

FINANCIAL AID HANDBOOK

REVISED JULY 2016



GTU Consortial Financial Aid Office

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FINANCING A SEMINARY EDUCATION

Students who answer God's call to the Christian ministry make a serious commitment of their time, talents and finances. It is important for a student to consider his/her ability to fund a seminary education which includes tuition, books, and living expense and other related costs. ABSW shares the conviction of the Association of Theological Schools that the individual student must pull together many resources to cover the cost of seminary education: personal savings and assets, summer employment, part-time employment, scholarships from home churches and other organizations and family assistance (parents and spouse).

The American Baptist Seminary of the West is committed to providing financial assistance to qualified students who enroll in the seminary's degree programs. The following is a partial list of financial assistance that may be available to you depending upon your financial need, scholarship requirements, and availability of funds.

- ABSW grant in aid scholarships
 - American Baptist grants and scholarships
 - Campus student jobs
 - Federal Student Loans
 - Seminarian Support Program (American Baptist Churches of the USA)
 - VA Yellow Ribbon Program
- (see appendix for more information)

The Graduate Theological Union (GTU) Financial Aid office processes all financial aid applications for the American Baptist Seminary of the West. The GTU Financial Aid Office is located at 2465 Le Conte Avenue, 3rd Floor, Berkeley, CA 94709 or finaid@gtu.edu.

FOR ADDITIONAL INFORMATION CONTACT:

- GTU Financial Aid Office, located at Le Conte Avenue, Berkeley, CA 94709, telephone: 510/649-2469, or email finaid@gtu.edu.
- ABSW Business Office at 2606 Dwight Way, 2nd floor, Berkeley, CA 94704-3029 or 510/841-1905 ext. 225
- ABSW Admissions Office, 2606 Dwight Way, 2nd floor, Berkeley, CA 94704-3029 or 510/841-1905 ext. 229.

<http://www.gtu.edu/admissions/financial-aid/applying-for-financial-aid/application-process>
or <http://www.absw.edu/prospective-students/financing-a-seminary-education/>

HOW TO APPLY

FORMS ARE AVAILABLE AT: <http://www.gtu.edu/admissions/financial-aid/applying-for-financial-aid/application-process>.

FALL AND SPRING TERMS APPLICATION:

Financial aid (scholarships and federal loans) are offered to all students (new and returning) who are enrolled at least half-time. Students must apply annually to be eligible for institutional grant in aid/scholarships and Federal Student Aid. The deadline for submission of all materials is **APRIL 15**. Applications for financial aid should be completed at the same time as the admissions application and sent directly to the GTU Financial Aid Office.

Domestic applicants (U.S. Citizens or Permanent Residents):

1. Complete and submit the **Domestic Student Financial Aid Application** on or before April 15. The application can be completed and saved electronically, and returned as an email attachment to finaid@gtu.edu. Or, it can be mailed to the GTU Financial Aid Office at 2400 Ridge Road, Berkeley, CA, 94709-1212 (mailing address).
2. File the Free Application for Federal Student Aid (FAFSA) online at www.fafsa.ed.gov on or before April 15. The ABSW school code of G01120 should be entered in the school section of the FAFSA. Use estimated tax information if your federal taxes are not complete by April 15.
3. Domestic students who are members of religious orders must also submit a letter from their superiors regarding their financial situation. The letter should indicate the level of support that the order will provide for the student's education in the upcoming academic year.

International applicants:

1. Complete and return the **International Student Financial Aid Application** along with bank statements for the past three months and a copy of your US tax return if applicable on or before April 15. The application can be saved, completed electronically and emailed as an attachment to finaid@gtu.edu. Or, it can be mailed to the GTU Financial Aid Office at 2400 Ridge Road, Berkeley, CA, 94709-1212 (mailing address).
2. International students who are members of religious orders must also submit a letter from their superiors regarding their financial situation. The letter should indicate the level of support that the order will provide for the student's education in the upcoming academic year.

Additional Requirements:

- Students who apply for financial aid after April 15 will be awarded on a first come basis and as funds are available. Priority is given to new students who are enrolling for the first time in the seminary.

- Student must be enrolled at least half-time.
- Students must be in good standing and maintain a GPA of 2.5 to receive financial assistance. Students who are placed on probation will be denied Government Guaranteed Student Loans until the probation has been removed. Students should refer to the *American Baptist Seminary of the West Admissions, Registration, and Academic Life Policies and Procedures Handbook* for additional information regarding Financial Aid policies.

SUMMER TERM APPLICATION

Summer period is considered the trailer to the academic year. An application for summer aid does not constitute an-application for financial aid for the academic year starting in September. To apply for financial aid for fall (September - December), you must complete the appropriate Free Application for Federal Student Aid (FAFSA) and the Domestic or International Student Financial Aid Application. Visit <http://www.gtu.edu/admissions/financial-aid> for more information.

