE:

ADMISSION PROCEDURES

Applicants for admissions are encouraged to visit The Praxis Institute in person. At the time of the interview, the prospective student will receive a complete orientation of the program chosen, goals, objectives, school services, requirements, cost and duration. The applicant will also receive a complete tour of the facilities and may attend a class for the day if he or she so desires.

Based upon entrance criteria as well as any other circumstances, which may be applicable to the admission process, approval for admission is granted or denied at the Campus Director.

All documents copies received in order to establish eligibility will become property of the school and will not be returned to the student.

GENERAL ADMISSION REQUIREMENTS

- 1) The applicant must be a high school graduate, have a GED equivalent diploma, or a School Certification.
- 2) Applicants must be at least eighteen (18) years of age.
- 3) Applicants receive an orientation about the institution's requirements, explanation of enrollment agreement, and sign it.

TITLE: Learning Supplies Receipts

PURPOSE: To establish procedures to document distribution of learning supplies to students of non-degree programs.

RESPONSIBILITY:

It is the responsibility of the Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to Non-Degree Programs.

PROCEDURE:

During admission process, upon receiving program's learning supplies the student will complete and sign the "Learning Supplies Receipt". Signed receipt will become part of the student's permanent record.

Attached.

LEARNING SUPPLIES RECEIPT DENTAL ASSISTANT PROGRAM

Student's Name:

DATE	DESCRIPTION	SIGNATURE
	1 Dental Assistant Book	
	2 Uniform	
	1 Bag	

LEARNING SUPPLIES RECEIPT Advanced therapeutic & clinical massage

Student's Name:

DATE	DESCRIPTION	SIGNATURE
	Massage Therapy Principle & Practice	
	Uniform	
	Bag & Massage Kit	
	Complete Review Guide	
	Neuro-Muscular Binder	
	Neuro-Muscular Kit	
	Sport Massage Binder	
	Sport Massage Book	
	Deep Tissues Binder	
	Deep Tissues Book	
	Drainage Lymphatic Binder	
	Clinical Rehabilitation Binder	

LEARNING SUPPLIES RECEIPT THERAPEUTIC MASSAGE TECHNICIAN PROGRAM

Student's Name: _____

DATE	DESCRIPTION	SIGNATURE
	Uniform	
	Massage Therapy Principles & Practice	
	Complete Review Guide	

LEARNING SUPPLIES RECEIPT PHARMACY TECHNICIAN

Student's Name: _____

DATE	DESCRIPTION	SIGNATURE
	Uniform (2)	
	Pharmacy Tech Principles & Practice Book	
	Pharmacy Tech Workbook Lab	
	Bag	
	Calculator	

THE PRAXIS INSTITUTE LEARNING SUPPLIES RECEIPT PATIENT CARE TECHNICIAN

Student's Name: _____

DATE	DESCRIPTION	SIGNATURE
	Uniform (2)	
	Fundamentals Concepts and Skills for the	
	Patient Care Technician	
	EKG Textbook: Theory and Practical	
	Approach	
	Phlebotomy Textbook: Theory and	
	Clinical Approach	
	Bag	

TITLE: Selection of Non-Degree Programs

PURPOSE: To establish admission process to document student receiving information about non-degree programs and choosing a program during admission.

RESPONSIBILITY:

It is the responsibility of the Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

PROCEDURE:

During admission process student will receive, complete, and sign the form documenting being informed about the different non-degree programs available at TPI, and his/her program selection.

Attached.

ELECCION Y/O CAMBIOS DE PROGRAMA

Por la presente dejo constancia que luego de haber recibido información sobre duración costo y contenido correspondientes a los programas de The Praxis Institute, he decidido matricularme en el programa de:

- ____Masaje Terapéutico (540 Horas) MT
- Masaje Terapéutico y Clínico Avanzado (750 horas) AT Asistente
- Dental (900 horas) DA
- Técnico en Farmacia (900 horas) PhT

Dejo en conocimiento que de acuerdo a la política de The Praxis Institute, solamente podré cambiar el programa que elegí por otro programa, en un periodo de 30 días, teniendo en cuenta la duración y costo de los diferentes programas.

Dejo constancia que estoy en conocimiento que de acuerdo a la política de The Praxis Institute, solamente podré completar las (300 horas) de la especialidad del programa avanzado en Masaje Terapéutico, si ya tengo 600 horas realizadas en esta escuela o en cualquier otra escuela acreditada dentro de los Estados Unidos.

Nombre del interesado

TITLE: Admission Procedures

PURPOSE: To establish process to govern admission procedures

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

PROCEDURE:

Evidence of High School Completion

The candidate must provide one of the following documents that will indicate his/her high school completion status when starting at The Praxis Institute:

- Original high school diploma
- Official high school transcripts that prove the date when the diploma was awarded
- State certificate or transcript received after completing a State-authorized examination (GED

test, HiSET, TASC, or other State-authorized examination) that the State recognizes as the equivalent of a high school diploma

- Home schooled Credential or Transcript*
- If secondary education was completed in a foreign country, an original High School Diploma is required

• Be at least 18 years old or possess a high school diploma from an accredited high school or GED certificate,

• The Praxis Institute reviews each Diploma (Doc: Report of Evaluation of

Educational Credentials). Each document is approved and signed by the Director of Distance Education and Notarized by a Notary Public in the State of Florida.

Contact the financial aid office if you are unable to obtain the documentation listed above.

* If you were home schooled in a state where state law does not require you to obtain a secondary school completion credential for home school (other than a high school diploma or its recognized equivalent), a transcript or the equivalent, signed by your parent or guardian, that lists the secondary school courses you completed and included a statement that you completed a secondary school education in a home school setting.

HSC. Policy and Procedures. 04.27.2018. 12:05PM

TITLE: Externship Non-Degree Programs

PURPOSE: To establish process to govern the externship process for non-degree programs

RESPONSIBILITY:

It is the responsibility of the Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled in any non-degree program that has an externship portion.

PROCEDURE:

During admission process, all students enrolling in a non-degree program that requires completion of externship hours for graduation, will complete and sign the Externship Form. Signed form will become part of the student's permanent file.

Attached.

THE PRAXIS INSTITUTE Admissions Application Externship

As part of your Program, please be advised that in order to graduate you must complete your externship hours. Your Program Coordinator will assign a site where you must regularly attend for the scheduled hours and time duration.

Your daily attendance is what the program is seeking for on the field training as part of your required skills to enter the workforce as a professional in your new career.

As part of your training, it is the institution's policy to have you submit every Friday the hours completed at the externship site. This form has to be completed by your site Supervisor and you, the student, as this process will formally record the hours and activities completed.

Is your responsibility to turn in the report which supports your clinical rotation/externship hours completed.

If you fail to complete your practice hours or fail to turn in the completed hours, fail attendance without any prior authorization for absence, the institution will process your drop.

Your signature below acknowledges you have been advised of the institution's policy where Externship is a requirement for graduation.

Signed this _____ day of ______ Year _____.

Admissions Officer

Student

TITLE: Family Right and Privacy Act – "Buckley Amendment" Forms

PURPOSE: To establish process to govern admission procedures.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

All students, during the admission process, will sign the "Family Right and Privacy Act"; and the "FERPA" forms. Signed forms will become part of the permanent content of the student's file.

Attached.

FAMILY RIGHT AND PRIVACY ACT

"Buckley Amendment" forms

The Praxis Institute complies with the confidentiality and student accessibility provisions of the Family Right Act of 1974 (P.L. 93-380, Section 438), commonly known as the Buckley Amendment. Confidentiality of student's records is strictly protected. Information on students is not available to anyone without (a) written request/release from the student, (b) a court order, or © accreditation agency requirements. However, parents of minor students and guardians of "tax dependent" students have the right to inspect and challenge the information contained within the records of a specific student.

ACTO DE DERECHO Y PRIVACIDAD

Forma "Enmienda Buckley"

The Praxis Institute, cumple con las provisiones del acta de derecho y privacidad de la Familia del año de 1974 (P.L. 93-380), Sección 438 conocida comúnmente como la enmienda de Buckley. La confidencialidad de los récords del estudiante serán estrictamente protegidos. Los récords no están disponibles para nadie, salvo pedido por escrito del estudiante, orden judicial, o agencias acreditadoras. Los padres de un menor o tutores tienen derecho de inspeccionar la información contenida en los récords.

BY SIGNING BELOW, I ACKNOWLEDGE THAT I READ AND UNDERSTOOD THE ABOVE STATEMENTS.

DECLARO QUE HE LEIDO Y ENTENDIDO LO ESCRITO MAS ARRIBA Y PONGO MI FIRMA EN Señal DE CONFORMIDAD.

Student's Signature: _

Firma del Estudiante:_____Date/Fecha:_____

<u>THE PRAXIS INSTITUTE</u> <u>Notification of Rights</u> <u>Under The Federal Education Rights and Privacy Act</u>

The Family Educational Rights and Privacy Act (FERPA) afford students certain rights with respect to their education records. They are:

- 1. The right to inspect and review the student's education records within 45 days of the day The Praxis Institute receives a request for access. Students should submit to the Student's Records Officer written requests that identify the record(s) they wish to inspect. The institutional official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by institutional official to whom the request is submitted, that official shall advise the student of the correct official to whom the request should be addressed.
- 2. The rights to request the amendment of the student's education records that the student believes are inaccurate or misleading. Students may ask The Praxis Institute to amend a record that they believe is inaccurate or misleading. They should write the institutional official responsible for the record, clearly identify the part of the record they want changed and specify why it is inaccurate or misleading. If The Praxis Institute decides not to amend the record as requested by the student, The Praxis Institute will notify the student of the decision and advise the student of his/hers right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.
- 3. The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent. One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official is a person employed by The Praxis Institute in an administrative, supervisory, academic or research or support

staff position (including law enforcement unit personnel and health staff); a person or company with whom The Praxis Institute has contracted (such as an attorney, auditor or collection agent); a person serving on the board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee or assisting another institutional official in performing his/hers tasks. An institutional official has a legitimate educational interest if the official needs to review an education record in order to fulfill his/hers professional responsibility.

4. The right to file a complaint with the U.S. Department of Education concerning failures by The Praxis Institute to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington DC, 20202-4605

The "U.S.A. Patriot Act", which was effective October 26, 2001, established the following exceptions relative to the release of information from institutional files:

<u>Ex Parte Orders</u> The Praxis Institute can disclose, without the consent or knowledge of a student or parent, personally identifiable information from a student's records to representatives of the Attorney General of the United states in response to an ex parte order in connection with the investigation or prosecution of terrorism crimes. An ex parte order is an order issued by a court without notice to an adverse party. When The Praxis Institute makes a disclosure pursuant to an ex parte order, it is not required to record that disclosure of information in the student's file.

<u>Lawful Issues Subpoenas and Court Orders</u> In the following three contexts, an institution can disclose, without consent, information from a student's education records in order to comply with a lawfully issued subpoena or court order:

- 1- Grant Jury Subpoenas
- 2- Law Enforcement Subpoenas- For these subpoenas, the court may order The Praxis Institute not to disclose to anyone the existence or contents of the subpoena or our response. If the court so orders, neither the prior notification requirements nor the recording requirements would apply.

<u>Health or Safety Emergency</u> The Praxis Institute is permitted to disclose personally identifiable information from a student's education record without the written consent of the student in the case of an immediate threat to the health or safety of students or others individuals. This is limited to a situation that presents imminent danger or to a situation that required the immediate need for disclosure to avert or diffuse serious threats to the safety of a student or other individuals.

<u>Disclosures to the Bureau of Citizenship and Immigration Services</u> The Praxis Institute may release personally identifiable information of a student who has signed a Form I-20 and any student attending on an M-1 or J-1 visa to the BSIC.

Student Signature

Date

Notificación the Derechos Bajo La Ley Federal de Educación y Derechos

La Ley de Familia a los Derechos de Educación y Privacidad provee a los estudiantes ciertos derechos con respecto a sus récords. Estos son:

- 1. El derecho a mirar y revisar los récords de educación del estudiante dentro de los 45 días a partir del DIA que The Praxis Institute recibe el pedido de acceso. Los estudiantes deberán someter el pedido por escrito al Oficial encargado de identificar que récords desean revisar. El oficial de la institución deberá hacer los arreglos para cumplir con el pedido y notificar al estudiante la hora y el lugar donde los récords podrán ser inspeccionados. En el caso que los récords no sean mantenidos por el oficial de la institución al que se le hizo el pedido, este deberá asesorar al estudiante a quien debe dirigir su pedido.
- 2. El derecho a enmendar los récords de educación del estudiante en el caso que este considere que no son correctos o falsos. Los estudiantes pueden solicitar a The Praxis Institute que arregle los récords si estos consideran que no son correctos o falsos. Ellos deberán escribir quien es el oficial responsable de llevar los récords, claramente identificar que parte del record quieren que sea cambiada y especificar el motivo por el cual no es correcto o falso. En el caso que The Praxis Institute decida no enmendar el record como fue solicitado por el estudiante, The Praxis Institute notificara al mismo de su decisión y asesorara a el/ella de su derecho a un juicio relacionado con su pedido de arreglo. Información adicional relacionada a los procedimientos del juicio le serán provistos al estudiante cuando se le notifique de su derecho a un juicio.
- 3. El derecho a dar su consentimiento para que se exteriorice información personal identificable contenida en su record de educación hasta donde esta ley permita informar sin su consentimiento. Una excepción que permite que se exteriorice información sin consentimiento, es a oficiales de la institución con legítimos intereses educativos. Un oficial de la institución es una persona empleada por The Praxis Institute como administrador,

supervisor, académico o asistente de algún administrador (incluido agentes de la ley o personal relacionado con la salud); una persona o compañía la cual The Praxis Institute a contratado (como ser un abogado, auditor o agente de colecciones); una persona relacionada con los dueños, o un estudiante que está dentro de un comité oficial, como ser disciplinario o de quejas o asistiendo a otro oficial de la institución en hacer su tarea. Un oficial de la institución tiene un interés legítimo en los récords educativos y necesita revisar los récords de educación para poder cumplir su responsabilidad profesional.

4. El derecho a realizar una queja con el U.S. Department of Education relacionado con fallas de The Praxis Institute en cumplir con los requerimientos de esta ley. El nombre y dirección de la oficina que administra FERPA es: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington DC, 20202-4605

El "U.S.A. Patriot Act", que fue efectiva a partir de Octubre 26, 2001, establece las siguientes excepciones relacionadas con dar información de récords de la institución:

<u>Ex Parte Orders</u> The Praxis Institute puede dar información sin el consentimiento o conocimiento de un estudiante o sus padres, información personal identificable del record del estudiante a representantes del Fiscal General de los Estados Unidos en respuesta de un ex parte order en conexión con la investigación o juzgamiento por crímenes de terrorismo. Un ex parte orders es una orden emitida por una corte sin notificar a la parte contraria. Cuando The Praxis Institute da información debido a un ex parte order, no es necesario que archive o anote esa información en el record del estudiante.

<u>Orden judicial de comparecer</u> Dentro de los siguientes tres contextos, una institución puede dar información, sin consentimiento, información del record de educación de un estudiante para cumplir con una orden judicial de comparecer:

- 1- Orden de un Gran Jurado
- 2- Orden de comparecer de agentes de la ley- la corte puede ordenar a The Praxis Institute no informar a nadie de la existencia o contenido de esta orden o su respuesta. Si la corte así lo ordena ni los requerimientos de notificación anteriores o los requerimientos de mantener la información aplicaran.

Salud o Emergencia de Seguridad The Praxis Institute tiene permitido exteriorizar información personal identificable sobre los récords de educación de un estudiante sin consentimiento escrito del mismo en caso de un peligro inminente hacia la salud o seguridad de estudiantes u otros individuos. Esto se limita a una situación que representa un peligro inminente o a una situación que requiere que se manifieste rápidamente para prevenir o difundir una situación peligrosa para la seguridad de un estudiante u otros individuos.

Información al Bureau of Citizenship and Immigration Services The Praxis Institute puede proveer información personal identificable de un estudiante que ha firmado la Forma I-20 y cualquier estudiante que asista bajo una M-1 o J-1 visa a la agencia antes mencionada.

Firma del Estudiante

____/_____ Fecha

TITLE: Student Orientation Checklist

PURPOSE: To establish process to govern admission procedures

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

All students, during the admission process, will receive a general institutional orientation. Student will sign the "Student Orientation Checklist" acknowledging receiving, reading, and understanding the content discussed and/or read. Signed forms will become part of the permanent content of the student's file.

Attached.

STUDENT ORIENTATION CHECKLIST

I,______, Enrolled at The Praxis Institute, acknowledge that I am in receipt of the following information. I further acknowledge that I have read the information, and I understand its contents and requirements. Should I have any questions concerning any of this information, or any other policies & procedures of the institution; I agree to ask an appropriate school official for advice.

Yo,_____, me he matriculado en The Praxis Institute, dejo constancia de que he recibido la siguiente información. Además reconozco que he leído la información, y que entiendo su contenido. Si tuviera alguna duda referente a cualquiera punto de esta información, o de la política y procedimientos de la institución, estoy de acuerdo en preguntarle sobre la misma a la persona apropiada para su aclaración o consejo.

- [] Admissions requirements
- [] Program objective
- [] Cost of programs
- [] Possible initial salary in the profession
- [] Academic information
- [] Class schedule
- [] School catalog
- [] Academic policies & procedures
- [] Job search assistance pledge
- [] Enrollment agreement
- [] Payment schedule
- [] Staff & faculty members
- [] Administrative office hours
- [] Graduation requirements
- [] Students services
- [] Drug free place
- [] Alcohol free place
- [] Crime statistics

- [] Requisitos de admisión
- [] Objetivos del programa
- [] Costo de los programas
- [] Salario inicial en esta profesión
- [] Información académica
- [] Horario de clase
- [] Catalogo de la escuela
- [] Política y procedimientos académicos
- [] Ayuda en la asistencia laboral
- [] Contrato
- [] Acuerdo de pago
- [] Administración e instructores
- [] Horario de la administración
- [] Requisitos para graduarse
- [] Servicios para el estudiante
- [] No drogas en la escuela
- [] No alcohol en la escuela
- [] Estadísticas de crímenes

Student's signature

/	/	
Date		

TITLE: Admission by Exception (A.S. Programs)

PURPOSE: To establish guidelines that will govern process for admission by exception.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Programs Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all candidates being considered for admission to The Praxis Institute.

POLICY:

Admission by Exception is the process by which the institution may admit a small proportion of applicants who have not fully achieved eligibility based on the established admission criteria, but demonstrate high potential for academic success and leadership. Admission by exception only applies to General Education courses.

The Guidelines present 5 principles, summarized as:

- 1. Campus-level flexibility in admissions is essential to the Institution.
- 2. Admission by exception into General Education courses does not confer guaranteed admission to a program.
- 3. Admission by Exception provides a means to identify students who do not meet numerical requirements for eligibility but who demonstrate strong likelihood of success at TPI or exceptional potential to contribute to the community and their chosen career.
- 4. Coordination of Admission by Exception with Comprehensive Review should guard against the unlikely event that applicants the campus determines to be less qualified for TPI are admitted instead of applications the campus determines to be more qualified. But, lack of an eligibility criterion must not automatically classify a potential student as non-competitive.
- 5. Admission by Exception also permits campuses to seek improvement in admission procedures by applying alternative criteria to small numbers of applicants and monitoring those students' subsequent performance at TPI.

The Guidelines also recommend periodic reviews of the procedure, to ensure that students admitted through the process are maintaining satisfactory academic success that the goals of the process are being met, and that Institution policies are being followed.

The Guidelines differentiate 5 categories of potential applicants that could qualify for this process:

- 1. Applicants who have overcome personal challenges that have affected their ability to meet TPI eligibility requirements but demonstrate strong potential for success at TPI.
 - a. The admission review system takes into account several measures of challenge, such as being a first-generation college student, coming from a low-income family, or attending an under-performing high school. Applicants in this category that receive a comprehensive review score, may be admitted by exception after qualitative review.

When an applicant requests consideration due to a disability, the case will be reviewed in collaboration with the Program Director and the VP of Academic Affairs.

- 2. Applicants from nontraditional high school settings, like home schooling, that have adversely affected their ability to complete TPI eligibility requirements, but who nonetheless demonstrate strong potential for success at TPI.
 - a. The Office of Admissions is directed to use its best judgment in conservatively converting nontraditional records into the campus' comprehensive review system. Applicants in this category that receive a comprehensive review score, may be admitted by exception after qualitative review.
- 3. Applicants who demonstrate extraordinary talent in a specific academic area such as mathematics, writing, science, or language.
 - a. The comprehensive review system considers exceptional achievements in a specific subject area, regardless of eligibility, as well as points for regional, statewide, and national academic accomplishments. Applicants in this category that receive a comprehensive review score, may be admitted by exception after qualitative review.
- 4. Applicants who demonstrate other exceptional talent, accomplishment, or potential in specific areas such as performing arts, athletics, leadership, or contribution to the community.
 - a. The comprehensive review system includes points in these areas, regardless of eligibility. Applicants in this category that receive a comprehensive review score may be admitted by exception after qualitative review.
- 5. Applicants who have achieved academically at a level equivalent to those of TPIeligible applicants but who have narrowly missed meeting no more than 2 of TPI's eligibility criteria, generally for a technical reason such as a late transcript submission, missing a Gen Ed grade that is not pre-requisite for

another course, etc. when the applicant has otherwise demonstrated proficiency.

a. Applicants in this category that receive a comprehensive review score may be admitted by exception after qualitative review. Some applicants enter this category as 'administrative commitments'.

TITLE: High School Validation

PURPOSE: Delineate admission procedures to validate authenticity of high school diplomas prior enrollment.

RESPONSIBILITY: It is the responsibility of the Admission Representative, Director of Distance Education, and Executive Director to ensure compliance with this policy.

APPLICABILITY: All students admitted to Praxis Institute.

POLICY:

If during the admission review of documents process the high school information appears to be questionable, for example (age and date of graduation are not reasonable, or the documentation doesn't look official, etc.) an official transcript will be requested and evaluated by the admissions representative and the director of distance education prior to enrolling the student.

PROCEDURE:

The Director of Distance Education and/or the admissions representative will look the school up by going to the website to see if it is an online high school, if not the Director of Distance Education will verify the school is licensed by the state and the website indicates a physical address in a building with a valid address. The website will be checked to determine if the requirements for graduation appear to be in line with the state requirements for graduation, and the student must complete courses in a reasonable time frame (not just pay a fee and get the diploma for not really completing academic requirements.) If the school claims to be accredited, the accreditation website will be checked to determine the date accreditation was granted. However, diplomas from unaccredited high schools can be valid and qualify students to receive FSA funds. A student's self-certification is not sufficient to validate a high school diploma that is in question. If there is conflicting information between the student's certification on the FAFSA and other documentation or information received from the student, the institution will resolve the conflict.

In most cases, applicants who completed their secondary school education in a foreign country will be able to obtain a copy of their foreign high school diploma or transcript. Applicants may also document their high school completion status by obtaining a copy of a "secondary school leaving certificate" (or a similar document) from the Ministry of Education in the country where they completed secondary school. For assistance in obtaining documentation of their secondary school education completion, applicants may contact the foreign high school, the Ministry of Education or that country's consulate in the United States. There may be rare cases where it is impossible for a refugee, an asylee, or a victim of human trafficking to obtain documentation of his or her completion of a secondary school education in a foreign country. Therefore, in these rare cases, applicants must submit to the institution:

- 1. Proof of their attempt to obtain documentation of their completion of a secondary school education in a foreign country, i.e., a copy of an e-mail or letter, including proof of mailing.
- 2. A signed and dated statement that indicates that the applicant completed his or her secondary school education in a foreign country, the name and address of the foreign high school where the applicant completed the secondary school education and the date when the foreign high school diploma was awarded.
- 3. A copy of the entry status documentation that identifies the applicant's current or prior status as a refugee, an asylee, or as a victim of human trafficking and who entered the United States after the age of 15.

In rare cases, the school in another country may be closed due to natural disaster. Praxis Institute will document calls made to the state/country to determine if the school has closed or that information is not available due to political unrest. In that case, the student will sign an affidavit indicating that they graduated, the name of the school, country, and date. <u>Required Verification</u> If the student is selected for Verification under V-4 or V-5, alternate documentation must be provided. In this instance, effective 7/1/16, selfcertification is not acceptable.

FINANCIAL AID

TITLE: Awarding of Federal Aid Programs

PURPOSE: To establish process to govern the awarding of federal aid programs.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Financial Aid Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

Federal student aid is awarded on the basis of need for each applicant.

Need is the difference between the cost of education (educational expenses such as tuition, fees, room, board, books, supplies, and other expenses) and the amount the student and his/her family can afford to pay for the student's education.

Need is determined by a standard formula which uses the information from the free application for Federal Student Aid. More detail can be found in The Student Guide (Guía de programas federales de ayuda estudiantil) that is available in the financial aid office or by meeting with the financial aid officer.

Procedures regarding the approval, disbursement, and delivery of Title IV funds, as well as the preparation and submission of reports to ED are the responsibility of TPI's servicer (FAME).

TITLE: Cancellation and Refund Policy

PURPOSE: To establish procedures for cancellation and refund of funds, should student be terminated or cancel for any reason.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Financial Aid Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

CANCELLATION AND REFUND POLICY: Should student be terminated or cancel for any reason, all refunds will be made according to the following refund schedule:

- 1. Cancellation must be made in person or certified mail, if possible.
- 2. All monies will be refunded if the applicant is not accepted by the school or if the student cancels within three (3) business days after signing the Enrollment Agreement and making initial payment.
- 3. Cancellation after the third (3) business day, but before the first class, will result in a refund of all monies paid; with the exception of the registration fee.
- 4. Refunds for the first time student who has not received Title IV Financial Aid will be calculated according to the standard institutional refund policy.
- 5. STANDARD INSTITUTIONAL POLICY:
 - a. The institution will refund at least 90% of the tuition if withdrawal occurs during the first 10% of the period of financial obligation.
 - b. The Institution will refund at least 50% of the tuition if withdrawal occurs between 10.1 % and 25% of the period of financial obligation.
 - c. The institution will refund at least 25% of the tuition if withdrawal occurs between 25.1% and 50% of the period of financial obligation.
 - d. No refund will be made if withdrawal occurs after 50% of the period of financial obligation.
 - The "period of financial obligation" is based on what the student is charged on their contract.
- 6. Refunds will be made within thirty (30) days of the last day of attendance if written notification has been given to the school by student. All refunds shall be made without requiring a request from the student and within thirty (30) days from the date that The Praxis Institute terminates the student or determines withdrawal by the student. In any event, all refunds shall be made within thirty (30) days of the student's last day of attendance, except: in case of leave of absence. For student that do not return from a leave of absence, refunds will be made within (30) days from the date the institution determines that the student did not return from the leave of absence. Students who withdraw will be accessed an administration fee charge of 10% or \$100.00, whichever is less.
- 7. A student can be dismissed at the discretion of the Director for unsatisfactory progress, non-payment of balance, or failure to comply with the rules. Enrollment time is defined as the time elapsed between the actual starting date and the date of the student's last day of physical attendance in the school. When situation of mitigating circumstances are in evidence, the school will adopt a policy wherein the refund to the student may exceed the minimum cancellation and settlement policy. If the school, for any reason is permanently closed and no longer offering instructions after a student enrolled, the student shall be entitled to 100% of all monies collected.
 - If a program is cancelled subsequent to a student's enrollment, the school shall al the student's option:
 - 1. Provide a full refund of all monies paid; or
 - 2. Provide completion of the program.

RETURN OF TITLE IV FUNDS:

Effective October 2000 the law now specifies how your school determine must the amount of SFA program assistance that you earn if you withdraw. Our institution will calculate the amount of Title IV aid that was earned based on a Payment period basis. Refunds will continue to be calculated by the enrollment period. The student will be obligated for any tuition, fees, books or equipment not covered by Title IV funds. The Institution will calculate the amount of Title IV aid that was earned based on a payment period basis.

Refunds will continue to be calculated by the enrollment period.

The institution will determine:

- 1. The Title IV Aid disbursed or that could have been disbursed.
- 2. The percentage of Title IV aid earned by the student.
- 3. The amount of Title IV aid earned by the student.
- 4. The total Title IV aid to be disbursed or returned
- 5. The amount of unearned Title IV aid to be returned by the school.
- 6. The amount of Title IV funds to be returned to each program by the school.
- 7. The initial amount of unearned Title IV funds to be returned by the student.
- 8. The amount of Title IV funds to be returned to each program by the student.

Refunds of unearned Title IV funds will be returned within 30 (thirty) days from the date that the institution determines that the student withdrew. **DIPLOMA:** THE PRAXIS INSTITUTE awards a Diploma to those students who have successfully completed his/her program. **PLACEMENT SERVICES:** Upon graduation from the program, the student will, without additional charges, receive the full benefit of THE PRAXIS INSTITUTE placement services, but employment is not guaranteed.

TITLE: Notification of Drop

PURPOSE: To establish process to notify student when a drop has been processed.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Financial Aid Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

Financial Aid Department will send "Notification of Drop" letter to student at the time of processing a drop.

Attached.

Fecha

Sr.(a): _____

Por la presente nos dirigimos a usted a fin de solicitarle se comunique con nuestra escuela, con vistas a su situación económica.

Adjunto, le estamos enviando una forma llamada <u>STUDENT CONTACT INFORMATION</u>, la cual debe completar y devolver a la escuela.

Esta forma es similar a la que usted completo, sobre los derechos y responsabilidades que usted asumió al solicitar un préstamo federal para estudiar. Al completarla debe poner sus datos personales actualizados, así como los de las personas que incluya como referencia.

Lamentablemente usted ha sido dado de baja en_____.

Sinceramente,

Saimy Díaz Financial Aid Officer Date

Student name

Dear: _____

This Letter is to inform you that you have been drop from the school system.

Attached find form called **STUDENT CONTACT INFORMATION**. This form must be completed and returned back to the institution. This form is similar to the one you completed, about the rights and responsibilities you assumed when you applied for a Federal student loan. When completing the form please include your updated personal data, including those listed as reference.

Unfortunately you have been drop as of ______.

Sincerely,

Saimy Diaz Financial Aid Officer

TITLE: Dependency Overrides Policy

PURPOSE: To establish procedures to perform dependency overrides.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Financial Aid Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

The Institution must ensure that dependency overrides are performed only for students having unusual circumstances and that the unusual circumstances are documented in the student's file.

A student is independent if he or she is:

- 1- 24 years of age or older by December 31 of the award year.
- 2- An orphan or ward of the court or was a ward of the court until the individual reached the age of 18.
- 3- Is a veteran of the Armed Forces of the United States.
- 4- A graduate or professional student.
- 5- A married individual.
- 6- Have legal dependents other than a spouse.

An individual who does not qualify as an independent student under one of these six categories may be considered an independent student under Section 480(d)(7) of the HEA if the student is one for whom a financial aid administrator makes a documented determination of independence by reason of unusual circumstances.

The Federal Student Aid Handbook states that if the aid administrator determines a dependency override is appropriate, a statement detailing the determination, along with supporting documentation, must be included in the student's file. Generally, third-party documentation is required. However, in rare cases where the only documentation available to the financial aid administrator is a written statement from the student, the file must include specific facts relating to the student's unusual circumstance.

None of the following conditions qualify as unusual circumstances or merit a dependency override:

1- Parents refuse to contribute to the student's education.

- 2- Parents are unwilling to provide information on the application or for verification
- 3- Parents do not claim the student as a dependent for income tax purposes.
- 4- Student demonstrates total self-sufficiency.

The dependency overrides do not carry over from one year to the next; if the student is not independent for some other reason, the financial aid administrator must reaffirm each year that the unusual circumstance persists and that an override is still justified.

Revised 01- 10-2008

TITLE: Verification of Information Provided By Applicants for Federal Student Financial Aid under the Title IV Programs

PURPOSE: To establish procedures to verify information provided by applicants for Federal Student Financial Aid under the Title IV Programs.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director and Financial Aid Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

Policies and Procedures for Verification

The Praxis Institute has developed the following policies and procedures regarding the verification of information provided by applicants for Federal student financial aid under the Title IV Programs.

1. Only those students who are selected for verification by the U.S. Department of Education or who have conflicting information in their records will be required to submit supporting documentation. In most cases, the required documentation consists of a completed Verification Worksheet and a signed United Stated Income Tax Return from the prior year. Any conflicting information in the student's file must be resolved before any financial aid may be disbursed, regardless of the student's verification status.

2. No Federal Pell Grant, Campus based, or Subsidized Direct Loan Funds will be disbursed prior to the completion of verification.

3. Students eligible to receive Pell, Campus Based or Subsidized Direct Loan will have until 120 days after their last day of attendance or August 31, whichever is earlier, to complete verification. However, in the interim, the student must have made arrangements with the school for payment of tuition and fees due or risk termination from school. After the passage of the aforementioned period, all financial aid that might have been due is forfeited.

4. When the FAFSA for a student or prospective student is selected for verification, the Financial Aid Department will send a timely message to the student's or prospective student's personal email account. The message will direct the student or prospective student to complete and submit requested documents required to confirm the accuracy of data reported on the FAFSA. At that time the student will be informed of the time parameters and the consequences of not completing the verification cycle. For a complete list of documents, please refer to the Income Verification Form.

All document requests must be completed before any financial aid can be disbursed. After verifying the new additional information that a student or prospective student submits, the Financial Aid Department may correct the FAFSA data, if necessary. If any additional discrepancies are discovered during the verification process, the Financial Aid Department may require additional information to correct the discrepancies. If a student or prospective student fails to provide the requested documentation in a timely manner, the Financial Aid Department at TPI will cancel the subsidized federal aid, and no aid will be disbursed.

The institution will notify the student or prospective student via letter if an award changes. The Institution will use as its reference the most recent Verification Guide supplied by the U.S. Department of Education. Under section 479A(a) of the Higher Education Act (HEA)TPI's financial aid office cannot adjust an applicant's cost of attendance or other data that may affect the applicant's Expected Family Contribution (EFC) prior to the applicant completing the verification.

5. If the student receives an overpayment based on providing inaccurate or conflicting information on any application and refuses to correct the information or repay the Federal funds after being counseled by the institution, the school will refer the case to the U.S. Department of Education for resolution. Unless required by the U.S. Department of Education, no Federal financial aid will be disbursed to the student.

6. Students and parents are advised that TPI must and will refer to the Office of Inspector General (OIG) any credible information indicating that an applicant for Federal Student Aid may have engaged in fraud or other criminal misconduct in connection with FAFSA applications. Common misconduct includes: false claims of independent status, false claims of

citizenship, use of false identities, forgery of signatures of certifications, and false statements of income. Note that fraud is the intent to deceive as opposed to a mistake on an application.

7. The financial aid file must be documented with the data that verification is completed.

TITLE:	Maximum Time Frame of Eligibility for Students Returning to the Same Clock-Hour Program After 180 days of Withdrawal.
PURPOSE:	To establish guidelines to govern process to determine Maximum Time Frame of Eligibility for students returning to the same clock- hour program after 180 days of withdrawal.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Registrar, Executive Director, and Campus Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all students seeking re-entry to the same clock-hour program after 180 days of withdrawal.

POLICY: All students in a clock-hour program, who withdraw from the program and returns to the same program after 180 days of withdrawal with no transfer hours (i.e., no prior hours earned accepted into the new enrollment) will be treated as a new student, similar to a new student in a new program.

Therefore, a student's maximum time frame of eligibility is based on the hours in the program the student is returning to, regardless of any previous hours completed prior to the withdrawal (greater than 180 days earlier).

The institution's determination that a student has no transfer hours accepted into the program the student is returning to after 180 days, will be solely based on well documented students' past academic performance.

Students returning to the same clock-hour program after 180 days with transfer hours will be processed according to institution's policy for transferred student.

TITLE: NSLDS Enrollment Reporting

PURPOSE: To establish guidelines to ensure compliance with federal regulations in regards to enrollment reporting.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Financial Aid Officer, Campus Director, and Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all students registered and pursuing higher education at The Praxis Institute.

POLICY:

Federal regulations and related guidance governing Title IV student aid programs requires monitoring and updating the enrollment status of students who receive Federal student aid. Completion of Enrollment Reporting satisfies these requirements for schools. The accuracy of Title IV student loan records depends heavily on the accuracy of the enrollment information reported by schools. Schools must review, update, and verify student enrollment statuses, effective dates of the enrollment status, and the anticipated completion dates that appear on the Enrollment Reporting roster file or on the Enrollment Maintenance page of the NSLDS Professional Access (NSLDSFAP) Web site. School officers also correct any NSLDS identified errors directly on website within 10 business days.

This policy addresses the frequency, timing, verification, and monitoring of reporting enrollment status from TPI to the National Student Loan Data System (NSLDS). The Praxis Institute completes the "Student Status Confirmation Report" (SSCR) and submits it to its third party administrator, FAME. SSCR report is completed according to the following schedule to maintain compliance with federal regulations:

- Six times per year
 - o January
 - o March
 - o May
 - o July
 - o September
 - o November

TITLE: Transfer Students

PURPOSE: To establish guidelines to ensure monitoring of Financial Aid for transferred students.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Financial Aid Officers, Campus Director, and the Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all students transferring from another institution of higher education to The Praxis Institute.

POLICY:

<u>Transfer Student</u>

Financial aid at The Praxis Institute (TPI) is awarded to transfer students in much the same way it is awarded to other undergraduate students. There are a few important things that are unique to transfer students:

- Students may or may not receive the same type or amount of aid they were awarded at the previous institution. Not all financial aid transfers from one school to another.
- Students may be awarded financial aid before their transcripts are fully evaluated by our institution. In this case, their loan award may be based on a lower than actual class standing. Once their credits are evaluated, they may request an adjustment to their loan by completing the Loan Adjustment Form.
- If the student received Federal Direct or Federal Perkins at their previous institution, they must complete Exit Loan Counseling at that institution. This will help them understand repayment of their federal student loans, but will not put them in repayment as long as they are enrolled at least half-time at TPI. Students should check their loan aggregates on the <u>National Student Loan Data System (NSLDS)</u> and compare their total loans to the <u>Loan Borrowing Limits</u>.
- An incomplete admissions file will delay the disbursement of financial aid. Students should submit their official final academic transcript from their previous institution to TPI admissions as soon as it is available.

Transfer Monitoring

The U.S. Department of Education requires that students who transfer from one institution to another during the same award year undergo a Transfer Student Monitoring process. Students transferring to TPI will be monitored during their initial semester for any National Student Loan Data System (NSLDS) changes in their financial aid history.

Students who have a financial aid file at TPI will have a temporary thirty (30) days hold to permit NSLDS to report any updates to their history and allow time for alerts to be sent to TPI. The thirty (30) days count will begin the first day of classes for admitted students with a FAFSA on file with TPI. Late FAFSA submissions will cause a delay in the temporary hold going into effect.

NSLDS Alerts

An NSLDS alert will be received for students with pending financial aid or flags at previous institutions. Students are encouraged to check their information on NSLDS to make sure their files are clear. Financial aid disbursement will not take place until alerts have been resolved.

In the event an alert takes place after disbursement, students must clear their file in order to maintain eligibility for aid they have received.

Student's responsibilities:

- Be informed. The application process must be complete; pay close attention to priority filing dates.
- If a FAFSA for the year in question has already been filed, student must request that the Federal Processor forward the information to TPI by following one of the steps below:
 - Go to the *FAFSA on the Web* (FOTW) home page and click **Start Here** to log in. Applicant will be given the option to **Make FAFSA Corrections**. The TPI School Code (Code# 031147) should be added and the corrections should be submitted for processing.
 - 2. Call the Federal Student Aid Information Center at (1-800-4 FED AID) and have them add TPI School Code (Code # 031147) to FAFSA application. The Data Release Number (DRN) from the Student Aid Report (SAR) or confirmation page will be required.
 - 3. Students who completed the paper FAFSA will need to add TPI to the colleges section on their SAR and mail it to the Federal Processor for corrections.
- Remember, not all financial aid programs are transferable; eligibility for some programs will be determined by TPI.
- Students receiving a private scholarship should contact the donor of the scholarship and notify them that they will be attending TPI.
- Students, who have already been awarded a loan for the current academic year at another school, should cancel that loan as soon as possible.
- Students transferring to TPI must be sure to read the policies regarding <u>Satisfactory</u> <u>Academic Progress</u> found on the institution's website.

TITLE: R2T4 Worksheet

PURPOSE: To establish guidelines to ensure timely refunds before deadlines and avoid costly liabilities.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Financial Aid Officers, Executive Director, and Campus Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all students registered and pursuing higher education at The Praxis Institute (TPI).

POLICY:

Refunds to Federal Student Aid Programs must be made within 45 days of the date of determination. All Refunds will be processed according to the following guidelines:

Date of Determination (DOD) that student withdrew

□ If the student notifies TPI, DOD is the withdrawal date or date of notification, whichever is later.

 \Box If the student does not provide notification to TPI, DOD is the date TPI becomes aware that the student ceased attendance.

 \Box If the student does not return from an approved leave of absence (LOA), DOD is the earlier of the date the student was expected to return from the leave of absence or the date the student notifies TPI that he/she will not be returning.

 \Box If the student rescinds his/her notification of withdrawal but subsequently withdraws within the same period or period of enrollment, DOD is the date TPI becomes aware that the student did not, or will not, complete the period.

□ TPI is required to take attendance are it does have a procedure in place to determine in a timely manner when a student withdraws. Except in unusual instances, the date of the institution's determination that a student withdrew should be no later than 14 days after the student's last day of attendance from the institution's attendance records.