To be eligible for ABSW Summer aid, the following conditions apply:

- You must be enrolled in the MDiv, MCL, or DMin programs. Common MA students: up to two (2) three (3.0) unit academic intersession or summer session courses may be counted toward the MA Program course requirements *with the approval of your advisor or the dean*.
- For federal Direct Loans, you must be enrolled at least half-time over the course of the summer session and you must complete an application for aid as outlined below.
- For ABSW Scholarship Aid you must be enrolled in at least one ABSW Summer Session course. There is no minimum enrollment requirement for scholarship aid eligibility.

Current Students (summer):

Federal Direct Loans:

- Complete the current academic year [Free Application for Federal Student Aid](#) (FAFSA) no later than **July 10**, if you have not yet completed a FAFSA.
- Complete the Summer Supplemental Financial Aid Application available by request from the Consortial Financial Aid Office. Write to finaid@gtu.edu with the subject line "**Summer Aid Application.**"
- Your financial aid file must be complete (no missing documents) before an award can be made.

ABSW Scholarship Aid:

A summer application is not required for scholarship aid. A summer aid application is only required if you wish to borrow Title IV federal student aid (i.e. federal Direct Loans). The scholarship you received for the previous fall

and spring terms will automatically apply to your ABSW summer credits so long as your summer credits are within the total number required to complete your program and, for Common MA students, so long as your credits are approved by your advisor or dean.

Entering Students (summer):

Federal Direct Loans:

- Complete the [Free Application for Federal Student Aid](#) (FAFSA) with the ABSW School Code: G04080, if you have not yet completed a FAFSA.
- Complete the **Summer Supplemental Financial Aid Application** available by request from the Consortial Financial Aid Office. Write to finaid@gtu.edu with the subject line “**Summer Aid Application.**”

ABSW Scholarship Aid: See “How To Apply” (Fall and Spring).

Types of Summer Aid Available:

Returning students who are recipients of ABSW need-based scholarship awards may expect their scholarship rate to be applied to ABSW summer tuition. Entering students may expect their determined rate of need-based scholarship aid for the fall to be applied to ABSW summer tuition.

Federal Direct Loans: Borrowers who have remaining Federal Direct Stafford unsubsidized loan eligibility in the academic year (September – August) may borrow additional Federal Direct Stafford unsubsidized loan funds for summer expenses. The maximum annual loan for a graduate student loan borrower is \$20,500. A Direct Stafford unsubsidized loan disbursed on or after July 1 has an annual, fixed interest rate of 5.84% and an origination fee of at least 1.073%.

Borrowers must complete a federal Direct Unsubsidized and/or Graduate PLUS Loan Master Promissory Note (MPN). However, first-time federal Direct Loan borrowers at ABSW must complete the required federal Direct Loan Master Promissory Note at www.studentloans.gov.

Graduate PLUS Loan: Borrowers who have exhausted federal unsubsidized loan eligibility may apply for a federal Grad PLUS loan. Federal Grad PLUS loans disbursed on or after July 1 have a 6.84% fixed interest rate and an origination fee of at least 4.292%. The Grad PLUS loan requires that a borrower pass a simple credit check by the federal government. If you receive a denied credit decision, you may appeal the decision with the Department of Education or apply with an endorser (cosigner).

Students who have already completed a Federal Grad PLUS Master Promissory Note (MPN) do not need to sign a new MPN, unless an endorser is required. First-time borrowers must complete the PLUS Request Process and the Federal Direct Grad PLUS Master Promissory Note at www.studentloans.gov. First-time Grad PLUS Direct Loan borrowers at ABSW must also complete a loan entrance counseling online at www.studentloans.gov.

Summer Cost of Attendance

All financial aid awards will be calculated against the cost of attendance (classroom attendance) for summer session. The cost of attendance will include the total cost of tuition plus an estimated cost for books, supplies and living expenses *for the period of enrollment in coursework, only*. The cost of attendance for students enrolled in independent study courses (Special Reading Courses) and/or online courses is limited to the cost of tuition, school fees, and books/supplies.

Disbursement of Financial Aid (Summer)

Scholarship Aid recipients: scholarship aid will post up to three days prior to the start of the summer session for students who are registered for summer class(s). Aid will not post unless you have registered at least half-time.

Direct Loans recipients: Federal student loan(s) will be disbursed in at least two installments. The disbursement schedule will be as follows:

- For students enrolled in summer classes that are arranged consecutively, without a break of one week or more between classes, disbursement #1 will occur three business days prior to the start of the first summer class. Disbursement #2 will occur three business days prior to the midpoint of the summer enrollment period, the midpoint between the start-date of the first class and the end-date of the final class.
- For students enrolled in summer classes that are scheduled with a break of at least one week between each class, loan disbursements will be scheduled to occur no earlier than three business days prior to the beginning of each summer class. Any remaining balance after the payment of school fees will be refunded to you

VETERAN BENEFITS

Those eligible for benefits from the U.S. Department of Veteran Affairs should speak with their local VA representative. Information about VA educational benefits may be found at the VA website: http://www.benefits.va.gov/gibill/get_started.asp; or in the Benefits for Veterans and Dependents Handbook (http://www.lapl.org/sites/default/files/media/pdf/vets/2015_Benefits_for_vet_and_Dependents).