Payment period vs. period of enrollment

 \Box The Praxis Institute performs the Return calculation on a payment period basis for all its students regardless of the program the student are enrolled.

Institutional Charges

□ The Praxis Institute charges used in the calculation are always the charges that were assessed the student for the entire payment period or period of enrollment, as applicable, prior to the withdrawal. Initial charges are only adjusted by those changes TPI made prior to the withdrawal (dropping or adding a class or enrollment status changes). If after withdrawal TPI changes the amount of institutional charges it assessed the student or decides to eliminate all charges, those changes affect neither the charges nor aid earned in the R2T4 calculation.

THE FOLLOWING SUPPLEMENTAL INSTRUCTIONS ARE USED BY THE INSTITUTION'S FINANCIAL AID OFFICER IN CONJUCTION WITH THE FEDERAL R2T4 WORKSHEET INSTRUCTIONS.

STEP 1- STUDENT'S TITLE IV AID INFORMATION

 $\hfill\square$ Use total aid disbursed for the payment period or period of enrollment in which the student withdrew.

• Remember if student does not begin all of their classes Pell recalculation may apply. See FSA Handbook, Volume 3, Chapter 3, page 3-70 or Volume 5, Chapter 1, page 5-5.

 $\hfill\square$ Exclude the matching portion of FSEOG unless the fund specific method of matching is used.

□ If a credit balance exists at the time of withdrawal, do not do anything with it. First, perform an R2T4 calculation, and then perform the institutional refund calculation to determine if a credit balance still exists. If a credit balance still exists, it is first applied to any grant overpayment (if applicable) and then paid to the student within 14 days from the date that the R2T4 was calculated.

The following concepts must be remembered in determining the amount of Title IV aid that "could have been disbursed":

□ Any un-disbursed Title IV aid for the period that the school uses as the basis for the Return calculation is counted as aid that could have been disbursed as long as the following conditions were met before the date the student became ineligible:

- The institution has a valid SAR/ISIR with an official EFC processed by ED.
- All C codes on ISIR must be resolved.
- For DL, the loan must have been originated.
- A promissory note must have been signed before the R2T4 calculation is performed for all Title IV loan programs.
- For FSEOG the award must have been made prior to the date the student became ineligible.

 \Box Use the net amount of Direct Loan proceeds.

 $\hfill\square$ Although these disbursements can be used as "could have been disbursed", TPI prohibits from making them:

- For non-standard term credit-hour programs with terms not substantially equal in length, credit-hour non term programs, and clock-hour programs, a second disbursement of a DL where the student has not reached the later of the calendar midpoint of the loan period, or the date that the student completes half of the academic coursework or clock hours (as applicable) in the loan period.
- A second or subsequent disbursement of DL where the student has not completed the period for which the loan was intended.
- First disbursements of a DL to first year, first time borrowers who withdraw before the 30th day of the student's program of study even though they can be used as "could have been disbursed".
- A first disbursement of DL in a loan period to a student in a modular program who has withdrawn before beginning attendance in at least half time enrollment status.

STEP 2 - PERCENTAGE OF TITLE IV AID EARNED

For TPI, the withdrawal date is the last date of academic attendance as determined by attendance records.

Note: ED's position is that an institution must use the earlier of the two dates if a student begins the withdrawal process and also provides official notification of intent to withdraw (even if the student rescinded his/her first notification and subsequently withdrew). If a student withdraws, the institution can always decide to use a last documented date of attendance at an academically-related activity instead of the midpoint or the date of official notification. Final regulations indicate that "An academically-related activity includes, but is not limited to an exam, tutorial, computer-assisted instruction, academic counseling, academic advisement, turning in a class assignment or attending a study group that is assigned by the institution".

Determining days in payment period for credit hour programs For non-term credit hour programs please refer to the latest FSA Handbook, Volume 5, for

detailed instructions on how to determine the number of days in the payment period.

STEP 3 - AMOUNT OF TITLE IV AID EARNED BY THE STUDENT

If the total amount of Title IV grant or loan assistance (or both) that the student earned is greater than the amount of the Title IV grant and/or loan assistance disbursed to the student, the difference between the two must be treated under the post-withdrawal disbursement requirements. See Step 4 to assist in an understanding of the use of post-withdrawal disbursements.

STEP 4 - AID TO BE DISBURSED OR RETURNED

 \Box If the amount of Title IV aid earned by the student is greater than the amount disbursed, the unearned Title IV aid must be returned to the appropriate Title IV program.

 \Box If the amount of Title IV aid earned by the student is less than the amount disbursed, TPI will perform a post withdrawal disbursement.

STEP 5 - AMOUNT OF UNEARNED TITLE IV AID DUE FROM THE SCHOOL

 \Box Once the prorated tuition is determined, it will be compared against the net amount of aid retained for TPI charges in Step 1E. The larger of these two amounts is the total institutional charges that will be used to determine the amount of Title IV aid for the school to return. Use the greater of the two in Step 5 N. Box L.

Note: Under the new Cash Management regulations effective 7/1/16 (34 CFR 668, Federal Register 10/30/15), TPI must determine by payment period the tuition, fees, books and supplies for credit balances and R2T4 calculations.

STEP 6 - RETURN OF FUNDS BY THE SCHOOL

TPI will use the order of funds as shown on R2T4 worksheets. TPI has 45 days from DOD to return the fund.

STEP 7 - INITIAL AMOUNT OF UNEARNED TITLE IV AID DUE FROM THE STUDENT

TPI Financial Aid officer will follow worksheet instructions if there is an amount due from student.

STEP 8 - REPAYMENT OF THE STUDENT'S LOANS

Student will pay any amount in this section through their normal loan repayment plan.

TITLE: Ledger Cards and COD Data Monitoring Process

PURPOSE: To establish guidelines to ensure compliance with federal regulations in regards to accuracy of institutional data against the USDE data.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Financial Aid Officer, Accounting Representative, Campus Director, and Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to the Financial Aid and Accounting Departments.

POLICY:

As part of an internal departmental QA strategy the following continuous process is performed:

- 1. Monthly, based on number of enrolled students, a random file sample is selected.
- 2. Sample is reviewed by Financial Aid supervisor, or designee, for accuracy of institutional data against USDE data.
- 3. If 100% of the reviewed sample is accurate, compliance with federal regulation is inferred.
- 4. If less than a 100% of the reviewed sample is accurate, random sample is expanded.
- 5. All records found with errors will be corrected.

TITLE: Master Promissory Note

PURPOSE: To establish guidelines for completing the Master Promissory Note (MPN) for a Direct Loan.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Financial Aid Officers, Campus Director, and the Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all Praxis' students applying for a Direct Loan.

POLICY:

It is the Policy of TPI to adhere to the guidelines described in the FSA Handbook in relation to the confirmation process for subsequent year loans, when using multi-year option MPN.

As required, Praxis offers both subsidized and unsubsidized Direct Loans.

PROCEDURE:

- Candidate completes MPN online.
- Through the Direct Loan Software FAME is also notified that the MPN has been signed and sent.
- Upon receipt of the MPN acceptance, FAME will process the disbursements, if the student is eligible for disbursement FAME will process the payment and send the disbursement to the school.
- FAME will process all reports, reconciliations and adjustments as required.

TITLE: Professional Judgment as defined by Section 479A of the Higher Education Amendment of 1992

PURPOSE: To establish procedures to navigate unusual and extenuating circumstances and help the financial aid officer exercise professional judgment.

RESPONSIBILITY: It is the responsibility of the Executive Director, Campus Director and Financial Aid Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled at TPI.

PROCEDURE:

Section 479A of the Higher Education Amendments of 1992 authorizes the financial aid administrator to exercise Professional Judgment (PJ) on a case-by-case basis for special or unusual circumstances.

Due to extenuating circumstances, students and parents often find the information they provided on the FAFSA does not realistically reflect their ability to provide educational support.

When this happens, students may choose to submit a Financial Aid Professional Judgment Appeal to the Financial Aid office requesting that their situation be reviewed. The Praxis Institute Financial Aid office will provide individual consideration of each student's circumstances to the extent possible. Appeals will be reviewed by the Financial Aid Office.

Students are notified that a successful appeal does not guarantee additional aid, and that sometimes additional aid is not immediately available.

Students that were selected for verification must complete the verification process prior to any professional judgment decisions.

If the appeal is approved, the aid eligibility will be reevaluated. No additional aid is guaranteed with a successful appeal, and any potential increases in aid eligibility are subject to fund availability.

Examples of professional judgment reasons include, but are not limited to the following:

- 1. Death of the dependent student's parent after application
- 2. Death of the independent spouse after application
- 3. Unusually high medical/dental expenses not covered by insurance (out-ofpocket expenses)—must have paid statements and not already itemized on tax return. Medical expenses must exceed \$3,000.00
- 4. Separated or divorce of parent or student after application
- 5. Dependent care expenses
- 6. Loss of wages:

o Dependent - students' parents' income has been significantly reduced in academic year

o Independent - students' income has been significantly reduced in academic year

o The student or parent no longer receives benefits such as child support or other sources of income.

All requests for the execution of professional judgment must:

- 1. Be initiated by a letter from the student in which the student requests consideration of his/her particular circumstances. Letter must be legible, signed, and dated. The student is encouraged to focus on events in the prior year that have affected or will affect his/her family's ability to pay for the current year's college expenses.
- 2. Include documentation such as:
 - A. For loss of employment:
 - 1. A termination/layoff letter that includes last day of employment.
 - 2. Documentation of unemployment benefits eligibility from a government agency.
 - B. For death:
 - 1. Copy of the death certificate for the parent of a dependent student, or spouse of an independent student.
 - 2. Signed copy of the parents and/or student's prior year income tax return.
 - C. For divorce:
 - 1. Copy of the divorce decree or separation agreement.
 - 2. Signed copy of the parents and/or student's prior year income tax return

- D. For loss of benefits:
 - 1. Copy of court order that specifies termination date and amount of child support.
 - 2. Copy of letter from appropriate state or federal agency that specifies termination date and amount of benefits.
 - 3. Completed, signed copy of prior year's income tax return, W-2 forms and any relevant worksheets or schedules.
- E. For extraordinary medical expenses:
 - 1. Receipts for medical expenses that show the total patient liability, that is, the amount due and not covered by insurance.
 - 2. Documentation of actual amount paid by family.
 - 3. If the receipts do not indicate whether or not the expense was covered by insurance, they must be accompanied by a letter from the medical provider or insurer stating that the expense, or a specified portion of the expense, was paid by the patient.
 - 4. Completed, signed copy of prior year's income tax return, W-2 forms and any relevant worksheets or schedules.
- F. For Bankruptcy:
 - 1. Documentation of the debt.
 - 2. Copy of court ordered bankruptcy payments.
 - 3. Completed, signed copy of prior year's income tax return, W-2 forms and any relevant worksheets or schedules.

If student or parent can satisfy any of the above conditions, and provide the required documentation, a written appeal should be submitted to the Financial Aid Office.

- 3. Include a valid and verified Student Aid Report. The Free Application for Federal Student Aid must be filed according to the instructions provided by the Department of Education. Special circumstances will be considered **only after** the school has received a valid SAR. If the student has been selected for verification, the school must complete the verification process **before** considering any special circumstances.
- 4. Require a signed copy of the tax transcript for the tax year information required on the FAFSA. If the student has not already provided a copy of all required tax documents for verification, this should be included with the request for consideration of special circumstances.

Any adjustments made to the SAR as a result of a request for a professional judgment decision may delay or change the financial aid package.

All Professional Judgment Requests Should Be Directed to the Financial Aid Office.

TITLE: Student Eligibility for HEERF

PURPOSE: Establish student eligibility criteria for HEERF funds.

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Campus Director, and Executive Director to ensure compliance with this policy.

APPLICABILITY: All active students at Praxis Institute during the distribution period(s).

POLICY: Praxis Institute will use a pre-determined methodology to determine student's eligibility to receive HEERF funds.

PROCEDURE:

1. The method used by TPI to determine which students receive Emergency Financial Aid Grants and how much they would receive under Section 18004(a)(1) of the CARES Act was:

First Disbursement:

- Eligibility
 - To determine eligibility, while following the CARES Act stipulations, TPI established that only students who are or could be eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965, as amended, may qualify to receive emergency financial aid grants. Additionally, students had to have been actively enrolled at TPI prior to April 1st/2020.
- Disbursed amount
 - 0. TPI disbursed the full amount, of the allocated funds, evenly among all eligible students.

Second Disbursement

• Eligibility

- 0. To determine eligibility, while following the CARES Act stipulations, TPI established that only students who are or could be eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965, as amended, may qualify to receive emergency financial aid grants. Additionally, students had to have been actively enrolled at TPI prior to March 14th/2021.
- Disbursed amount
 - 0. TPI disbursed the full amount, of the allocated funds, evenly among all eligible students.

Third Disbursement

- Eligibility
 - 0. To determine eligibility, while following the CARES Act stipulations, TPI established that only students who are or could be eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965, as amended, may qualify to receive emergency financial aid grants. Additionally, students had to have been actively enrolled at TPI prior to July 13th/2021.
- Disbursed amount
 - 0. TPI disbursed the full amount, of the allocated funds, evenly among all eligible students.

TITLE: Federal Supplemental Educational Opportunity Grants*

PURPOSE: To establish the mechanism to identify and select eligible students to receive a Federal Supplemental Educational Opportunity Grant (FSEOG).

RESPONSIBILITY: It is the responsibility of the Financial Aid Supervisor, Campus Director, and Executive Director to ensure compliance with this policy.

APPLICABILITY: All Praxis Institute applicants with exceptional financial needs.

POLICY: Federal Supplemental Educational Opportunity Grants (FSEOG) help financially needy undergraduate students, who have not earned a bachelor's or professional degree, meet the cost of postsecondary education. Although it is a federal program, it is considered campus-based funding since awards are administered by individual schools. The program gives priority to students who receive Federal Pell Grants. FSEOG awards range from \$100 to \$4,000 a year depending on financial need. The award is made by the school based on the availability of funds. A FSEOG does not need to be repaid.

Section 413C of the Higher Education Act of 1965 (HEA), as amended, requires institutions to prioritize awarding of funds to students who both demonstrate exceptional need and are eligible to receive a Federal Pell Grant award. The law further defines "exceptional need" as students with the lowest Expected Family Contribution (EFC). Historically, the lowest EFC has been zero (0), with priority going to students receiving Pell Grants.

To be eligible for this benefit program, the applicant must be all the following:

- A student pursuing an undergraduate degree or certificate.
- Have financial need.

To determine whether the applicant is eligible to receive assistance through this program, applicant must first complete a <u>Free Application for Federal Student Aid</u> (FAFSA) online. Praxis will use the information from the FAFSA to determine applicant's actual financial aid package. Praxis will inform the applicant how much money may he/she be eligible for that academic year.

PROCEDURE:

- The Consolidated Appropriations Act of 2021 (P.L. 116-220) amended the HEA under the provisions of the FAFSA Simplification Act, replacing the EFC with the Student Aid Index (SAI) as a measure of need.
- This amendment allows for an SAI to be as low as negative 1,500.
- Prior to the amendment a student's EFC could not be less than zero.
- However, the amended HEA in Sec. 401(b)(1)(B)(ii) provides, with respect to Pell Grant calculations, that a negative SAI shall be treated as zero.
 - A negative SAI converted to zero will also not increase a student's eligibility for non-need-based aid.
- Institutions are required to prioritize students with the lowest EFCs who will also receive Pell Grants.

Therefore, effective with the 2024-2025 award year, in identifying students with exceptional needs, Praxis will treat all negative SAIs (down to negative 1,500) as equal to an SAI of zero in its selection criteria.

When applying its award selection procedures, Praxis will take a consistent approach to negative SAIs.

* Information for policy derived from: DE Dear Colleague Letter (GEN-23-11).

HUMAN RESOURCES

TITLE: Employment Agreement

PURPOSE: To establish procedures to execute Employment Agreement between Institution and employee.

RESPONSIBILITY:

It is the responsibility of the Executive Director and/or the VP of Academic Affairs to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all personnel.

PROCEDURE:

An Employee Agreement, setting out the terms and conditions under which the program director shall be employed by the Institute, will be executed for all program director positions.

Attached.

EMPLOYMENT AGREEMENT

This Employment Agreement (the "Agreement") is made by and between Duran-Rubero Beauty Center, Inc., known as The Praxis Institute (the "Institute"), and (the "employee title"). It sets out the terms and conditions under which the ("employee title") shall be employed by the Institute. In exchange for the mutual promises and covenants contained in this Agreement and as a condition to, and in consideration of, the employment of the ("Employee Title") by the Institute, the parties to this Agreement agree as follows:

1. <u>Employment</u>. The Institute agrees to employ the ("name of employee") as its ("Employee Title"), and the ("Employee Title") accepts such employment, upon the terms and conditions set forth in this Agreement.

2. Duties and Responsibilities. The ("Employee Title") shall be employed by the Institute beginning on (the "Start Date"). In addition to other duties that may be assigned to the ("Employee Title") by the Institute from time to time, the ("Employee Title") duties and responsibilities shall include those listed in Exhibit "A" to this Agreement. The ("Employee Title") agrees to faithfully and dutifully perform the tasks, duties and responsibilities assigned to him by the Institute, including, but not limited to those listed in Exhibit "A." The ("Employee Title") shall be employed by the Institute on an exclusive basis to produce the maximum benefit for the Institute's business. As a result, the ("Employee Title") agrees that during his employment by the Institute he will not engage in any other business activity, whether or not such business activity is pursued for gain or profit, which may tend to (i) interfere with the performance of his duties and responsibilities as an employee of the Institute, (ii) create a conflict of interest, or (iii) be competitive with the Institute's business activities, services and/or programs.

3. <u>Performance of Duties.</u> The ("Employee Title") agrees to perform his duties and responsibilities in a competent manner consistent with the policies and procedures established by the Institute from time to time, and he agrees to abide by such policies and procedures. The ("Employee Title") further agrees to, at all times, comply with any and all applicable laws, rules, regulations and/or ordinances when performing the services and duties contemplated under this Agreement on behalf of or for the benefit of the Institute. The ("Employee Title") acknowledges and agrees that he shall be subject to all general policies, guidelines, rules and regulations established for employees of the Institute, including all policies relating to sick days, vacation time (including request and approval of same), expense reimbursement, travel for business purposes and all guidelines applicable to the Institute's offices and facilities. He shall also comply with all policies set forth in the Institute's employee handbook/manual.

Throughout the term of his employment, the ("Employee Title") shall have obtained and maintain in effect and in good standing any and all licenses, certifications, registrations or other credentials and comply with any and all applicable continuing education requirements necessary under, or required by, applicable laws, rules, regulations or ordinances to perform the duties and tasks assigned to him by the Institute. The ("Employee Title") also agrees to immediately notify the Institute if any such licenses, certifications, registrations or other credentials expire or are restricted, revoked or limited in any way during his employment with the Institute.

4. <u>Compensation</u>. As compensation for all services performed by him for or on behalf of the Institute, the ("Employee Title") shall be paid an annual salary of (insert amount) less all required payroll deductions (e.g., federal withholding, Social Security and Medicare). The ("Employee Title") salary will be paid in accordance with the Institute's payroll schedule and policies.

5. <u>Benefits.</u> The ("Employee Title") shall be eligible to participate in and receive such employee benefits furnished by the Institute to its full time employees from time to time, all in accordance with the Institute's applicable policies and procedures in effect from time to time. The ("Employee Title") understands that any employee benefits provided to him by the Institute may be modified or eliminated by the Institute at its sole discretion and at any time to the extent permitted by law. The ("Employee Title") will be reimbursed for the ordinary, necessary and reasonable travel, entertainment and other expenses you incur in furtherance of the Institute's business, upon presentation of appropriate receipts thereof.

6. <u>Term and Termination</u>. Your employment shall commence on the Start Date and shall continue for a period of six (6) months (the "Initial Term"), unless terminated sooner in accordance with the terms and conditions in subparagraphs 6 a-d below. The ("Employee Title") agrees and acknowledges that, after the end of the Initial Term, he shall be an "employee at will," unless his employment is terminated sooner in accordance with the terms and conditions in this Agreement. After the Initial Term, the ("Employee Title") employment shall be for an indefinite period of time and may be terminated by him or the Institute at any time and for any reason.

a. Termination for Cause During Initial Term. During the Initial Term, the Institute may terminate this Agreement immediately for "good cause" as that phrase is defined below. As used in this Agreement, the term "good cause" shall mean: (i) the ("Employee Title") arrest or conviction of a crime; (ii) the commission by the ("Employee Title") of any act against the Institute constituting willful misconduct, dishonesty, fraud, theft or embezzlement; (iii) the ("Employee Title") failure, inability or refusal to perform any of the duties or responsibilities as required of him under this Agreement, or to comply with the terms and conditions of this Agreement or the policies or procedures established by the Institute, for any reason other than his illness or physical or mental incapacity; (iv) conduct of the ("Employee Title") disloyal to the Institute; (v) the ("Employee Title") dependence, as determined in good faith by the Institute, on any addictive substance, including, but not limited to, alcohol, amphetamines, barbiturates, methadone, cannabis, cocaine, PCP, THC, LSD or any other illegal or narcotic drugs; (vi) the destruction of, or damage to, the Institute's property caused by the ("Employee Title") willful or grossly negligent conduct; (vii) the ("Employee Title") failure to comply with the Institute's reasonable instructions; (viii) acts of moral turpitude by the ("Employee Title") (ix) conduct of the ("Employee Title") that in the Institute's good faith determination demonstrates the ("Employee Title") unfitness to serve as a manager, instructor, faculty member or employee of the Institute, including, but not limited to, any acts of employee or student harassment by the ("Employee Title"); and (x) a pattern of conduct by the ("Employee Title") which, in the Institute's sole discretion, tends to hold the Institute up to ridicule in the industry or community.

b. <u>Mutual Consent to Terminate During Initial Term.</u> During the Initial Term, this Agreement shall immediately terminate upon the mutual consent of the parties to terminate the ("Employee Title") employment with the Institute, which consent shall be evidenced by a written agreement of termination signed by the parties.

c. <u>Termination Due to Disability During Initial Term</u>. The Institute may, at its sole option and upon notice to the ("Employee Title"), immediately terminate this Agreement during the Initial Term, if, by reason of accident, illness or mental or physical disability, the ("Employee Title"), with our without reasonable accommodation, is incapacitated or prevented from fully performing the essential functions of his job for the Institute.

d. <u>Effect of Termination During the Initial Term.</u> In the event of the termination of this Agreement pursuant to subparagraphs 6 a-c above or otherwise, if applicable, the Institute shall pay

to the ("Employee Title") or his estate the accrued portion of the compensation and benefits, if any, due the ("Employee Title") pursuant to this Agreement at the time of the termination of this Agreement. The Institute shall have no further obligations to make any other payment, including severance or other compensation, of any kind.

7. Non-Compete, Non-Solicit, Confidentiality and Work for Hire

a. The Institute was founded in 1988 and is dedicated to providing the community career education in employable fields. Although the career education field has become competitive, the ("Employee Title") agrees and acknowledges that the Institute has a distinct competitive advantage over others as a result of (i) its business practices and procedures, including, but not limited to, the excellent educational programs, curriculum and placement services offered by the Institute, (ii) its confidential, proprietary and trade secret information, (iii) its relationships with current and former students, and (iv) other matters, experiences, personnel and relationships obtained, developed, created or perfected by the Institute during its 25 years providing the specialized education and training services described above. The ("Employee Title") also understands and agrees that, as a result of his employment with the Institute he will gain substantial knowledge of the Institute's students, policies, procedures, services, and curriculum, among other matters. The ("Employee Title") further understands and agrees that the purpose of this paragraph 7 is to protect the Institute's competitive advantage, and the Institute would not have employed the ("Employee Title") if he had not entered into this Agreement.

Confidential Business Information. The ("Employee Title") acknowledges that in b. the course of his employment with the Institute, he will have access to, be entrusted or become acquainted with, and may acquire knowledge of various confidential, trade secret and/or proprietary information of the Institute and/or its students, staff and suppliers that (1) is or has been disclosed to or made known to the ("Employee Title") or conceived by the ("Employee Title") (whether solely by the ("Employee Title") or jointly with others) as a consequence of, or through his employment with, the Institute, (2) is not generally known outside of the Institute, and (3) is treated by the Institute as confidential during the time of the ("Employee Title") employment (all of which shall collectively be referred to as the "Confidential Business Information"). By way of illustration only, and not limitation, Confidential Business Information may include information regarding (a) marketing, promotion, positioning, public relations and information gathering campaigns, strategies, programs, plans, methods and techniques; (b) tuition, pricing, payment and credit and financial aid policies and terms; (c) current, prospective and former student, placement, and lead lists and data bases, and other lists and data bases; (d) curriculum, training and teaching modalities, lesson plans, guides, exams, forms, summaries, teaching aids, and handouts; (e) internal academic, administrative or placement policies and procedures; (f) technical data, software and hardware technology and other technology, concepts, research and development information, compilations, programs, methods, techniques, inventions, devices, and systems; (g) expansion plans, management policies, and other business policies and strategies; (h) business forecasts, financial data, cost, tuition and revenue reports, and any analyses not publicly disclosed; (i) employment lists and information regarding employees, representatives. agents. instructors, consultants and independent contractors of the Institute; (j) internally developed computer programs and software and internal procedures and forms; (k) lists of the Institute's vendors, suppliers, and contract terms; (1) logos, designs, pictures, story boards, layouts, images and other creative materials or ideas; and (m) other information which enables the Institute to compete successfully.

The ("Employee Title") agrees not to use any Confidential Business Information for any purpose other than in the course and scope of his employment with the Institute and for the exclusive benefit of the Institute. Except for disclosure in the course and scope of his employment with the Institute and on behalf of the Institute, the ("Employee Title") will never at any time, either during or after the end of his employment with the Institute for any reason, directly or indirectly, use, publish, disseminate, distribute or otherwise disclose any Confidential Business Information to any other person or entity.

The ("Employee Title") also agrees to take all steps necessary, and all steps requested by the Institute, to ensure that the Confidential Business Information is kept secret and confidential and for the sole use and benefit of the Institute and to comply with all applicable policies and procedures of the Institute regarding the storage and security of all Confidential Business Information, whether in hard copy form or stored on computer disks or other electronic media. The ("Employee Title") also acknowledges that the Confidential Business Information is and has been the subject of efforts that are reasonable under the circumstances to maintain its confidentiality.

The ("Employee Title") further acknowledges and agrees that the Confidential Business Information is a special and unique asset of the Institute and derives independent economic value, actual or potential, from not being generally known by the public or by other persons or entities who can obtain economic value from its disclosure. The ("Employee Title") agrees that the disclosure of any Confidential Business Information to competitors of the Institute both during and after his employment with the Institute, or use of any Confidential Business Information for his own benefit, would constitute misappropriation of the Confidential Business Information.

c. <u>Return of Documents and Information</u>. The ("Employee Title") acknowledges that all documents, records and materials that he prepares in the course and scope of his employment with the Institute, and Confidential Business Information that he may have access to, may be given or entrusted to him, or he may acquire knowledge of in the course of his employment with the Institute, are and shall remain the sole property of the Institute. In the event that his employment with the Institute ends for any reason, or upon demand by the Institute, the ("Employee Title") agrees to immediately return or turn over to the Institute all Confidential Business Information (and any copies thereof) in his possession, custody or control, as well as any documents, records, notes, materials, information, other work product and other property in his possession, custody or control which is in any way connected with or derived from the services he provided to, or his employment with, the Institute.

d. <u>Non-Solicitation of Employees and Other Personnel</u>. The ("Employee Title") agrees that during his employment with the Institute and for a period of months after the end of his employment for any reason, he will not, directly or indirectly, (i) solicit, hire, retain, engage, induce or attempt to induce away, or aid, assist or abet any other person or entity in soliciting, hiring, retaining, engaging, inducing or attempting to induce away from its/his/her employment, engagement, or association with the Institute any officer, director, employee, independent contractor, consultant, agent, or other personnel or representative of the Institute who is currently, or was during the 12 months prior to the end of the ("Employee Title") employment with the Institute, employed or engaged by, or associated with, the Institute and any of its officers, directors, employees, independent contractors, consultants, agents, or other personnel or representatives who are currently, or were during the 12 months prior to the end of the ("Employee Title") employment with the Institute, or associated with, the Institute and any of its officers, directors, employees, independent contractors, consultants, agents, or other personnel or representatives who are currently, or were during the 12 months prior to the end of the ("Employee Title") employment with the Institute, employed or engaged by, or associated with, the Institute and any of its officers, directors, employees, independent contractors, consultants, agents, or other personnel or representatives who are currently, or were during the 12 months prior to the end of the ("Employee Title") employment with the Institute, employed or engaged by, or associated with, the Institute.

e. <u>Non-Solicitation of Students</u>. The ("Employee Title") agrees that during his employment with the Institute and for a period of months after the end of his employment for any reason, he will not, directly or indirectly, call upon or solicit, either for himself or for any other person or entity, any current, former or prospective student of the Institute about whom he obtained confidential, proprietary or trade secret information as a result of his employment by the Institute, or with whom he otherwise dealt or had contact while employed by the Institute in order to provide or

attempt to provide any products or services that compete with the products or services offered by the Institute from time to time.

f. <u>Covenant Not to Compete</u>. The ("Employee Title") also agrees that during his employment with the Institute and for a period of months after the end of his employment for any reason, he, either individually or jointly, directly or indirectly, whether as an employee, employer, agent, independent contractor or otherwise, will not anywhere within a fifty (50) mile radius of any location of the Institute conduct, engage in or be related to any business or enterprise that competes with the business engaged in by the Institute from time to time, including, but not limited to, the business described in paragraph 7.a above.

Work Product / Work for Hire. The ("Employee Title") acknowledges that all g. original works of authorship which are created, conceived, developed or reduced to practice by or under the direction of the ("Employee Title") (solely or jointly with others) during the period of his employment that relate to business activities of the Institute and its affiliates (whether or not during normal working hours, on the premises of the Institute or using the Institute's property, equipment or Confidential Business Information), including, without limitation, any designs, forms, formulas, materials, products, deliverables, work product, tests, summaries, syllabus, developmental or experimental work, computer software programs (including, without limitation, images, text, source code, object code, html code and scripts), databases and other original works, and any upgrades, modifications or enhancements to the foregoing and any related patents, patent applications, copyrights, copyright applications (collectively referred to herein as the "Work Product"), are and shall remain the sole and exclusive property of the Institute, and all right, title and interest therein shall vest in the Institute and shall be deemed a "work made for hire", as that term is defined in the United States Copyright Act. Unless otherwise agreed to in writing by the Institute, nothing in this or any other agreement or in the course of dealing between the ("Employee Title") and the Institute shall be construed to grant to the ("Employee Title") any ownership right, title or interest in or license to any of the Work Product. To the extent that title to any of such Work Product may not, by operation of law, vest in the Institute, or any of such Work Product may not be considered to be "work made for hire," the ("Employee Title") hereby irrevocably assigns to the Institute without limitation all right, title and interest therein. All Work Product shall belong exclusively to the Institute with the Institute having the right to obtain and to hold in its own name copyright, patent and trademark registrations or such other protection as may be appropriate to the subject matter, and any extensions and renewals thereof. All Work Product which, within twelve (12) months after the termination of the ("Employee Title") 's employment with the Institute for any reason, are made, disclosed, reduced to a tangible or written form or description, or are reduced to practice by the ("Employee Title") and which relate to the current or anticipated business of the Institute and its affiliates at the time of such termination shall, as between the ("Employee Title") and the Institute, be presumed to have been made during the ("Employee Title") employment by the Institute. The ("Employee Title") further agrees without charge to the Institute, but at its expense, to assist the Institute in every proper way and execute, acknowledge and deliver, during and after his employment by the Institute, all such documents necessary and perform such other legal acts as may be necessary, in the opinion of the Institute, to obtain or maintain United States or foreign patents, copyrights, or other proprietary protection, for any and all Work Product which pursuant to this paragraph or applicable law belongs to the Institute in any and all countries, and to vest title therein in the Institute, provided, however, in the event such assistance is provided when ("Employee Title") is no longer employed by the Institute, the Institute shall compensate ("Employee Title") for such assistance at an hourly rate commensurate with the Base Salary payable to him by the Institute on the date on which his employment with the Institute ended.

h. <u>Reasonableness of Covenants Not to Solicit and to Compete</u>. The ("Employee Title") agrees that the covenants in this paragraphs 7 are reasonable and necessary to protect the Institute's legitimate business interests, including, without limitation, the confidential business or professional information and trade secrets of the Institute, the goodwill of the Institute, and the substantial relationships between the Institute and its officers, directors, employees, independent contractors, consultants, agents, other personnel and representatives, and current, former and prospective students. The ("Employee Title") also agree that time and geographical limitations in this paragraph 7 are reasonable and that the enforcement of the covenants in this paragraph 7, whether by injunctive relief, damages, or otherwise, is in no way contrary to the public health, safety and welfare.

i. Remedies. The ("Employee Title") agrees and acknowledges that the restrictive covenants and undertakings contained in this paragraph 7 relate to matters that are of a special, unique and extraordinary character and that a violation or breach of any of the restrictive covenants or provisions in this paragraph 7 above will cause irreparable harm to the Institute, the full amount of which will be impossible to estimate or determine and which cannot be adequately compensated. For that reason, the ("Employee Title") agrees that, in addition to any other remedies, the ("Employee Title") will be entitled to an injunction, restraining order or other equitable relief from any court of competent jurisdiction to enforce this Agreement in the event of an actual, potential or threatened breach of the restrictive covenants or provisions in this paragraph 7. Without regard to whether it seeks or is granted any such equitable relief, the Institute will not be prejudiced in its right to seek and be awarded damages for any breach of any restrictive covenant or other provisions in this Agreement. The ("Employee Title") understands that the rights and remedies provided for in this Agreement are cumulative and will be in addition to any rights and remedies otherwise available to the Institute under applicable law. The ("Employee Title") also agrees that the existence of any claim or cause of action that he may have against the Institute, whether predicated on this Agreement or otherwise, shall not constitute a valid defense to the enforcement of the restrictive covenants and other provisions contained in this paragraph 7.

The ("Employee Title") further agrees and acknowledges that should legal proceedings be initiated by the Institute to enforce the restrictive covenants in this paragraph 7, the commencement of the month period will commence on the date of the entry of an order granting the injunctive, monetary or other relief from the actual or threatened breach of said covenants and will remain in effect for the next succeeding _______ months, as applicable. The ("Employee Title") acknowledges that the purpose and effect of the covenants contained in this paragraph 7 would be frustrated by measuring the month period from the end of his employment with the Institute where he fails to honor the covenants in this paragraph 7 until ordered to do so by a court of competent jurisdiction.

i. <u>Notice to Others</u>. The ("Employee Title") agrees that during his employment with the Institute and during the months after the end of his employment with the Institute for any reason, he will notify any prospective employer, contractor or joint venture, prior to accepting any such employment, engagement, contract or joint venture, of this Agreement, including without limitation the restrictive covenants contained in this Agreement. The ("Employee Title") further agrees and acknowledges that the Institute has the right to contact any potential or actual future employer of the ("Employee Title"), or other individual or entity seeking to retain the ("Employee Title") , to notify the future employer or other individual or entity of the ("Employee Title") obligations under this Agreement. The Institute also shall be entitled to notify such actual or potential future employer or other individual or entity of the requirements of this Agreement and what steps, if any, the Institute intends to take to insure the ("Employee Title") compliance with, or enforcement of, this Agreement.

8. <u>No Other Obligations.</u> The ("Employee Title") represents and warrants to the Institute that he is not under any contract, agreement or restrictive covenant, and has not previously signed any documents whatsoever with any other person or entity that will in any way prevent or limit his ability to perform his duties and responsibilities as an employee of the Institute.

The ("Employee Title") also represents and warrants that he will not bring with him to the Institute, and will not use in the course and scope of his employment by the Institute, any confidential, proprietary and/or trade secret materials or information that he obtained from a former employer or other individual or entity. The ("Employee Title") furthers represents and warrants that during his employment by the Institute he will not breach any obligation or duty to maintain confidential and not to disclose or use that he may owe to any former employer or other individual or entity.

9. <u>**Conditions to Employment.**</u> As a condition of his employment, the ("Employee Title") will be required to successfully complete all applicable pre-hire processes, including an employment application, pre-employment background investigation and employment eligibility verification.

10. <u>No Disparagement.</u> Both during his employment and after the termination of his employment for any reason, the ("Employee Title") agrees that he will not make any adverse, derogatory, or disparaging comments or statements, orally or in writing, direct or indirect, about or against the Institute, its business, business practices, programs, curriculum and/or workplace or otherwise (with such restrictions being applicable during and after the term of this Agreement). The ("Employee Title") further agrees that he will not issue any communication, written or otherwise, that disparages, criticizes or otherwise injures or reflects adversely or encourages any adverse action against the Institute, except if testifying truthfully under oath pursuant to any lawful court order or subpoena or otherwise responding to or providing disclosures required by law.

11. <u>Entire Agreement</u>. This Agreement constitutes the entire agreement and understanding between the parties with respect to the ("Employee Title") 's employment by the Institute, and the other subject matters contained herein, expressly superseding all prior written, oral or implied agreements and understandings. In executing this Agreement, the ("Employee Title") has not relied on any promises or representations other than those contained in this Agreement.

12. <u>Waiver</u>. The waiver by any party of any breach of any provision, restrictive covenant or condition of this Agreement shall not be construed as a waiver of any subsequent breach of such provision, restrictive covenant or condition or of the breach of any other provision, restrictive covenant or condition contained in this Agreement.

13. <u>Headings</u>. Any section or paragraph title or caption contained in this Agreement is for convenience only, and in no way defines, limits or describes the scope or intent of this Agreement or any of the provisions hereof.

14. <u>Successors</u>. The Institute may assign the rights and benefits given to it in this Agreement and this Agreement shall survive any sale of assets, merger, consolidation, or other change in the corporate structure of the Institute. The duties of ("Employee Title") hereunder are personal in nature and may not be assigned.

15. <u>Severability</u>. If any term, condition, or provision of this Agreement shall be found to be illegal or unenforceable to any extent for any reason, such provision shall be modified or deleted so as to

make the balance of this Agreement, as modified, valid and enforceable to the fullest extent permitted by applicable law.

16. <u>Amendment or Modification</u>. This Agreement shall not be amended, revoked, altered or modified in whole or in part, except by an agreement in writing signed by the parties.

17. <u>Governing Law: Venue</u>. This Agreement shall be governed by and construed in accordance with the laws of the State of Florida, regardless of conflicts of laws, and venue shall be in Miami-Dade County, Florida. If the Institute undertakes any action or retains legal counsel to enforce any of the provisions of this Agreement, the Institute shall be entitled to recover reasonable attorney's fees and costs from ("Employee Title").

18. <u>Waiver of Jury Trial</u>. EACH OF THE PARTIES HERETO HEREBY KNOWINGLY, VOLUNTARILY AND INTENTIONALLY WAIVE THE RIGHT TO A TRIAL BY JURY IN RESPECT OF ANY LITIGATION ARISING FROM OR RELATING TO THIS AGREEMENT, THE NON-COMPETE AGREEMENT, THE ("EMPLOYEE TITLE") 'S EMPLOYMENT BY THE INSTITUTE OR ANY COURSE OF CONDUCT, COURSE OF DEALING, STATEMENTS WHETHER VERBAL OR WRITTEN) OR ACTIONS ON ANY PARTY TO THIS AGREEMENT. THIS IS A MATERIAL INDUCEMENT FOR THE PARTIES ENTERING INTO THIS AGREEMENT.

19. <u>Construction</u>. This Agreement shall not be construed against any party by reason of the fact that the party may be responsible for the drafting of this Agreement or any provision hereof.

20. <u>**Cumulative Remedies**</u>. Each and all of the several rights and remedies provided in this Agreement, or by law or in equity, shall be cumulative, and none of them shall be exclusive of any other right or remedy, and the exercise of one of such rights or remedies shall not be deemed a waiver of, or an election to exercise, any other such right or remedy.

21. <u>Knowledge of Rights and Duties</u>. The parties have carefully reviewed and completely read and understand all of the provisions of this Agreement. Executive acknowledges that he enters into this Agreement of his own free will

IN WITNESS WHEREOF, the parties have executed this Agreement on the date(s) below indicated.

Duran-Rubero Beauty Center, Inc., known	
as The Praxis Institute	
Name:	Date:
Title:	
Date:	

POLICY AND PROCEDURE

TITLE: Admission's Personnel Training Program

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Admission Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all admission department personnel.

PROCEDURE:

ADMISSIONS TRAINING PROGRAM

At the Praxis Institute, all admissions officers are interviewed and carefully screened prior to being hired. Prior sales experience and/or school experience are preferred but not required. All potential admissions officers must be personable, well groomed, and must be able to relate to prospective students. They must be willing to be of service to students and to assist students in realizing their career objectives. Above all, prospective admissions officers must be honest and demonstrate a sense of caring and integrity.

Probation

All new admissions officers will initially be placed on a 90-day probationary period during which their performance will be observed and evaluated. They will receive training, advice and counseling during this period of time. At the end of the probationary period, if their performance is not satisfactory, they will be terminated. If their performance is satisfactory, their probationary status will be lifted and they will become regular employees of the Institute.

Initial Training

During the first two weeks of the admissions officer's employment (or longer if necessary), the new hire will receive comprehensive training on the school's program offerings as well as the school's policies and procedures. The new admissions officer will be required to be knowledgeable about everything contained in the school catalog and all school handbooks and guides. The admissions officer will also receive training on state, accrediting commission, and federal rules and regulations governing the school, and in particular, those applicable to the admissions process.

During the first two weeks of employment, the new admissions officer will sit in on admissions interviews conducted by experienced admissions officers and will observe the process followed by the admissions department and how the admissions interview is conducted. After this initial period of time, if the new admissions officer is deemed ready to conduct his or her own admissions interview, then the roles will be reversed and an experienced admissions officer will observe the new admissions officer conduct admissions interviews to ensure that accurate information is being conveyed to the prospective student, and that the new admissions officer has an adequate command of the programs offered and is able to properly explain school policies and procedures to prospective students. Once the new admissions officer has demonstrated the ability to properly convey information about the school to the prospective student and to properly enroll that student to the satisfaction of the Director of Admissions, the new admissions officer will be allowed to enroll students on his or her own.

Weekly Reports

All admissions officers are required to submit regular weekly reports to the Director of Admissions that describe the admissions officer's activities during the week, including the number of interviews held and the results of those interviews. If the Director of Admissions believes that additional or refresher training is needed, the Director of Admissions might decide to observe some admissions interviews conducted by the admissions officer, and if necessary, provide training in areas that are deemed in need of improvement. These training sessions might require further educating the admissions officer on school policies and procedures, or sitting in on admissions interviews as an observer with a more experienced or skilled admissions officer. The Director of Admissions might also decide to provide one-on-one training sessions with the admissions officer until the deficiency has been corrected.

Weekly Meetings

All admissions officers will meet on a weekly basis with the Director of Admissions. During these meetings, weekly reports will be reviewed, any impending changes in school policies, procedures or programs will be discussed, and any difficulties being encountered will be dealt with. These meetings might also be used as group training sessions should the need arise. These meetings shall be the proper venue for admissions officers to communicate with each other and with their supervisors, and to become informed of any changes in rules and regulations that affect the school or them in particular.

On-going Training

At least once each year, all admissions officers will be required to attend a workshop or seminar dealing with admissions and/or changes in rules and regulations applicable to the school or to admissions in particular. These training activities might require the admissions officer to travel outside the school to a formal workshop or meeting, or they

might be conducted in-house in the form of an in-service training workshop. All training received must be documented in each admissions officer's file.

Annual Evaluations

All admissions officers will undergo formal written evaluations on an annual basis, or more often if such a need is determined. These evaluations will normally be conducted by the Director of Admissions, but might also be conducted by the school Director. Any areas deemed in need of improvement will be addressed through counseling and/or additional training provided to correct deficiencies in the admissions officer's performance.

POLICY AND PROCEDURE

TITLE: Job Descriptions

PURPOSE: To establish procedures to ensure clear delineation of duties, authorities, responsibilities, and lines of communications within the organization.

RESPONSIBILITY:

It is the responsibility of the Executive Director, VP of Academic Affairs, and Campus Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all personnel.

PROCEDURE:

The Praxis Institute provides a written job description for each position and for each employee. The purpose of job descriptions is to establish clear communication between administration and the employees to assure that they have the same perception of their duties, authorities, responsibilities, and measures of performance for a particular position. Job descriptions also provide the basis for performance evaluation.

Each employee is responsible for carefully reviewing his or her specific job description, understanding what is required of the job, and agreeing to do the job as outlined. Job descriptions may need to be updated periodically. Employees who feel that their job description needs to be updated should speak with the Executive Director.

Job descriptions provide a summary of the position's duties, to who is the employee responsible to, principal responsibilities, education and experience requirements, and an overview of other generally expected responsibilities placed upon the employee.

Review and revision

Job descriptions are reviewed at every annual evaluation and are revised as needed to insure that they reflect the nature of the position. A request for review of any job description may be made to the Executive Director at any time.

Attached



Job Title: Academic Coordinator of Clinical Education

Reports To: PTA Program Director

Iob Description: The essential job functions and responsibilities for this position include, but are not limited to: planning and coordination of clinical education for the Physical Therapist Assistant Program as well as the organization, administration, continuous review, development, and general effectiveness of clinical experiences for students enrolled in the Physical Therapist Assistant Program. Essential responsibilities include classroom instruction, coordinating the administration of the clinical education program of students to the program curriculum, and evaluating students' progress in integrating academic and clinical experiences.

<u>Responsibilities: *</u>

The ACCE is responsible for coordinating and managing the efforts of the academic program and clinical education sites in the education and preparation of PTA students by performing the following activities:

I. Communicates Between the Academic Institution and Affiliated Clinical Education Sites

A. Communicates news, and current information (e.g., curriculum, clinical education objectives, staffing changes, and site availability) among all concerned stakeholders (e.g., the academic institution, clinical education sites, clinical faculty and students) to maintain current knowledge of the educational program, the clinical education site, and health care changes affecting clinical practice and education.

B. Provides ongoing communication of information with clinical educators at each clinical education site to include:

- 1. Philosophy of the academic program;
- 2. Academic program curriculum and specific syllabus and learning objectives for each clinical experience and behavioral expectations that may not be addressed by learning objectives;
- 3. Policy and procedures of the academic program pertaining to clinical education;
- 4. Current materials required for accreditation;
- 5. Clinical education contractual agreements negotiated and maintained between the academic program and each clinical education site;
- 6. Dissemination of appropriate student and related information (e.g., health insurance, liability/malpractice insurance, state/federal laws and regulations such as ADA);
- 7. Collection of information about clinical education sites for use by students in their selection of or assignment to clinical education sites;
- 8. Provision of dates for each clinical education experience;

- 9. Academic program requests from clinical education sites regarding the number and type of available student clinical placements;
- 10. Coordinating student assignments (consideration might be given to items such as patient variety, health care settings and size, types of learning experiences, clinical site and student expectations, strengths/limitations of clinical experiences);
- 11. Clinical faculty development opportunities including educational seminars and faculty availability as a resource in their areas of expertise, and
- 12. Maintenance and distribution of a clinical education manual.

C. Communicates and oversees communication with Center Coordinators of Clinical Education (CCCEs), Clinical Instructors (CIs), and students to monitor progress and assess student performance. Provides guidance and support as required to problem solve and discuss pertinent issues with student(s), CIs, and/or CCCEs.

D. Places, supervises, and communicates with students while on clinical experiences. Responsibilities associated with these roles include, but are not limited to:

- 1. Informing students of clinical education policies and procedures;
- 2. Supplying relevant clinical education site information to facilitate students' selection of or assignment to clinical education sites (e.g., learning experiences, clinical site prerequisites, housing availability);
- 3. Providing a process for students to assess their performance and satisfaction;
- 4. Preparing clinical rotation assignment schedules and coordinating information dissemination to clinical education sites;
- 5. Assisting with educational planning, behavior/performance modification, remedial education, referral to student support agencies (financial aid counseling as required), and
- 6. Arranging for periodic and or impromptu visits/communication to students, clinical education sites and clinical faculty as needed to problem solve, support, and discuss pertinent issues with student(s), CIs, and/or CCCEs.

E. Evaluates each clinical education site through student feedback, on-site visits, and ongoing communications and routinely shares this information with academic and clinical faculties. Provides feedback to clinical educators concerning their effectiveness in delivering clinical learning experiences based on student feedback and through direct observations.

II. Clinical Education Program Planning, Implementation, and Assessment

A. Performs academic responsibilities consistent with the Commission on Accreditation in Physical Therapy Education (CAPTE), and with institutional policy.

1. Coordinates and teaches clinical education courses and other related course content based on areas of content and clinical expertise.

2. Directs effort and attention to teaching and learning processes used throughout the curriculum (e.g., management and education theory, adult learning).

3. Participates in the governance of the program and institution, including the responsibility for academic regulations specific to the program and the curriculum.

4. Monitors and documents the academic performance of students to ensure that they successfully achieve the criteria for completing clinical learning experiences. To include:

a. Reviews and records student evaluations from CIs and determines the final grade for all clinical education courses in the curriculum.

- b. Confers with the appropriate faculty (clinical and academic), the Program Director, Administration and other individuals (e.g., counseling staff) where applicable.
- 5. Provides direct input into curriculum design, review, and revision processes by:
 - a. Collecting and organizing pertinent information from clinical education sites and students and disseminating this information to faculty during curricular review processes in a timely manner.
 - b. Keeping faculty informed about the clinical education program, pertinent policies and procedures, and changes influenced by accreditation.
 - c. Preparing reports and/or engaging in discussions with faculty on student progress in clinical education.
- 6. Coordinates and/or provides leadership for a Clinical Education or Program Advisory Committee consisting of area clinical educators, employers, or other persons, where feasible.

7. Develops and implements a plan for self-development that includes the participation in and enhancement of teaching, delivery of physical therapy services, and development of scholarly activities (e.g., scholarship of teaching, application, integration and discovery).

8. Monitors the changing health care delivery system and advises the Program Director and faculty of changing trends and potential impact on student enrollment, instruction, curriculum design, clinical education, and equipment needs.

9. Develops and administers information and education technology systems which support clinical education and the curriculum.

10. Participates in regional, state, and/or national clinical education forums, clinical education related activities, and programs designed to foster clinical education (e.g., Clinical Education Consortia, Clinical Education Special Interest Group (SIG) of the Section for Education, Chapter Clinical Education SIGs, and APTA Education Division activities).

B. Administers a system for the academic program's clinical education records which include:

- 1. Current database of clinical education sites;
- 2. Current information on clinical education site and clinical faculty;
- 3. Status of negotiated clinical education agreement between the academic program and clinical education site;
- 4. Utilization of clinical education sites;
- 5. Reports on the performance of students in clinical education, and
- 6. Reports on clinical site/faculty performance in clinical education
- C. Acts as an intermediary among the appropriate parties to:
- 1. Facilitate the acquisition of clinical education agreements;
- 2. Administer policies and procedures for immunization, preventive health care practices, and for management of student injury while at clinical sites, and
- 3. Ensure liability protection of students (and faculty if required) inclusive of professional, governmental, institutional, and current risk management principles.

D. Assists the Program Director in the development of a program budget by providing input on items related to the clinical education program and overall program budget.

E. Manages fiscal allocations budgeted for clinical education.

F. Develops, implements, and monitors adherence to policy and procedures for the clinical education component of the curriculum.

G. Develops, administers, and monitors the academic program's evaluation process for the clinical education component, including instruments used for evaluation of student performance, clinical education sites and faculty.

H. Participates in the preparation of accreditation documentation and outcome performance assessment of students in the physical therapy program.

III. Clinical Site Development

A. Develops criteria and procedures for clinical site selection, utilization, and assessment (e.g., APTA Guidelines for Clinical Education).

B. Establishes, develops, and maintains an adequate number of clinical education sites relative to quality, quantity and diversity of learning experiences (i.e., continuum of care, commonly seen diagnoses, across the lifespan, health care delivery systems, payers, cultural competence issues) to meet the educational needs of students and the academic program, the philosophy and outcomes of the program, and evaluative criteria set by CAPTE. C. Provides clinical education site development opportunities through ongoing evaluation and assessment of strengths and areas needing further development or action (e.g., in service training, discontinue student placements).

IV. Clinical Faculty Development

A. Collaborates with clinical faculty to promote, coordinate, plan, and provide clinical faculty development opportunities using effective instructional methodologies and technologies.

B. Maintains knowledge of current trends in health care and its affect on clinical education and apprises clinical educators and faculty of any changing trends.

C. Mentors other academic faculty about their role and responsibilities related to clinical education (e.g., clinical site visits, determining readiness for the clinic).

* This portion of this JD document was taken directly from the APTA position/description template.

Qualifications:

- Minimum of an Associate of Science degree in Physical Therapist Assistant
- Minimum of 2-3 years proven credentialed professional experience in therapy field
- Two (2) years teaching/clinical coordination experience.
- Bachelor's degree is preferred.
- Must be certified as a Physical Therapist Assistant or Physical Therapist by the State of Florida (Bureau of Professional Regulation) and have the related valid Florida State license.
- Proficiency in classroom instruction, academic/clinical coordination, counseling, and accreditation; and experience in curriculum and program planning, and student evaluation.

Knowledge, Skills, and Abilities:

- Knowledgeable of education, management, and adult learning theories and principles.
- Computer literacy and experience using computers with a willingness to apply technology and innovative approaches to the teaching of physical therapist assisting is also required.
- Able to work with students with special needs based on the Americans with Disabilities Act (ADA).
- Knowledge of Physical Therapist Assistant or Physical Therapy program accreditation standards and processes.
- Able to travel, as needed.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: Accounting Coordinator

Reports To: Campus Director

Job Description: Responsible for programming, implementing, and handling of the organization's accounting processes. Offers assistance to customers, as well as helps resolve issues affecting the customer. Assist with financial reporting, best practices, and execution of new tasks that may be assigned. Functions closely with other units within the organization to guarantee prompt and precise processing of payroll, ensuring the confidentiality and uprightness of payroll-affiliated data.

Responsibilities:

- Ensure configuration of the general ledger, cash management, accounts payable, and accounts receivable.
- Maintain records of accounting transactions and evaluate results efficiently.
- Analyze accounting process, identify issues and perform research on all solutions to ensure efficient workflows.
- Maintain journal entries and all ledger accounts and ensure reconciliation of all statements according to US GAAP.
- Perform regular analysis on accounting issues and resolve it efficiently.
- Administer reconciliation of all contract amounts and manage all claims on monthly basis.
- Maintain and perform regular update on accounting systems on an everyday basis.
- Provide technology support and analyze all input data.
- Prepare balance sheets and income statements and provide support to all internal and external auditors.
- Develop systems to improve efficiency of accounting processes.
- Monitor all reporting requests and prepare reports on a regular basis to ensure resolution.
- Coordinate with management and departments and ensure optimal quality of services to all clients.
- Collaborate with project teams and resolve all accounting issues for new products and system.
- Monitor inventory for stock accounts, prepare status reports for all fixed assets.
- Manage billing of all contracts and ensure accuracy.
- Develop internal control programs and maintenance program for same.

Qualifications:

Accounting Degree

- 2-4 years of experience in accounting field.
- Proficiency in Excel QuickBooks and Peachtree. н.
- Familiar with ACCPAC, MASS90 and Crystal Reporting
- Prior experience with the use of Internet based payroll system.
- Outstandingly proficient in customer service and skills in Excel, with a strong attention aptitude.
- Remarkable organizational dexterity and willingness to work extra time as may be required. .
- Ability to carry self professionally.

Knowledge, Skills, and Abilities:

- Possess practical experience in one or more of the areas like financial reporting, project planning • software execution, industry accounting, data conversion, as well as relating with all financial aspects of a company.
- Capability to comprehend quickly and display sufficient dexterity in reasoning effectively. •

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Administrative Assistant

Reports To: Executive Director

Iob Description: Performs a wide range of administrative and office support activities for the Executive Director to facilitate the efficient operation of the organization. Monitors administrative projects. Performs admissions responsibilities and clerical support for the PTA program.

General Responsibilities:

- Answers, screens and directs inbound phone calls.
- Receives and direct visitors and clients
- Performs general clerical duties (faxing, photocopying, filing, mail distribution, etc.)
- Manages "Petty-Cash" funds and its distribution.
- Retrieves documents from filing system.
- Handles requests for information and data.
- Resolves administrative problems and inquiries.
- Provides responses to routine enquiries.
- Schedules and coordinates meetings and appointments for Executive Director.
- Opens, sort, and distribute incoming correspondence.
- Maintains office supply inventories.
- Coordinates maintenance of office equipment.
- Coordinates and maintain records for staff and students parking decals.
- Prepares staff timecards.
- Handles cash payments of products, continue education seminars, etc.
- Provides receipts to customers.
- Proctors institution and program's entrance exam.
- Receives and processes equipment requests.
- Receives and processes faculty reimbursement requests.
- Assists with the process of applicant's diploma verification process.
- Coordinates externships for the Dental Assistant Program for Miami Campus.
- Attends to the needs of the students, faculty, personnel, and public in general.
- Creates Word document and Excel Spreadsheets
- Performs any other duties as deemed necessary by the Executive Director.

Responsibilities Specifics to the PTA Program

- Organizes and schedule appointments for PTA Program
- Provides clerical support to PTA program director and faculty.
- Maintains an accurate record of prospective PTA program students.
- Send communications and distributes PTA program information to potential candidates.
- Receives and processes all PTA program admission paperwork from candidates.

- Compiles PTA candidates and enrolled student's academic files.
- Coordinates PTA program admission process with other departments.
- Conducts follow up with PTA program students to ensure that admission documentation is complete and current.
- Assist with reporting PTA program enrollment and student data to other departments.
- Initiates tracking of transfers credits requests in conjunction with PTA program director and administration.

Qualifications:

- High School diploma or equivalent. Post-secondary education on business or related field is preferred.
- Knowledge of Word and Excel required.
- Must possess computer skills and knowledge of relevant software.
- Must possess knowledge of operation of standard office equipment.
- Must possess knowledge of clerical and administrative procedures and systems such as filing and record keeping
- Must possess knowledge of principles and practices of basic office management
- Must possess exceptional customer service skills, over the phone and in person, with external customers and internal departments.
- Must possess a strong sense of urgency and problem solving skills.

Knowledge, Skills, and Abilities:

- Provides a welcoming environment for new and enrolled students and maintains effective communication with prospective students.
- Able to analyze the needs of each individual candidate and follows through accordingly answering questions, providing appropriate forms, or providing a referral to the appropriate person or department.
- Able to juggle multiple projects with superb accuracy.
- Must possess strong administrative skills.
- Must be able to anticipate needs and act accordingly.
- Must be able to work independently but also in group/collective approach.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: Admissions Representative

Reports To: Campus Director

Iob Description: This position coordinates all campus activities pertaining to admissions while working very closely with the Registrar, Financial Aid, the faculty and other institution personnel. Responsible for enrolling good prospective applicants to enter the institution. Responsible for handling files of applicants. Execute all necessary work to comply with departmental expectations. Coordinates with Campus Director different strategies for the registration of applicants.

Responsibilities:

- Provide administrative support including document filing, creating student admission file, and faxing during the admission process.
- Assist in student admission processes based on state and federal laws.
- Explain the institution's policies and enrolment process to the students and their families.
- Provide assistance to students in completing admission forms and other related paperwork.
- Schedule student appointments and interviews for admission process.
- Collaborate with team members to complete and validate the admission files of students.
- Implement strategic plans and initiatives to achieve the enrolment objectives.
- Organize admissions process educational presentations as per the Campus Director/Executive Director.
- Plan and organize admission related events and activities.
- Address student queries and complaints in timely fashion.
- Coordinate with the administrative team to schedule admission and recruitment initiatives.
- Maintain a student admissions database with clear and complete student enrolment files.
- Maintain a cordial relationship with administration, students, faculties and administrative staff teams for smooth operations.
- Collaborate with marketing efforts for preparing or updating admission materials, institution's publications, and web sites.
- Develops new ideas for promotion and provides this information to supervisor.
- Directs activities that relates to public relations with the community.
- Coordinates, prepares, and directs activities like seminars, visits to schools, newspaper ad, radio, etc.
- Coordinates promotional mailing.
- Distribute information to applicants and maintain a follow-up of such.
- Interviews all applicants in a professional and judicious manner.
- Verifies that all new students have submitted all required documentation and follows up until admission process is completed.
- Responsible for monthly statistics of enrollment of students program, and the source from which it came.

• Responsible for administering admission test (if necessary).

Qualifications:

- Some College required. Bachelor's degree preferred.
- Ability to apply TPI's policies regarding admissions.
- Two years of experience in an institution of higher education admissions or recruiting setting is highly preferred.

Knowledge, Skills, and Abilities:

- Knowledge of student admissions requirements.
- Able to interact with prospective students, parents of students, faculty and staff, and alumni to provide relevant information to implement TPI's admissions policies
- Understand the institution's philosophy/mission.
- Possesses effective interpersonal, written and verbal communication; and presentation skills.
- Ability to plan, prioritize and solve problems independently.
- Promote and provide a strong student/customer service centered atmosphere.
- Knowledge of TPI's student information system and microcomputer/software applications.
- Strong commitment to access and equity.
- Coordinate responsibilities with those of other student services departments.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: Director Biomed Program

Reports To: VP of Academic Affairs

Job Description: Responsible for day-to-day operations, assisting students toward successful program completion and staffing the classroom with instructors who support the mission of the institution. The PD is co-responsible with the Executive Director / Campus Director for the fiscal well being of the program as it relates to education. The Director also participates in activities that promote the stature of the program and the institution and abides by the mandates set by the Governing Board. Incumbent must assure that the organization philosophy: quality services to clients; development, growth, involvement, and recognition of employees; sound economic principles; and environment which is conducive to innovation, positive thinking and expansion - is considered in carrying out the duties and responsibilities of this position.

Responsibilities:

- 1. Responsible for coordinating all aspects of the Biomed program to include instruction, student externships, labs, accreditation, and supervisory responsibilities.
- 2. Provides strategic leadership for the program in education, faculty and student retention, and student services.
- 3. Participates in the governance of the program and institution, including the responsibility for academic regulations specific to the program and the curriculum.
- 4. Develops and maintain knowledge of all institutional and programmatic accreditation rules and regulations.
- 5. Follows written system for all institutional accreditation.
- 6. Assures that the program is operating within current professional essentials, including interpreting same to administrators, faculty, and affiliating agencies
- 7. Preside over the entrance/admission to program process to include health screen process, monitor results and meets with each student prospect prior to admission into the program.
- 8. Analyze, in conjunction with other faculty, educational outcomes, and examination passing rates statistics. Manage those statistics accordingly and adjust policy if necessary to ensure student success.
- 9. Interview, hire, and dismiss instructors.
- 10. Assess competency level of each instructor reviewing faculty credentials and ensuring accreditation guidelines are maintained.
- 11. Conducts classroom evaluations of all faculty (1 per quarter for FT faculty and 2 per quarter for first time/adjunct faculty).
- 12. Perform faculty evaluations, ensuring follow up and including professional development plans based on specific needs or deficits identified.
- 13. Conduct new instructor program orientation.

- 14. Select, train, develop, manage, and lead faculty and staff team members according to the guidelines provided by the Organization.
- 15. Provide support to institution and community relations activities while planning and implementing a budget including personnel requirements, program expenses, and capital needs.
- 16. Collaborate with other departments within own campus and across campus: scheduling, sharing faculty, and other.
- 17. Other responsibilities as determined by the Executive Director.

Qualifications:

- Administrative/leadershipexperience.
- Possesses Biomed degree with minimum Bachelors level.
- 3 years teaching experience in a post-secondary setting.

Knowledge, Skills, and Abilities:

- Ability to read, understand, interpret and implement accreditation criteria and state agency regulations.
- Ability to resolve inquiries and complaints from employees, students, regulatory agencies, or members of the academic or business community.
- Ability to effectively present information to faculty, academic and campus leaders, corporate leaders, and public groups.
- Experience with computerized administrative systems.
- Proficient with the use of standard office applications on personal computers.
- Other requirements specific to the discipline.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

•

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee

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Job Title: Campus Director

Reports To: Executive Director

Job Description: The Campus Director directs, manages, monitors and maintains control and supervision of the day-to-day operation of the campus. According with the institution's mission ensures that the organization complies and maintains all of its standards in the academic aspects as well as in the operation functions. This position works in accordance with the mission, core values and purposes of the institution.

Responsibilities:

- 1. Responsible for hiring of instructional in collaboration with program directors.
- 2. Responsible for hiring of administrative staff.
- 2. Responsible for providing orientation to all new hires.
- 3. Works in conjunction with the Executive Director in the management and coordination of the campus activities.
- 4. Responsible for maintaining accurate records of the education process.
- 5. Responsible for implementing new procedures.
- 6. Responsible for all the operational departments.
- 7. Responsible for coordinating the revision of curriculum and lesson plans with faculty and program directors.
- 8. Actively participates in the development of new programs.
- 9. Evaluates and provide input on recommended texts and media services.
- 10. Administers faculty/course surveys to students.
- 11. Responsible for coordination of continue education and professional development for instructors and staff.

- 12. Responsible for coordination of the physical maintenance of the institution, housekeeping, equipment, supplies, materials, and facilities
- 13. Responsible for the well-being and safety of the students and staff.
- 14. Provides academic counseling to the students depending on their needs.
- 15. Coordinates student's evaluations, probation period, and satisfactory academic progress.
- 15. Coordinates and supervises tutorial plan for students.
- 16. Ensures compliance with institution policies, procedures, practices and philosophies.
- 17. Guides and monitors all aspects of academics to ensure that quality educational opportunities are provided to students.
- 18. Oversees graduate placement efforts to ensure that student/graduates are obtaining positions related to their career objectives and field of study.
- 19. Directs the development of the library and media services; coordinates the participation of faculty and staff for such services.
- 20. Assures all students' records are complete with required documents and kept in secured file cabinet.
- 21. Responsible for preparing list of graduate students, honors, and diplomas.
- 22. Responsible for conducting the annual performance evaluation of staff.
- 23. Coordinates with program directors the annual performance evaluation of faculty.
- 24. For CAPTE accreditation purpose, submits required fees and documentation, including reports of graduation rates, performance on state licensing or certification examinations and employment rates.
- 25. Responsible for notification to CAPTE of expected or unexpected substantive change(s) within the program, and of any change in institutional accreditation status or legal authority to provide postsecondary education.
- 26. Responsible for coming into compliance with accreditation criteria within two years or the length of the program, whichever is shorter.

Qualifications:

- Bachelor's degree or progressive working experience required.
- At least six months full-time equivalent leadership experience; management and supervisory experience preferred.

Knowledge, Skills, and Abilities:

• Proven ability to manage, direct, control, implement and monitor all aspects of operations

• Excellent oral and written communications skills required.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Campus Registrar

Reports To: Campus Director

<u>Iob Description:</u> Plans, organizes, and supervises the development and operations of Admissions, Registration, and Student Records for an assigned campus.

Responsibilities:

- Attends the needs of the students, professors, personnel, and public.
- Participates in enrollment procedures.
- Coordinates procedures and services with other departments of the institution.
- Participates and follow up in the process of readmission of the students.
- Inputs all data information related with department into the institution's system
- Hands out and receive all the official schedules of classes.
- Attends and process students appeal related with change of grades and others.
- Works with all students' records including the files.
- Provides follow-ups on personal and academic documents.
- Informs student about grades obtained.
- Registers daily attendance and refer to counseling those students who do not comply with attendance or academic satisfaction.
- Controls and supervises the Registrar's Assistant activities.
- Supervises all admissions, registration, and student records activities for the assigned campus.
- Oversees procedural requirements necessary for compliance with state and federal laws affecting admissions, records, and registration.
- Gather data, and report findings to the Campus Director, the VP of Academic Affairs, the Director of Compliance and Accreditation, and the Executive Director.
- Oversees systems for on-site record maintenance, papers, and electronic files to ensure accuracy, security, and availability.
- Collaborates and participates in development of marketing to promote utilization of campus services.
- Assists with the development and assessment of new systems and procedures that the institution has implemented.
- Provides professional assistance to the Campus Director, VP of Academic Affairs, and Executive Director.
- Performs other duties as assigned.

Qualifications:

- 5 years of experience in a Campus Registrar position
- Two to four years of supervisory experience needed and work within enrollment services

environment preferred.

• Ability to apply TPI's operational policies.

Knowledge, Skills, and Abilities:

- Knowledge of admissions, registration, and records procedures and systems.
- Knowledge of institution's policies, state and federal laws.
- Knowledge of supervision and budget management.
- Ability to handle multiple responsibilities, visualize changes and solutions.
- Achieve cooperation in the mediation of disputes.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Date

Supervisor or Administrative Designee

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Job Title: Director of Accreditation and Compliance

Reports To: Executive Director

Iob Description: The Director of Accreditation and Compliance provides leadership and oversight of assessment activities for the purposes of program development and evaluation, accreditation, and institutional effectiveness. Moreover, the Director coordinates and manages institutional activities in ways that are consistent with the mission, values and vision.

Additionally, the Director of Accreditation and Compliance supports quality studentlearning by assisting academic programs in meeting the goals of defined learning outcomes, the development of assessment strategies, and encouraging a culture of learner-centered education. These goals are accomplished by working with the Executive Director, VP of Academic Affairs, and all academic programs in developing and implementing plans for assessing student learning outcomes, analyzing assessment data; serving as an assessment resource for the institution community; and facilitating communication about assessment activity through a variety of venues.

Responsibilities:

- Coordinates institution's accreditation activities, including Academic Program Reviews.
- Ensures that institutional assessment activities are appropriately supportive of and nested within the context and structure of the Institution's Strategic Plan.
- Related to the aforementioned, the Director, in consultation with the Executive Director and VP of Academic Affairs, conceptualizes the TPI's approach to evaluation, assesses the adequacy of current assessments and evidence, and develops all needed new assessments to meet accreditation and program approval standards.
- Conducts internal reviews and evaluations of current programming (AS and certificate programs).
- Manages and oversees accreditation process for the PTA and OTA programs.
- Works with the Executive Director, VP of Academic Affairs, Program Directors, and faculty to develop policies and procedures to foster a "culture of assessment."
- Establish, maintain, and deepen institution-wide collaborations and efforts in institutional assessment.
- Ensures program assessment activities are properly designed, implemented, analyzed, and reported in a manner that is useful for curricular and program improvement.
- Manages special assessment and accreditation projects as assigned.
- Manage and support the development of institutional assessment activities in support of:
 - o Institutional Strategic Planning
 - Institutional Brand (strength and mission/vision consistency)
 - Organizational Assessment (student general education and programs outcomes, operational unit assessment, and personnel assessment)

• Resource Allocation Alignment (departmental goals, alignment of institutional resources with strategic goals/themes) •

Qualifications:

- Three to five years of experience in a leadership position in a higher-education setting.
- Master's degree required; Doctorate degree in Education or related field preferred.
- Successful professional experience in an educational environment.
- Strong research and analytical skills.
- Familiarity with college level accreditation agencies such as COE, CAPTE, ACOTE.
- Basic knowledge of the field of education and current trends related to assessment and evidencedriven policies.
- Ability to work with senior administrators, staff, and faculty of all levels as a team in order to write reports and meet deadlines.
- Ability to extract, properly summarize, interpret, and report data from databases.
- Proficiency in student information systems, data analysis software, Microsoft Office and Excel.
- Excellent writing and presentation skills.
- Demonstrated success working as part of the team
- Strong leadership skills.

Knowledge, Skills, and Abilities:

The successful candidate will possess a wide range of personality traits, work habits, communication and social skills necessary to work effectively within the institution's environment. This person will have both personal and professional integrity, strong communication skills and a professional appearance and presentation. In addition, a strong desire to succeed in a challenging environment.

Other proficiencies and best practices include:

- **Integrity & compliance:** Can be relied upon to act ethically, to safeguard confidential information and to adhere to the mission and core values of the organization.
- Leadership: Ability to build senses of shared purpose and commitment in others.
- **Strategic vision & thinking:** Ability to position the organization for the future, looking beyond present situation to conceptualize key trends and identify changing market demands.
- **Coaching & developing others:** Guides others in performing effectively and provides others with development opportunities; provides direction without moving responsibility.
- **Managing performance:** Assists others in setting goals that are challenging and aligned with the broader organization goals.
- **Relationship building:** Networks inside the organization and builds positive strategic relationships with key individuals.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: Executive Director

Reports To: Governing Board

<u>Iob Description</u>: Direct, lead, and perform the management of the institution activities; and work closely with the Governing Board and VP of Academic Affairs to develop and implement the organization's mission, vision, and goals.

Responsibilities:

- 1. Supervises the management in achieving the mission of the institution in its academic instructions.
- 2. Is responsible for keeping the governing board and the advisory board advised of the institution, keeping them informed of all developments, trends, and activities in occupational resources.
- 3. Assists the governing board.
- 4. Hold meetings to advise the boards with information relative to day-to-day operations of the institution.
- 5. Provides technical and professional support to improve services and programs by the institution.
- 6. Controls budged and coordination of annual budget projections.
- 7. Have control of banking accounts of the institution. Responsible for banking reconciliation.
- 8. Responsible for preparation of projected income and expenses of the institution.
- 9. Prepare all necessary documents and information for government and federal agencies.
- 10. Approves payment plan for students who qualify. Administers federal funds (if such is the case).
- 11. Responsible for job descriptions for all departments.
- 12. For CAPTE accreditation purpose, submits required fees and documentation, including reports of graduation rates, performance on state licensing or certification examinations and employment rates.

- 13. Responsible for notification to CAPTE of expected or unexpected substantive change(s) within the program, and of any change in institutional accreditation status or legal authority to provide postsecondary education.
- 14. Responsible for coming into compliance with accreditation criteria within two years or the length of the program, whichever is shorter.

Qualifications:

- Possesses a degree in an appropriate field, and 2 years of related work experience; or any satisfactory combination of experience and training, which demonstrates the knowledge, skills and abilities to perform the above duties.
- Possesses broad knowledge of institutional operations and activities coordination.

Knowledge, Skills, and Abilities:

- Excellent communication skills, public speaking ability, and presentation techniques.
- Experience in media relations, developing, and designing marketing information, and managing teams.
- Ability to plan, organize and direct multiple programs.
- Ability to analyze and prepare information for reports.
- Ability to research information.
- Knowledge of budgeting and records maintenance.
- Task/action oriented.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Financial Aid Officer

Reports To: Campus Director

<u>Iob Description</u>: Evaluates, approves, and awards financial aid to students in accordance with federal, state, and institution regulations, policies, and operating guidelines. Assesses financial needs of students, and advises students and parents regarding financial aid options, processes, and requirements. Evaluates student academic progress, and adjudicates academic progress appeals. Participates as appropriate in systems/procedures planning and management.

Responsibilities:

- Analyzes and evaluates financial viability of students and families, and provides advice and counsel regarding available financial aid opportunities, eligibility requirements, and the application process.
- Reviews and assesses eligibility of applications for financial aid; exercises professional judgment to determine whether adjustments should be made.
- Reviews for accuracy and provides signature approval/disapproval of loan applications, promissory notes, and other financial documents.
- Conducts orientations, and entrance and exit interviews, in accordance with institution, state, federal, and other agency guidelines.
- Responds to inquiries and researches and resolves problems related to transactions handled by the department; serves as liaison with other departments in the resolution of day-to-day administrative and operational issues.
- Provide information, in person, on the telephone, and through electronic means, to students, prospective students, and families regarding student financial aid.
- Serves as liaison with state, federal, and other agencies; keeps abreast of student assistance opportunities and program regulations.
- Oversees the collection, management, and reporting of data in accordance with the objectives of the position; participates in the development and implementation of data management systems and procedures, as appropriate.
- Serves as an operational resource to other staff and/or students.
- Educates students, parents, and/or other interested parties on financial aid policy and procedural issues.
- Participates in academic advisement and crisis intervention.
- Performs miscellaneous job-related duties as assigned.

Qualifications:

- High school diploma or GED; at least 5 years of experience directly related to the duties and responsibilities specified.
- Completed degree(s) from an accredited institution that are above the minimum education requirement may be substituted for experience on a year for year basis.

Knowledge, Skills, and Abilities:

- Strong interpersonal and communication skills and the ability to work effectively with a wide range of constituencies in a diverse community.
- Skill in the use of personal computers and related software applications.
- Ability to communicate effectively, both orally and in writing.
- Ability to verify and assess student eligibility for financial aid.
- Ability to analyze and solve problems.
- Interviewing skills.
- Ability to make evaluative judgments.
- Ability to investigate and analyze information and draw conclusions.
- Ability to supervise and train employees, to include organizing, prioritizing, and scheduling work assignments.
- Organizing and coordinating skills.
- Knowledge of federal and state laws, regulations, and policies concerning the provision of financial aid to students.
- Knowledge of financial aid policies, procedures, and eligibility requirements.
- Knowledge of data management systems and processes.
- Ability to develop and present educational information/material.
- Ability to communicate effectively verbally, in writing, and over the telephone.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: Instructor

Reports To: Program Director

Job Description: The instructor teaches in discipline areas in which he or she has specific training and competence. As such, the instructor is expected to plan, organize, and teach in a manner that encourages academic development in harmony with the institution's mission, goals, and values. He or she also promotes and directs successful student learning in keeping with the learning-centered values and goals of the organization. Faculty members are expected to demonstrate and maintain competence in each of the following areas throughout their employment at TPI.

Responsibilities:

- I. Mastery of Subject Matter
 - a. Demonstrate a thorough and accurate knowledge of their field or discipline.
 - b. Display an ability to interpret and evaluate the theories of their field or discipline.
 - c. Connect their subject matter with related fields.
 - d. Stay current in their subject matter through professional development, through involvement
 - in professional organizations, and attending professional meetings, conference or workshops.

e. Learn and use technology to enhance teaching and the educational experience when appropriate.

- II. Teaching Performance
 - a. Teach a course load appropriate to their discipline or program.
 - b. Plan and organize instruction in ways that maximize student learning.
 - c. Employ appropriate teaching and learning strategies to communicate subject matter to students.

d. Modify, where appropriate, instructional methods and strategies to meet diverse students needs.

e. Employ available instructional technology, i.e. the Internet, Blackboard, or interactive technology, when appropriate.

f. Encourage the development of communication skills and higher order thinking skills through appropriate assignments.

g. Contribute to the selection and development of instructional materials in accordance with course objectives.

- III. Evaluation of Student Learning
 - a. Establish and follow meaningful learning objectives.
 - b. Develop and explain methods that fairly measure student progress toward course objectives.
 - c. Evaluate student performance fairly and consistently and return student work promptly to promote

maximum learning.

- d. Maintain accurate records of student progress and submit final grade rosters to registrar each semester according to established deadlines.
- e. Demonstrate sensitivity to student needs and circumstances.

IV. Support of Institution's Policies and Procedures

The incumbent in this job is expected to assist the Institution in achieving its vision and mission. Customer focus, college service, and a willingness to assist as needed are expectations for all employees.

- a. Teach classes as assigned in a multi-campus environment, if necessary.
- b. Teach credit or non-credit courses within field or discipline as needed.
- c. Maintain regular office hours to ensure accessibility to colleagues and to students for advisement and consultation.
- d. Serve as faculty advisor within the current institution's advisement system.
- e. Prepare, distribute, and submit syllabi and approved course outlines for all assigned sections in accordance with program and institutional policies.
- f. Maintain confidentiality of student information.
- g. Substitute for other instructors within discipline or program in case of an absence.
- h. Exercise stewardship of institution's facilities and materials.
- V. Participation in Institution and Program Activities
 - a. Serve on institutional and program committees as assigned.
 - b. Participate in meetings and events required by the institution and program administrators.
 - c. Respond in a timely fashion to information requests from institution and program administrators.
 - d. Support both adjunct and full-time colleagues.
 - e. Contribute to program curriculum development processes.
 - f. Participate in graduation ceremonies.
 - g. Demonstrate strong interpersonal skills in communication with students, colleagues, staff, and administrators as an individual or on a team.
- VI. Contribution to the Growth and Enhancement of institution's Mission and Programs
 - a. Maintain familiarity with institution's goals, mission and long-range plans.
 - b. Contribute to planning and development processes through appropriate mechanisms and channels.

c. Participate in professional activities that contribute to the educational goals of the institution and its constituents.

d. Perform professional responsibilities in accordance with pertinent goals, missions, and plans of the institution and program.

e. Participate in the marketing, recruitment and retention of students, faculty and staff.

Qualifications:

- Non-Degree Programs
 - Instructors must possess, at a minimum, a certification/diploma in their teaching field from an accredited institution.
- Degree Granting Programs
 - General Education Faculty
 - Instructors must possess, at a minimum, a bachelor's degree from an accredited institution with a minimum of 18 credits in the field of their assigned teaching

responsibility.

- o Core Faculty
- Instructors must possess, at a minimum, an Associates degree in the program's field from an accredited institution.
- Minimum two years of teaching experience (could be in a clinical setting).
- Minimum three years clinical experience as a licensed clinician.
- Licensed, or candidate for licensure, in the State of Florida.

Knowledge, Skills, and Abilities:

- All instructors must have pedagogical character qualities and academic skills necessary to fulfill the duties of their job assignments as listed above.
- Experience in teaching is preferred, though not required.
- TPI strives to maintain sound teaching principles; thus, all instructors, once they are employed at TPI, are expected to be part of Faculty Development efforts.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Library Director and Distance Education Director

Reports To: Executive Director

Job Description: The Library Director is responsible for the management of the library collection and the provision of library services to students, faculty, and staff. Duties include policy recommendation, departmental planning, and direction and administration of library activities. The position is also invested in making the most challenging library technical decisions. The work requires that the employee have thorough knowledge, skill, and ability in every phase of the library field.

Distance Education Director responsibilities include facilitating the development, implementation, and evaluation of distance education courses and programs; marketing; and enrollment management. The position provides training to assist faculty and staff with incorporating instructional design principles that reflect current learning theory and efficiently employing technology to ensure the sustained academic integrity and continual improvement of the student's learning process.