PAYMENT OF TUITION AND FEES:

All bills are due and payable at the time of registration. Payment plans are available upon approval by the Chief Financial Officer. All financial obligations and/or agreements must be fulfilled prior to enrollment in the next semester. Grades are issued, degrees conferred and transcripts issued only after all accounts are settled.

Refund Policy:

1. Prior to the end of General Registration: full tuition.
2. During late registration: full tuition.
3. 3rd week of classes: 80% of tuition.
4. 4th and 5th week of classes: 50% of tuition.
5. After the 5th week of classes: no refund.

Students should refer to the *ABSW Admissions, Registration and Academic Life Policies and Procedures* for more information on policies governing payment and refund policies. For a current list of tuition and fees, see website at www.absw.edu or contact the ABSW Business Office located at 2606 Dwight Way, Hobart Hall 2nd floor, Berkeley, California or telephone 510/841-1905.

ESTIMATED NON-TUITION STUDENT EXPENSES

To establish a student's financial need and the total aid a student may receive under the Federal Direct Loan programs, the Financial Aid Office calculates an estimated Cost of Attendance, or standard student budget, for each financial aid applicant. Listed below are the cost components and amounts used in determining an applicant's cost of attendance for the Fall and Spring enrollment periods. Costs incurred prior to the start of the academic year and costs that do not directly apply to the categories listed below are generally not considered when establishing a student's financial aid package. However, additions to the cost of attendance will be considered for child care and the one-time purchase of a computer.*

The non-tuition figures listed below are based on a survey of costs incurred by students throughout the GTU consortium over the course of the nine-month academic year. Actual costs for non-tuition expenses will vary from student to student. In particular, students living in school housing may have room and board expenses below the housing and food estimates listed below. We recommend that each student create a personal budget using actual or projected costs to estimate one's budget and financial need most accurately. While expenses for family members are not factored into the COA, we suggest adding a minimum of \$7,000 for a dependent spouse and \$4,000 for a dependent child to one's personal budget for the 9-month academic year.

Single Student Budget (non-tuition expenses) for 2015-2016 ACADEMIC YEAR

	<u>Per month</u>	<u>One term</u>	<u>9-month Ac. Yr</u>
Books/supplies		\$500	\$1,000
Housing	\$1,100	\$4,400	\$9,900
Food	\$375	\$1,500	\$3,375
Transportation	\$250	\$1,000	\$2,250
Medical		\$1,627	\$3,254
Miscellaneous	\$150	\$600	\$1,350
Total estimated non-tuition expenses	\$1,875	\$9,627	\$21,129

For information on individual budget adjustments, refer to “Requesting a Financial Aid Budget Adjustment” under the Financial Aid Information section at: www.gtu.edu/admissions/financial-aid.

FINANCIAL AID TERMS AND RESPONSIBILITIES

When you accept financial assistance, you are agreeing to comply with the terms and responsibilities listed below and all applicable federal regulations:

- An award will be made in accordance with all current regulations and appropriations of the federal government and ABSW. The Financial Aid Office reserves the right to adjust or withdraw an award in the event of changes in policy, appropriation, or unintended error.
- Eligibility for financial aid is based on at least half-time enrollment.
- Your award is based on the projected enrollment status indicated on your Financial Aid Application. If you enroll for less units than projected, or drop classes which bring you below the projected units, your award will be adjusted accordingly or withdrawn completely. Funding is not guaranteed for increased enrollment. Students on internship or CPE will have institutional aid and/or Work Study awards revoked, if offered.
- In cases of withdrawal or leave of absence before the end of a semester, awards will be adjusted in accordance with the refund policy of your school and federal funds will be returned to aid sources as required by federal law.
- If you received aid for which you are no longer eligible, you must make arrangements to repay that aid.
- If required, you must provide verification documents requested by the Financial Aid Office in a timely manner. An award is subject to adjustment or cancellation if aid eligibility changes as a result of the verification process.
- In order to receive financial aid, satisfactory academic progress (as determined by your school) toward a degree must be maintained.
- Total financial aid cannot exceed the Cost of Attendance and need-based aid cannot exceed the calculated financial need. Therefore, if you receive additional outside aid, your financial aid award may result in adjustments to your award package.
- If an award includes Federal Work Study, *necessary employment forms must be completed prior to beginning work*. Work-Study employment is contingent upon availability and is not guaranteed.
- Recipients of Federal loans must complete the entrance counseling requirements before receiving any funds.
- With the exception of federal Work-Study, financial aid awards will be credited to your account.