Responsibilities (Library Director):

- Provide reference service to students, faculty, and staff with development of research skills.
- Design and develop learning modules for online and self-paced learning.
- Create and deliver a wide range of information literacy services to students and faculty, including classroom teaching, WebCT/Blackboard courses, and individualized training.
- Perform bibliographic searches in a wide variety of medical and educational databases, medical/health journals and print collections.
- Consult with faculty and students to identify, evaluate and recommend relevant instructional information technology for use and purchase, using present and emerging information and technologies.
- Promote instruction design resources and services to college faculty; maintain up-to-date knowledge of techniques for assessing the impact of technology use on teaching and learning.
- Collaborate with faculty in research projects and writing for publication.
- Participate in relevant campus committees to ensure cooperation between the Library and other groups both within and outside the Institution, as assigned.
- Select appropriate information technology to acquire, organize and disseminate information.
- Utilize appropriate business and management approaches to communicate the importance of information services to senior management.
- Facilitates the continuing transformation of the Library into a knowledge commons that integrates diverse resources, seek new opportunities, engages with the community, collaborates with university units, and sustains a vibrant research and learning community.

- Creates an environment that facilitates research and scholarly activity with an understanding of innovative and traditional methods of information dissemination.
- Create updated library publications, such as manuals, guides, bookmarks, bibliographies, subject guides and other information literacy/library promotional materials.
- Promotes and advocates for library programs that address the needs of students, staff, faculty, and the community.
- Works with library staff and institution's department heads/deans, as well as external sources, to identify, evaluate and implement programs that improve services and facilities, enhance the quality of resources and increase operational efficiency within the library.
- Prepares and administers the library budget.
- Fosters professionalism and a positive work/learning environment.
- Supervises the professional library staff and faculty.
- Develops, maintains, and promotes the Library Archives and special collections.
- Develops, amends, and enforces all library and archive policies and regulations adopted by the institution.
- Coordinates and oversees all research inquiries to the Institute's Archives and special collections.
- Acquire new materials in all formats consistent with overall institutional strategic goals, the library's collection development policy, and annual budget allocations.
- Continually improves information services in response to the changing needs.
- Assist in strategic planning and preparation of the annual library budget.
- Provide excellent instruction and support for library and information service users.
- Assist with the Collection Development and Acquisitions of Library materials for all academic programs, create and implement all library procedures and policies, and set up of LibraryWorld.
- Review existing collections for continued curriculum relevance.
- Assist with the marketing of library and tutoring center to students and faculty, provide reference assistance to students, and work to promote a student-centered environment in the library
- Responsible for providing reference, research and information literacy instruction to the campus community, using library materials in all formats.
- Assist faculty, students, and staff in the development of research skills as well as teach patrons how to use the Library's integrated catalog.
- Develop and maintain library operations manual.
- Attend meetings and workshops, and seek additional opportunities for professional development.
- Responsible for cataloging all library materials.
- Full administrative ownership of the CSOD LMS, including configuration, tracking, troubleshooting and reporting for all Management Concepts solutions that involve the LMS.
- Assist with the design and maintenance of the Student, Employee and Instructor portals.
- Identify and communicate opportunities for process and quality improvements; provide feedback on usage, defects, and suggested enhancements.
- Stay up-to-speed with CSOD's quarterly releases, and recommend ways to best apply the new features/functionality in day-to-day business.
- Create, manage, and enforce LMS standards, policies, and procedures.
- Ensure proper user rights are assigned to maintain adequate system security.
- Assist in digital content implementation of master and live courses into the LMS environment.
- Other duties as assigned.

Knowledge, Skills, and Abilities:

- Thorough knowledge of the principles and practices of library functions.
- Thorough knowledge of the principles and practices of administration as applied to a library.
- Thorough ability in oral and written communications.
- Thorough ability to administer the activities of a library and to supervise the work of others.
- Thorough ability to make decisions in an environment of limited resources and competing claims.

• Thorough ability to establish and maintain effective working relationships with superiors, subordinates, associates, officials of other agencies, and the general public.

Responsibilities (Distance Education Director):

- Promote development and implementation of policies, procedures, and standards of effective delivery of distance education.
- Coordinate physical resources; assign and supervise support staff; respond to problems related to distance learning as needed; and communicate with faculty, staff, and students regarding instructional stoppages or other problems.
- Participate in an on-going planning process that includes specific objectives, activities, and time frames; assist in the development of the distance learning annual budget; develop annual goals and action plans in cooperation with the directive.
- Collaborate with student services, campus bookstore, Learning Assistance Center(s), Public Information, Marketing and Development Manager, and site directors to address various student information, advising, and learning support needs at all campuses.
- Provide training for instructors in the use of distance education technologies, methods, and procedures.
- Assist faculty in ensuring courses offered through distance education meet the overall educational standards of the institution.
- Participate in the faculty evaluation process where appropriate.
- Supervise the blackboard in designing and implementing processes for reviewing and evaluating distance education courses for instructional effectiveness and assist faculty with effective course design that reflects principles of learning theory.
- Serve as the college distance education coordinator and primary contact for the Praxis Institute, as well as to other external organizations; provide accurate and appropriate information for internal and external reports; and oversee the maintenance of distance learning records and files.
- Remain current with regional and national developments in distance education and update faculty and staff on these developments through classes, workshops, and one-on-one training as appropriate.
- Ensure compliance with college, state, and federal codes, guidelines, and policies, including accreditation standards, copyright and intellectual property rights, and Section 508 compliance.
- Supervise distance education staff, including set priorities, direct workflow, and conduct employee evaluations.
- Identify, write, and administer grant and revenue generating proposals consistent with college and district strategic plans.
- Attend a variety of meetings and serve on assigned committees.
- Perform related duties as assigned.

Qualifications:

- Bachelor's Degree in Library Science or/and Bachelor's Degree in Business Administration (Master's Degree in Library Science preferred) from an accredited college or university.
- Five years of progressively responsible library administration experience including at least three years in a supervisory capacity, OR, an equivalent combination of education and experience substituting on the basis of one year for each year of education.
- Three years demonstrated progressively responsible leadership and supervisory roles in an educational setting.
- Demonstrated sensitivity to and understanding of the diverse academic, socioeconomic, cultural, ethnic, and disability backgrounds of community higher education students and employees.

Knowledge, Skills, and Abilities:

- Current issues, trends, and best practices in distance education.
- Modes of distance delivery, including online, interactive television, blackboard, hybrid, and video

conferencing.

- Recent developments in distance education technologies.
- Effective instructional design principles.
- Section 508 compliance standards for distance education.
- Matriculation procedures.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Library Assistant

Reports To: Library Director

Iob Description: The Library Assistant helps to maintain a study atmosphere in the library and tutoring lab helping students and staff with basic research needs. The work-student will also aid staff by performing clerical duties such as data entry, phones, and other administrative projects as needed.

Responsibilities:

- Assist students and staff in the circulation of library materials and use of online database resources.
- Responsible for shelving, straightening and shelf reading of library materials.
- Process new library materials received for circulation.
- Process periodicals received for circulation.
- Manage one or more simple projects that require data-entry and summary skills.
- Compiles records, sorts and shelves books, and issues and receives library materials, such as books, films, slides, and phonograph records: Records identifying data and due date on cards by hand or using photographic equipment to issue books to patrons.
- Inspects returned books for damage, verifies due-date, and computes and receives overdue fines.
- Reviews record to compile a list of overdue books and issues overdue notices to borrowers.
- Sorts books, publications, and other items according to classification code and returns them to shelves, files, or other designated storage area.
- Locates books and publications for patrons.
- Issues borrower's identification card according to established procedures.
- Repairs books, using mending tape and paste and brush and places plastic covers on new books.
- Answers inquiries of nonprofessional nature on telephone and in person and refers persons requiring professional assistance to the librarian.
- Perform other duties as assigned.

Additional responsibilities for Library Assistant in Hialeah Campus only:

For the OTA Program:

- Works in conjunction with the Admission's representative and the Registrar to complete new students' files and recordkeeping.
- Facilitates student compliance with obtaining of proper documentation needed for completion of students' files.
- Serves as test monitor during students' placement examination.
- Works in conjunction with the Placement Officer in preparing statistics related to student graduation, employment, per program, for programmatic, state and federal agencies.

• Performs other duties as assigned by the Praxis Institute (e.g. Clerical support as required by Program Directors and Faculty to facilitate the day to day operations of programs).

Additional responsibilities for Library Assistant in Miami Campus only:

- Organizes and schedule appointments for Biomedical Technology Program.
- Provides clerical support to Biomedical Technology program director and faculty.
- Maintains an accurate record of prospective Biomedical Technology program students.
- Sends communications and distributes Biomedical Technology program information to potential candidates.
- Receives and processes all Biomedical Technology program admission paperwork from candidates.
- Compiles Biomedical Technology candidates and enrolled students' academic files.
- Coordinates Biomedical Technology program admission process with other departments.
- Assist with the reporting of Biomedical Technology program enrollment and student data to other departments.
- Provide diplomas and certificates to Massage Therapy, Dental Assistant, and Pharmacy Technician students when they graduated.
- Distribute print learning resources to students (Massage Therapy, Dental Assistant and Pharmacy Technician.)

Qualifications:

- High school diploma or GED.
- Keyboarding and general office experience.
- Some previous library or work experience.
- Good interpersonal communication skills.
- Dependable with an excellent record of attendance, punctuality, flexibility, and time management.
- Must be able to occasionally lift 15 lbs.

Knowledge, Skills, and Abilities:

- Working knowledge of library methods and procedures.
- Ability to operate library machines properly.
- Keyboarding and filing ability.
- Knowledge of English grammar and spelling.
- Willingness to maintain skills in areas mentioned above through active participation in appropriate library skills learning experiences.

Training:

• The Library Assistant will be trained on essential Library functions by the librarian.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date



Job Title: Maintenance Worker

Reports To: Campus Director

<u>Iob Description:</u> Under general supervision, performs a variety of work in the general maintenance and repair of buildings, facilities, and equipment. Performs related duties as assigned.

Responsibilities:

Position may not include all of the listed duties, nor do all of the listed examples include all tasks which may be found in positions within this classification.

- General Maintenance and Repair of Buildings, Facilities, Equipment, and Grounds
- Performs a variety of work in the maintenance and repair of buildings and grounds at various facilities/sites including:
 - Carpentry, electrical, plumbing, glazier, and painting tasks;
 - Repairs and treats structures such as floors, showers, sinks, walls, ceilings, and carpets;
 - o Performs minor troubleshooting,
 - o Repairs, and adjustments of locks on doors, cabinets, desks, closets;
 - Repairs door hinges; cleans plugged key slots;
 - Changes filters on various ventilation units;
 - Reports mechanical malfunctions to appropriate party for action;
 - Moves and assists in moving furniture and equipment at various facilities/sites;
 - Sets up and breaks down cubicle partitions and furniture;
 - Identifies projects requiring the services of a higher skilled crafts person;
 - Closes Hialeah campus
 - Assists with special projects periodically as directed;
 - Maintains clean, safe, and orderly work sites.

a. Carpentry: Performs basic rough and finished carpentry repair of structures such as partitions, walls, doors, window frames, office furniture, and shelves.

b. Glazier: Removes broken glass, putty or plastic; replaces windows and door hardware; replaces doors, and light fixtures.

c. Electrical: Performs basic electrical repair work for switches, outlets, plugs, cables, appliances, and lighting systems; reports unsafe electrical conditions.

d. Plumbing: Identifies and performs basic repairs of plumbing leaks or breaks; opens clogged lines and drains; replaces seals and other minor parts; maintains drinking fountains; repairs, replaces and maintains hot water heaters and other appliances.

e. Painting: applies and prepares various surfaces for paint, enamel, lacquer, varnish, or stain; removes or paints over graffiti; repairs wall coverings.

f. Grounds Maintenance: Maintains grounds in clean, safe, and orderly manner.

Qualifications:

Any combination of education, training, and experience which demonstrates ability to perform the duties and responsibilities as described above including related work experience in one or more of the building trades.

Knowledge, Skills, and Abilities:

- Methods used in maintenance including basic knowledge of the following trades: carpentry, plumbing, glass replacement, painting, maintenance of hand tools, standard practices and tools used in the maintenance and repair of building facilities;
- Safety practices and procedures related to the building trades;
- Proper lifting techniques;
- Basic math to add, subtract, multiply, and divide.
- Effectively use a variety of hand and power tools;
- Perform a variety of physical labor including climbing ladders, bending, kneeling, reaching, and standing for long periods of time; lift and carry boxes, tools, equipment and materials;
- Review and identify projects needed to be serviced by outside contractors;
- Follow oral and/or written instructions; c\
- Communicate effectively in both oral and written form;
- Maintain work logs and service requests;
- Establish and maintain cooperative and effective working relationships with those contacted in the course of work assignments.
- Possession of a valid Florida driver's license; willingness to work outside (if necessary) in inclement weather.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Date

Supervisor or Administrative Designee

252



Job Title: Director Non-Degree Occupational Program

Reports To: VP of Academic Affairs

Job Description: Responsible for day-to-day operations, assisting students toward successful program completion and staffing the classroom with instructors who support the mission of the institution. The PD is co-responsible with the Executive Director / Campus Director for the fiscal well being of the program as it relates to education. The Director also participates in activities that promote the stature of the program and the institution and abides by the mandates set by the Governing Board. Incumbent must assure that the organization philosophy: quality services to clients; development, growth, involvement, and recognition of employees; sound economic principles; and environment which is conducive to innovation, positive thinking and expansion - is considered in carrying out the duties and responsibilities of this position.

Responsibilities:

The Program Director will adhere to the duties and responsibilities as outlined below:

- Responsible for the management and administration of the program, including planning, evaluation, budgeting, selection of faculty and staff, and commitment to strategies for professional development.
- Demonstrates sufficient release time to ensure that the needs of the program are being met.
- Facilitates ongoing programmatic assessment through collaboration with the VP of Academic Affairs and faculty to review, document and revise, as applicable (but not limited to):
 - 1. Curriculum and program objectives
 - 2. Curriculum proposals and revisions (e.g. textbooks, course revisions)
 - 3. Programmatic and Institute resources (internal and external)
 - 4. Faculty and student evaluations
 - 5. Fieldwork evaluations (student and site) Only for Pharmacy Tech and Dental Assistant Programs.
 - 6. Employer and graduate surveys
- May be assigned other institutional duties as requested by the Praxis Institute that do not interfere with the management and administration of the Program.

Qualifications:

- Hold a minimum of a Diploma degree in the respective program field.
- Minimum of three (3) years of documented experience in the respective field. This experience could include:
 - 1. Supervisory/administrative experience, budgeting, program planning and implementation
 - 2. Experience and understanding of working in health-care field.

- 3. At least one (1) year teaching experience at a post-secondary level.
- Strong leadership, communication (oral and written), organizational, and interpersonal skills
- **<u>PCT Program only</u>**: 1 year of experience in nursing home services is required.

Knowledge, Skills, and Abilities:

- Ability to read, understand, interpret and implement accreditation criteria and state agency regulations.
- Ability to resolve inquiries and complaints from employees, students, regulatory agencies, or members of the academic or business community.
- Ability to effectively present information to faculty, academic and campus leaders, corporate leaders, and public groups.
- Experience with computerized administrative systems.
- Proficient with the use of standard office applications on personal computers.
- Other requirements specific to the discipline.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Date

Supervisor or Administrative Designee



Job Title: OTA Program Adjunct Faculty

Reports To: Program Director

Iob Description:

Responsibilities:

Adjunct faculty will function as described in the Standards of Practice of the Occupational Therapy profession and the American Occupational Therapy Association (AOTA) Code of Ethics as well as assist with the duties and responsibilities as outlined in the Praxis Institute Employee and Faculty handbook (page 13-14) and as outlined below (in accordance to ACOTE standard A.2.0):

- Curriculum development, maintenance and quality assurance
- Facilitate the development of policies and procedures (Academic, Admissions)
- Student advisement and tutoring
- Facilitate programmatic assessment of the Program review, document and revise, as applicable (but not limited to):
 - 1. curriculum and program objectives
 - 2. curriculum proposals and revisions (e.g. textbooks, course revisions)
 - 3. programmatic and Institute resources (internal and external)
 - 4. faculty and student evaluations
 - 5. employer and graduate surveys
 - 6. Program's attainment of benchmark NBCOT pass rate
- Work in conjunction with the guidelines established with the Accreditation Council in Occupational Therapy (ACOTE) to meet and maintain accreditation standards, including, documented expertise in area (s) of teaching responsibility.
- Adhere to biannual continuing education requirements to facilitate licensure requirements and in accordance to his/her professional development plan.
- Obtain professional membership (as a recommendation) and participate in community awareness/education of the profession.
- Work on an "as needed" schedule while still upholding the expectations outlined by the Program and the Praxis Institute.
- May be assigned other institutional duties as requested by the Praxis Institute that do not interfere with curriculum of the Program.

Qualifications:

- Licensed Occupational Therapist or Occupational Therapy Assistant in the state of Florida
- Hold a minimum of a Bachelors degree (not limited to Occupational Therapy) awarded by an institution that is accredited by an USDE-recognized regional or national accrediting body.
- Minimum of three (3) years of documented experience in the Occupational Therapy field.
- Possess documented expertise for area(s) of teaching responsibility sought and knowledge of the content delivery method
- At least one (1) year teaching experience is preferred
- Strong leadership, communication (oral and written), organizational and interpersonal skills

Knowledge, Skills, and Abilities:

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Academic Fieldwork Coordinator (AFC)

Reports To: Program Director

Iob Description:

Responsibilities:

The Academic Fieldwork Coordinator will function as described in the Standards of Practice of the Occupational Therapy profession and the American Occupational Therapy Association (AOTA) Code of Ethics as well as adhere to the duties and responsibilities as outlined in the full-time faculty job description and in conjunction as outlined below (in accordance to ACOTE standard C.1.0):

- Responsible for the Program's compliance with Fieldwork education requirements:
 - a. Ensure that the fieldwork program reflects the sequence and scope of content in the curriculum design in collaboration with faculty so that fieldwork experiences strengthen the ties between didactic and fieldwork education
 - b. Document the criteria and process for selecting fieldwork sites
 - c. Demonstrate that the AFC and Clinical Instructors (CI) collaborate in establishing fieldwork objectives and communicate about progress with the student and Clinical instructor
- Collaborate in establishing fieldwork objectives prior to the fieldwork experience and communicate with the student about progress and performance throughout the fieldwork experience:
 - a. Ensure that the ratio of Clinical Instructors to students' ratio is sufficient to provide proper supervision and frequent assessment of student progress in achieving stated fieldwork objectives.
 - b. Ensure that fieldwork agreements are sufficient in scope and number to allow completion of graduation requirements as outlined by the Program and the Praxis Institute
 - c. Obtain and maintain (in a secure manner) evidence of understanding and all records related to steps in preparation for fieldwork experiences as well as progress and feedback related to student performance and student evaluation of clinical sites.
- Demonstrates sufficient release time to ensure that the needs of the fieldwork program are being met as indicated in OTA Program Policies & Procedures Manual, page 142
- To facilitate programmatic assessment, collaborate with the Program Director in assessing the fieldwork education experience/evaluations, the clinical sites and Instructors.
- May be assigned other institutional duties as requested by the Program Director and the Praxis Institute that do not interfere with the management and administration of the fieldwork program.

Qualifications:

- Licensed Occupational Therapist or Occupational Therapy Assistant in the state of Florida
- Hold a minimum of a baccalaureate degree awarded by an institution that is accredited by an USDE-recognized regional or national accrediting body.
- Previous teaching experience preferred
- Minimum of three (3) years experience as a clinician and includes experience as a Clinical Educator to students
- Strong communication, organizational and interpersonal skills
- Ability to work autonomously with minimal supervision

Knowledge, Skills, and Abilities:

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Supervisor or Administrative Designee

Date



Job Title: Director OTA Program

Reports To: VP of Academic Affairs

Job Description: Responsible for day-to-day operations, assisting students toward successful program completion and staffing the classroom with instructors who support the mission of the institution. The PD is co-responsible with the Executive Director / Campus Director for the fiscal well being of the program as it relates to education. The Director also participates in activities that promote the stature of the program and the institution and abides by the mandates set by the Governing Board. Incumbent must assure that the organization philosophy: quality services to clients; development, growth, involvement, and recognition of employees; sound economic principles; and environment which is conducive to innovation, positive thinking and expansion - is considered in carrying out the duties and responsibilities of this position.

Responsibilities:

The Program Director will function as described in the Standards of Practice of the Occupational Therapy profession and the American Occupational Therapy Association (AOTA) Code of Ethics as well as adhere to the duties and responsibilities as outlined in the Praxis Institute Faculty handbook, the Full-time faculty job description and as outlined below (in accordance to ACOTE standard A.2.0):

- Responsible for the management and administration of the program, including planning, evaluation, budgeting, selection of faculty and staff, maintenance of accreditation, and commitment to strategies for professional development.
- Demonstrate sufficient release time to ensure that the needs of the OTA program are being met as indicated in OTA Program Policies & Procedures Manual (page 142)
- Facilitate ongoing programmatic assessment of the Program via collaboration with the VP of Academic Affairs, the Academic Fieldwork Coordinator and faculty to review, document and revise, as applicable (but not limited to):
 - 1. Curriculum and program objectives
 - 2. Curriculum proposals and revisions (e.g. textbooks, course revisions)
 - 3. Programmatic and Institute resources (internal and external)
 - 4. Faculty and student evaluations
 - 5. Fieldwork evaluations (student and site)
 - 6. Employer and graduate surveys
 - 7. Program's attainment of NBCOT pass rate
- Work in conjunction with the guidelines established with the Accreditation Council in Occupational Therapy (ACOTE) to meet and maintain accreditation standards.

- Communicate, as applicable, with ACOTE to include completing ACOTE reports/requests in a timely fashion.
- Adhere to biannual continuing education requirements to facilitate licensure requirements and professional development.
- May be assigned other institutional duties as requested by the Praxis Institute that do not interfere with the management and administration of the Program.

Qualifications:

- Licensed Occupational Therapist or Occupational Therapy Assistant in the state of Florida.
- Hold a minimum of a Masters degree (not limited to Occupational Therapy) awarded by an institution that is accredited by an USDE-recognized regional or national accrediting body.
- Minimum of five (5) years of documented experience in the Occupational Therapy field. This experience must include:
 - 1. Supervisory/administrative experience including but not limited to supervising OT practitioners, budgeting, program planning and implementation
 - 2. Experience and understanding of working with Occupational Therapy Assistants
 - 3. At least one (1) year teaching experience at a post-secondary level.
- Strong leadership, communication (oral and written), organizational, and interpersonal skills

Knowledge, Skills, and Abilities:

- Ability to read, understand, interpret and implement accreditation criteria and state agency regulations.
- Ability to resolve inquiries and complaints from employees, students, regulatory agencies, or members of the academic or business community.
- Ability to effectively present information to faculty, academic and campus leaders, corporate leaders, and public groups.
- Experience with computerized administrative systems.
- Proficient with the use of standard office applications on personal computers.
- Other requirements specific to the discipline.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date



Job Title: Placement Officer

Reports To: Campus Director

Job Description: Obtains employment and experiential opportunities in business and industry for students and alumni in all curricula. Counsel, prepare, and enhance hiring potential of students, new graduates, and alumni into the job market. Assist in the placement of work-study eligible students.

Responsibilities:

- Generates employment opportunities for TPI students and alumni by establishing and maintaining productive employer partnerships.
- Interviews futures graduates.
- Obtains, from records clerk, list of upcoming graduates to prepare them in how to present themselves for job interview.
- Makes contact with the eligible students and explain all possibilities of employment in the career chosen.
- Is familiar with the job preferences of the student.
- Maintains a list of job opportunities of the industry to be contacted for placement of the institutions' student.
- Makes personal contact with companies of the industry by writing, phone, or personal visits.
- Follows up on students who are placed and verify with employers his/her performance, and helps solve any problems, if any.
- Maintains proper documentation in students file of student notification or letter sent and try to provide employment for at least 70% or more per class and per program.
- Prepares statistics of employment per program for state and federal agencies.
- Documents all efforts done in seeking employment for students and prepare monthly report of all works accomplished.
- Collaborate and promote Career Planning services through in-class presentations, student organization outreach, New Student Orientation and in concert with institution's support services.
- Markets Career Planning services and programs to business and industry, as well as non-profits and internal constituencies by targeting mailings and e-mailings, attending promotional events, presenting information and workshops at various business functions, and through involvement in business associations.
- Aggressively contacts businesses and industries in the Institution's service area to develop partnerships and placements.
- Helps students identify employment options that match their career interests.
- Assists students in all aspects of the job search including resume writing, interviewing techniques, and job referrals.

- Schedules and follows up on student interviews with prospective employers.
- Participates in coordination and organization of on-campus events such as Career job fair.
- Ensures that new jobs and internships are submitted and posted.
- Assists in publicizing job placement and internship opportunities to TPI community.
- Develops and maintains a collaborative relationship with academic departments and all TPI stakeholders.
- Contacts business and industry to develop reciprocally beneficial partnerships for jobs, internships and job shadowing opportunities.
- Assists employers in advertising job opportunities through campus systems.
- Develops an active on-campus business and industry presence.
- Assist with maintaining employer database(s).
- Maintains student files as needed. Submit reports as requested.
- Provides targeted career information and resources for specific academic programs and interest groups to students, alumni, faculty, and administration as needed.
- Attends seminars and other training opportunities for professional development.
- Performs other related duties as assigned.

Qualifications:

- Student centered professional in higher education with the ability and experience to interact and support a diverse student body in a positive, friendly, and welcoming manner.
- Bachelor's degree preferred.
- Two years' work experience in job development and marketing required, as well as previous work experience building employer relations in a higher education setting.
- Well informed of labor market trends, employer needs and best practices in career services.
- Must have access to and use of own transportation.

Knowledge, Skills, and Abilities:

- Experience with electronic career management systems required.
- Familiar with social media platforms.
- Computer proficiency required.
- Excellent presentation, networking and communication skills.
- Collaborative and team oriented working style.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Date

Supervisor or Administrative Designee



Job Title: Director PTA Program

Reports To: VP of Academic Affairs

Job Description: Responsible for day-to-day operations, assisting students toward successful program completion and staffing the classroom with instructors who support the mission of the institution. The PD is co-responsible with the Executive Director / Campus Director for the fiscal well being of the program as it relates to education. The Director also participates in activities that promote the stature of the program and the institution and abides by the mandates set by the Governing Board. Incumbent must assure that the organization philosophy: quality services to clients; development, growth, involvement, and recognition of employees; sound economic principles; and environment which is conducive to innovation, positive thinking and expansion - is considered in carrying out the duties and responsibilities of this position.

Responsibilities:

- 18. Responsible for coordinating all aspects of the PTA program to include instruction, student externships, labs, accreditation, and supervisory responsibilities.
- 19. Provides strategic leadership for the program in education, faculty and student retention, and student services.
- 20. Participates in the governance of the program and institution, including the responsibility for academic regulations specific to the program and the curriculum.
- 21. Develops and maintain knowledge of all institutional and programmatic accreditation rules and regulations.
- 22. Develops and maintains knowledge of all APTA, CAPTE state laws and regulations pertaining to Physical Therapy Assisting.
- 23. Follows written system for all institutional and programmatic accreditation.
- 24. Assures that the program is operating within current professional essentials, including interpreting same to administrators, faculty and affiliating agencies
- 25. Performs documentation and communication necessary to initiate and maintain annual accreditation status
- 26. Coordinates preparation of program's self-study prior to accreditation
- 27. Provides follow-up on any accreditation deficiencies or suggestions
- 28. Preside over the entrance/admission to program process to include health screen process, monitor results and meets with each PTA student prospect prior to admission into the program.
- 29. Evaluate weekly lesson plans submitted by PTA instructors to assure achievement of course objectives in accordance with prepare syllabus including CAPTE minimum required skill competencies and PTA skill categories.

- 30. For CAPTE accreditation purpose, submits required fees and documentation, including reports of graduation rates, performance on state licensing or certification examinations and employment rates.
- 31. Responsible for notification to CAPTE of expected or unexpected substantive change(s) within the program, and of any change in institutional accreditation status or legal authority to provide postsecondary education.
- 32. Responsible for coming into compliance with accreditation criteria within two years or the length of the program, whichever is shorter.
- 33. Conducts SSR for CAPTE for accreditation purpose.
- 34. Completes CAPTE programmatic accreditation within a timely manner so that all PTA students will be recognized as a graduate from a CAPTE accredited program.
- 35. Analyze, in conjunction with other faculty, educational outcomes, PTA examination passing rates statistics. Manage those statistics accordingly and adjust policy if necessary to ensure student success.
- 36. Interview, hire and dismiss instructors.
- 37. Assess competency level of each instructor reviewing faculty credentials and ensuring programmatic accreditation guidelines are maintained.
- 38. Conducts classroom evaluations of all faculty (1 per quarter for FT faculty and 2 per quarter for first time/adjunct faculty).
- 39. Perform faculty evaluations, ensuring follow up and including professional development plans based on specific needs or deficits identified.
- 40. Conduct new instructor program orientation.
- 41. Select, train, develop, manage, and lead faculty and staff team members according to the guidelines provided by the Organization.
- 42. Provide support to college and community relations activities while planning and implementing a budget including personnel requirements, program expenses, and capital needs.
- 43. Collaborate with other departments within own school and across schools: scheduling, sharing faculty, and other.
- 44. Other responsibilities as determined by the Executive Director.

Qualifications:

- Administrative/leadership experience.
- Possesses PT or PTA degree with minimum Master level (not necessarily in PT discipline)
- State license.
- Teaching experience.

Knowledge, Skills, and Abilities:

- Ability to read, understand, interpret and implement accreditation criteria and state agency regulations.
- Ability to resolve inquiries and complaints from employees, students, regulatory agencies, or members of the academic or business community.
- Ability to effectively present information to faculty, academic and campus leaders, corporate leaders, and public groups.
- Experience with computerized administrative systems.
- Proficient with the use of standard office applications on personal computers.
- Other requirements specific to the discipline.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.

• Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: Registrar Clerk

Reports To: Registrar

<u>Iob Description:</u> Assist the Registrar with services to support the student enrollment process, prepare student records and enforce the college's policies and procedures for admissions.

Responsibilities:

- Assists the Registrar with daily office responsibilities.
- Assists Registrar in resolving admissions and registration issues.
- Assist Registrar with process to issues transcripts and grades.
- Submits and maintains files in storage facility.
- Verifies enrollment for all students to include loan deferments, insurance forms, and background checks.
- Assists in locating archived files through researching the microfiche, microfilm, and various reports.
- Enters student's attendance and grades in the TPI system.

Qualifications:

• One year experience with operations in a registrar's office.

Knowledge, Skills, and Abilities:

- Knowledge of Immigration & Naturalization Service Regulations
- Knowledge of Family Educational & Rights & Privacy Act Regulations (FERPA)
- Ability to interpret complex policies and procedures
- Demonstrated ability to maintain confidentiality
- Excellent communication skills
- Ability to prioritize, coordinate and manage; attention to details
- Proficiency in computer and office software applications

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee



Job Title: VP of Academic Affairs

Reports To: Executive Director

Job Description: Under the direction of the Executive Director, the Vice President of Academic Affairs serves as the chief academic officer of the Institute and is responsible for educational policy and academic programs. This includes program review and improvement, accreditation and self-evaluation, assessment of student learning and advancement of student success, academic personnel decisions, budget development, enrollment management, fiscal accountability, program and curriculum development, and the encouragement and improvement of teaching and learning.

Responsibilities:

- Provides strong, dynamic academic and administrative leadership, fosters a collegial environment which encourages scholarship, teaching, and learning excellence;
- Possesses the vision to guide the institution's academic programs into the future;
- Understands and appreciates the mission of TPI and is able to relate it to all constituencies; aids in making decisions consistent with the mission and goals;
- Advocates and promotes quality instruction, student success, integrated planning, and the expansion of Student Learning Outcomes to meet the educational needs of students in a diverse community environment;
- Works with the instructional staff in development of the educational program, including the maintenance of standards and the evaluation of teachers;
- Plans, in coordination with other administrators and faculty, the schedule of classes;
- Provides leadership and oversight for enrollment management strategies, initiatives and efficiencies;
- Provides oversight of assessment of Student Learning Outcomes and institution-wide accreditation;
- Works effectively with community groups, educational entities, business, industry, government and legislative bodies to develop partnerships which result in improved service to students and to the community;
- Provides innovative and successful academic leadership and vision in instruction and program development in basic skills, transfer, vocational developmental and non-traditional programs;
- Provides guidance to, and receives recommendations from the Advisory Boards and other representative organizations regarding the planning, implementation and review of academic programs, services, activities and related matters;
- Participates in the planning of new facilities for the purpose of instruction and student services;
- Supervises the development of community education, contract education, learning resource center/library services, and distance learning;
- Acts as the officer in the recruitment and selection of faculty, and to recommend to the Executive Director the employment of those selected;

- Understands and promotes the role and use of technology in the instructional environment;
- Participates in sessions of the Advisory Board.
- Prepares, submits, and monitors the annual budget for areas of responsibilities;
- Trains, supervises, evaluates, and directs the work of assigned personnel;
- Completes other duties as assigned by the Executive Director.

Oualifications:

Required Qualifications

The Vice President of Academic Affairs will possess:

- A Master's degree from an accredited institution;
- Five years of senior administrative level leadership and experience in higher education;

• Demonstrated skill in respectful, sensitive communication with people who are diverse in their cultures, languages and abilities;

• Demonstrated sensitivity to and ability to work with the diverse academic,

socioeconomic, cultural and ethnic backgrounds of members of TPI community, including those with disabilities.

Desired Qualifications

The desired qualifications for this position are:

- An earned doctorate from an accredited institution;
- Three years teaching experience in higher education with a demonstrated studentcentered philosophy of education;

• An understanding of TPI mission, its educational and financial stand, the laws and regulations of Florida;

• Proven experience in and commitment to participatory governance with meaningful involvement of all constituent groups;

• Demonstrated experience with strategic planning, strong fiscal management linking resource allocation to planning and priorities (including data-driven decision-making) and leading the ongoing efforts of the college to meet accreditation standards;

• Demonstrated record of fiscal responsibility and accountability utilizing enrollment management in schedule planning;

- Demonstrated advocacy for and addressing the needs of the underprepared student;
- Demonstrated commitment to academic quality and standards;
- A background of supporting efforts in environmental sustainability;

• Demonstrated experience in both academic and Career and Technical Education programs and services;

• Demonstrated support for faculty and staff development;

• Demonstrated ability to work effectively and cooperatively with diverse constituents within a participatory governance environment; •Demonstrated support for and encouragement of faculty and student scholarship.

Knowledge, Skills, and Abilities:

- Knowledge and experience in Student Learning Outcome (SLO) design, development, implementation, and assessment;
- Knowledge of computers and computer applications that support management systems and business office functions;
- Knowledge and experience in curriculum development and innovation;
- Knowledge of the State and Federal codes, statutes and regulations that govern Florida instructional, student support, auxiliary, and other student learning programs, including those relevant to the role of the Faculty in issues of participatory governance;

• Knowledge and experience in accreditation self-evaluation.

Evaluation Procedure and Schedule:

- Evaluation is conducted by the overseeing supervisor.
- Informal feedback conducted on an as-needed basis.
- Formal, written evaluation conducted annually, one-on-one with supervisor.

Last Date Reviewed 3/4/2018

The undersigned employee certifies receiving, reading, and understanding this job description document.

Employee Signature

Date

Supervisor or Administrative Designee

POLICY AND PROCEDURE

TITLE: Employee Handbook

PURPOSE: To prepare the employee to be an efficient functioning member of the staff of the organization.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all personnel.

PROCEDURE:

All new employees, during the hiring process, will receive a copy of TPI Employee Handbook.

Employee Handbook will be reviewed and, if necessary, updated at least annually.

Attached.

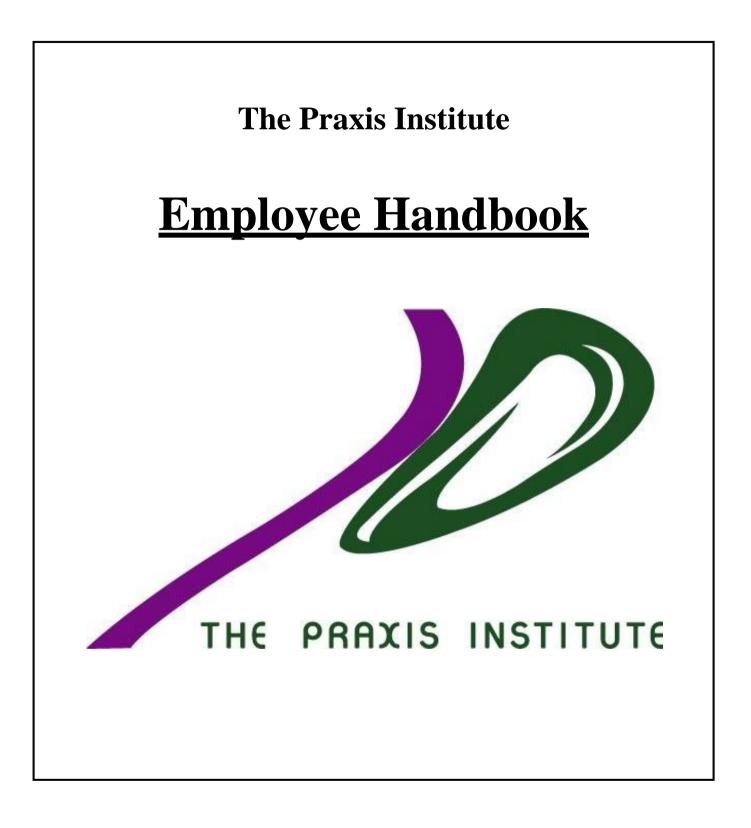


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Welcome to The Praxis Institute

Dear Employee:

We are very happy to welcome you to **The Praxis Institute.** Thank you for joining us! We want you to feel that your association with our institution will be a mutually beneficial and a pleasant one.

You have joined an organization that has established an outstanding reputation for quality services and is a benchmark for training delivery quality. Credit for this goes to every employee. We hope you will find satisfaction and take pride in your work here.

This Manual provides answers to most of the questions you my have about **The Praxis Institute's** policies and procedures we abide by, our responsibilities to you and your responsibilities to the institution. If anything is unclear, please discuss the matter with your superior. You are responsible for reading and understanding this Employee Handbook, and your performance evaluations will reflect your adherence to **The Praxis Institute** policies. In addition to clarifying responsibilities, we hope this Employee Handbook also gives you an indication of the institution's interest in the welfare of all who work here.

From time to time, the information included in our Employee Handbook my change. Every effort will be made to keep you informed through suitable lines of communication, including postings on the company bulletin boards.

Compensation and personal satisfaction gained from doing a job well are only some of the reasons most people work. Most likely, many others factors count among your reasons working, pleasant relationships and working conditions, career development and promotion opportunities, are just a few, **The Praxis Institute** is committed to doing its part to assure you of a satisfying work experience.

I extend to you my personal best wishes for your success and happiness by joining our team.

Sincerely,

Rebeca Alfie, Executive Director

Purpose of This Manual

This Manual has been prepared to inform you about **The Praxis Institute's (TPI)** history, mission, philosophy, employment practices, and policies as well as our responsibilities to you as a valued employee and the conduct expected from you.

No employee manual can answer every question, nor would we want to restrict the normal question and answer interchange among us. It is in our person-to-person conversations that we can better know each other, express our views, and work together in a harmonious relationship.

We hope this Manual will help you feel comfortable with us. We depend on you; your success is our success. Please don't hesitate to ask questions. Your superior will gladly answer them. We believe you will enjoy your work and your fellow employees here.

TPI's policies, benefits, and rules, as explained in this Manual, may be changed from time to time as business, employment legislation, and economic conditions dictate. If and when provisions are changed, you will be given replacement pages for those that have become outdated.

The Praxis Institute faculty will have a role in the development and continual reassessment of all curricula.

License and Accreditation

TPI is licensed by the: Commission for Independent Education Accredited by: Commission of the Council on Occupational Education

History of the School

TPI was founded in 1988 as America Duran Skin Care, Massage & Nail School a private vocational school to provide training in the art of Skin Care. In 1991, the institution expanded its scope of career education to include a Therapeutic Massage Training Program for state licensure by the Florida Board of Massage.

In 1994, ADS received national accreditation from the Southern Association of Colleges and Schools and transfer its membership in 1995 to the Commission on Occupational Education Institutions (COEI), now known as Commission of the Council on Occupational Education (COE).

In 1999 a change in ownership took place and the institution has been renamed **The Praxis Institute.** In the year 2003 the institution opens a branch in the city of Hialeah.

Throughout the past years the focus of our institution has remained constant: to provide career education in employable fields for the community.

Mission Statement

The mission of TPI is to provide quality training to the community leading to employment. Thereby, enabling students to engage in a mutually, beneficial, and supportive process.

We further believe that the primary goal of our institution is to offer programs with the necessary skills compatible with the needs and demands of today's competitive job market.

Ownership

TPI, is owned and operated by Duran Rubero Beauty Center, Inc., and is a Florida Corporation. The principal owners of the corporation are Miguel Alfie and Rebeca Alfie

The Board of Directors:

Miguel Alfie, Chairman of the Board of Directors Rebeca Alfie, President and Executive Director Flavio Alfie, Vice-President and Hialeah Campus School Director

Dario Alfie, Vice-President and Miami Campus School Director

What You Can Expect From TPI

TPI's established employee relation's policy is to:

- 1. Operate an economically successful business so that a consistent level of steady work is available.
- 2. Select people on the basis of skill, training, ability, attitude, and character without discrimination with regard to age, sex, color, race, creed, national origin, religious persuasion, marital status, political belief, or disability that does not prohibit performance of essential job functions.
- 3. Pay all employees according to their effort and contribution to the success to our business.
- 4. Review wages, employee benefits and working conditions constantly with the objective of providing maximum benefits in the areas, consistent with sound business practices.
- 5. Dedicate ourselves to "Total Quality" and "Constant and Never-ending Improvement"
- 6. Develop competent people, who understand and meet our objectives, and who accept with open minds the ideas, suggestions and constructive criticisms of fellow employees.
- 7. Assure employees, after talking with their superior, and opportunity to discuss any problem with officers of TPI.
- 8. Make prompt and fair adjustment of any complains which may arise in the everyday conduct of our business, to the extent that is practicable.
- 9. Respect individual rights, and treat all employees with courtesy and consideration.
- 10. Maintain mutual respect in our working relationship.
- 11. Provide buildings and offices that are attractive, comfortable, orderly, and safe.
- 12. Promote employees on the basis of their ability and merit.

- 13. Make promotions to fill vacancies from within TPI whenever possible.
- 14. Keep all employees informed of TPI's progress, as well as the company's overall aims and objectives.
- 15. Do all these things in a spirit of friendliness and cooperation so that TPI will continue to be as "a great place to work!"

What TPI Expects From You

Your first responsibility is to know your own duties and how to do them promptly, correctly and pleasantly.

Secondly, you are expected to cooperate with management and your fellow employees and maintain a good team attitude. How you interact with fellow employees and those whom TPI serves, and how you accept direction can affect the success of your department. In turn, the performance of one department can impact the entire service offered by TPI. Consequently, whatever your position, you have and important assignment: perform every task to the very best of your ability. The result will be better performance for the company overall, and personal satisfaction for you.

You are encouraged to grasp opportunities for personal development that are offered to you.

Remember, you help create the healthful, pleasant and safe working conditions that TPI intends for you. Your dignity and that of fellow employees, as well as that of our students, is important.

TPI needs your help in making each working day enjoyable and rewarding.

Your Personnel File

Keeping your personnel file up-to-date can be important to you with regard to pay, deductions, benefits and other matters. If you have a change in any of the following items, please be sure to notify your superior as soon as possible.

- 1. Legal name
- 2. Home address
- 3. Home telephone number
- 4. Person to call in case of emergency
- 5. Number of dependents
- 6. Marital status
- 7. Military or draft status
- 8. Exemptions in your W-4 tax form
- 9. I-9 Forms

10. Certifications, Licenses, Permits, Diplomas, Resumes, Etc.

Since TPI refers to your personnel file when need to make decisions in connection with promotions, transfers, layoffs and recalls, it's to your benefit to be sure your personnel file includes information about completion of educational or training courses, outside civic activities, and areas of interest and skills that may not be part of your current position here.

You may see information, which is kept, in your own personnel file if you wish, and may request and receive copies of all documents you have signed.

Employment Classifications

Full Time Employees

At the time you are hired, you are classified as full-time, part-time, or temporary. All policies described in this Manual apply to all employees.

An employee who has successfully completed the probationary period of employment and who works at least thirty (30) hours per week is considered a full-time employee.

Part Time Employees

An employee who works less than thirty (30) hours per week is considered a part-time employee.

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Temporary Employees

From time to time, TPI may hire employees for specific periods of time or for the completion of a specific project. An employee hired under these conditions will be considered a temporary employee. The job assignment, work schedule and duration of the position will be determined on an individual basis.

Normally, a temporary position will not exceed six (6) months in duration, unless specifically extended by a written agreement.

Employment Policies

Whether you are a new hire or a former employee returning to TPI, you may feel a little strange in your new surroundings. This is a normal feeling and is expected. Your fellow employees, especially your superior, want to help you get off to a good start. Feel free to ask them for help concerning anything you don't understand.

One of the first things you should do is carefully read this Manual. It is designed to answer many of your questions about the practices and policies of TPI, what you can expect from TPI, and what TPI expects from you.

Anniversary Date

The first day you report to work is your "official" anniversary date. Your anniversary date is used to compute various conditions and further benefits in the institution.

Business Hours

TPI administrative offices are open Monday through Friday from 9:00 to 6:00 p.m. Classes are in session Monday through Thursday, from 8:00 a.m. to 10:00 p.m., Friday from 9:00 a.m. to 6:00 p.m.

Confidential Information

Our students and suppliers entrust TPI with important information relating to their businesses. The nature of this relationship requires maintenance of confidentiality. In safeguarding the information received, TPI earns the respect and further trust of our students and suppliers.

Your employment with TPI assumes an obligation to maintain confidentiality, even after you leave our employ.

Any violation of confidentiality seriously injures TPI's reputation and effectiveness. Therefore, please do not discuss TPI business with anyone who does not work for us, and never discuss business transactions with anyone who does not have a direct association with the transaction. Even casual remarks can be misinterpreted and repeated, so develop the personal discipline necessary to maintain confidentiality. If you hear, see or become aware of anyone breaking this trust, consider what he or she might do with information they get from you.

If you are questioned by someone outside the company or your department and you are concerned about the appropriateness of giving them certain information, remember that you are not required to answer, and that we do not wish you to do so. Instead, as politely as possible, refer the request to your superior.

No one is permitted to remove or make copies of any TPI records, reports or documents without prior management approval.

Because of its seriousness, disclosure of confidential information could lead to dismissal.

Student Relations

The success of TPI depends upon the quality of the relationships between TPI, our employees, our students, our suppliers and the public in general. Our student's impression of TPI and their interest and willingness to study with us is greatly formed by the people who serve them. In a sense, regardless of your position, you are TPI's ambassador. The more goodwill you promote, the more our students will respect and appreciate you, TPI's programs, and services.

Here are several things you can do to help student's good impression of TPI:

- 1. Act competently and deal with students in a courteous and respectful manner.
- 2. Communicate pleasantly and respectfully with other employees at all times.
- 3. Follow up on orders and questions promptly, provide businesslike replies to inquiries and requests, and perform all duties in an orderly manner.
- 4. Take great pride in your work and enjoy doing your very best

These are the building blocks for your and TPI's continued success. Thank you for adding your support.

Equal Employment Opportunity

TPI will provide equal employment opportunity without regard to race, color, sex, age, disability, religion, national origin, marital status, sexual orientation, ancestry, political belief or activity, or status as a veteran.

The policy applies to all areas of employment, including recruitment, hiring, training and development, promotion, transfer, termination, layoff, compensation benefits, social and recreational programs, and all other conditions and privileges of employment in accordance with applicable federal, state and local laws.

It is the policy of TPI to comply with all relevant and applicable provisions of the Americans with Disabilities Act (ADA). TPI will not discriminate against any qualified employee or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability .TPI also will make reasonable accommodation wherever necessary for employees or applicants with disabilities, provided that the individual is otherwise qualified to safety perform the duties and assignments connected with the job and provided that any accommodations made do not require significant difficulty or expense.

Management is primarily responsible for seeing that TPI's equal employment opportunities policies are implemented, but all members of the staff share in the responsibility for assuring that by their personal actions the policies are effective and apply uniformly to everyone.

Any employees, including officers, involved in discriminatory practices will be subject to discharge.

Note: throughout this Manual, masculine pronouns such as he, his, or him shall be construed so as to include both sexes.

Harassment Policy

TPI intend to provide a work environment that is pleasant, healthful, comfortable, and free from intimidation, hostility or other offences, which might interfere with work performance. Harassment of any sort- verbal, physical, visual-will not be tolerated.

What is Harassment?

Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, or violence. Harassment is not necessary sexual in nature.

Sexually harassing conduct may include unwelcome sexual advances, requests for sexual favors, or any other verbal or physical contact of a sexual nature that prevents an individual from effectively performing the duties of their position or creates an intimidating, hostile or offensive working environment, or when such conduct is made a condition of employment or compensation, either implicitly or explicitly.

Responsibility

All TPI employees, and particularly officer, have a responsibility for keeping our work environment free of harassment. Any employee, who becomes aware of an incident of harassment, whether by witnessing the incident or being told of it, must report it to their immediate superior or any management representative with whom they feel comfortable. When management becomes aware that harassment might exist, it is obligated by law to take prompt and appropriate action, whether or not the victim wants the company to do so.

Reporting

Any incidents of harassment must be immediately reported to a manager or other management representative. Appropriate investigation and disciplinary action will be taken. All reports will be promptly investigated with due regard for the privacy of everyone involved. Any employee found to have harassed a fellow employee or subordinate would be subject to severe disciplinary action or possible discharge. TPI will also take any additional action necessary to appropriately remedy the situation. No adverse employment action will be taken for any employee making a good faith report of alleged harassment.

TPI accepts no liability for harassment of one employee by another employee. The individual who makes unwelcome advances, threatens or in any way harasses another employee is personally liable for such actions and their consequences. TPI will not provide legal, financial or any other assistance to an individual accused of harassment if a legal complaint is filed.

How You Were Selected

We carefully select our employees through written application, personal interview and reference checks. After all available information was carefully considered and evaluated; you were selected to become a member of our team.

Introductory Period

Your first ninety (90) days of employment at TPI are considered Introductory Period.

This Introductory Period will be a time for getting to know your fellow employees, your superior, and tasks involved in your job position, as well as becoming familiar with TPI's programs and services. Your superior will work closely with you to help you understand the needs and processes of your job.

This Introductory Period is a try-out time for both, you, as an employee, and TPI, as an employer. During this Introductory Period, TPI will evaluate your suitability for employment, and you can evaluate TPI as well. At any time during this first ninety (90) days, you may resign without any detriment to your record. If during this period, your work habits, attitude, attendance or performance do not measure up to our standards, we may release you.

At the end of the Introductory Period, your superior will discuss your job performance with you; also the orientation program will be part of the review.

Please understand that completion of the Introductory Period does not guarantee continued employment for any specific period of time, nor does it require that an employee be discharged only for "cause".

A former employee who has been rehired after a separation from TPI of more than one year is considered an introductory employee during their ninety (90) days following rehire.

Job Descriptions

We maintain a job description for each position in TPI. When your duties and responsibilities are changed, your job description will be updated.

Knowledge of TPI

After having learned to competently perform your own duties and completed the orientation program, your next step is to familiarize yourself with other TPI activities. This can prove valuable to you, our students, and TPI as well.

Knowledge of the programs and services of TPI will help you to avoid the "I don't know" syndrome. Our student's confidence in you increases, as you are able to answer their basic questions. However, please don't pretend you know the answer or try to guess the answer when you are uncertain. If you are unsure of the correct information, refer the inquiry to your superior, or to a person more qualified to respond.

We Need Your Ideas

Ask any of our employees who have worked with us for a long time and they will probably tell you of the many changes and improvements that have come about in their departments since they first joined us. We believe the person doing a job is in the best position to think of ways of doing it more easily, more efficiently, and more effectively. If you think of a better way of doing your job or the job of a fellow employee, discuss it with your superior, who will welcome your suggestions and ideas.

Remember, there may be areas in TPI's operation that can be improved. These could be in service, methods, equipment, communication, safety, and ways to reduce costs, losses, and/or waste, or other improvements you may see a need for. Please give us the benefit of your unique experience and thoughts.

Standards of Conduct

Whenever people gather together to achieve goals, some rules of conduct are needed to help everyone work together efficiently, effectively, and harmoniously. Some people have problems with "rules" and "authority figures", and past experience may have justified these thoughts and feelings, however, at TPI, we hold ourselves to high standard of quality where the rules and authority figures simply assure that quality is maintained.

By accepting employment with us, you have responsibility to TPI and to your fellow employees to adhere to certain rules of behavior and conduct. The purpose of these rules is not to restrict your rights, but rather to be certain that you understand what conduct is expected and necessary. When each person is aware that he or she can fully depend upon fellow workers to follow the rules of conduct, then our organization will be a better place to work for everyone.

Unacceptable Activities

Generally speaking, we expect each person to act in a mature and responsible way at all times. However, to avoid any possible confusion, some of the more obvious unacceptable activities are noted below. Your avoidance of these activities will be to your benefit as well as the benefit of TPI. If you have any questions concerning any work or safety rule, or any of the unacceptable activities listed, please see your superior for an explanation.

Occurrences of any of the following violations, because of their seriousness, may result in immediate dismissal without warning:

- Willful violation of any company rule; any deliberate action that is extreme in nature and is obviously detrimental to TPI's efforts to operate profitably.
- Willful violation of security or safety rules or failure to observe safety rules or TPI safety practices; tampering with TPI equipment or safety equipment.
- Negligence or any careless action, which endangers the life or safety of another person.
- Being intoxicated or under the influence of controlled substance drugs while at work, use or possession or sale of controlled substance drugs in any quantity while on company premises except medications prescribed by a physician which do not impair work performance.
- Unauthorized possession of dangerous or illegal firearms, weapons or explosives on company property or while on duty.
- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone on company premises or when representing TPI; fighting, or horseplay or provoking a fight on company property, or negligent damage of property.
- Insubordination or refusing to obey instructions properly issued by your superior pertaining to your work, refusal to help out on a special assignment.
- Threatening, intimidating or coercing fellow employees on or off the premises-at any time, for any purpose.
- Engaging in an act of sabotage; willfully or with gross negligence causing the destruction or damage of company property of fellow employees, students, suppliers, or visitors in any manner.
- Theft of company property or property of fellow employees; unauthorized possession or removal of any company property, including documents, from the premises without prior permission from management; unauthorized use of company equipment or property for personal reasons; using company equipment for profit.
- Dishonesty; willful falsification or misrepresentation on your application for employment or other work records.

- Violation of the Confidentiality and Non-Competition Agreement you signed with TPI (See Appendix A).
- Malicious gossip and/or spreading rumors; engaging in behavior designed to create discord and lack of harmony; interfering with another employee on the job; willfully restricting work output or encouraging others to do the same.
- Immoral conduct or indecency on company property.
- Conducting a lottery or gambling on company premises.

Occurrences of any of the following activities, as well as violations of any TPI rules or policies, may be subject to disciplinary action, including possible immediate dismissal. This is not all-inclusive and, notwithstanding this list, all employees remain employed "at will".

- Unsatisfactory or careless work; failure to meet quality standards as explained to you by your superior; mistakes due to carelessness or failure to get necessary instructions.
- Any act of harassment, sexual, racial or other; telling sexist or racial-type jokes; making racial or ethnic slurs.
- Leaving work before the end of a workday or not being ready to work at the start of a workday without approval of your superior, stopping work before time specified for such purposes.
- Sleeping on the job; loitering or loafing during working hours.
- Excessive use of company telephone for personal calls.
- Smoking in restricted areas or at non-designated times, as specified by department rules.
- Creating or contributing to unsanitary conditions.
- Posting, removing or altering notices on any bulletin board on company property without permission of an officer of TPI.
- Failure to report an absence or late arrival; excessive absence or lateness.
- Buying company merchandise for resale.
- Obscene or abusive language toward any superior, employee or student, indifference or rudeness towards a student or fellow employee; any disorderly/antagonistic conduct on company premises.
- Failure to immediately report damage to, or an accident involving company equipment.
- Soliciting during working hours and/or in working areas; selling merchandise or collecting funds of any kind for charities or others without authorization during business hours, or at a time or place that interferes with the work of another employee on company premises.

- Failure to maintain a neat and clean appearance in terms of the standards established by your superior; any departure from accepted conventional modes of dress or personal grooming; wearing improper or unsafe clothing.
- Eating food and beverages in inappropriate areas or at your workstation.

Disciplinary Actions

The Disciplinary Policy applies to all regular employees who have completed the introductory period.

This policy pertains to matters of conduct as well as the employee's competence. However, an employee who does not display satisfactory performance and accomplishment on the job may be dismissed, in certain cases, without resorting to the steps set forth in this policy.

Under normal circumstances, department heads are expected to follow the three-step procedure outlined below. There may be particular situations, however, in which the seriousness of the offense justifies the omission of one or more of the steps in the procedure. Likewise, there may be times when the company may decide to repeat a disciplinary step.

To insure that TPI business is conducted properly and efficiently, you must conform to certain standards of attendance, conduct, work performance and other work rules and regulations.

When a problem in these areas does arise, your superior will coach and counsel you in mutually developing an effective solution. If however, you fail to respond to couching or counseling, or upon the occurrence of an incident requiring formal discipline, the following procedures will take place.

Step One: Oral Warning

Your superior will meet with you to discuss the problem, making sure that you understand the nature of the violation and the expected remedy. The purpose of this conversation is to remind you exactly what the rule or performance expectations is and also remind you that it is your responsibility to meet that expectation.

You will be informed that the Oral Reminder is the first step of the discipline procedure. Your superior will fully document the Oral Reminder, which will remain in effect for (3) months. Documentation of the incident will remain in the department file and will not be placed in your permanent record, unless another disciplinary transaction occurs.

Step Two: Written Warning

If your performance does not improve within the (3) month period, or if you are again in violation of TPI practices, rules or standards of conduct, your superior, after reviewing the situation with his/her superior, will discuss the problem with you, emphasizing the seriousness of the problem and the need for you to immediately remedy the problem.

Following the conversation, your superior will write a memo to you summarizing the discussion. The original memo will go to you and a copy will be routed to the Human Resources Department. The Human Resources copy of the memo will be placed in your file.

The Written Reminder will remain in effect for (3) months.

Step Three: Decision-Making Leave

If your performance does not improve within the (1) month period following a Written Reminder, or if you are again in violation of TPI practices, rules or standards of conduct, you will be placed on Decision Making Leave. The Decision Making Leave is the final step of TPI's disciplinary system.

Decision Making Leave is a paid, one-day disciplinary suspension. Employees on Decision Making Leave will spend the following day away from work deciding whether to correct the immediate problem and conform to all of the company's practices, rules and standards of conduct, or to quit and terminate their employment with TPI.

If your decision following the Decision Making Leave is to return to work and abide by TPI practices, rules and standards of conduct, your superior will write a letter to you explaining your commitment and the consequences of failing to meet this commitment. You will be required to sign the letter to acknowledge receipt. A copy of the letter will be routed to the Executive Director. A copy will be placed in your personnel file.

You will be allowed to return to work with the understanding that if a positive change in behavior does not occur or if another disciplinary problem occurs within the next (12) months, you will be terminated.

If you are unwilling to make such a commitment, you may be terminated.

Crisis Suspension

If you commit any of the actions listed below, or any other not specified but similarly serious, you will be suspended without pay pending the investigation of the situation. Following the investigation you may be terminated without any previous disciplinary action having been taken.

1. Theft

- 2. Falsification of Company records
- 3. Failure to follow safety practices
- 4. Conflict of interest
- 5. Threat of, or the act of doing bodily harm
- 6. Willful or negligent destruction of property
- 7. Use and/or possession of intoxicants, drugs or narcotics
- 8. Neglect of duty
- 9. Refusal to perform assigned work or to follow a direct order

Discipline Deactivation

Step 1 of the procedure (Oral Reminder) will be in effect for 3 months

Step 2 (Written Reminder) will be in effect for 3 months

Step 3 Decision Making Leave) will be in effect for 12 months.

If no further performance problems occur during the active period, the discipline procedure will be formally deactivated at the end of the appropriate time period. Your superior will initiate a memo advising you of the inactive status of discipline and, when appropriate, commend you for performance improvement.

Dismissal

Employment and compensation with TPI is "at will" in that they can be terminated with or without cause, and with or without notice, at any time, at the option of either TPI or yourself, except as otherwise provided by law.

Wage & Salary Policies

It is TPI's desire to pay wages and salaries that are competitive with other employers in the marketplace in a way that will be motivational, fair and equitable, variable with individual and company performance and in compliance with applicable statutory requirements.

You are employed by TPI and will be carried directly on our payroll, or by the existence of a contract relationship.

Basis for Determining Pay

Your pay is influenced by three factors:

- 1. The nature and scope of the job
- 2. What other employers pay their employees for comparable jobs
- 3. Individual performance

Job Scope

Through a process called job evaluation, the scope, responsibility, impact and required skills and abilities of each job at TPI are compared. The results are a relative ranking of all jobs, from high to low. Job evaluation is independent of any employee or his performance.

External Comparability

Once jobs are ranked, jobs are compared with external market data. Each job is assigned a range of pay. Periodically TPI will examine the market conditions to ensure ongoing comparability. Changes in pay ranges will be made as needed and as the company can afford to maintain market comparability.

Individual Pay

An individual pay within this range will depend on the sustained performance over time. Each year every employee will have an evaluation with his superior. During that evaluation, significant performance events that occurred throughout the year will be discussed.

The overall performance rating will influence the wage/salary adjustment. Through individual performance and by increasing job responsibilities and moving to higher-level jobs, you have significant impact on your pay.

TPI's Calendar Pay Period is Semi-Monthly.

Performance Evaluation

Your superior is continuously evaluating your job performance. Day-to-day interaction between you and your superior should give you a sense of how your superior perceives your performance.

However, to avoid haphazard or incomplete evaluations, TPI conducts a formal review once a year for each employee.

During formal performance evaluations, your superior will consider the following things, among others:

- Attendance, initiative, and effort
- Knowledge of your work
- Attitude and willingness
- The quality and quantity of your work
- The conditions under which you work

The primary reason for performance reviews is to identify your strengths and weaknesses in order to reinforce your good habits and develop ways to improve in your weaker areas. This review also serves to make you aware of and to document how your job performance compares to the goals and description of your job. This is a good time to discuss your interests and future goals. Your superior is interested in helping you to progress and grow in order to achieve personal as well as work-related goals, perhaps he or she can recommended further training or additional opportunities for you.

In addition to individual job performance evaluations, TPI periodically conducts a review of job descriptions to insure that we are fully aware of any changes in the duties and responsibilities of each position and those changes are recognized and adequately compensated. Please refer to Performance Evaluation Policy for more details.

TPI conducts compensation reviews annually on or about each employee's anniversary date.

Work Schedule

The normal workweek consists on five (5) days, eight (8) hours long, Monday through Friday. Your superior will give your schedule of daily work hours to you. You will be notified promptly whenever a change is necessary. Should you have any questions concerning your schedule, please ask your superior.

Absence or Lateness

From time to time, it may be necessary for you to absent from work. TPI is aware that emergencies, illnesses, or pressing personal business that cannot be schedule outside your work hours may arise.

If you are unable to report to work, or if you arrive late, please contact your superior immediately. Give him or her as much time as possible to arrange for someone else to cover your position until you arrive. If you know in advance that you will need to be absent, you are required to request this time off directly from your superior. He or she will determine when will be the most suitable time for you to be absent from your work.

When you call to inform TPI of an unexpected absence or late arrival, ask for your superior directly. For late arrivals, please indicate when you expect to arrive for work. If you are unable to call yourself because of an illness, emergency or for some other reason, be sure to have someone call on your behalf. If your superior is not available when you call, you may leave the information with another responsible person.

Absence from work for three (3) consecutive days without notifying your superior or other personnel administrator will be considered a voluntary resignation.

Attendance

You are expected to be at your work station and ready to work at the beginning of your assigned daily work hours, and you are expected to remain at your work station until the end of your assigned work hours, except for approved breaks and lunch.

Lunch Period

If you work longer than four (4) hours, you will be given an unpaid lunch period. The time when lunch periods are scheduled varies among departments, depending on the needs of each department. You are expected to take your full-allotted time for lunch. You are requested not to perform any work during your regularly scheduled lunch period, unless specifically requested to do so by your superior.

Holidays

The company observes the following holidays:

- New Year day
- Martin Luther King's Day
- Presidents Day
- Good Friday
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- Veterans Day
- Thanksgiving Day
- Friday after Thanksgiving
- Christmas Eve
- Christmas Day

TPI is also closed during Winter Break, usually the week between Christmas and New Year's Day.

Vacations

Vacations are a time to rest, relax, and pursue special interests. TPI has provided paid vacation as one of many ways in which we show our appreciation for you loyalty and continued service.

Only regular full time employees are eligible for paid vacation. You are not eligible for paid vacation during your first six (6) month of employment or if you are a part time or temporary employee. Please see Paid Vacations Policy for more details.

Please see the revised vacation policy for updated version.

Funeral (Bereavement) Leave

You are entitled to take up to two (2) workdays with pay to attend the funeral and take care of personal matters related to the death of a member of your immediate family: a parent, spouse, spouse's parent, child, spouse's child, by a former marriage, brother or sister. One (1) day of paid funeral leave will be granted in the case of the death of a grandparent, your spouse's grandparent or sibling, or any member of your extended family living in your home. Only regular full time employees are eligible for paid funeral leave.

Pay for funeral leave will be made for actual time lost from work. If the death occurs at a time when work is not scheduled, payment will not be made. If a holiday or part of your vacation occurs on any of the days of absence, you may not receive holiday pay in addition to paid funeral leave.

An excused absence for family death may not be retroactive, postponed of split.

Jury Duty

Salary for time spent on jury duty applies only to full-time employees. Accordingly, we will pay fulltime employees eight hours of wages per day for the first three days of service, as required by State Law. Should your jury duty service extend beyond three days you will be entitled to receive eight hours of wages per day less payment received by you for jury service from the State.

Upon receiving a notice for jury duty, you must provide us with a copy of the notice as soon as possible.

You must report for work if you are released from jury duty before the end of our workday or if you are temporarily released from jury duty.

Sick Leave

To qualify for sick leave you must be a full time employee and have completed six (6) month of employment. Time taken of before this period will be without pay. If you must be absent from work because of a personal illness, you will be eligible to receive your regular straight time pay, for up to three (5) days per calendar year. Please advise your superior as soon as possible that you will be absent from work due to illness.

Sick leave may be used for the purpose of visiting doctors, dentists or other practitioners in their offices. This time may also be used for tending to a serious illness suffered by a member of your immediate family, in the event the illness requires your personal time and attention. For purpose of this section, immediate family includes spouse, child, parent, or sibling living in your home. If another person can attend to the needs of an ill family member, you are expected to fulfill your duties as an employee of TPI.

Sick days do not accumulate from year to year.

Educational Leave of Absence

An educational leave of absence may be approved if the desired curriculum is of mutual benefit to you and to TPI. As a full time employee, and after your Introductory Period is completed, you are eligible to take two (2) days of paid personal leave during each calendar year.

Military Leave of Absence

If you are a full time employee and are included into the U.S. Armed Forces, you will be eligible for reemployment after completing service, provided:

- 1. You show your orders to your manager as soon as you receive them.
- 2. You satisfactorily complete your active duty service.
- 3. You enter the military service directly from your employment with TPI.
- 4. You apply for and are available for re-employment within ninety (90) days after discharge from active duty. If you are returning from up to six (6) months active duty from training, you must apply within a reasonable time (usually thirty (30) days after discharge.

Military Reserves or National Guard Leave of Absence

Employees who serve in U.S. military organizations or state militia groups may take the necessary time off without pay to fulfill this obligation, and will retain all of their rights for continued employment under existing laws.

Bulletin Boards

Bulletin Boards are our "official" way of keeping everyone informed about new policies, changes in procedures and social events. Information of general interest is posted regularly on the bulletin board. Please form the habit of reading the bulletin board regularly so that you will be familiar with the information posted on it.

Only authorized personnel are permitted to post, remove or alter any notice on the bulletin board.

Communications

Successful working conditions and relationships depend upon successful communication. Not only do you need to stay aware of changes in procedures, policies and general information, you also need to communicate your ideas, suggestions, personal goals or problems as they affect your work.

In addition to the exchanges of information and expressions of ideas and attitudes which occur daily, make certain you are aware of and utilize all TPI methods of communications, including this Employee Handbook, bulletin boards, memoranda, staff meetings, training sessions, etc.

Staff Meetings

From time to time, the institution will schedule staff and faculty meetings before, during, or after work. It is an advantage to attend to these meetings. They'll give you and your fellow workers a chance to receive information on TPI events, to review problems and possible solutions, and to make suggestions about your department or your job.

Your attendance to these meetings is mandatory.

Dress Code/Personal Appearance

Please understand that you are expected to dress and groom yourself in accordance with accepted social and professional business standards, particularly if your job involves dealing with students or visitors in person. Each department head is responsible for establishing a reasonable dress code appropriate to the job you perform. However, sun dresses with bare backs and/or shoulders, men's undershirts, and shorts, for men or women, are not appropriate.

A neat, tasteful appearance contributes to a positive impression you make in our students. You are expected to be suitably attired and groomed during working hours when representing TPI. A good clean appearance bolsters your own poise and self-confidence and greatly enhances our company image.

Emergency Evacuation and Safety

During your Orientation Period you will be explained the Emergency Evacuation and Safety Plan that the institution has in place. You must read it and remember how to proceed in case of emergency. The Building Administration schedule drills throughout the year for employee and students safety.

Housekeeping

Neatness and good housekeeping are signs of efficiency. You are expected to keep your work area neat and orderly at all times, it is required for safety precaution.

Easily accessible trash receptacles are located throughout the building. Always be aware of good health and safety standards, including fire and loss prevention.

Please report anything that needs repairing or replacing to your superior immediately.

Grievances

Our goal is to maintain a comfortable working environment for everybody. We do this in several ways.

- By treating each of you as an individual and encouraging your maximum development.
- By recognizing that each of you is essential to the success and growth in our institution.
- By maintaining direct communications with all of our employees and ensuring that each and every one of you can speak directly and openly with our management team.

We believe that this type of communication, without interference from any outside party, is best for all concerned. Therefore, when you wish to express your problems, opinions, or suggestions, you will always find an open door and an attentive ear.

As time goes by and TPI grows, we will continue to listen and respond to your questions and comments.

Resolving Problems

Whenever you have a problem or complaint, we expect you to speak up and communicate directly with us. You can take the following steps:

- 1. First, talk with the School Director. The School Director is most familiar with you and your job, therefore he is in the best position to assist you. The School Director works closely with you, and is interested in seeing that you are treated fairly and properly.
- 2. If the School Director cannot help you resolve the matter, you should request a meeting with the Executive Director, who will give your problem or complain prompt consideration.

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Remember, it is always best to resolve problems right away. Little problems tend to turn into big problems; facts become confused; resentment and anger builds up. It is always best to get things off your chest before they get out of hand.

Promotion Policy

It is our policy to advise all employees about advancement opportunities. Whenever a position becomes available, every effort will be made to fill it by promoting qualified employee. Jobs will be awarded based on individual ability and past job performance, as well as length of service if two people have similar qualifications. By utilizing all opportunities for education and performing your job excellently, you may become qualified to fill a position of a greater skill, responsibility and value at TPI. TPI will always continue to look outside the company for potential employees as well.

Properly & Equipment Care

It is your responsibility to understand the equipment you need to use to perform your duties. Good care of any machine that you use during the course of your employment, as well as the conservative use of supplies will benefit you and TPI. If you find that a machine is not working properly or in any way appears unsafe, please notify your superior immediately so that repairs or adjustments may be made. Under no circumstances should you start or operate a machine you deem unsafe, nor should you adjust or modify the safeguards provided.

Violations of Policies

You are expected to abide the policies in this Manual. Failure to do so will lead to appropriate disciplinary action. A written record of all policy violations is maintained in each individual's personnel file.

A partial list of causes for possible disciplinary action ("Unacceptable Activities") is presented under "Standards of Conduct" in the "Employment" section of this Manual. This list is not to be considered all-inclusive.

POLICY AND PROCEDURE

TITLE: Paid Vacations

PURPOSE: To establish procedures regarding eligibility and scheduling of employees paid vacations.

RESPONSIBILITY: It is the responsibility of the Executive Director and Assistant Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all eligible employees.

POLICY: The present policy changes TPI's policies and procedures regarding paid vacations provided by TPI's Employee Handbook as follows:

Eligibility for Paid Vacations

1. Full time permanent employees that completed their introductory period of six (6) months of employment are eligible for paid vacations.

2. Part time or temporary employees or employees during their first six (6) month of employment are not eligible for paid vacation.

Amount of Vacation

1. Full Time employees are eligible for paid vacation for each calendar year of service from the completion date of their Introductory Period of six (6) months of employment during Winter Break from Christmas to New Year Day.

2. In addition to Winter Break paid vacations, full time employees that completed twelve (12) months of full time employment are eligible to take one week of paid vacation during each calendar year at the time of their choosing. To ensure that employee's vacation does not disrupt TPI's operation and/or its educational programs, eligible employees are required to request prior approval of TPI's authorities according to TPI's policies and procedures.

3. All vacation time must be taken in full at one time. Vacation time may not be carried over and accumulated in subsequent calendar years.

Procedure to schedule employee's vacations

1. Eligible employees must submit to the Executive Director (Rebeca Alfie) or the Assistant Executive Director (Flavio Alfie), a Request for Permission to take Paid Vacation no later than 90 days in advance to the requested date. The Executive Director or Assistant Executive Director will approve or deny the request within 30 days of

employee's submission. A verbal approval or denial of a permission to take paid vacations has no effect whatsoever.

2. Eligible Employees that wish to change their requested dates for paid vacation must submit to Executive Director or Assistant Executive Director a new Request for Permission to Take Paid Vacations no later than 90 days in advance to the new date. The Executive Director or Assistant Executive Director will approve or deny the request within 30 days of employee's submission. A verbal approval or denial of a permission to take paid vacations has no effect whatsoever.

Attached.

THE PRAXIS INSTITUTE REQUEST FOR PERMISSION TO TAKE PAID VACATION

Date:

Employee's Name:

Dates requested for vacations:

Employee's Signature

FOR USE OF TPI'S AUTHORITIES

Date: ______ Request Adjudicated by: _____ Request's Adjudication: APPROVED [] DENIED []

Adjudicator's Signature

POLICY AND PROCEDURE

TITLE: CIE Instructional and Administrative Personnel Form

PURPOSE: To establish procedures to ensure consistency with employment hiring procedures.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy. This policy is to be implemented by all supervisors and directors.

APPLICABILITY:

This policy applies to all personnel.

PROCEDURE:

As part of the hiring process for all instructional and administrative personnel, the CIE Instructional and Administrative Personnel Form will be fully completed and notarized. Original form will be submitted to CIE and a copy will be retained in employee's personnel file.

Attached.

COMMISSION FOR INDEPENDENT EDUCATION INSTRUCTIONAL AND ADMINISTRATIVE PERSONNEL RETAIN A COPY OF THIS DOCUMENT IN FACULTY MEMBER'S PERSONNEL FILE.

INSTITUTION DATA						
Name:					ID No.:	
	PERSO	NNEL D	ATA			
Name:						
Address (Residence):						
City:			State:	Zip	:	
Business No.:	Residence No.:	E-U Tim	e 🗌 Part Time	Emai	11:	
Date of Initial Employment:		Full 1 lin				
Primary responsibilities (or courses taught:					
Educational Declarge	• /*		1			
Educational Background School Name	Location (City, State)	of the credentia Month/	Month/	Major Area of	Certificate, Diploma, or	
School Funite	Location (Criji, State)	Year	Year To	Study	Degree Earned	
		From				
Work Experience:				<u> </u>		
Employer	Address (Street, City, State, Zip	Month/	Month/	J	ob Title and Duties	
	Code)	Year From	Year To			
		riom				
Certifications/Licenses: (A	Attach a copy of faculty member's crede	entials)				
Occupational Lie	censes, Certifications, or Registration	s Held		State Issue	ed Expiration Date	
Have you been employed	hy involved with or in	any way	rolated wi	th other odu	cational institutions in	
Florida or any other state	• /	• •		in, other euro	cational institutions in	
Yes \square No \square If Yes, please provide spo			and/or involvem	ent		
Have you ever been know					n this application?	
Yes No If Yes, please explain.				a are using o		
Notarization						
State of				County of		
Before me, a Notary Public, personally known to me , or documentation provided						
being duly sworn affirms that he/she will represent this institution in good faith and in compliance with the						
laws of the State of Florida, and authorizes the Commission to receive criminal justice information, as defined						
in Section 943.045, Florida Statutes, regardless of the jurisdiction in which such information originated,						
pursuant to Section 1005.2						
and correct.	2(1)(11), 1 lollau Statates, (is that the	statements co		
Applicant Signature:						
Subscribed and sworn to be	efore me this day of		, 20			
Notary Public:	nore me uns uay 01	MyC	commissio	n Evniras	(SEAL)	
TNOTALY FUULIC.		IVI y C	.01111115510	n Expires.	(SEAL)	

POLICY AND PROCEDURE

TITLE: Performance Appraisals

PURPOSE: To establish a general framework for evaluating individual performance in an equitable and consistent manner for all eligible employees of TPI.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy. This policy is to be implemented by all supervisors and directors.

APPLICABILITY:

This policy applies to all personnel.

PROCEDURE:

It is the policy of TPI to provide constructive feedback to all employees on their strengths and weaknesses in performance, attitude, and potential. TPI encourages its employees to utilize this review process to express specific concerns they may have, to reach or renew their mutual understanding of the objectives of their department and their role, to clarify works standards, discuss training needs and offer general comments about TPI.

Supervisors or Directors are expected to conduct Performance Appraisals for all employees at the conclusion of the employees' probationary period and at least annually, by the end of each calendar year, thereafter.

A probationary evaluation will be conducted upon completion of the employee initial ninety days of continuous employment. If more than ninety days is needed for adequate evaluation, an extension of up to sixty days may be granted.

The Annual Performance Appraisal will be conducted annually, during the last quarter of each calendar year. If an employee transfers to another position or receives a promotion they will be placed on a ninety days probationary period and evaluated on their new responsibilities.

Performance evaluations will focus on accomplishments (contributions to the department and facility as a whole) and the process used to achieve the end result (i.e., interpersonal skills.

Employee participation and the right to differ are guaranteed and encouraged. Appropriate documentation that accurately reflects decisions and conclusions reached and discussed with employees must be created and acknowledged.

ANNUAL PERFORMANCE EVALUATION

Employee Name:_]	Date:	
1 0 -			

Position:

_____Hired Date: _____

SCALE:

4 =Outstanding 3 =Average 2 =Below Average 1 =Does Not Meet

Evaluation Factors	4	3	2	1
Quantity of Work				
Volume of Work Completed				
Ability to meet deadlines				
Comments:				
Quality of Work	4	3	2	1
 Accuracy and Thoroughness of work completed Organizes, prioritizes, and performs work in 				
a timely and efficient manner. Comments:				
Joh Knowledge	A	3		1
 Job Knowledge Demonstrates good working knowledge of job responsibilities. Demonstrates ability to work unsupervised Demonstrates ability to learn new tasks Demonstrates ability to train others 	4	3	2	1
Comments:				
AttitudeDemonstrates a pleasant and calm personality:• Towards co-workers• Towards Supervisors• Level of cooperation displayed	4	3	2	1
Comments:		<u>.</u>		
Appearance	4	3	2	1

Appropriate for office				
 Appropriate for job position 				
• Well groomed. Clean. Neat.				
Comments:			1	
Adaptability/Flexibility	4	3	2	1
Ability to Accept Changes				
Comments:				
			-	
Initiative	4	3	2	1
Presents innovative and realistic ideas				
• Able to take anticipate needs and take action				
• Consistently displays a "Self-starter" quality Comments:				
Comments:				
Attendance/Dedication	4	3	2	1
• Reports to work on time				
• Is present to perform duties as scheduled				
• While at work, uses time efficiently and				
constructively				
Comments:				

General Comments:

Strengths:

Weaknesses:

Opportunities for Improvement:

This Performance Evaluation has been reviewed with me, and comments, if desired.	d I understand that I m	ay attach my
Supervisor Signature:	Date:	
Employee Signature:	Date:	

Name			Date	
Scale: Exemplary 5	Above Standard 4	Standard 3	Below Standard 2	Unacceptable 1
1. Teaching				
2. Service				
3. Other				
4. Core Values	**			
5. Overall Rati	ng			
Comments:				

FACULTY EVALUATION FORM

****** Core Values (Professionalism) are an expectation of all faculty and will not be weighted as are the standard Teaching, Service, and Other categories. Instead, the scores for the other categories will be totaled and "points" will be deducted if a faculty member is not "professional." However, if points are subtracted for lack of professionalism, the Program Director **must specifically justify, in writing, why the points are being deducted.**

I have read this written evaluation and rating.

Faculty Signature:	Date:	

Director Signature:_____Date: _____

I have read this written evaluation and rating by the chair and disagree as noted in the attached letter.

Faculty Signature:	Date:
--------------------	-------

Director Signature:		Date:	
---------------------	--	-------	--

Evaluation Scale for Faculty Assessments

NOTE: Written Comments, which justify or support the numerical score, should be included for each performance area.

Numerical	Word	Representative Examples
Score	Description	
5	Exemplary	Greatly exceed the standard performance and
		accomplishments expectations; worthy of high
		merit; plans and execute special assignments
		with little or no guidance; substantially
		accomplished the negotiated goals/objectives for
		the year.
4	Above Standard	Performance above the standard expectation;
		performs special assignments with limited
		guidance; substantially accomplished the
		negotiated goals/objectives for the year.
3	Standard	Expected performance; performs all
		responsibilities well; performs special
		assignments with limited guidance; substantially
		accomplished the negotiated goals/objectives for
		the year.
2	Below Standard	Performance below expectation; performs some
		responsibilities well; needs guidance to perform
		some routine job responsibilities; does not
		substantially meet negotiated goals/objectives.
1	Unacceptable	Performance well below expectation; perform
		few, if any, responsibilities adequately; requires
		guidance to perform job responsibilities;
		improvement required; not effective; does not
		substantially meet negotiated goals/objectives.

THE PRAXIS INSTITUTE

INSTRUCTOR EVALUATION FORM

Instructor's Name:

= 0

= N/A

Date Hired: __/_/ _ Date of Evaluation: __/_/

Evaluation key: Excellent = 4 Below Average (can be corrected with effort, desire) = 1 Good = 3 Average = 2

Unacceptable: Not applicable

A column for comments is provided to the side of each category to state weaknesses and strengths.

SUBJECTS TO BE EVALUATE	4	3	2	1	0	N/A	COMMENTS
1. Appearance of instructor.							
2. Class room organization.							
3. Subject material organization.							
4. Objectives explained.							
5. Communication skills.							
6. Work area maintenance.							
7. Motivation.							
8. Leadership qualities.							
9. Subject knowledge.							
10. Self confidence.							
11. Dependability.							
12. Attitude.							
13. Updated educationally.							
14. Professional relationship with student.							
15. The instructor prepared all necessary							
equipment prior to classes.							
16. Lesson plan is followed.							
17. Board is used during classes.							
18. Visual aids are visible to all students.							
19. The instructor is asking questions							
during class or demonstrations.							
20. The instructor is going properly into							
practical sessions.							
21. The instructor is rotating from student							
to student instructing and assisting students							
when performing skills.							
22. Written tests are administered properly.							
23. If homework is given, are explicit							
instructions in the assignment given so that							
there is no question on how or when it is							
due.							
24. All students are attentive.							
25. Notes are being taken.							

26. Students are motivated with the subject.			
27. Equipment, products or materials are in			
place.			
28. All students are seated in their student			
desks.			
29. All supplies were requisitioned prior to			
class.			
30. The objective is in the board.			
31. Students are in proper uniforms.			
32. The Demo is conducted according to			
plan.			
33. The Demo is conducted in timely			
fashion.			
34. The Demo is visible to all students.			
35. The class is participating.			

OBSERVATIONS/RECOMENDATIONS:

EMPLOYEE: I certify that this report has been discussed with me. I understand my signature does not necessarily indicate agreement.

EMPLOYEE'S SIGNATURE

__/_/___ DATE

DIRECTOR'S SIGNATURE

<u>/_/</u> DATE

POLICY AND PROCEDURE

TITLE: Staff Orientation Checklist

PURPOSE: To prepare the new employee to be a functioning member of the facility.

RESPONSIBILITY:

It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all personnel.

PROCEDURE: All new employees, during the hiring/orientation process will complete all the required documentation for his/her personnel file. An orientation checklist will be completed for all new employees detailing the areas covered and items discussed with the new employee.

Attached.

THE PRAXIS INSTITUTE

STAFF & FACULTY ORIENTATION CHECK LIST

PERSONNEL USE ONLY:		
Employee Name:		
Job Title:		
Hire date: / Full -Time[] Part - Time[] Substitute[]		
The employee whose name appears above has completed all of the documentation required for his/her personnel file and he/she is ready to start the orientation procedures outlined in his/her job description.		
Program Director/Chief InstructorDate:	/ /	
 [] Review of the Job Description [] Explanation of the Institute's Mission [] Chain of Command [] Explanation of the Programs Objectives [] Programs Outlines [] Lesson Plans [] Explanation of the Equipment [] Explanation of the Media Services [] Explanation of the Media Services [] Explanation of the Safety & Emergency Procedures [] Attendance [] Grading System [] Student Evaluations [] Student Evaluations [] Placement Services [] Other	-	

My signature below indicates that I have received explanation on the items listed above. Furthermore, I understand if I have questions I will contact my supervisor

Employee's Signature: ___

Date: _ / /_

Supervisor's Signature: ____

Date: _ / /_

POLICY AND PROCEDURE

TITLE: Workplace Violence Prevention

PURPOSE: To establish procedures to address prevention and response to workplace violence.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Programs Directors, faculty and staff members to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all The Praxis Institute (TPI) staff members.

POLICY:

TPI will not tolerate any type of workplace violence committed by or against staff. Any threats or acts of violence against a staff member, vendor, customer, visitor, or any piece of TPI's property will not be tolerated. Any staff member determined to have committed such acts will be subject to corrective actions up to and including termination. Where appropriate, TPI will report violent incidents to local law enforcement authorities.

Violence Response

Staff is encouraged to be alert to the possibility of incidents and threats of violence. TPI prohibits retaliation against any staff member who, in good faith, reports a violation. Every effort will be made to protect the safety and anonymity of anyone who comes forward with concerns about a threat or act of violence.

Additional behaviors that should be reported (may not be a violation of policy, but may indicate the need for intervention and assistance) include, but are not limited to:

- Erratic, impulsive or bizarre behavior that generates fear in others
- High degree of emotional stress
- Suicidal statements
- Verbal Abuse
- Any behavior or collections of behaviors that instill fear or create concern that an individual might act out violently

Examples of violent behaviors prohibited under this policy include, but are not limited to:

- Threats: an expression of intent to cause physical or emotional harm to another person or damage the property of another. A threat may be direct, indirect, conditional or veiled and without regard to whether the party communicating the threat has the ability to carry it out in the present or future.
- Overt Physical Intimidation or Aggression: actions that frighten, coerce, or induce duress; actions may also include property damage.
- Physical Attack: unwanted physical contact such as hitting, kicking, pushing, shoving, biting, fighting or throwing objects or use of an unauthorized weapon against another person.
- Stalking or Unwanted Contact: obsessive and persistent intrusion upon another person(s) or persistent unwanted pursuit (often romantic).

Note: Individuals who have a restraining order covering a member of TPI's community that potentially affects TPI business or work environment should report the restraining order to TPI's administrator.

Intimate Partner Violence

Intimate partner violence or violence in the home can impact the workplace. All employees should be alert to warning signs that may show an individual could be in an abusive relationship and report concerns on a timely basis.

Potential Signs

- Victim conceals injuries or offers unconvincing reasons for them
- Uncharacteristic tardiness or errors
- Unwelcome visits by the partner to TPI Campus
- Unusual number of phone calls or text messages from partner
- Reluctance by the individual to converse with a partner

If a staff member is a victim of workplace violence, his or her department will make every effort to provide support and security measures after the incident is reported. Staff is encouraged to talk with their supervisors, or Administrative officers.

Please refer to the table below for further information concerning TPI's policies on violence in the workplace.

Definition	Action
"Emergency" - A situation is considered an	In an emergency, the staff member should consider his or her
"emergency" if an injury has occurred or if	personal safety first. If possible, the staff member should then
there is an immediate threat of physical harm	adhere to the following steps below:

or injury.	Step 1 – Call 911, if appropriate. Step 2 – Notify a supervisor.
"Non-Emergency" - A situation is considered a "non-emergency" if no injury has occurred or if there is no immediate danger, but the words or gestures of one person have induced fear of physical harm in another person.	In the event of a non-emergency, the staff member should notify a supervisor, or and administrative representative.
The supervisor should become familiar with the "Workplace Violence Policy"	This policy should be enforced fairly and uniformly. Call 911 and request assistance if the situation is perceived as dangerous. Attempt to identify and diffuse all conflicts as soon as possible without endangering personal safety or the safety of others. Report the incident and notify a supervisor. In the event of a non-emergency, report any knowledge of a real or potential violation of this policy as well as any suspicious or unusual behaviors of a staff member, student, faculty member, vendor, or customer to his or her supervisor. Do not attempt to challenge or disarm an armed and dangerous person.
Report Completion	All injuries must be reported by completing an incident report.

TITLE: Data Security Agreement

PURPOSE: To establish guidelines to safeguard institution's data obtained by employees while performing job duties and/or regular institution's business.

RESPONSIBILITY: It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all staff and faculty at The Praxis Institute.

POLICY:

Upon hire all employees will sign the Data Security Agreement (Attached). All employees will conduct their day-to-day regular business and job duties while honoring the signed agreement.

Data Security Agreement

This Data Security Agreement (Agreement) is agreed upon effective _____ (Date) by and between <u>The Praxis Institute</u> (Institution) and _____ (Employee).

1. Disclosure of Institution's Data:

Employee shall not disclose Institution's Data in any manner that would constitute a violation of state and or federal law or the terms of this agreement including, without limitation, by means of outsourcing, sharing, retransfer, or access, to any person or entity, except:

- a. Employees or agents who actually and legitimately needs to access or use Institution's Data in the performance of duties to Institution;
- b. But only after such party has agreed in writing and in advance of any disclosure, to be bound by confidentiality terms at least as stringent as the terms of this Agreement; or
- c. Any other third party approved by the institution in writing and in advance on any disclosure, but only to the extent of such approval.
- 2. Use of, Storage of, or Access to, Institution's Data Employee shall only use, store, or access Institution's Data:
 - a. In accordance with, and only to the extent permissible under this agreement; and
 - b. In full compliance with any and all applicable laws and regulations, only to the extent applicable to employee, but without limitation: Family Educational Rights and Privacy Act (FERPA) and, Health Insurance Portability and Accountability Act (HIPAA),
 - c. Any transmission, transportation, or storage of Institution's Data outside the United States is prohibited except on prior written authorization by the Institution.
- 3. Safeguarding Institution's Data

Employees agrees that use, storage, and access to Institution's Data Shall be performed with that degree of skill, care, and judgment customarily accepted as sound, quality, and professional practices. Employee shall conduct daily responsibilities and maintain safeguards necessary to ensure the confidentiality, availability, and integrity of Institution's Data.

Institution's Representative _____

Date _____

Employee _____

Date _____

PLACEMENT AND STUDENT SERVICES

TITLE: Student Services

PURPOSE: To define and delineate what comprises student services.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Student Services Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all registered students at TPI.

PROCEDURE: The following items are part of the services provided to students at TPI, through its departments:

ADMISSIONS: Orientation of career chosen, requirements of the same. Graduation requirements, cost of program, aids available, admissions test if applicable.

COUNSELING: Academic counseling is provided to students on a daily basis, both by the student's own instructor and by the School Director. Personal and non-academic counseling is referred to community professionals.

PLACEMENT: The institution will assist students in the process of seeking employment. The institution does not guarantee or promise employment as a precondition to enrollment or to graduate.

TRANSCRIPTS: All students receives a transcript upon completion, the transcript contains information about program of study, courses completed, grades and clock hours attended, at no additional cost.

LIBRARY: The institution has a library with professional books, magazines and videos/DVD. This facility will help the student expand his knowledge and enhance new experiences.

LICENSED PROGRAMS: The institution will provide to the students, who are candidates for graduation, the service of filling out the documentation or application for their license.

BOOK STORE: Students can conveniently purchase books, videos, posters, massage tables & chairs, and various other items related to their programs of study, at a very suitable prize.

The institution will evaluate its student personnel services plan annually and distribute the results of the evaluation to the staff, so that the information may be used to improve the student services.

TITLE: Localization Letter

PURPOSE: To establish procedures to contact students after multiple phone calls failed attempts.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Coordinators to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all registered students at TPI.

PROCEDURE:

After multiple phone calls failed attempts, The Placement Assistance Department will send the localization letter to any student with whom the department has not been able to established contact. A copy of the letter will become part of the student's placement file.

THE PRAXIS INSTITUTE

CARTA DE LOCALIZACION

FECHA:

PARA: _____

Estimado/a_____:

El personal del Departamento de Asistencia Laboral de The Praxis Institute, ha tratado en repetidas ocasiones de ponerse en contacto con usted a estos teléfonos:

- •
- _____

No habiendo podido hacer contacto con usted le estamos dirigiendo la presente, para solicitarle tenga a bien comunicarse con nosotros a la brevedad posible al siguiente teléfono: (305) 642-4104

Sinceramente,

PLACEMENT DEPARTMENT

TITLE: Employer Information Form

PURPOSE: To establish procedures to document potential employers' information data.

RESPONSIBILITY:

It is the responsibility of the Placement Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the Placement Department.

PROCEDURE:

Placement Department Staff will document employers' information data using the designed form. Completed form will be filed in the Placement office.

Employer Information

Company Name:
Address:
City:
State:
Phone # : ()
Fax #: ()
Contact Person:

TITLE: Job Placement Follow-Up Form

PURPOSE: To establish procedures to document job placement follow-up.

RESPONSIBILITY:

It is the responsibility of the Placement Department Staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to Placement Department and all placed students.

PROCEDURE:

Placement Department will perform a follow up on all job placements. Follow up will be documented using the Job Placement Follow Up Form. Form will be filed in each student's placement file.

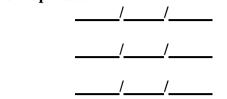
THE PRAXIS INSTITUTE				
Job Placement Follow-up Form				
Graduate's Name:				
Graduation Date:/Social Security:				
Program Studied:				
Name of the Employer:				
Employer Address:				
Telephone () Fax () Hourly weep				
Contact Person: Hourly wage Current When placed: \$Hourly wage: \$				
Current Job Title:				

CIRCLE ONE

CURRENT STATUS	IF DISCHARGED QUIT OR LAID OFF	IF DISCHARGED OR QUIT	APPRAISAL OF EMPLOYEE
1. Employed	Last Day Worked	1. Unsatisfactory job performance.	1. Adaptable
2. Discharged		job performance.	2. Not adaptable
3. Quit		2.Excessive Absences	3. Good learning ability
4. Laid Off	//	3.Disciplinary Reasons	4. Difficulty in understanding directions.
5. Failed to Report		4. Not trained for	
6. Not Placed		Job 5. Job was temporary 6. Other employment 7. Return to school 8. No reason given	 5. Good attitude toward employer & coworker 6. Argumentative & difficult to work with
		9. Other/Explain	7. Hard working

under	
Remarks	8. Not motivated

Follow-up Date:



REMARKS:

Placement Counselor's Signature:

Date: ____/ ____

TITLE: Placement Record Card

PURPOSE: To establish procedures to document activity every time the placement officer performs any form of contact (attempt or actual).

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Officer to ensure compliance with this policy.

APPLICABILITY:

This policy applies to Placement Department/Placement Officers.

PROCEDURE:

This two-page document is one of the most important parts of the file, and will be filled with all the information that is required by the Commission for Independent Education and COE documents for placement.

This is the official communication between the student and the placement support services as well as our back up documentation for the Commission for Independent Education and COE and for other auditors of our entire education process. This information must be complete and extremely accurate.

Page 2 of the record card is used to document activity every time the placement office performs any form of contact (an attempt to contact or actual contact). All contacts must be recorded on this form with the date and time of the interaction.

This document is comprised of 4 parts.

First Part: Information regarding the student: Name, Address, Phone Number, Message, Program the student graduated at The Praxis Institute, the start date and the graduation date of the student when he/she finished the program.

This first part is completed on every single student who is included in the start list, and it is updated on a regular basis, whenever there is a change of information.

Second Part: This second part is the mid section of the form, and it is completed at the end, it is the result of third and fourth part.

Date Hired/Placed, is the date the job offer is made to the graduate. Start Date, is the first day of the student's employment. This section mostly refers to the company where the graduate works and it should be completed thoroughly.

Third Part: Job Leads given to the Student: In this section the graduate will sign for the number of leads received on a particular date.

Fourth Part: On this second page of the document, the placement office will record every activity or effort done on the student. This page can be duplicated as many times as needed.

TITLE: Placement Department Orientation

PURPOSE: To establish procedures to inform and orient the new student about the placement department and its role and responsibilities.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Admissions Department, and Placement Department to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the Admissions Department and Placement Department.

PROCEDURE: During the admission process students will receive orientation about

the placement department, its roles and responsibilities.

ORIENTATION

Placement Department

According to the internal rules of TPI, and in accordance with our mission, our purpose in the placement department is to help our students, to find a job in the areas in which they have been trained. We would like to clarify that we do not take the total responsibility of ensuring that our graduates are placed; rather, we work together with the cooperation of the students in this effort. TPI cannot guarantee placement, but we can guarantee that we will make the efforts to provide our best support to all graduates who wish placement assistance.

In order for the students to be able to qualify for this assistance, they need to be in regular contact and communication with an officer from the Placement Department, and they:

- 1. Need to make us aware of their interest and intentions in using the services in this department.
- 2. Be sure to notify the Placement Department if the student changed his/her address or phone number (so that we can keep in touch with students regarding their employment).
- 3. Make time to go to the interviews scheduled for the students by the Placement Department and the potential employer.

- 4. Be in regular contact with the Placement Department, before and after the interviews, and keep the placement officer informed of any successes, concerns, and suggestions in order to help other students who are currently going through the process. In this way we can all benefit from our individual placement experiences.
- 5. Students have to notify the department when they get a job, whether it is in their own, or through an interview that the placement department has scheduled.

Note for the students: If the institution has not been notified of your intention to look for employment during the last 90 days after your graduation, the institution will assume that the student has released or waived the placement service assistance/support.

TITLE: Plan for Placement of Students

PURPOSE: To document a fully delineated plan for the placement of students.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Department Staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the Placement Department.

PROCEDURE:

PLAN FOR PLACEMENT OF STUDENTS

Purpose: It is the objective of this Department to provide assistance and guidance to all graduates and/or active students who are seeking employment at no additional charge. Our main purpose is to enable our students to find jobs and to provide support services enabling them to keep their jobs and to continue their overall professional development. To that end, we will provide this assistance through a job referral service: this is maintained by our constant updating of job banks for our students.

This complete support and development service for our graduates and active students seeking employment is augmented by our systematic and attentive interaction with potential employers in our local communities. We meet our overall TPI educational mission by first providing the training, and then providing the tools to effectively use the training in the work environment.

Our entire emphasis has been and will continue to be to enable students to build on their ability to work, survive and become productive members of their local communities.

Responsibility: It is the responsibility of the Placement Officer to make all students aware of TPI'S Placement Assistance according to the procedures noted in this manual. Furthermore, it is the responsibility of the placement team to provide the support skills and the supportive environment to allow students to feel free to ask for additional information, and to gain confidence in their skills, improve their professional interactions, and utilize the overall services that our team can provide to our graduates. The key individuals who are held responsible for the effective implementation of these procedures are the School Director and the Placement officer.

The Placement Officer will prepare in advance a list of how many students will graduate each month. The instructor must be part of the network between the Placement Department and employers in our community.

It is your responsibility at this time to begin thorough monitoring of the students list in order to ensure that these prospective graduates are maintaining satisfactory progress in both attendance and academics. You should also make sure that you begin building rapport with each of the prospective graduates.

For each of the students listed, a folder will be created to begin monitoring each interaction with these students.

The procedures to be used to build an appropriate Graduate's "Placement: file are as follows:

- 1. Prepare and/or review the files for all documentation needed.
- 2. Call the student and verify the phone number, address, and set up an appointment with the student to explain to him/her the procedures for the State License Application or National Board of Massage Exam Application.
- 3. For those students scheduled to take the National Board of Massage Exam, contact them, to know the results of the exam.
- 4. Once they pass the Exam, set up an appointment to apply for the State License.
- 5. After the graduate received the State License is ready for his first job interview.

TITLE: Placement Department Guides

PURPOSE: To establish objectives and define the operational intent of the Placement Department.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Department staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to Placement Department.

PROCEDURE:

PLACEMENT DEPARTMENT GUIDES

It is the objective of this Department to provide assistance and guidance to our graduates and/or active students who are seeking employment. Our main purpose is to enable our students to find jobs and to provide services enabling them to keep their jobs and to continue their overall professional development. To that end, we will provide this assistance through a job referral service: this is maintained by our constant updating of job banks for our students.

This complete support and development service for our graduates and active students seeking employment is augmented by our systematic and attentive interaction with potential employers in our local communities. We meet our overall THE PRAXIS INSTITUTE educational mission by first providing the training, and then providing the tools to effectively use the training in the work environment.

Our entire emphasis has been and will continue to be to enable students to build on their ability to work, survive and become productive members of their communities. For those who are immigrants, this will eventually afford them the opportunity to become citizens of the United States.

It is the responsibility of the Placement Officer to make all students aware of THE PRAXIS INSTITUTE'S Placement Assistance, according to the procedures noted in this manual. Furthermore, it is the responsibility of the placement team to provide the support skills and the supportive environment to allow students to feel free to ask for additional information, and to gain confidence in their skills, improve their professional interactions, and the utilize the overall services that our team can provide our graduates.

The key individuals who are held responsible for the effective implementation of these procedures are the School Director and the placement team at the Campus.

The placement personnel will prepare seminars about interviews, preparation of resumes, be ready for appointments, and how to keep a job.

The instructors will communicate with the placement coordinator about students that are ready to graduate.

We know that will serve our students with excellence.

TITLE: Placement Waiver Form

PURPOSE: To establish procedures to monitor and document process for students to waive placement assistance from the institution and the reasons for.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Department staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students that graduated from TPI and Placement Department staff.

PROCEDURE:

If and when a graduate encounters a situation that may preclude or interfere with the institution's attempts to help the graduate find a job, the student or placement officer will complete and sign the Placement Waiver Form. Form will become permanent part of the student's placement file.

PLACEMENT WAIVER FORM

Student Name: _____

Social Security #:_____

My signature below indicates that I have understood that The Praxis Institute will find difficulties in the process of helping me to find a job for the following reason:

- () Have experienced medical difficulties.
- () Serving in the military.
- () Continuing my education.
- () Other reason(s):

By this document, I attest that this reason has been fully described to an institution's official by me.

For this reason, I indicate that I will use my own means to pursue future job opportunities. I further understand, that under no circumstances will The Praxis Institute guaranteed me a job.

 Signature:

 Comments:

 :

•

TITLE: Job Lead/Referral Procedures

PURPOSE: To establish procedures to document job leads to build data bank of potential employers.

RESPONSIBILITY:

It is the responsibility of the Placement Department Staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all Placement Department Staff.

PROCEDURE:

JOB LEAD/REFERRAL PROCEDURES

The placement officer based on the employer information and request will prepare the job leads. The job developer's responsibility includes directing student to each interview and helping him/her to build support and confidence.

Each time a student is officially prepared for a job lead, he or she will be given a copy of the job lead referral form for ready reference. A copy of this form must also be placed in the student placement file; the form must contain the student's signature.

If, for example, a student goes to ten different interviews, the file would show that the student signed for each interview. Also the contact information about the interview will be recorded on the Placement Record Card as part of the placement activity for that student.

	Т	HE PRAXIS INS	STITUTE		
	<u>Job</u>	Lead/Refer	ral Form	L	
Company Name:					
Address:					
City:	State :		_Zip Cod	e:	
Phone #: ()		Fax #: ()		
Contact Person:					
Program				Name:	
Positions Available:					
Requirements:					
Appointment:	Date:			_	
	Time:			_	
Remarks:					
Remarks					
By signing this form, I ac					
Student's Name: <u>-</u>			SS#:	<u>. . </u>	
Student's Signature:			Date:	/ /	

- TITLE: Job Placement Plan Outline
- **PURPOSE**: To establish the institution's job placement plan outline.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Department Staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the overall institution and the Placement Department.

PROCEDURE:

JOB PLACEMENT PLAN OUTLINE

Essential elements of the communication network will be:

- Institution communication with potential employees.
- Posting employment opportunities on the bulletin boards.
- Instructors' communication with the placement department about students ready to graduate.
- Employment opportunities information provided directly to instructor for dissemination to the students.
- Reference of graduates to employers seeking candidates for employment.
- Follow-up of students that have been placed.

TITLE: Labor Market Survey

PURPOSE: To establish procedures to assess labor market opportunities, current or potentials, available.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Placement Department Staff to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the Placement Department.

PROCEDURE:

Placement department staff will monitor available job openings opportunities and document those using the Labor Market Survey Form. Form will be used to create job opportunities bank data.

THE PRAXIS INSTITUTE LABOR MARKET SURVEY <u>Job Openings/Job Bank</u>				
Date://				
Company Name:				
Address:				
Telephone Number: ()				
Fax Number: ()				
1. Are there any positions available at this moment?				
Yes () How many?No ()				
2. Do you anticipate any future openings?				
Yes () How many?When?				
3. Do the potential candidates have to meet any specific requirements?				
Please list:				
4. What salary range does the company offer?				
<pre>\$[] Salary [] Hourly [] Bi-weekly [] Weekly [] Commission</pre>				
5. Work Schedule: Monday through FridayP/TF/TW/E				
6. Would one of our students be considered employable at your company?				
Yes () No ()				
7. Do they have to take any type of tests?				
8. Would you call us when you need a graduate? Yes () No ()				

REMARKS:		
		-
		 -
Survey conducted by:		

REGISTRAR

TITLE: Completion of Program/Final Documents Letter

PURPOSE: To establish procedures to notify students of program completion final documents.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Registrar's office to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered at TPI and the registrar's office.

PROCEDURE:

Upon completion of the program, registrar's office will send letter to student notifying them of final documents being ready to be pick-up.

Fecha:

Nombre del Estudiante:

Estimado (a) estudiante,

The Praxis Institute le informa que sus documentos como conclusión del programa están listos.

Conjuntamente con esta carta va a recibir una forma llamada <u>Student Contact Information</u> que es su **exit interview** y similar a la que completó en Financial Aid cuando aplicó por la ayuda financiera. Esta forma debe llenarla con letra de molde y enviarla a través del correo o traerla cuando pase a recoger sus documentos.

Usted puede llamar y hacer una cita para retirarlos en cualquier momento, teniendo en cuenta que estos documentos son necesarios para la solicitud de su licencia.

Le informamos que su deuda con la escuela es de \$_____. Cantidad que debe ser cancelada antes de recoger sus documentos

Para hacer una cita debe llamar al (305) 642-4104 y un representante de la institución le dará fecha y hora en la que deberá asistir para este trámite.

Zoila Espinosa Education Department Date:

Student's Name:

Dear Student,

The PRAXIS Institute is hereby informing you that the final documents related to the completion of your Education in our Institution are now ready.

Enclosed we are attaching the **STUDENT CONTACT INFORMATION** Form which is your **Exit Interview**, which is similar to the one you completed with Financial Aid. This form needs to be completed in block letters and mail it or bring it to our Institute.

You can also make an appointment to pick up your documents since these are required for your licensing process.

We are also informing you that there is a balance due to the School for \$_____. This amount must be satisfied in order to pick up your certifications and Diploma.

Please call (305) 642-4101 or (305) 541-5554, and a PRAXIS Representative will give you a date and time to proceed.

Sincerely,

Zoila Espinosa Education Department

TITLE: Drop Notification Letter

PURPOSE: To establish procedures to notify students of program drop.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, and Registrar's office to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered at TPI and the registrar's office.

PROCEDURE:

Upon processing of program drop, registrar office will send letter to student notifying them.

Fecha:

Nombre del Estudiante:

Estimado (a) Estudiante:

Le informamos que a solicitud suya la escuela determino su status en una baja.

También le hacemos saber que si en algún momento quisiera retomar el programa, horas, exámenes y servicios le serán reconocidos, ya que su record quedara en nuestros archivos

Atentamente,

Zoila Espinosa Education Officer

TITLE: Early Pass

PURPOSE: To establish procedures to document and notify the registrar's office when a student needs to be excused earlier from class.

RESPONSIBILITY:

It is the responsibility of the Campus Director, Faculty, and Registrar's office to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students registered at TPI and the registrar's office.

PROCEDURE:

If and when a student needs to be excused earlier from class, such student will complete the early pass form. Form will become part of the student's permanent file.

Attached.

THE PRAXIS INSTITUTE 1850 SW 8th St. 4 floor Miami, Fl. 33135 Phone (305) 642-4104

EARLY PASS FORM (Spanish)

El/La abajo firmante notifica al Departamento de Record que por razones de:

en el día de hoy todos los días	necesito retirar	me antes de
finalizar la Clase, siendo mi hora de salida:		
Por lo cual firmo la presente a los	del mes de	del

Nombre del Estudiante

Firma del Estudiante

TITLE: Academic Leave of Absence (LOA)

PURPOSE: Define and delineate procedures to follow when requesting an academic LOA.

RESPONSIBILITY: It is the responsibility of the Registrar, Financial Aid Supervisor, and Program Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to the entire student body at Praxis Institute.

POLICY:

A Leave of Absence (LOA) is a temporary interruption in a student's program of study. Students who find it necessary to take a Leave of Absence (LOA) from school for personal, medical or other reasons must request such LOA in writing. Leave of Absence will be granted only for up to 30 days. In no instance will students be allowed LOA longer than 30 days. The Leave of Absence may not be granted for a period of time, which would cause the student to take longer that one and one-half times the normal length of the enrollment period to complete. Should a student know in advance that leave will be necessary; the request must be submitted prior to its beginning. Only one LOA may be granted during the time a student is enrolled in school. Students should provide a written, signed, and dated request for leave that includes the reason for the request. If the student does not have or is unable to obtain this documentation, then the student should submit a declaration stating when and why the student requested the leave of absence, if and when it was granted by the school, the expected date of return, and why the student does not have documentation. If unforeseen circumstances prevent a student from providing a written request, the school may grant the request as long as it documents the decision and collects the written request at a later date. If the student does not return to school after a leave of absence, the withdrawal date will be the date that the school determines the student began the leave of absence.

TITLE: Academic Leave of Absence (LOA) disruption as a result of a Declared National Emergency or any other type of public health threat (extenuating circumstances) such as the Declared National Emergency concerning COVID-19.

PURPOSE: Define and delineate procedures to follow when the student has to default to an academic LOA due to a disruption as a result of a Declared National Emergency or any other type of public health threat (extenuating circumstances).

RESPONSIBILITY: It is the responsibility of the Registrar, Financial Aid Supervisor, and Program Director to ensure compliance with this policy.

APPLICABILITY: All students are eligible to apply for the LOA if impacted or had disruptions due to the Declared National Emergency.

POLICY:

A Leave of Absence (LOA) is a temporary interruption in a student's program of study up to a maximum of 180 days. A COVID-19 related circumstance LOA will be processed when one of the following situations is present:

- A student completes all the required academic hours (theory didactic component) of the registered program, but is unable to move forward with the completion of the hands-on face-to-face, in campus (laboratory) or off campus (externship), academic component.
- Student becomes ill due to COVID-19 and is unable to complete or attend online classes (theory didactic component).
- Student is unable to attain and secure the required technological resources to participate in online classes.

Leave of Absence will be granted for the time period, up to a maximum of 180 days:

• The campus is officially closed or the community based clinical centers are not permitted to accept students to complete their required externship hours. Such LOA will remain until the campus re-opens for academic activities or the community based clinical centers are allowed to accept students for externships.

- The student health condition prevents him/her to retake academic responsibilities.
- The student is unable to attain/secure the required technological resources.

The Leave of Absence may not be granted for a period of time, which would cause the student to take longer that one and one-half times the normal length of the enrollment period to complete.

Only one LOA may be granted during the time a student is enrolled in school.

For all leaves of absence granted as the result of disruptions due to COVID-19 related circumstances, Praxis may approve, and students may begin, the LOA prior to submitting a written request for the LOA. However a LOA requests must be obtained subsequently.

If the student does not return to school after a leave of absence, the withdrawal date will be the date that the school determines the student began the leave of absence or the last date the student attended an academically related activity, whichever is first.

Furthermore, as stipulated in the electronic announcement (EA) from the Department published on March 5, 2020 and updated on June 16, 2020, the Department will permit students to take an approved leave of absence for COVID-19-related concerns or limitations (such as interruption), to take such leave, even if the student notifies the institution in writing after the approved leave of absence has begun. In such a case, the institution may retain those Title IV funds to apply when the student continues enrollment. If the student does not return to complete their program within 180 days, the school would then be expected to perform the Return of Title IV funds calculation based on the date on which the leave-of-absence began.

SAFETY

TITLE: Safety

PURPOSE: To ensure students and personnel safety while in the premises of the organization.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, s Directors, and entire faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all employees and students admitted to theinstitution.

PROCEDURE:

Employees and Students must be aware that safety is of prime importance at all times during class, laboratory practice, and clinical practicum. Students need to follow all stated precautions and procedures established by The Praxis Institute, the programs, and the practicum/clinical sites, when applicable. Students should be aware of:

- Exits in case of emergencies
- Fire drill procedures
- Policies for safety in patient skills, such as correct body mechanics, positioning, and transfers
- Manufacturer's instructions for safe use of all equipment
- Hand washing
- Indications and contraindications for exercise

Failure to follow safety standards will result in student counseling and remediation. Consistent documented failure to observe proper safety standards will result in the student being removed from classroom, laboratory, or clinical practicum activities until adequate remediation is completed. Students who demonstrate an inability or unwillingness to observe these safety standards will be dismissed from their clinical practicum with a failing grade and be dismissed from the program.

Safety in application of treatments will be a primary emphasis in the Programs as it should be students' future practice. The student is trained to apply the least amount of force or intensity to achieve the treatment goals. As with any treatment, the student must understand that there exists the possibility of discomfort, pain, muscle soreness, freezing or burning tissue, or other unexpected phenomenon. It is the students' responsibility to adhere to safety guidelines. Additionally, the student must immediately report any problems of feelings of discomfort to the instructor.

Students in the Program will be working with health care supplies and equipment in the laboratory and clinical settings. Students will be required to purchase some of these health care supplies. Supplies and equipment are to be utilized only for educational purposes. Use of these products for purposes other than those expressly authorized by the instructor is strictly prohibited. TPI assumes no liability for any unauthorized use and will take disciplinary action against any employee or student, up to and including expulsion or termination, who utilizes these products and equipment in an unauthorized manner. Students are encouraged to ask their instructors questions about use of these products.

All classroom and laboratory equipment are property of TPI, and not for personal use. All laboratory equipment used in the skills laboratory must be used under the supervision of or with approval from the program faculty. Students are expected to use good judgment and follow safety practices when using all equipment. Equipment will be inspected and maintained in proper working order.

For a more thorough description of the institutional safety program please refer to Safety Manual.

TITLE: Equipment Maintenance Plan

PURPOSE: To assess and control the clinical and physical risks of equipment used for educational training on the treatment, monitoring and care of patients. This policy is designed to assure that all equipment is operating within manufacturer specification and meet the established codes. The ultimate goal is to provide safe, effective training/education as well as to assure the safety of all students and faculty.

RESPONSIBILITY:

It is the responsibility of the Campus Director, and Programs Directors to ensure compliance with this policy.

APPLICABILITY:

All Academic Programs.

POLICY:

Equipment Maintenance Plan

The institution has developed the following plan for maintaining equipment and/or replacing and/or disposing obsoletes equipment.

- 1. General equipment maintenance will be provided by local technicians on 24 hours call.
- 2. The institution will signed service, maintenance and repair agreements with lenders and providers to keep our equipments in good conditions.

3. If necessary, a telephone request is to be made for a loaner while equipment is being repaired and serviced, until repaired unit is returned to the institution.

- 4. Maintenance record form for each equipment unit is to be documented identifying exact maintenance or service performed.
- 5. The institution will make provisions in its annual budged for maintaining, replacing or disposing obsolete equipment.
- 6. The Campus Director makes the decision when any equipment has to be replaced and the old one is not longer in use.

<u>THE PRAXIS INSTITUTE</u> Physical Plant and Equipment Inspection Maintenance Checklist

		GOOD (PERFECT WORKING CONDITIONS)	FAIR (NEEDS ATTENTION)	POOR (NEEDS IMMEDIATE ATTENTION)
1. JAI	NITORIAL SERVICES FOR:			
٠	RECEPTION AREA			
٠	ADMINISTRATION OFFICES			
•	CLASSROOMS			
•	LABORATORY CLASSROOMS			
•	LIBRARY			
•	FACULTY OFFICES			
•	LUNCH/LOUNGE AREA			
•	STORAGE AREA			
2. LIC	GHTHING CONDITIONS			
3. DR	OP CEILING TILES			
4. AIF	R CONDITIONER AND VENTS			
5. EQ	UIPMENT AND MEDIA			
SERV	ICES			
•	COMPUTERS			
•	OVERHEAD PROJECTORS			
•	PRINTERS			
•	PHOTOCOPY/SCANNER MACHINES			
•	FAX MACHINES			
6. MA	SSAGE PROGRAM			
EQUI	PMENT			
٠	MASSAGE TABLES			
•	FACE RESTS			
•	MASSAGE CHAIRS			
٠	FACE RESTS			
٠	HOT PACK MACHINE			
٠	LASER MACHINE			
	NTAL ASSISTANT PROGRAM PMENT			
•	DENTAL CHAIR			
•	STOOLS			
•	DENTAL UNIT			
٠	COMPRESSOR			
•	CURING LIGHT			
•	AUTOCLAVE			
•	ELECTRONIC B/P DEVICE			
•	DENTAL X-RAY MACHINE			
•	PANORAMIC X-RAY MACHINE			
•	AUTOMATIC FILM PROCESSOR			
•	LAB VACUUM FORMING MACHINE			
8. PH	ARMACY TECHNICIAN GRAM EQUIPMENT			

•	COMPUTER	
•	PRINTER	
•	ELECTRONIC BALANCE	
•	DOMESTIC REFRIGERATOR	
•	LAMINAR FLOW HOOD	
•	EMERGENCY EYE WASH STATION	
•	EPIPEN TRAINER	
•	HOT PLATE	
	YSICAL THERAPIST STANT PROGRAM EQUIPMENT	
٠	HI-LO TREATMENT TABLE	
٠	HOSPITAL BED	
•	TREATMENT TABLES	
•	TREATMENT MATS	
•	WHEELCHAIRS	
٠	TREADMILL	
•	TRAINING STAIRS	
•	PARALLEL BARS	
•	COLD PACK REFRIGERATOR	
•	HOT PACK HYDROCOLLATOR	
•	COMPRESSION THERAPY UNIT	
•	HOYER LIFT	
•	ULTRASOUND MACHINES	
•	US/ES COMBO MACHINES	
•	PARAFFIN UNIT	
•	LASER UNIT	
٠	DIATHERMY	
•	GEL WARMERS	
10. O	CCUPATIONAL THERAPY	
ASSIS	STANT PROGRAM EQUIPMENT	
•	SMART BOARD	
•	PROJECTOR	
•	VIDEO RECORDER WITH TRIPOD	
•	CAMERA	
•	WII	
•	TV/DVD	
	OMEDICAL PROGRAM PMENT	
•	COMPUTER	
•	PROJECTOR	
•	LAB EQUIPMENT (MULTIPLE)	

INSPECTION COMPLETED BY:

PRINT NAME

SIGNATURE

THE PRAXIS INSTITUTE

MAINTENANCE AND UPKEEPING OF EQUIPMENT

Program	Equipment's Description	Company Phone & Address	Date of Maintenan ce	Date of Shipmen t	Date of Return	Remarks

TITLE: Inclement Weather Procedure

PURPOSE: To establish procedures to handle emergency weather situations and ensure students safety.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Programs Directors, and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI and employees as well.

POLICY:

In the event of severe inclement weather the procedure for the programs will be as follows:

Faculty Responsibilities

- 1. Each instructor will make a reasonable decision related to weather conditions based on listening for radio/T.V. announcements.
- 2. For the PTA/OTA programs the ACCE/AFC will be responsible for notifying students if a clinical experience has been canceled due to weather conditions. It will be the student's responsibility to contact their respective clinical site and notify them. The ACCE/AFC will also notify the Program Director of his/her decision.

3. For non-degree programs the program directors will be responsible for notifying students if a clinical experience/externship has been canceled. It will be the student's responsibility to contact their respective clinical sites and notify them.

- 3. If weather conditions become severe during the day, the Program Director will make the decision for canceling and rescheduling classes. In the clinical setting, the clinical instructor will make a reasonable decision as to when to release the students (immediately, after completion of patient care, post conference, etc.)
- 4. The faculty will review student absences for inclement weather.

Student Responsibilities

- 1. Each student will make a reasonable decision related to weather conditions based on listening for radio/T.V. announcements.
- 2. Based on the information received, students will notify the instructor and clinical agency that they will not be in for clinical, or will be late in arriving.

A clinical absence due to inclement weather is classified as an excused absence. Students should use reasonable judgment. No class session is so important that a student should risk an accident.

TITLE: Standard Precautions

PURPOSE: To promote high quality care and safety for clients, students, staff, and faculty.

RESPONSIBILITY:

It is the responsibility of the Campus Director, Programs Directors. and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students admitted to TPI.

POLICY:

STANDARD PRECAUTIONS

Appropriate universal precautions should be taken, as outlined by the Center for Disease Control (CDC) guidelines, by all PTA students and are the responsibility of the student. The CDC guidelines describe reduction measures for health care workers to use when they come in contact with blood or body fluids or patients.

TPI PTA Program complies with the American Physical Therapy Association position that all health care workers must follow universal precautions and established infection control procedures to reduce the infection risk to the patient and themselves.

It is the responsibility of the student to follow these guidelines in the clinical setting.

STANDARD BLOOD AND BODY FLUID PRECAUTIONS

1. Gloves:

- A. For touching blood and body fluids, mucous membranes or non-intact skin of all patients (e.g., wound/decubitus care; oral care; suctioning; intubation, staple and suture removal)
- B. For handling items or surfaces soiled with blood or body fluids (e.g., sanitary pads, soiled dressings, emptying Foley bags, bed pans, drains, suction equipment/canisters; incontinent patients contaminated instruments)
- C. For performing venipuncture and other vascular access procedures (e.g., I.V.'s, heparin locks, central lines, changing tubing)
- D. Handling newborns at delivery
- E. To be changed after contact with each patient
- F. Assisting physician with invasive procedures.

- 2. Masks and Protective Eyewear: worn during procedures likely to generate droplets of blood or other body fluids (e.g., suctioning trach, endotracheal tube, nasopharyngeal, removal of endotracheal tubes, assisting with deliveries, endoscopic procedures, during intubation of patients, providing wound care, providing burn care, etc.)
- 3. Plastic Aprons: worn during procedures likely to generate splashes of blood or other body fluids (e.g., profuse hemorrhage, extensive bleeding, and projectile vomiting).
- 4. Hands and Skin:

A. Wash immediately and thoroughly if contaminated with blood or other body fluids. B. Hands are to be washed immediately after gloves are removed.

- 5. Needles and Sharps:
 - A. Take precautions to prevent injuries when cleaning used instruments and handling sharp instruments after procedures.
 - B. Needles should not be recapped, purposely bent or broken by hand, removed from disposable syringes, or otherwise manipulated by hand.
 - C. Disposable syringes and needles, scalpel blades and other sharp items should be placed in puncture-resistant containers for disposal.
- 6. Laundry:
 - A. Soiled linen should be handled as little as possible and with minimum agitation.
 - B. All soiled linen should be bagged and contained at location where it was used (follow facility policy).
- 7. Waste:
 - A. All waste is to be contained at site of use for transport and disposal (standard waste liners and bags).
 - B. Bulk blood (20cc), suctioned fluids, excretions and secretions may be poured down a drain (patient bathroom) to a sewer.
 - C. Clip blood transfusion tubing with scissors and discard in puncture proof needle box. Tubing and bag may be discarded in trash.
- 8. Cleaning and Decontaminating Spills of Blood or Other Body Fluids:
 - A. Gloves should be worn.
 - B. In patient care areas, visible material should first be removed and then the area decontaminated with chemical germicide.
- 9. Isolation/Labeling:
 - A. Universal blood and body fluid precautions for all patients eliminates' the need for use of the category of "Blood and Body Fluids."

- B. Isolation as previously recommended will be used for air-borne diseases (e.g., tuberculosis), contact diseases (e.g., scabies) and for patients colonized with multiple resistant organisms (e.g., MRSA).
- C. The Isolation Guidelines are available in all agencies for reference for ineffective material, mode of transmission and duration of isolation.
- 10. Specimen Collection, Transportation and Processing:
 - A. All specimens of blood and body fluids are to be in a container to prevent leaking.
 - B. Care should be taken when collecting each specimen to avoid contaminating the outside of the container and laboratory form.
 - C. A contaminated container must be placed in an agency approved container.
- 11. Resuscitation: Resuscitation devices will be available in each patient area.
 - A. Ambu bags are to be used for resuscitation.
 - B. Gloves and protective eyewear should be worn.

References: MORBIDITY AND MORTALITY WEEKLY REPORT, Supplement, August 21, 1987/Vol.36/No. 2S Centers for Disease Control, Atlanta, Georgia.

TITLE: Emergency Evacuation and Safety Plan

PURPOSE: To establish and document institutional emergency evacuation and safety plan.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Programs Directors, and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

Emergency Evacuation and Safety Plan

In the event of real, threatened or impending danger, the following procedures should be followed:

- 1- Fire extinguishers are located at various points throughout the institution and are pointed out during the tour of the facility at the employee orientation.
- 2- Fire evacuation routes are posted in all areas. Instructors inform students regarding evacuation procedures during the first day of the program or during program's orientation.
- 3- First aid kits are located in the admission office and in classrooms and labs.
- 4- In the event of an accident, illness or severe weather situation, any staff member or instructor has the authority to take any necessary action to ensure the safety of the students and employees of the institution. If there is advance notification, The Executive Director and Director must be notified immediately.
 - **a. Tornadoes & Hurricanes**: Severe weather conditions may spawn tornadoes or high winds. The institution will monitor public broadcasts regarding this weather condition and will comply with any recommendations for safety. If tornado is sighted, everyone should move to an interior room and take shelter under tables until the all-clear is sounded

In case of hurricanes, the students will be sent home well in advance of the arrival of a hurricane.

- **b. Fire**: Immediately call 911 for assistance. Try to use fire extinguishers if possible, Otherwise immediately evacuate the premises. All students must meet there. Instructor at least 200 feet from the building, so attendance can be taken. This will Insure that all students have left the building. Staff members cannot leave until the Supervisor had taken note of their evacuation.
- **c. Robbery:** Remain calm. Do not make any sudden movements and follow the robber's instructions for materials or monies. Call 911 to notify authorities as soon as it is safe. Complete a written Theft report and submit to the Director.

d. For all other accidents or potentially dangerous situations, contact the appropriate authorities and the Director and follow directions.

TITLE: Incident Report

PURPOSE: To establish procedures to document an incident.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Programs Directors, and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to the entire organization.

POLICY:

All incidents will be documented by one of the following: the involved person, a witness, supervisor, or faculty member, using the approved form. Completed forms will be turned in to the Executive Director for appropriate follow-up, resolution, and filing.

Attached.



Incident Report

Directions to complete the Incident Report Form:

Any on-duty* personnel responding to or involved in an employee, visitor, or student incident/accident will call his/her Supervisor and/or related Program's Director as soon as possible and complete this report within twenty-four (24) hours. The Supervisor or related Program Director will review the completed report's details for any needed follow-up before forwarding the original and any applicable documentation/evidence to the Campus Director and/or Executive Director.

*Note: "On Duty" means from the time you started work or class (at the office or at school) and the time you left, and/or any other time you might be somewhere on school business.

CAMPU	US:			
1. NAI	ME:			
2. AD	DRESS:			
3. SEX	K: FEMALE	MALE		
4. AG	E:			
	ΓΕ AND TIME INCIDE ΓΕ:		/EEK	
TIM	IE:	A.M	P.M	
6. TY	PE OF INCIDENT • ACCIDENT/INJU • ALTERCATION • THEFT • OTHER		oort to Supervisor Immedi	ately)
INJURY	Y :			
7. NAT	FURE OF INJURY:			
8. PAR	T OF BODY INJURED	:		
9. DEC	GREE OF INJURY:			

10.DAYS LOST FROM SCHOOL/WORK:

11. CAUSE OF INJURY:

12. IF ACCIDENT/INJURY, NOTIFIED:

- Doctor
- Hospital
- Relative
- Police/Emergency
- Other:_____

INCIDENT:

13. LOCATION OF INCIDENT:

14. CLASSIFICATION OF INDIVIDUAL(S) INVOLVED (Please Circle):

- Student
- Employee
- Visitor
- Other _____

15. During Incident, Individual(s) was:

- Confused
- Oriented
- Disoriented
- In Class
- In Building
- In Office
- Off Campus
- On Campus
 - Other:_____

16. CORRECTIVE ACTION(S) TAKEN OR RECOMMENDED:

17. DESCRIPTION: (Provide a word picture of the incident explaining who, what, when, why, and how.)

First Reported to and/or first observed by:

Date & Time Reported to Program Director/School Director/Administration and/or Campus Safety Team member:

Other Persons Involved including contact information & classification:
Witnesses, including contact information:
Did involved party refuse medical treatment? □No □ Yes (if "Yes", party involved signature required):
Signature of individual (s) involved indicating refusal of medical treatment:
Date:
Action Taken by Individual(s) if medical treatment is refused:
Property Damage? No Yes (if "Yes", please describe):
Supervisor's Name /Department:
Supervisor's recommendations/Comments:
Supervisor's signature:
School Director's Signature:
DATE OF REPORT:
PREPARED BY:
PREPARER'S SIGNATURE:

TITLE:	Campus Safety
PURPOSE:	To establish processes to ensure compliance and enhance campus safety.

RESPONSIBILITY: It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to the entire organization (both campuses).

POLICY: The organization will have a written Security Plan designed to delineate mechanisms to deal and address emergency responses and evacuation procedures.

PROCEDURES:

I. <u>Emergency Response and Evacuation Procedures</u>

The Campus Director is responsible for the Emergency Operations Plan (EOP). This plan is designed to be an all-hazards disaster response and emergency management plan that includes planning, mitigation, response, and recovery actions.

Our priorities are:

- A. Life safety, infrastructure integrity, and environmental protection during an emergency;
- B. Coordination with institution's departments to write, maintain, test, and exercise the EOP;
- C. Cooperation, Integration, and Mutual Aid with local, state and federal planning, response, and public safety agencies and their EOPs.

Drills, Exercises, and Training

Annually, the institution conducts an emergency management exercise, announced or unannounced, to test emergency procedures. The scenarios for these exercises change from year-to-year. The institution conducts after-action reviews of all emergency management exercises.

In conjunction with at least one emergency management exercise each year, the

institution will notify the community of the information included in the institution's publicly available information regarding emergency response procedures.

Emergency Notification

Praxis Institute is committed to ensuring the campus community receives timely, accurate, and useful information in the event of a significant emergency or dangerous situation on campus or in the local area that poses an immediate threat to the health and safety of campus community members.

<u>Confirming the Existence of a Significant Emergency or Dangerous Situation and</u> <u>Initiating the Emergency Notification System</u>

Campus staff or faculty may become aware of a critical incident or other emergency situation that potentially affects the health and/or safety of the campus community. Generally, campus staff or faculty becomes aware of these situations upon discovery during day-to-day assignments.

Once staff/faculty confirms that there is, in fact, an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the campus community, staff/faculty will notify the campus director to issue an emergency notification.

Praxis Institute's authorized representatives will immediately initiate all or some portions of the institution's emergency notification system. If, in the professional judgment of first responders, issuing a notification potentially compromises efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency, Praxis Institute may elect to delay issuing an emergency notification. As soon as the condition that may compromise efforts is no longer present, the institution will issue the emergency notification to the campus community.

Determining the Appropriate Segment or Segments of the Campus Community to Receive an Emergency Notification

Executive Director will assist the Campus Director determining what segment or segments of the campus community should receive the notification. Generally, campus community members in the immediate area of the dangerous situation (i.e., the building, adjacent buildings, or the surrounding area) will receive the emergency notification first. The institution may issue subsequent notifications to a wider group of community members. If the emergency affects a significant portion of the institution, administrative officials will distribute the notification to the entire campuses communities.

Determining the Contents of the Emergency Notification

Executive Director and Campus Director are responsible for issuing the emergency notification and will determine the contents of the notification. The individuals authorizing the alert will develop the most concise message to convey the appropriate information to the community. The goal is to ensure individuals are aware of the situation and that they know the steps to take to safeguard their own personal safety and that of those in the community.

Procedures Used to Notify the Campus Community

In the event of a situation that poses an immediate threat to members of the campus community, the institution has various methods in place for communicating information quickly. Some or all of these methods of communication may be activated in the event of an emergency to all or a segment of the campus community. These methods of communication include Praxis Alert e-mail system, text message, and Praxis Alert webpage messages. The institution will post important updates during critical incidents on their homepage.

II. RESPONSE TO SEXUAL AND GENDER VIOLENCE

Personal Safety

Despite law enforcement's efforts, serious crimes do occur on campuses. It is important to report any suspicious incidents to police and always remain alert and vigilant.

One of the more serious crimes that too often is unreported is sexual assault. It is important to know what these crimes are because in many cases, victims do not realize that they have been victimized. Additionally, crimes of this nature are very difficult for victims to report for a number of very complex reasons. We provide the following information to help those who may have been victims of sexual assault and/or domestic violence or who have a friend who has been sexually assaulted. There are many guidelines to help you be more alert and aware of the situation to prevent such serious crimes. Such as:

- Know your surroundings
- Be alert
- Call for help
- Report any suspicious people and/or activity, immediately

Defining Rape and Sexual Assault in Florida

Rape and sexual assault are called "Sexual Battery" under Florida criminal law. See criminal code in Florida section 794.011

Sexual battery

(1) As used in this chapter:

(a) "Consent" means intelligent, knowing, and voluntary consent and does not include coerced submission. "Consent" shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.

(b) "Mentally defective" means a mental disease or defect which renders a person temporarily or permanently incapable of appraising the nature of his or her conduct.

(c) "Mentally incapacitated" means temporarily incapable of appraising or controlling a person's own conduct due to the influence of a narcotic, anesthetic, or intoxicating substance administered without his or her consent or due to any other act committed upon that person without his or her consent.

(d) "Offender" means a person accused of a sexual offense in violation of a provision of this chapter.

(e) "Physically helpless" means unconscious, asleep, or for any other reason physically unable to communicate unwillingness to an act.

(f) "Retaliation" includes, but is not limited to, threats of future physical punishment, kidnapping, false imprisonment or forcible confinement, or extortion.

(g) "Serious personal injury" means great bodily harm or pain, permanent disability, or permanent disfigurement.

(h) "Sexual battery" means oral, anal, or vaginal penetration by, or union with, the sexual organ of another or the anal or vaginal penetration of another by any other object; however, sexual battery does not include an act done for a bona fide medical purpose.

(i) "Victim" means a person who has been the object of a sexual offense.

(j) "Physically incapacitated" means bodily impaired or handicapped and substantially limited in ability to resist or flee.

(2)(a) A person 18 years of age or older who commits sexual battery upon, or in an attempt to commit sexual battery injures the sexual organs of, a person less than 12 years of age commits a capital felony, punishable as provided in ss. 775.082 and 921.141.

(b) A person less than 18 years of age who commits sexual battery upon, or in an attempt to commit sexual battery injures the sexual organs of, a person less than 12 years of age commits a life felony, punishable as provided in s. 775.082, s. 775.083, s. 775.084, or s. 794.0115.

(3) A person who commits sexual battery upon a person 12 years of age or older, without that person's consent, and in the process thereof uses or threatens to use a deadly weapon or uses actual physical force likely to cause serious personal injury commits a life felony, punishable as provided in s. 775.082, s.

775.083, s. 775.084, or s. 794.0115.

(4) A person who commits sexual battery upon a person 12 years of age or older without that person's consent, under any of the following circumstances, commits a felony of the first degree, punishable as provided in s. 775.082, s. 775.083, s. 775.084, or s. 794.0115:

(a) When the victim is physically helpless to resist.

(b) When the offender coerces the victim to submit by threatening to use force or violence likely to cause serious personal injury on the victim, and the victim reasonably believes that the offender has the present ability to execute the threat.

(c) When the offender coerces the victim to submit by threatening to retaliate against the victim, or any other person, and the victim reasonably believes that the offender has the ability to execute the threat in the future.

(d) When the offender, without the prior knowledge or consent of the victim, administers or has knowledge of someone else administering to the victim any narcotic, anesthetic, or other intoxicating substance which mentally or physically incapacitates the victim.

(e) When the victim is mentally defective and the offender has reason to believe this or has actual knowledge of this fact.

(f) When the victim is physically incapacitated.

(g) When the offender is a law enforcement officer, correctional officer, or correctional probation officer as defined by s. 943.10(1), (2), (3), (6), (7), (8), or (9), who is certified under the provisions of s. 943.1395 or is an elected official exempt from such certification by virtue of s. 943.253, or any other person in a position of control or authority in a probation, community control, controlled release, detention, custodial, or similar setting, and such officer, official, or person is acting in such a manner as to lead the victim to reasonably believe that the offender is in a position of control or authority as an agent or employee of government.

(5) A person who commits sexual battery upon a person 12 years of age or older, without that person's consent, and in the process thereof does not use physical force and violence likely to cause serious personal injury commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, s. 775.084, or s. 794.0115.

(6) The offense described in subsection (5) is included in any sexual battery offense charged under subsection (3) or subsection (4).

(7) A person who is convicted of committing a sexual battery on or after October 1, 1992, is not eligible for basic gain-time under s. 944.275. This subsection may be cited as the "Junny Rios-Martinez, Jr. Act of 1992."

(8) Without regard to the willingness or consent of the victim, which is not a defense to prosecution under this subsection, a person who is in a position of familial or custodial authority to a person less than 18 years of age and who:

(a) Solicits that person to engage in any act which would constitute sexual battery under paragraph (1)(h) commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(b) Engages in any act with that person while the person is 12 years of age or older but less than 18 years of age which constitutes sexual battery under paragraph (1)(h) commits a felony of the first degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(c) Engages in any act with that person while the person is less than 12 years of age which constitutes sexual battery under paragraph (1)(h), or in an attempt to commit sexual battery injures the sexual organs of such person commits a capital or life felony, punishable pursuant to subsection (2).

(9) For prosecution under paragraph (4)(g), acquiescence to a person reasonably believed by the victim to be in a position of authority or control does not constitute consent, and it is not a defense that the perpetrator was not actually in a position of control or authority if the circumstances were such as to lead the victim to reasonably believe that the person was in such a position.

(10) Any person who falsely accuses any person listed in paragraph (4)(g) or other person in a position of control or authority as an agent or employee of government of violating paragraph (4)(g) is guilty of a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

The following information provides steps to follow should a sexual assault occur:

- Get to a safe place as soon as possible!
- Try to preserve all physical evidence The victim should not bathe, shower, brush teeth, douche, use the toilet, or change clothing until he or she has a medical exam. Contact a close friend or relative, if available, who can provide support and accompany the victim to the medical exam and/or police department.
- Get medical attention as soon as possible An exam may reveal the presence of physical injury of which the victim is unaware. Following a sexual assault, antibiotics are typically given at the time of the exam to help prevent the victim from acquiring certain sexually transmitted diseases. Emergency contraceptive pills are offered to all victims at the time of the exam (if the victim presents within 120 hours) to help prevent pregnancy from occurring as a result of the rape. If the victim reports memory loss, loss of consciousness or other circumstances suspicious for a drug-facilitated assault, a urine test may be done if the victim presents within 96 hours. Some of the commonly used "date rape" drugs, however, are only detectable in the urine for 6-8 hours after ingestion.
- Contact the police Sexual assault is a crime, it is vital to report it. It is important to remember reporting a crime is not the same as prosecuting the crime. The decision to prosecute may be made at another time. The final decision to prosecute is determined by the District Attorney.
- Consider talking to a counselor Seeing a counselor may be important in helping the victim understand his/her feelings and begin the process of recovery.

Our Commitment to Addressing Sexual Harassment, Including Sexual Assault

Praxis Institute does not tolerate sexual misconduct or abuse, such as sexual assault, rape or any other forms of non-consensual sexual activity. Sexual misconduct in any form violates the Student Code of Conduct, institutional policies and may violate Federal and State Laws. Violations of this policy are subject to disciplinary sanctions as outlined in applicable institutional policies. The institution provides the following rights to all sexual assault victims:

- Upon request, the institution will make any reasonable change to a victim's academic, living, transportation, and/or working situation.
- The victim and the accused will receive a written explanation of their rights and options.
- Both the complainant and the respondent will have the same opportunities to have others present during the conduct proceedings.
- The institution will ensure that the complainant and the respondent both receive a written notice of the final determination of the investigation.
- If desired, institution's staff will assist the victim in contacting local law enforcement authorities.
- Counseling services are available to students through the Student Services Department.
- Students who have been subject to sexual assault, sexual violence or sexual harassment may request to withdraw from a semester or individual courses.

Institution's Procedures for Responding to Reports of Sexual Assault

If you or someone you know is the victim of a sexual assault, the victim has several rights, including:

- The right to report the incident to the local authorities. Upon request, the institution will assist victims in notifying the local police. Filing a police report does not mean the victim must pursue criminal charges. The victim maintains his or her rights throughout the process.
- There are several community service organizations that can provide counseling, mental health, and other related services to sexual assault victims. Student Services Department can assist with connecting victims to these services.
- The victim can also contact the Office of Civil Rights (OCR) by calling 1-800-421-3481 or by visiting the OCR website (<u>www.hhs.gov</u>).

Campus Resources

• Student Services Department

Off-Campus Resources

- Roxcy Bolton Rape Treatment Center
 - 0 305-585-5185
 - Provides services at JMH and Jackson South Community Hospital to victims, non-offending family members and other relatives.
- Men and Women United in Justice, Education Reform
 - o 305-247-1388
 - Provides direct response services to domestic and sexual abuse victims and families.
- HELPline Miami
 - o 305-358-HELP (4357)
 - Free and confidential counseling, crisis intervention, suicide prevention and referral services.
- Florida Abuse Hotline
 - o 1-800-962-2873
 - Accepts reports 24/7 of known or suspected abuse of children or vulnerable adults.
- Rape Abuse and Incest National Network (RAINN)
 - 0 1-800-656-4673
 - Confidential online chat with a trained staff member who can provide help and support in Spanish or English.
- Rape Hotline
 - 305-585-RAPE (7273)
- Sexual Crime Investigation Unit
 - o 305-715-3300
- Domestic Crimes Investigations Unit
 - o 305-418-7200

Miami-Dade Police Victim Advocates Email

- <u>svbinfo@mdpd.com</u>
- Special Victims Bureau

1701 NW 87th Avenue

Suite 100

Doral, FL 33172

If a victim of a sexual assault or relationship violence incident requests a change in her or his living arrangements or academic schedule, Student Services Department, and other offices at Praxis Institute, will assist the individual with making these changes, as long as they are reasonably available.

Medical Services for Survivors/Victims of Sexual Assault

A survivor/victim of sexual assault may also receive comprehensive medical services for sexual assault WITHOUT reporting to the Police or the institution. Sexual Assault Forensic Evidence exams are available at local hospital Emergency Departments.

A survivor may request for evidence to be collected ANONYMOUSLY using a SAFE kit from local hospital, and may later decide to make a formal report to law enforcement.

Disciplinary Procedures in Sexual Assault Incidents

If you have been sexually assaulted, you have options for addressing such conduct. You may wish to discuss the problem privately with a student service representative.

The institution's student conduct process is designed to afford a complainant (the person who is bringing a charge) and a respondent (the person who is answering a charge) a fair, prompt, and appropriate resolution process. The process is designed to help persons who need support as they address these incidents.

The Student Services Department manages the resolution proceeding in which a student is the alleged perpetrator. The Executive Director office is responsible for managing proceedings for those cases in which an employee is the respondent.

In determining whether the alleged conduct constitutes sexual harassment or

assault, the full context in which the alleged incident occurred must be considered. In any case, both the accuser and the accused are entitled to the same opportunities to have others present during any disciplinary proceeding. Both the accuser and the accused will be informed of the outcome of any proceeding.

During any sexual assault complaint proceeding, the institution has a range of sanctions available. Those sanctions may range from probation to expulsion from Praxis Institute, depending upon the nature and circumstances of the specific incident.

Sexual Assault Prevention Education Programs

The Student Services Department is primarily responsible for sexual assault education and awareness. The Student Services Department will provide education for the student community about sexual violence through presentations at least once a year. Below is a list of some of the topics:

- Student Information & Awareness Programs:
 - Stalking Awareness & Suicide Prevention
 - Date Rape
 - Dating Violence & Sexual Assault
 - Staying Safe on Campus
 - Alcohol, Drugs and Sexual Assault Prevention Fair
 - These presentations will educate students about the elements of a healthy relationship, the importance of sexual consent and the role of bystanders in creating safe and healthy communities.

Sex Offender Registration - Campus Sex Crimes Prevention Act

The Florida Statute 943.0345 requires that sexual offenders register with the department of law enforcement (FDLE). The Registry serves as a resource to help protect and inform the public.

FDLE has established the following toll-free number for public access to FDLE's Missing Persons and *Offender* Registration: 1-888-*FL*-PREDATOR (1-888-357-7332). By contacting FDLE at this number, the public can request information about *Sexual Offenders* living in their communities and around the state. For information about registered sex offenders in the State of Florida, you may also visit the U.S. Department of Justice National Sex Offender website <u>www.nsopw.gov</u>.

TITLE: Student Sexual Misconduct

PURPOSE: To establish procedures to address sexual misconduct by students.

RESPONSIBILITY:

It is the responsibility of the Executive Director, Campus Director, Programs Directors, and all faculty to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students enrolled in any academic program at The Praxis Institute.

POLICY:

I. Introduction

The Praxis Institute (TPI) supports its educational mission by fostering a community based on civility, dignity, diversity, inclusivity, equality, freedom, honesty, and safety. Consistent with these values, TPI is committed to providing a safe and non-discriminatory learning, and working environment for all members of the academic community. TPI does not discriminate on the basis of sex or gender in any of its education or employment programs and activities.

TPI prohibits sexual assault, sexual and gender-based harassment, intimate partner violence, stalking, retaliation, and violation of interim measures (collectively Prohibited Conduct). Prohibited Conduct is expressly forbidden and will not be tolerated at TPI. It may also violate federal and state law.

TPI is committed to encouraging and sustaining a learning and living community that is free from harassment, violence, and prohibited discrimination. In that regard and consistent with federal law TPI has developed this comprehensive Student Sexual Misconduct Policy, applicable to all students.

The Student Sexual Misconduct Policy prohibits all forms of sex/gender-based harassment, sexual/gender violence, sexual exploitation, relationship violence (domestic violence and dating violence), and stalking. Collectively, these terms are referred to in this policy as "Sexual Misconduct." They are defined below under

"**Prohibited Conduct**." (Note that non-sex/gender-based harassment is also a violation of institutional policy).

The Student Sexual Misconduct Policy serves three principal purposes:

- First, it establishes conduct standards—namely, prohibited sexual misconduct—for all TPI students. Note that a violation of this policy may also constitute a crime, which can be independently reported to the appropriate law enforcement agency.
- Second, the Student Sexual Misconduct Policy outlines reporting, investigation, and report resolution procedures in cases where it is alleged that a TPI student has engaged in sexual misconduct. This policy refers to the individual who is the alleged victim of the behavior(s) in question as the "**complainant**" and the student alleged to have committed the violation of the policy as the "**respondent**." Both the complainant and the respondent will be treated fairly and with respect throughout the process. A respondent is entitled to a presumption that there is not a violation of this policy throughout the disciplinary process unless and until they are found responsible for a violation of this policy.
- Third, the Student Sexual Misconduct Policy describes resources available on campus and in the community to assist students in dealing with the impact of sexual misconduct, whether it happened recently or in the past.

In the paragraphs that follow, the Student Sexual Misconduct Policy describes to whom violations of this policy should be reported; avenues for confidential reporting; immediate/interim/long-term measures available to the complainant and the respondent; how TPI will investigate and resolve alleged violations; possible sanctions; and, the appeal process.

Confidentiality

Students should be aware that all employees who become aware of conduct that might fall under this policy are expected to document and report, to the administration, the information with the names of the parties involved and the details of the report.

Information for the Complainant

The complainant will be treated with respect before, during, and after the disciplinary process. During an initial meeting, the administrative designee will inform the complainant of the institution's disciplinary process and possible

outcomes. The administrative designee will communicate substantive and, when warranted, procedural developments regarding an investigation. The alleged conduct may also be criminal in nature, and the complainant has the right to report—or not to report—the conduct to the appropriate law enforcement agency. A criminal report does not preclude TPI disciplinary action.

The complainant is strongly encouraged to seek counseling and support available through resources. For more information on these resources, please see "Support Services and Options for the Complainant," below.

Regardless of whether a complainant pursues a criminal complaint and/or the TPI's complaint process through this policy, TPI may investigate the incident(s) in question and will take appropriate responsive action to ensure that the educational environment is free of harassment and to prevent the recurrence of a hostile environment—and, if appropriate, remedy the effects of the alleged harassment on the complainant. As discussed later in the policy, remedies available to a complainant may include, but are not limited to: reasonable academic accommodations, a "no contact" directive between the respondent and the complainant, and disciplinary action against the respondent as determined through the disciplinary process outlined in this policy.

A complainant may request or TPI may issue immediate/interim actions and supports such as a "no contact" directive and changes to academic situations regardless of whether a complainant files a formal report. A complainant will be notified as to what changes are reasonably available and/or are being implemented.

Information for the Respondent

The respondent will be treated with respect before, during, and after the disciplinary process. During an initial meeting, the administrative designee will inform the respondent of TPI's disciplinary process and possible outcomes. The administrative designee will communicate substantive and, when warranted, procedural developments regarding an investigation. Note that alleged behavior may also be criminal in nature, and the respondent may be subject to a criminal investigation by the appropriate law enforcement agency at the same time as an investigation by TPI under this policy; the respondent may wish to consult with a criminal lawyer as TPI does not provide advice as to the criminal process. A respondent is entitled to a presumption that there is not a violation of this policy throughout the disciplinary process unless and until they are found responsible for a violation of this policy.

The respondent has the right to (and is strongly encouraged to seek) counseling and support available through support services. For more information on these resources, please see "Support Services and Options for the Respondent," below.

The respondent may request, or the administrative designee may change, academic situations and will be notified as to what changes are reasonably available and/or are being implemented.

II. Scope

This Student Sexual Misconduct Policy applies to any instance in which any TPI student (a person enrolled in any TPI's program) is alleged to have engaged in sexual misconduct against anyone (e.g., a student, employee, or third party such as a guest speaker, or contractor), regardless of the complainant's or respondent's sex, gender, sexual orientation, or gender identity. TPI will respond to any complaint of sexual misconduct, including conduct alleged to have occurred during breaks, leaves of absence, or periods of dismissal, whether on or off campus. The disciplinary process is available as an option from the date of a respondent's application until the date of the respondent's degree conferral.

III. Prohibited Conduct

Rule - TPI prohibits all forms of sex/gender-based harassment, sexual/gender violence, sexual exploitation, relationship violence (domestic violence and dating violence), and stalking.

Sex/Gender-Based Harassment - Sex- or gender-based harassment may take two forms:

One form of harassment is unwelcome verbal or physical conduct based on sex that, because of its severity, persistence, and/or pervasiveness, creates a hostile environment by interfering significantly with an individual's work or education, or adversely affecting an individual's living conditions.

The other form of harassment is a student's use of a position of authority to engage in unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- submission to such conduct is explicitly or implicitly made a term or condition of an individual's employment or education; or
- submission to or rejection of such conduct is used as a basis for decisions affecting an individual's education.

The conduct alleged to constitute harassment under this policy must be sufficiently severe, persistent, and/or pervasive to actually interfere with the complainant's education process to a significant degree. The severity, persistence, and/or pervasiveness of the alleged conduct will also be evaluated from the perspective of a reasonable person similarly situated to the complainant and in consideration of the context of the behavior.

Harassment must be distinguished from behavior that, even though unpleasant or disconcerting, is appropriate to the carrying out of certain instructional, advisory, or supervisory responsibilities or to legitimate academic and related discussions. Harassment may be verbal, nonverbal, or physical.

Examples of conduct that may constitute sex/gender-based harassment include:

- Continued unwelcome questioning about intimate or personal matters
- Unwelcome touching, or other physical acts of a sexual nature
- Severe, persistent, or pervasive comments or jokes of a sexual nature
- Severe, persistent, or pervasive unwelcome comments or conduct regarding an individual's sexual orientation or gender identity
- Sending emails that contain extreme or persistent sexual messages, images, or language
- Repeated derogatory comments of a non-sexual nature relating to a particular sex/gender generally and targeted to (a) specific individual(s) of that sex/gender
- Sex/gender-based violence—non-sexual physical assault of an individual because of the individual's sex or gender

Harassment may be verbal, nonverbal, or physical. The above list is not exhaustive, but intended only to provide general examples of possible prohibited conduct.

Sexual Violence - Sexual violence is a particularly severe form of harassment defined as any physical act of a sexual nature based on sex and perpetrated against an individual without consent or when an individual is unable to freely give consent. See Section IV of this policy ("IV. Consent") for more information about consent.

Physical acts of a sexual nature include, but are not limited to, touching or attempted touching of an unwilling person's breasts, buttocks, inner thighs, groin,

or genitalia, either directly or indirectly; and/or sexual penetration (however slight) of another person's oral, anal, or genital opening with any body part or object.

Sexual Exploitation - Sexual exploitation includes taking sexual advantage of another without consent for one's benefit or the benefit of another party.

Relationship Violence - Relationship violence is any act of violence or pattern of abusive behavior in an intimate relationship that is used by one partner to gain or maintain power and control over another partner. Relationship violence can be physical, sexual, emotional, economic, or psychological actions or threats of actions that influence another person. Relationship violence includes domestic violence and dating violence (adapted from the Office on Violence Against Women, U.S. Department of Justice, justice.gov/ovw/domestic-violence .)

- **Domestic violence** is any act of violence or pattern of abusive behavior committed by a student against the student's current or former spouse/cohabitant, person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law.
- **Dating violence** is any act of violence or pattern of abusive behavior committed by a student who has been in a social relationship of a romantic or intimate nature with the complainant. Whether there was such relationship will be gauged by its length, type, and frequency of interaction.

Sex/Gender-Based Stalking - Sex/gender-based stalking is a course of conduct (including cyberstalking) directed at a specific person that would cause a reasonable person to fear for their own or others' safety, or to suffer substantial emotional distress. Stalking by a student not based on sex or gender is addressed under the stalking policy.

Retaliation

Retaliation is prohibited under Title IX and this policy and is adjudicated under this policy and procedures. Retaliation is defined as words or acts taken in response to a good-faith reporting of sexual misconduct, or to an individual or group's participation in TPI's complaint process or the follow up to a TPI complaint. The policy's prohibition against retaliation also protects individuals who oppose through words or actions what they reasonably believe to be sexual misconduct. Retaliation will be a violation of this policy when it is sufficiently serious (e.g., severe, persistent, and/or pervasive) to discourage a reasonable person from further such activity. The protection against retaliation applies to the parties and to all witnesses. All persons who believe they have been subjected to misconduct under this policy are encouraged and have the option to seek support, utilize available resources, and come forward with their concern or complaint.

Fear of retaliation should never be an obstacle to reporting an incident of alleged sex/gender-based harassment, sexual/gender violence, sexual exploitation, relationship violence, or stalking.

IV. Consent

Consent is an affirmative decision to engage in mutually acceptable sexual activity freely given by clear actions and/or words.

Consent is an involved decision made freely and actively by all parties. Relying solely upon nonverbal communication can lead to miscommunication. It is important not to make assumptions. If confusion or ambiguity on the issue of consent arises anytime during a sexual encounter, it is essential that each participant stops and clarifies, verbally, willingness of all parties to continue. Students should understand that consent may not be inferred from silence, passivity, or lack of active resistance alone. Furthermore, a current or previous dating or sexual relationship is not sufficient to constitute consent. Consent to one form or type of sexual activity does not constitute consent to other forms of sexual activity.

Sexual conduct is "without consent" if no clear consent, verbal and/or nonverbal, is given. An individual is unable to freely give consent when the individual is incapacitated (drugged, drunken, and passed out, asleep, unconscious, or mentally or physically impaired). An individual is also unable to freely give consent when the individual is coerced into sexual activity, such as, through the use of physical force, threat of physical or emotional harm, undue pressure, isolation, or confinement.

The perspective of a reasonable person will be the basis for determining whether a respondent knew, or reasonably should have known, whether a complainant was able to freely give consent and whether consent was given. Additionally, being intoxicated does not diminish one's responsibility to obtain consent and will not be an excuse for sexual misconduct.

V. Complaint Resolution

Reporting

Students are encouraged to report violations of this policy to Praxis administration or any Praxis employee they feel comfortable with.

Once a report is received, an investigation and/or immediate actions may occur, including adjudication through the disciplinary process described below. Interim measures such as a "no contact" directive, interim suspension, reasonable academic modifications, or other measures designed to reasonably minimize the possible recurrence of, and mitigate the effects of, the alleged conduct will be implemented as necessary.

A complainant may request that the complainant's identity in responding to a report not be reveal. In some situations, it may be possible to proceed fully with an investigation without disclosing the name of the complainant. A complainant may also request that TPI take limited or no action in response to a report. However, the complaint must be internally documented.

A request to preserve the confidentiality of any party involved in a report or that no action be taken should be made in writing to the administrative office. TPI will attempt to preserve the confidentiality of the complainant and/or respect a request for limited or no action in response to a report except when, in TPI's judgment, doing so would jeopardize the safety of members of the academic community (including the complainant) or where TPI is required by law to disclose the information (such as in response to a legal process).

Immediate and/or Interim Measures

TPI may take immediate action and/or issue interim measures in response to a report, including but not limited to restrictions on contact between the complainant, the respondent, and/or other involved parties; and, exclusion from areas of campus. The Executive Director and Vice President of Academic Affairs, or designee, may impose an interim suspension.

Time Frames

TPI seeks to resolve reports under this policy within 60 business days from receipt of a report, excluding days classes are not in session. An investigation typically takes up to 45 business days or more to complete. Generally, within 15 business days after completion of an investigation, an administrative or panel hearing, if applicable, is scheduled. During this time, TPI may seek clarifying information and/or meet with a complainant, respondent, investigator, or others.

Circumstances may require TPI to extend this overall time frame or any individual time frame discussed in this policy. Examples of reasons why time frames may

need to be extended include the complexity of the case, delays due to fall/spring/summer/holiday breaks, inclement weather, and other extenuating circumstances. Exceptions to these time frames will be communicated to the complainant and respondent.

Advisors

The complainant and respondent may consult with anyone they wish (including an attorney) during any stage of this process. One advisor of the complainant's/respondent's choice may accompany the complainant/respondent to any meeting or hearing. The advisor's role in any meeting or hearing is limited to quietly conferring with the complainant or respondent through written correspondence or whisper, and the advisor may not address any other participant or the hearing panel. An advisor may not also be a witness.

Relevance

TPI or the hearing panel, as appropriate, may exclude and/or redact:

- Information that has no bearing on a fact at issue in the case, is more prejudicial than probative, or is duplicative;
- Prior or subsequent sexual activity, unless the previous or subsequent behavior (as shown by witness testimony and/or past school disciplinary findings) was substantially similar to the conduct at issue or indicates a pattern of behavior and substantial conformity with that pattern;
- Medical or mental health information, treatment and/or diagnosis, unless relevant to a fact at issue in the case;
- Sensitive personally identifying information (e.g., social security numbers, contact information, etc.).

Polygraph examinations and/or their results are neither admissible nor considered in any part of the disciplinary process.

Alternative/Informal Resolution

Either party may request, or TPI, in its discretion, may offer the parties the opportunity to resolve a report using alternative/informal resolution (e.g., restorative principles or mediation). Both parties must agree to the alternative/informal resolution. Should the alternative/informal resolution not be successful, the complainant may initiate/resume the investigation and hearing process described below.

Investigation

After it receives a report, TPI administrator, or designee, typically meets with a complainant and respondent separately in order to review the disciplinary process and to hear an overview of each party's account of the incident. Immediate, interim, and/or long-term measures may also be discussed. TPI may use any information gleaned through this and/or subsequent meetings with the complainant/respondent in the disciplinary process.

If TPI's administrator determines further investigation is warranted, it will refer the report to the Title IX Compliance Officer.

The Title IX Compliance Officer will interview the complainant and respondent, who will be invited to provide the names of witnesses that they would like the Title IX Compliance Officer to interview. The Title IX Compliance Officer will determine which of the witnesses will be interviewed and may also identify others to interview. Parties and/or witnesses may not record their interviews with the Title IX Compliance Officer. After collecting information, the Title IX Compliance Officer will submit a written report of relevant information to TPI administrator, who will review the report for completeness and relevance (as that term is defined above), and direct further investigation as necessary before the report is shared with the complainant and respondent.

The investigator's report will be shared with the complainant and respondent, who then have five business days to respond in writing to the report with any clarifications, additional witnesses requested to be interviewed (including a brief summary of information each witness would provide), or other relevant information. The complainant and respondent must also submit in writing by that time the names of any witnesses the complainant/respondent wishes to testify (should the matter proceed to a hearing) and a summary of information each witness would provide through their testimony. Character witnesses are not permitted. Names of witnesses provided by the complainant/respondent will be shared with the other party. The Title IX Compliance Officer will review the feedback to the report, interview additional relevant witnesses (as the investigator deems appropriate), and make changes/additions to the report as determined necessary. After the five-business-day deadline, the complainant and respondent may not provide any additional written information for the hearing packet (defined below) or hearing, unless that information was not reasonably available prior to the closing of the five-day window. The hearing panel or TPI's administrator, as appropriate, determines whether to grant exceptions to this five-day deadline.

TPI's administrator will determine what, if any, final changes or additions are made to the Title IX Compliance Officer's report based upon its review of the report and feedback as described above from the complainant and respondent.

TPI's administrator will determine whether to proceed to a hearing based on its assessment of whether there is sufficient information to believe that a policy violation may have occurred. TPI's administrator will convey this decision in writing to the complainant and respondent as applicable, who may ask that TPI's administrator reconsider its decision.

VI. Hearing Procedures

When TPI administrator decides that a case should proceed to a hearing, the case may be resolved either through an administrative resolution or a hearing panel. Under both types of proceedings, TPI will use a "preponderance of the evidence" (more likely than not) standard.

Administrative Hearing

At the discretion of TPI administrator, and with the agreement of both the complainant and respondent, a report may be resolved through an administrative hearing. The parties will be notified (typically via email) of the specific violations of the Student Sexual Misconduct Policy under consideration in advance of an administrative hearing. An administrative designee will review the information gathered during the investigation separately and in private with each party and give each party an opportunity to respond. The designee will determine if the respondent is responsible for the alleged policy violation(s), and, if so, issue (an) appropriate sanction(s). The parties will be notified in writing of the outcomes concurrently. If the respondent or complainant does not accept the administrative hearing resolution, either party may request by the stated deadline (typically 72) hours after notification of the outcome) a hearing before a hearing panel, as described below. If such a request is made, TPI will then proceed in scheduling a hearing panel. The proposed outcome from the administrative hearing will not be disclosed to the hearing panel unless the complainant or respondent decides to share such information.

Hearing Panel

If TPI administrator decides the case should be resolved through a hearing panel, TPI administrator will appoint a specially trained three-person hearing panel (typically including two faculty and one staff member) to resolve a complaint under this policy. A finding of responsibility must be based on a unanimous vote. Sanctions of suspension or expulsion must also be supported by a unanimous vote. A majority vote is required for all other sanctions.

The following procedures apply to a complaint that proceeds to a hearing panel:

- Notice. Both the complainant and the respondent will be notified at least 120 hours in advance of the date and time of the hearing and the names of the hearing panelists.
- **Hearing Packet.** In advance of the hearing, the Title IX Compliance Officer finalizes a packet with information it deems relevant to the case to be shared with the hearing panel. The hearing packet typically includes the Title IX Compliance Officer's report (if applicable). TPI administrator will share a copy of that packet with both the complainant and the respondent at least 120 hours in advance of the hearing.
- **Conflict of Interest.** A complainant and/or respondent may challenge the participation of a panelist because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made within 48 hours of notification of the names of the hearing panelists. At its discretion, TPI administrator will determine whether such a conflict of interest exists and whether a panelist should be replaced. Postponement of a hearing may occur if a replacement panelist cannot be immediately identified.
- Witnesses. The hearing panel may, at its discretion, exclude witnesses or witness testimony the panel considers irrelevant or duplicative.
- Electronic Devices. A respondent, complainant, advisor, and/or witness may not bring electronic devices that capture or facilitate communication (e.g., computer, cell phone, audio/video recorder, etc.) into a hearing room, unless previously authorized by the hearing panel. TPI will make an audio recording of the hearing to be kept on file for three years. Reasonable care will be taken to create a quality audio recording and minimize technical problems; however, technical problems that result in no recording or an inaudible one will not be a valid argument for appeal.
- **Hearing Procedure.** A hearing panel has general authority over the conduct of the hearing (e.g., it may set time frames for witness testimony and it may limit opening/closing statements or their length, etc.). The general course of procedure for a panel hearing is as follows: introductions; respondent's statement accepting or denying responsibility; opening comments from the complainant; opening comments from the respondent; questions from the panel; testimony/questions of other material witnesses (if applicable); closing comments from the complainant; and, closing comments from the

respondent. A complainant or respondent may not question each other or other witnesses directly, but may raise questions to be asked of that party through the hearing panel, which will determine whether to ask them. The hearing panel determines the relevancy of any information presented/submitted at the hearing and can exclude irrelevant information.

• Hearing Facilitator. A staff member will serve as the non-voting hearing facilitator.

The complainant and respondent will receive verbal notification of the decision of a hearing panel no later than five business days after the hearing. Notification will be individually given to the respondent and complainant at approximately the same time. A written hearing report outlining the decision and rationale of the hearing panel will be delivered to the respondent and the complainant typically within 10 business days of the hearing.

Sanctions

Sanctions for a finding of responsibility include, but are not limited to, expulsion, suspension, disciplinary probation, recommended counseling, and/or other educational sanctions. In determining (a) sanction(s), the hearing body will consider whether the nature of the conduct at issue warrants removal from the institution, either permanent (expulsion) or temporary (suspension). Other factors pertinent to the determination of what sanction applies include, but are not limited to, the nature of the conduct at issue, prior disciplinary history of the respondent (shared with a panel only upon a finding of responsibility for the allegation), previous institution's response to similar conduct, and institution's interests (e.g., in providing a safe environment for all).

Appeals

A respondent or complainant may appeal the hearing panel's decision by submitting a written appeal statement within five business days of the date the hearing report is sent to the parties. Appeals are limited to five pages (12-point font, 1-inch margins). The two grounds for appeal are:

- 1. New information not reasonably available at the time of the hearing that is material to the hearing panel's decision; and/or
- 2. Procedural error(s) that materially impacted the hearing panel's decision.

The appeal statement must identify the ground(s) for appeal. Note that an appeal is not a re-hearing of the case.

If, by majority vote, the appellate panel determines that a ground of appeal is substantiated, the panel will return the case to the Title IX Compliance Officer. Otherwise, the decision of the hearing panel stands. When a case is returned to the Title IX Compliance Officer, the Title IX Compliance Officer may decide to drop the case (e.g., based on insufficient information to believe that a policy violation may have occurred), send the case to the original hearing panel for reconsideration, send the case to a new hearing panel with the same or different charges, and/or (re)implement any aspect of the disciplinary process. A different decision (i.e., the decision of responsibility and/or sanctions) may subsequently result.

Appeal Procedures

The Appellate Board's role is limited to reviewing the hearing panel record, the appealing party's ("**appellant**") written appeal statement, any response to that statement by the other party ("**appellee**"), and information presented at a meeting of the Appellate Board, if convened.

The appellate panel will typically notify the parties of its decision regarding an appeal in writing within 20 business days from receipt of the appeal statement. If the decision will take longer, the chair will inform the parties.

The following procedures guide the Appellate Board process:

- **Appeal Statement.** The written hearing report will include instructions for submitting an appeal. The chair may summarily deny an appeal if it is not based on one or both grounds of appeal listed above.
- **Composition of Panel.** If the appeal is not summarily denied by the chair, the chair will convene a three-person panel and notify the appellant and appellee of the names of the panel members. The appellant and/or appellee may challenge the participation of an appellate panelist because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be submitted in writing to the chair no later than 48 hours after notification of the names of the appellate panel members. The chair will determine whether such a conflict of interest exists and whether a panelist should be replaced.
- **Response to Appeal.** The chair will provide written notice to the appellee that an appeal has been submitted and will give the appellee an opportunity to review the appeal statement. The appellee may submit a written response to the appeal ("response"). The response is due five business days from the date the chair provides written notice of the appeal to the appellee and is limited to five pages (12-point font, 1-inch margins). The chair will provide

the appellant an opportunity to review the response, though no additional opportunity to respond in writing will be provided to the appellant.

- **Exceptions.** The appellant and appellee may submit to the chair requests for exceptions to page limits or deadlines. Exceptions must be requested in advance of any deadline by sending an email to chair with justification for such request(s). If either party fails to meet a deadline or exceeds page limits without receiving an exception, the chair has the discretion to summarily reject an appeal or the appellate panel may disregard the response.
- **Meetings.** On its own or at the request of the appellant or appellee, the appellate panel may convene a meeting to give the parties an opportunity to amplify the reason(s) for the appeal or the response. If a meeting is convened, the appellate panel will invite both the appellant and appellee, who may bring an advisor of their choice to the meeting. The advisor's role is limited to quietly conferring with their advisee, and may not address the appellate panel. In the event an appeal alleges a procedural error, the appellate panel may request that a TPI administrator or a designee and the Title IX Compliance Officer attend the meeting to gather more information about the alleged procedural error.
- Written Decision. The Appellate Board will provide written notification of the final decision to the appellant and appellee at approximately the same time.

TITLE: Use of Safety Walkie-Talkies by Faculty

PURPOSE: To establish guidelines to regulate the use of walkietalkies by faculty during class hours.

RESPONSIBILITY: It is the responsibility of the Campus Safety Director, Programs Directors, and programs faculty to ensure compliance with this policy.

APPLICABILITY: This policy applies to all programs faculty at The Praxis Institute.

POLICY:

Since classrooms and lab rooms are not equipped with phone lines, it is the policy of Praxis Institute that all faculty members will have a walkie-talkie in possession during class hours to be used exclusively to alert and send a message of alarm to the designated staff (institutional receiver/dispatcher) when facing a situation deemed as an emergency during class/lab hours.

- 1. Prior going into their classrooms all faculty members will sign-out a walkietalkie, using the designated form.
- 2. The choosen Channel to be used for internal communication is *Channel 1*.
 - a. Faculty member upon retrieval of walkie-talkie must verify channel selection. Failure to do so will leave faculty member outside of the designated internal emergency communication connection with subsequent potential safety consequences.
- 3. Walkie-Talkie communication is restricted to emergency situations **ONLY**.
 - a. Use of walkie-talkies for other type of communication is completely forbidden and could result in disciplinary actions.
- 4. After finishing the class every faculty member is to hand back and sign-in the return of the walkie-talkie to the charging station.
- 5. Walkie-Talkies are not to be taking home.

TITLE: Annual Clery Security Report

PURPOSE: To establish guidelines to govern the institution's annual publication of Clery Security Report.

RESPONSIBILITY: It is the responsibility of the Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to the whole institution.

POLICY:

Each year, during the month of October, TPI issues an annual report about safety and security programs and crime statistics as part of compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"). The statistics reflect incidents that have occurred within the campus and in public areas immediately adjacent to the campus.

All students, applicants, and employees, will receive notification of the publication and how to access it electronically. However, a printed copy of the report will be provided to all those who request it.

We rely on all members of the Praxis community to help identify and report potential safety concerns. The institution works closely with local law enforcement departments to solve problems and proactively address issues that will reduce the likelihood of crime occurring on our campus.

TITLE: Acceptance of Credit Cards/Cardholder Data

PURPOSE: To ensure that The Praxis Institute (TPI) provides appropriate security for processing credit card payments and cardholder data in its domain of ownership and control. Furthermore, TPI recognizes its responsibility to remain compliant with all state and federal laws and regulations on the acceptance of credit cards as a form of payment. Moreover, the TPI recognizes its responsibility to comply with the Payment Card Industry Data Security Standard (PCI DSS) requirements issued by the Payment Card Industry Security Standards Council (PCI Council).

RESPONSIBILITY: It is the responsibility of the Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to individuals that process credit cards as a form of payment for TPI. This policy applies to all cardholder data, even if stored without the use of an IT resource. Further, this policy applies to all IT resources that store, process, or transmit cardholder data.

Securing and protecting cardholder data from misuse or malicious activity and maintaining compliance with the PCI DSS is the responsibility of those who manage systems as well as those who use them. Effective security is a team effort involving the participation and support of every member of the academic community who accesses and uses cardholder data.

POLICY:

TPI is committed to ensuring the privacy and proper handling of cardholder data that it collects and maintains from students, patrons, and other individuals conducting business with the institution. Anyone accessing cardholder data must protect the data from a loss of availability, confidentiality, or integrity. All systems, electronic or paper-based, processing credit card payments must be secured sufficiently to protect the availability, confidentiality, and integrity of the cardholder data.

Whereas the confidentiality of cardholder data is of chief importance, measures necessary to protect the confidentiality of cardholder data are superior to the availability of credit card payment systems.

Individuals who knowingly violate this policy and/or in any way compromise the

availability, confidentiality or integrity of cardholder data may be subject to appropriate disciplinary action and/or sanctions.

As required by the PCI DSS, TPI shall follow a comprehensive set of standards for the processing of credit card payments. These standards shall be updated regularly as advances in technology and changes to the PCI DSS occur.

Usage of Terms:

AVAILABILITY – Availability is the ability to assure that systems work promptly and service is not denied to authorized users. A loss of availability is the disruption of access to or use of information or an information system.

CONFIDENTIALITY – Confidentiality ensures that confidential information is only disclosed to authorized individuals. A loss of confidentiality, for the purposes of this policy, is the unauthorized disclosure of information.

CARDHOLDER DATA – Confidential or identifying information found on a credit (or debit) card, such as cardholder name, primary account number, expiration date, service code, and any validation codes (CVV/CVC).

INTEGRITY – Integrity is the appropriate maintenance of information and systems. A loss of integrity is the unauthorized modification or destruction of information.

IT RESOURCE – IT resource may include computers, software, servers, network utilization, storage utilization, virtual machine capacity, tablets, phones, multimedia devices, storage devices, wireless spectrum, and any other in-demand resource managed by IT staff.

TITLE: Access To and Use of Institution IT Resources

PURPOSE: To establish mechanisms for all individuals using institution's IT resources and take appropriate measures to manage the data stored on IT resources. To preserve and protect administrative data transmitted and stored on IT system.

RESPONSIBILITY: It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to users of Institution's information technology resources irrespective of whether those resources are accessed from oncampus or off-campus locations. Persons having the following affiliations with the institution are eligible to access and use the Institution's information technology resources:

1. Current faculty and staff;

2. Currently enrolled students;

3. Certain persons affiliated with external agencies collaborating with the Institution.

Unless eligible through another affiliation, alumni of the Institution are not eligible to access and use Institution's information technology resources, except when such resources are available to the general public.

This policy applies to all Institution's information technology resources, including: 1. Data and other files, including electronic mail and voice mail, stored in

individual computer accounts on institution-owned centrally-maintained systems;

2. Data and other files, including electronic mail or voice mail stored on departmentally-maintained systems;

3. Data and other files, including electronic mail and voice mail, stored in individual computer accounts on systems managed by the institution on behalf of affiliated organizations;

4. Data and other files, including electronic mail or voice mail stored on institution-owned systems assigned to a specific individual for use in support of job functions; and

5. Telecommunications (voice or data) traffic from, to, or between any devices described above.

POLICY:

Confidentiality

- A. In general, information stored on information technology resources is considered confidential, whether protected by the computer operating system or not, unless the owner intentionally makes that information available to other groups or individuals. The institution assumes that individual users wish the information they store on central and campus shared information technology resources to remain confidential.
- B. Free expression of ideas is central to the academic process. The institution acknowledges the importance of the diversity of values and perspectives prevalent in an academic institution, and is respectful of freedom of expression of ideas. The institution does not condone censorship nor does it endorse the inspection of electronic files or monitoring of network activities related to individual activities.
- C. Legitimate reasons for persons other than the account holder to access computer files, computers, or network traffic, or to disclose data to third parties, include:

1. Ensuring the continued integrity, security, or effective operation of Praxis systems;

- 2. Protecting user or system data;
- 3. Ensuring continued effective departmental operations;
- 4. Ensuring appropriate use of Praxis systems;
- 5. Satisfying a legal obligation;
- 6. Complying with the Federal Rules of Civil Procedure for E-Discovery; or
- 7. Health and safety emergencies.
- D. In any case where it becomes necessary for persons other than the account holder to access computer files or computers or network traffic for one or more of the purposes outlined above, all reasonable attempts shall be made to limit the access to the related purpose and to preserve confidentiality of any personal identifiers.

Security

- A. Although the institution takes reasonable measures to protect the security of its information technology resources and accounts assigned to individuals, the institution does not guarantee absolute security.
- B. The institution helps users of its central and campus shared information technology resources to protect the information they store on those resources from accidental loss, tampering, unauthorized search, or other access. In the event of inadvertent or non-malicious actions resulting in the loss of or damage to information or the invasion of the user's identity or privacy, the institution's information technology contractor shall make a reasonable effort to mitigate the loss or damage.
- C. The institution provides industry-standard security on institutions maintained systems. Users are responsible for properly safeguarding the information technology resources under their control, specific to files associated with their computer accounts.
- D. Users may request that arrangements be made to protect information stored on such resources. These requests may be honored at the discretion of the Executive Director.

Information Technology Users' Privileges and Responsibilities

- A. The institution grants access to its information technology resources to an individual solely for the individual's own Institution mission-related use. User access shall not be transferred to or shared with another without explicit authorization by the Executive Director, or a designee.
- B. All users of Institution's information technology resources are expected to exercise common sense and decency, including due respect for the rights of others in public areas.
- C. User access to information technology resources is contingent upon prudent and responsible use, which includes following appropriate security measures. The user shall not use information technology resources to violate any state or federal laws, Administrative Policies, or Code of Student Conduct. Incidental personal use is an accepted and appropriate benefit of being associated with the Institution's technology environment. An employee's supervisor may require the employee to cease or limit any incidental personal use that hampers job performance, adversely affects or

conflicts with Institution's operations or activities, or violates Institution's policy.

- D. The user shall not use information technology resources for any individual commercial purpose or for personal gain.
- E. Information technology resources shall be shared among users in an equitable manner. The user shall not participate in any behavior that unreasonably interferes with the fair use of information technology resources by another.
- F. Information technology resource users shall facilitate computing in the Institution's environment by:

1. Regular deletion of unneeded files from one's accounts on central or shared machines in accordance with the Institution's record retention policy.

2. Refraining from overuse of information storage space, printing facilities, or processing capacity, and interactive network connections.

Violations

Legitimate use of an information technology resource does not extend to whatever an individual is capable of doing with it. Just because an individual is able to circumvent restrictions or security, does not mean that the individual is permitted to do so.

Examples of Violations

Violations generally consist of downloading or posting to Institution's computers, or transporting across Institution's networks, material that is illegal, proprietary, in violation of internal policies or contractual agreements, or otherwise is damaging to the institution.

Examples of specific violations include, but are not limited to:

- 1. Sharing passwords or acquiring another's password without prior written authorization from the appropriate administrator;
- 2. Unauthorized accessing, using, copying, modifying, or deleting of files, data, user ids, access rights, usage records, or disk space allocations;

- 3. Accessing resources for purposes other than those for which the access was originally issued, including inappropriate use of authority or special privileges;
- Copying or capturing licensed software for use on a system or by an individual for which the software is not authorized or licensed. Misappropriation of data or copyrighted materials, including computer software, may constitute theft;
- 5. Use of information technology resources for remote activities that are unauthorized at the remote site;
- 6. Causing computer failure through an intentional attempt to "crash the system," or through the intentional introduction of a program that is intended to subvert a system, such as a worm, virus, Trojan horse, or one that creates a trap door;
- 7. Intentional obscuring or forging of the date, time, physical source, logical source, or other header information of a message or transaction;
- 8. Interception of transmitted information without prior written authorization from the appropriate administrator;
- 9. Failure to reasonably protect one's account from unauthorized use (e.g., leaving one's terminal publicly logged on but unattended);
- 10. Violation of priorities for use of information technology resources as established by an individual department within the Institution's system;
- 11.Excessive use of information technology resources, especially when it impedes the mission-related activities of other users, or adversely affects system availability or performance;
- 12.Use of information technology resources for individual commercial activities that are not approved by the Institution, for personal private gain, or for political campaigning;
- 13. Violation of software license agreements, including making more copies of licensed software than the license allows (i.e. software piracy); or

14.Sending a crippling number of files across the network (e.g. email "bombing" or "spamming").

See "Unacceptable Use of Information Technology Resources" Policy, for more details on violations.

Response, Investigation, and Sanctions

A. Response

- 1. In the event that administrative officials are notified of alleged misconduct or illegal activity on the part of a member of the Institution's community, contents of an individual's e-mail, other computer accounts, office computer, or network traffic may be copied and stored to prevent the destruction and loss of information, pending formal review of that material.
- 2. Except when inappropriate or impractical, efforts will be made to notify the involved individual prior to accessing the computer account or device, or before observing network traffic attributed to them. Where prior notification is not appropriate or possible, efforts will be made to notify the involved individual as soon as possible after the access.

B. Investigation of Allegations

1. When the administrator has reason to believe that a violation of this policy may have occurred, she may initiate an investigation and suspend technology privileges for the individual(s) involved, pending further investigation.

2. If significant Institution sanctions are imposed, such action, together with an explanation of the causal events, shall be reported to the Executive Director.

C. Sanctions

1. Institution sanctions are imposed by the appropriate institution's authority and may include, but are not limited to, limitation or revocation of access rights.

2. Disciplinary actions may also include any combination of disciplinary action, or civil or criminal liability. The usual rights and privileges of appeal apply.

3. Violation of this policy may also result in the Institution referring the violation to the appropriate state or federal agency.

Appeals

A. In cases where a user's technology privileges are limited or revoked, a user may request a review of the action. The review shall be conducted according to established procedures.

TITLE: Collecting Information from Visitors to Institution's Website

PURPOSE: Define what data TPI collects from visitors to its website and how that information may be used.

RESPONSIBILITY: It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to all Institution's Website visitors.

POLICY:

Individuals who are the subjects of data collected or maintained about them by the institution have the right to:

- know what data is kept and how it is classified;
- notification when private or confidential data is collected from them; and
- have private data secured.

The Praxis Institute (TPI) understands the importance of protecting the privacy of applicants and students. This policy explains what data TPI collects from visitors to its website and how that information may be used.

TPI is the sole owner of the information it gathers on its website. It will only share collected information with outside parties in ways that are described in this policy or if it is required to do so by law or in the good-faith belief that such action is necessary in order to conform to the edicts of the law, cooperate with law enforcement agencies, or comply with a legal process served on the Institution.

No part of the institution's Website may be reprinted, reproduced, transmitted, stored in a retrieval system, or otherwise utilized, in any form or by any means electronic or mechanical, including photocopying or recording, now existing or hereinafter invented without the prior written permission of The Praxis Institute. Permission for a current or prospective student to download and/or print out a single copy of the Institution's Catalog for personal use only is granted. Questions, comments and/or concerns regarding the websites functions should be directed to the Webmaster.

Information Collected and Use of Information

TPI may collect online and store personal identifiable information about persons who visit its website and voluntarily submit information. Praxis routinely collects information such as name, mailing address, email address, phone number, employment, former education and other information related to the application process. TPI will not sell any of this information to third parties without the advance explicit permission of the applicant/student. However, in the normal course of business it may share such information with employees assisting an applicant or student, as well as regulatory, licensing, and accrediting agencies acting within the scope of their responsibilities.

TPI uses email links located on the "Contact" page and other areas of the website to allow interested parties to contact the organization directly with any questions or comments. TPI personnel read every message submitted and attempt to reply promptly. This information is used to respond directly to questions or comments. TPI may also file such questions or comments to improve its website and institution's systems and procedures.

TPI may use personal information:

- To provide the "public visitor" with personalized content.
- To process and respond to inquiries.
- For the purposes for which the "public visitor" provided the information.
- To alert the "public visitor" of new Website features, special events, products and services.
- To promote, measure, and improve the effectiveness of the institution's products and services.

Electronic Group Participation Activities

During the course of General Education studies at TPI, students may be participating in online Course Forums, Electronic Classrooms, and other group activities. During such activities, a student's name will be viewable by classmates, faculty members, and administration.

Privacy Policies of Other Websites

TPI Website contains links to other sites. TPI is not responsible for the privacy practices or the content of such websites. Readers are encouraged to review the privacy statement of any website that they may visit.

Privacy Precautionary Warning

It should be noted that no data transmission over the Internet is 100% secure. As a result, TPI cannot guarantee the security of the information that is transmitted via its online services. However, a digital certificate has been installed on its website. Furthermore, all website traffic and contact forms submitted are routed and encrypted with SSL to and from the server..

Reservation of Rights

TPI reserves the right to access and/or disclose the user information discussed herein (including personal information) as required by courts, regulators, administrative agencies or accrediting bodies and to the extent required to permit TPI to investigate suspected fraud, harassment or other violations of law or its usage policies.

Consent/Opt Out

By using TPI's website, the "public visitor" consent to the collection, use and storage of his/her personal and non-personal information as described in this policy. "Public visitor" further authorize the export of personal information to the United States and its storage and use as specified in this policy. This policy and all legal obligations of the organization are subject to the laws of Florida and the United States, regardless of the location of any user. Any claims or complaints must be filed in the State of Florida. If a "public visitor" have questions about TPI's privacy policy, or wish to have his/her provided information removed from the institution's systems, they must contact TPI directly.

Notification of Changes

If TPI intends to use personally identifiable information in a manner different from that stated at the time of collection through its website, it will notify the parties via email. Parties would then have a choice as to whether or not TPI may use the information in this different manner.

TITLE: Internal System Access Control

PURPOSE: Physical and logical access to information in the possession of, or under the control of TPI must be restricted to authorized individuals. This policy outlines the requirements for logical access controls with the intent of reducing the risk of unauthorized access to TPI information assets. This also outlines the procedures for removal of access with regard to employee separations.

RESPONSIBILITY: It is the responsibility of the Executive Director and Campus Director to ensure compliance with this policy.

Failure to comply with this policy may result in disciplinary actions.

APPLICABILITY: This policy applies to any Praxis Institute (TPI) employee, contractor, or third party who has access to TPI information.

This policy affects systems that are implemented on the TPI network or any system that in the course of standard business operations represents TPI.

POLICY:

Access Management

All computer equipment and media used for the generation, distribution, and storage of information used by the institution are to be controlled and physically protected. The controls and protection are in place to prevent damage to assets, minimize interruption to business activities, and protect confidential data. Need to Know

Individuals having elevated access privileges (e.g. system administrators) are prohibited from accessing information they otherwise would not have a need to know, unless required to do so in the performance of specific tasks to support critical system needs.

Privilege Assignment

Formal standards and procedures cover all stages in the lifecycle of user access, from the initial registration of new users to the final termination of users who no longer require access to information systems and services. As per institution practices, access privileges are removed in the event of a change in role or status with the institution.

Access control privileges for institution's information resources shall be assigned to users via roles, policies, or job functions wherever possible and practical. Roles are established based upon department and job function and are reviewed and updated when job or departmental functions change.

Review of Administrative Rights

The privileges granted to all institution's employees will be periodically reviewed by information custodians (Executive Director and Campus Director) to ensure that all employees have access only to data that they have a need to know.

Customary Separation

Email access is allowed through the communicated separation date, in consideration that the employee complies with all usage restrictions as communicated at the time of separation.

Identification and Authentication

Institution's employees must provide valid identification before being granted access to institution's computing resources. For employees, this process is within the HR process that completes the I-9 form. For students, the proofing process is handled by the admissions department.

Identification Assignment

Each user of institution's computing resources must be assigned a unique ID for use during the authentication (login) process. Users are forbidden to share their ID and will be held responsible for activities that take place using their user accounts.

Shared access accounts are discouraged but in certain cases are necessary. Due to the risk inherent with shared accounts, additional controls need to be in place:

• Before a shared account is approved, alternatives that could help accomplish the objective without using a shared account are analyzed.

• Passwords for shared accounts must be changed when anyone with knowledge of the password leaves the organization or changes responsibilities and no longer requires access to the account.

• Upon a user's separation date, their access is revoked.

Dormant User Identification

User account usage must be automatically or manually reviewed to determine which users have not authenticated to information systems during the ninety (90)day period prior to the review date. User accounts must be disabled if they have not been used for ninety (90) days.

Password Requirements

The administrator of institution information system resources will assign user passwords during initial account setup and will reset passwords only when requested by account owners.

Under no circumstances may passwords be stored or transmitted in plaintext format. Similarly, passwords must not be written down in some readily decipherable form and left in a place where unauthorized persons may discover them.

Minimum Controls for Authentication Credentials

• Systems accessed using authentication credentials must not be left unattended in locations where unauthorized persons might gain access to them.

- Users must lock systems that their account is logged into before they leave the system for extended periods of time.
- Users must not reveal their authentication credentials, including passwords, to others. Control over the use of those privileges relies upon the exclusive utilization of the user account by the authorized user.
- Users must be vigilant both in recognizing and reporting security violations related to authentication credentials.

Network Access

Access to both internal and external networked services must be controlled. This is necessary to ensure that users who have access to networks and network services do not compromise the security of these network services by ensuring: 1. Appropriate interfaces between the institution's network and other external networks

2. Appropriate authentication mechanisms for users and equipment

3. Control of user access to information services

Network Trust

Institution's employees must not establish connections with external networks unless these connections have been approved by the administration.

All inbound session connections to institution's computers from external networks (e.g. the Internet) must be protected with an approved control system. **Firewalls**

Network devices performing firewall functionality must be configured to support a minimum necessary/least-privilege approach to security, allowing only specific systems, services, and protocols to communicate through the network perimeter. Logical and physical access to these systems must be limited to those personnel with specific training and authorization to manage the device.

Remote Access

Only virtual private network (VPN) technologies approved by the Information Security Office are permitted to be connected to the institution's network environment for remote access to systems that contain restricted data.

Procedures

Requesting Access to Electronically Store Regulated Data

To be granted access to electronically store regulated data, an individual must first be formally hired by the organization and complete the HR verification and authentication process.

Regulated Data Storage Requirements

Technical Requirements

All regulated data must be stored on the Institution's Data Server. Updates will be made to this requirement as technology and cybersecurity threats change. Authorized users will be notified as changes are made.

Audits

All institution-owned equipment is subject to audit for unauthorized storage of regulated data. Reasonable prior notification of an audit will be provided. Audit results are handled confidentially and reported to the Executive Director.

Training

Training on technical requirements will be provided at the time authorization is granted.

Definitions

Minimum Necessary/Least Privilege: The concept that all users at all times are to perform their job duties with as few privileges as possible.

Separation Date: Date at which employee separation becomes official.

Collaboration Tools: The tools provided for communication and collaboration. These include, but are not limited to email, instant messaging, phone, and voicemail.

Account: Typical access ID used for the access of applications and systems. **Privilege**: Access to institution's resources.

Authentication Credentials: Identifying information that when used in conjunction with a password or passcode allows access to a protected resource. Virtual Private Network (VPN): Protects data transfers between two or more networked devices so as to keep the transferred data private from other devices

on one or more intervening local or wide area networks.

Shared Access Accounts (e.g. generic or general accounts): Allows multiple users to logon to the information technology resources using the same ID and password.

TITLE: Records Retention and Disposal

PURPOSE: To establish guidelines to address the retention and disposal of The Praxis Institute's Records.

RESPONSIBILITY: It is the responsibility of the Executive Director, Campus Director, and Registrar to ensure compliance with this policy.

APPLICABILITY: This policy applies to the whole organization.

POLICY:

The Praxis Institute (TPI) requires that Records be retained for specific periods of time, taking into account legal or other institutional requirements.

The retention periods set forth here in this policy are the minimum retention periods required by institution. At the conclusion of the retention period, the Records should be properly disposed. Requests to deviate from or modify this Policy or these retention periods must be made to and approved by the Executive Director.

This Policy sets forth procedures to manage the retention and disposal of Records, and is intended to ensure that TPI:

- meets legal standards;
- properly manages the use of electronic and physical storage space;
- and disposes of outdated Records.

No one person or unit can possibly be directly responsible for all Records. Therefore, every office or department managing records is responsible for:

- Implementing records management practices consistent with this Policy.
- Educating staff/faculty in the Records management practices.
- Preserving Records as required under this Policy.
- Properly disposing of Inactive Records at the end of the applicable retention period.
- Protecting Records against misuse, misplacement, damage, destruction, or theft.
- Monitoring compliance with this Policy.

Institution's Records are the property of TPI and not of the officers, faculty members, or employees who create them or to whom they are entrusted.

II. Types of Institutional Records

Record: Any type of data file/document created or received in the course of institutional business, including, but not limited to, paper, email, any type of electronic file or data, still photographs, motion pictures, drawings, plans/blueprints, and audio/video recordings, etc.

- An **Active Record** is any Record that is currently in active use by an office or function of the institution.
- An **Archival Record** is an Inactive Record that has permanent value and is not required to be retained in the office in which it was originally generated.
- An **Electronic Record** is a Record kept in an electronic format, such as a word processing document, a spreadsheet, a database, a scanned or imaged document, and any other type of file stored on a computer, server or mainframe storage device or medium, or on any external or off-site storage medium, or with a third party acting as TPI's agent. Electronic Records have the same retention periods as paper and other tangible Records.
- An Inactive Record is a Record that is no longer an Active Record but still must be maintained pursuant to the Records Retention Schedule set forth. Inactive Records are typically maintained at an off-site storage facility or at other locations on campus.
- A Record with **Personal Information** is a Record that include an individual's name or personal mark together with that individual's social security number; drivers license number or other government identification card number; financial account number, credit or debit card number, or any number or code which may be used alone or in conjunction with another piece of information to assume the identity of another person, access financial resources, or obtain credit information. Personal Information is highly sensitive and must be safeguarded and secured at all times.

III. Retention of Records

All student hard copy academic records (i.e., registration/admissions forms, financial aid, exams, attendance records, graded work, etc.) will be retained for a three-year period after graduation date. After the three years period student's hard

copy of non-academic records (i.e., registration, financial aid file, etc.) will be scanned and stored in electronic file (CD). Electronic file will be maintained and safeguard in registrar's office in a lock cabinet. Hard copies/Physical records will be stored off-site campus by IDD for another three years. After the three years period in off-site storage, records are disposed by IDD once approved by the institution.

Since no policy list can possible cover all situations, questions regarding the retention period for a specific document or class of documents not included in this policy should be addressed to the Executive Director.

All Records pertaining to ongoing or pending audits or lawsuits (including reasonably anticipated lawsuits) should not be destroyed, damaged, or altered, even if the records retention date has expired, until the matter has been resolved and it has been specifically advised by the Executive Director or Legal Counsel that such Records may be destroyed.

IV. Disposal of Records

If the record retention period has expired and the Record does not pertain to an ongoing or pending audits or lawsuits (including anticipated lawsuits), the Record should be recycled or destroyed.

TPI has executed a written agreement with International Data Depository (IDD) to convert existing student records into digital images for the digital storage, search, and retrieval. IDD also provides disposal services for the hard-copy/physical record version of files.

IDD provides electronic copy of all contract compliance documents. Therefore, implement a disaster recovery process for all such records. IDD also is required, by contract, to comply with government regulations for record keeping, confidentiality, and security of records.

V. Institution's Records Disposal and Storage Resources Disposal and Storage Resources

• Electronic Media and Equipment Electronic records have the same retention periods as tangible records. • Shredding

TPI utilize external vendor (IDD) for the disposal of records through designated pick-up dates, and times. Registrar's Office coordinate pick-ups.

• Storage Facilities on Campus

Departments use their own discretion when determining where to maintain their respective records. Records are typically maintained on-site.

VI. Additional Information

While the Records Retention and Disposal Policy identify most of the Records at TPI, it does not cover all documents or situations and may be updated to reflect best practices or changing legal requirements.

Updated on 1/16/2020

TITLE: Unacceptable Use of Information Technology Resources

PURPOSE: To establish guidelines to define and regulate the acceptable use of information technology resources.

RESPONSIBILITY: It is the responsibility of the Executive Director to ensure compliance with this policy.

APPLICABILITY: This policy applies to the whole institution (Faculty, Staff, and Students).

POLICY:

TPI cherishes the diversity of values and perspectives endemic in an academic institution and so is respectful of freedom of expression. TPI does not condone censorship, nor does it endorse the inspection of electronic files other than on an exceptional basis. As a result, TPI cannot protect individuals against the existence or receipt of material that may be offensive to them. TPI encourages individuals to use electronic communications in a responsible manner. Finally, this policy includes information about behavior that would constitute a violation.

Policy violations fall into four categories that involve the use of electronic communications to:

- Harass, threaten, or otherwise cause harm to a specific individual(s); for example, sending an individual repeated and unwanted (harassing) e-mail or using e-mail to threaten or stalk someone. Alleged violations of this type can be reported directly to the Police Department if the situation is potentially serious and requires immediate attention. If the person responsible is not affiliated with the institution or if it is not possible to identify the individual, the incident can still be reported to the police. The police can assist by referring to appropriate sources of help outside the institution. Save electronic copies of all correspondence for evidence.
- Impede, interfere with, impair, or otherwise cause harm to the activities of others; for example, propagating electronic chain mail, or sending forged or falsified e-mail. Alleged violations of this type can be reported to the Campus Director. If the person responsible is not affiliated with the institution, the incident should be reported to the site that provides the individual with Internet

access. If it is not possible to identify the origin, contact the IT Contractor for assistance. Save electronic copies of anything that can be used as evidence.

- Download or post to institution's computers, or transport across institution's networks, material that is illegal, proprietary, in violation of institution contractual agreements, or otherwise is damaging to the institution; for example, launching a computer virus, distributing child pornography via the web, distributing copyrighted musical recordings via a file-sharing application, or posting an institution's site-licensed program to a public bulletin board.
- Harass or threaten classes of individuals. Alleged violations of this type can be reported directly to the Executive Director. If the person responsible is not affiliated with the institution, the incident should be reported to the site that provides the individual with Internet access. If it is not possible to identify the origin, contact TPI IT Contractor for assistance. Save electronic copies of anything that can be used as evidence.

THIS POLICY BECOMES EFFECTIVE THE DAY OF DISTRIBUTION

TITLE: Return to Campus Criteria for students with SARS-CoV-2 Infection

PURPOSE: Establish return to campus criteria for student with SARS-CoV-2 infection.

RESPONSIBILITY:

It is the responsibility of the Executive Director, VP of Academic Affairs, and Campus Directors to ensure compliance with this policy.

APPLICABILITY:

This policy applies to all students at The Praxis Institute (TPI).

POLICY:

This guidance, adapted from CDC*, provides a criteria for making decisions about return to campus for all students with SARS-CoV-2 infection.

*Adapted from CDC - https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html

PROCEDURE:

- 1. As per CDC a test-based strategy is not recommended because, in the majority of cases, it results in excluding individuals who continue to shed detectable SARS-CoV-2 RNA but are no longer infectious.
- 2. The symptom-based strategy, described below, depends on: the time period since symptoms first appeared and whether symptoms are improving; whether the individual is immunocompromised; and the severity of their illness.
- 3. Symptom-based strategy for return to campus:

> Individual with a possibility of exposure

- Report suspicion to instructor/professor.
- DO NOT ATTEND <u>ANY</u> EVENT ON CAMPUS.
- Isolate immediately
- Get tested within 3-5 days of the suspected exposure
 - An individual could test earlier (1-2 days after the suspected exposure). However, if individual chooses to test earlier and the initial test is

negative it will be necessary to re-confirmed initial test results with a second test at a later time (5-9 days).

> Individual with a negative test

- No limitations Clear to attend on campus activities.
- Individual with a positive test but who were asymptomatic throughout their infection and are *not* severely immunocompromised:
 - At least 10 days have passed since the date of their <u>first</u> <u>positive</u> viral diagnostic test before they can return to campus.
- Individual with positive test and <u>mild to moderate</u> illness who are NOT severely immunocompromised:
 - At least 10 days have passed *since symptoms first appeared* **and**
 - At least 24 hours have passed *since last* fever without the use of fever-reducing medications **and**
 - Symptoms (e.g., cough, shortness of breath) have improved.
- Individual with positive test and <u>severe to critical illness</u> or who are severely immunocompromised:
 - At least 10 days and up to 20 days have passed *since symptoms first appeared* **and**
 - At least 24 hours have passed *since last* fever without the use of fever-reducing medications **and**
 - Symptoms (e.g., cough, shortness of breath) have improved.
 - Consider consultation with infection control experts.

Note:

Individuals who are **severely immunocompromised** may produce replicationcompetent virus beyond 20 days after symptom onset or, for those who were asymptomatic throughout their infection, the date of their first positive viral test. Therefore, consultation with infectious diseases specialists is recommended.

THIS POLICY BECOMES EFFECTIVE ON OCTOBER 4TH/2021.

TITLE: Vaccination against SARS-CoV-2 Infection

PURPOSE: Establish guidelines that will govern institution's vaccination requirements.

RESPONSIBILITY:

It is the responsibility of the Executive Director, VP of Academic Affairs, and Campus Directors to ensure compliance with this policy.

APPLICABILITY:

As of October 4th/2021 this policy applies to all students at The Praxis Institute (TPI).

POLICY:

In an effort to decrease the eminent risk and/or likelihood of contagion, TPI highly encourages its entire student body to be vaccinated against SARS-CoV-2.

PROCEDURE:

- 1. Every student with an official evidence of vaccination against SARS-CoV-2 <u>MUST</u> bring a copy for their student's file to their program director.
- Students that elect to remain unvaccinated against SARS-CoV-2 and required to attend weekly academic activities in campus, will be <u>REQUIRED</u> to present weekly (every Monday) an <u>official negative test</u> result to their program director
- 3. <u>Unvaccinated</u> students who <u>do not</u> attend campus activities on a weekly basis, are <u>**REQUIRED**</u> to present an <u>**official negative test**</u>, on the day they come to campus, to their program director.

TITLE: Disciplinary Action - Safety in Private Spaces Act (6E-7.001)

PURPOSE: To delineate the disciplinary actions pertaining to a non-compliance event with the Safety in Private Spaces Act and provide administration guidance.

RESPONSIBILITY: The Executive Director, Campuses Directors, and Program Directors are responsible for the implementation and observance of this policy.

APPLICABILITY: All Praxis Institute administrative and instructional personnel

POLICY: TPI expects employees to be aware of and follow all workplace policies and procedures. In addition, employees are expected to abide by all federal, state, and local laws. This policy defines the process for correcting single and repeat episodes of employee failure to comply and/or enforce the guidelines of the state Safety in Private Spaces Act. The Safety in Private Spaces Act (6E-7.001) establishes that all educational institution licensed by the state Commission for Independent Education (CIE) have the following:

(a) That restrooms are designated for exclusive use by males or females based on biological sex at birth., as defined s. 553.865(3), F.S., or that there is a unisex restroom.

(b) That changing facilities are designated for exclusive use by males or females based on biological sex at birth., as defined in s. 553.865(3), F.S., or that there is a unisex changing facility.

Therefore, all TPI personnel is required to use the restrooms facilities designated to their respective biological sex at birth. Furthermore, TPI administrative and educational personnel is expected to discourage, redirect, or divert any individual whose biological sex at birth does not appear to match the restroom facility they are trying to occupy/use. Those individuals should be redirected to a single stall/private restroom.

Progressive Discipline

Progressive Discipline is a step-by-step process designed to modify and improve unacceptable employee practices. Many situations, particularly for first time

offenders, may be resolved through verbal counseling or discussion with the employee; however, repeat offenders or some one-time incidents may be severe enough to merit a written warning, suspension (without pay), final warning or termination, depending on the severity of the event. The seriousness of the offense and the employee's disciplinary and performance history will be considered when determining the level of discipline to be applied. Each incident should be assessed to determine the employee's understanding of the rules and expectations, their willingness to follow them, any systems failures and workplace obstacles interfering with compliance and whether the action was the result of an excusable mistake, an inexcusable error or deliberate action. Taking these into account the supervisor, in consultation with the administration, will determine the appropriate level of discipline. In situations where an employee repeats the non-compliance practice, the following discipline should be progressive. However, there may be situations where the recurrence, severity or impact of the non-compliance act will warrant moving immediately to a written discipline, a final discipline, or the termination of employment. All decisions to escalate disciplinary action to a higher level of discipline must be made in consultation with administration.