When you accept financial assistance, you must notify the Financial Aid Office:

- If your address changes at any time during the academic year

- If your enrollment status changes below half-time or if you withdraw from school at any time during the academic year;
- If the amount and source of any additional financial aid or resource you receive is not shown on your financial aid package. Examples of such aid include: support from religious affiliations, outside scholarships, support from private organizations, AmeriCorps, etc

POLICY OF NON DISCRIMINATION

ABSW does not permit discrimination or harassment in its programs and activities on the basis of race, color, national origin, ancestry, sex, gender, gender identification or expression, sexual orientation, disability, age, religion, medical condition, veteran status, marital status or any other characteristic protected under law.

SATISFACTORY ACADEMIC PROGRESS

Federal regulations require institutions of higher education to establish minimum standards of satisfactory academic progress for recipients of financial aid. These standards must equal or exceed the academic standards for students not receiving financial aid. In keeping with these regulations, ABSW has established the following policy governing Satisfactory Academic Progress.

Satisfactory Academic Progress is cumulative and made up of both a qualitative component and a quantitative component. Students must meet both aspects of the standard in order to maintain their eligibility during all periods of enrollment, even those for which the student did not receive or request financial assistance.

IMPORTANT NOTE: Some scholarships have additional grade point average requirements that may be higher than those listed below. Review the catalog for the specific grade point average requirements for your scholarship or contact the Financial Aid Office for additional information.

The Higher Education Act and California state government require that in order to receive any Title IV Aid (Federal Direct Stafford Loan, Federal Direct GRAD PLUS Loan), a student must maintain satisfactory academic progress towards a degree. All academic semesters are utilized to determine Satisfactory Academic Progress (SAP) eligibility regardless of whether federal financial aid was received. In addition, The Higher Education Act standards apply to *all* students, whether or not they have ever received any federal financial aid.

The following criteria apply:

- Full time students are expected to enroll in nine (9) credit hours or more each semester. A full time student will be allowed four (4) years to complete a two-year program (MA,

MCL); six (6) years to complete a three-year program (MDiv); eight years to complete a four-year, dual-degree program (MDiv/MCL or MDiv/MA). The maximum time frames for these degrees also apply to part-time students. International students must complete a minimum of twenty-four (24) units per year in order to complete the MDiv degree within three (3) years.

- At the end of each academic semester, full-time students must have earned at least nine (9) credit hours and part-time students must have earned at least 1.5 credit hours, or enough hours to progress toward the completion of the degree within the maximum time frame for the program. All students must complete the required number of hours with a cumulative GPA of 2.5 or higher for MDiv and MCL degrees or 3.0 for common MA degrees.
- Financial aid recipients must complete 2/3 (67%) of their attempted courses each semester to be eligible for financial aid. Satisfactory Academic Progress is measured after each semester (January term will be paired with spring semester and summer term will be paired with fall semester). Only grades of A through C- or P (pass) count as completed credits. Courses with grades of I (Incomplete), F (Fail), NR (None Reported), NS (Not Satisfactory), NC (No Credit), W/F (Withdrawal Fail), W/P (Withdrawal Pass), and W (Withdrawal) are not completed credits.

The number of hours in which a student is enrolled on the day following the published last day to add or drop a class will be used as the official enrollment date for financial aid purposes.

All students are required to meet both cumulative grade point average (GPA) and cumulative hours earned to demonstrate satisfactory academic progress for financial aid. A review will be made at the end of each semester to determine if the student meets the criteria.

Students who do not register for two consecutive semesters will not make Satisfactory Academic Progress unless they have filed the appropriate Leave of Absence forms. (See Leave of Absence policy 6.8 in this handbook.)

STUDENT LOAN BORROWING POLICY

In an effort to educate borrowers in making informed financial decisions while in school and to help students realize their educational goals with the minimum necessary amount of educational debt, the GTU Consortial Financial Aid Office has adopted a Student Loan Borrowing Policy. Students admitted to a program of the American Baptist Seminary of the West are expected to abide by this policy. Listed below are the requirements and options for the federal student loan borrower.

1. All federal student loan borrowers must complete Entrance Counseling once in the course of a program and prior to the first disbursement of loan funds. To complete online Entrance Counseling go to <https://studentloans.gov> and sign in to “Manage My

Loans,” if you have not previously completed entrance counseling for the school with which your latest financial aid award is associated.

2. Prior to graduating, withdrawing or dropping below half-time enrollment, all federal student loan borrowers must complete Exit Counseling. On campus sessions are announced during the Spring semester. To complete online federal Stafford student loan Exit Counseling visit http://nslds.ed.gov/nslds_SA/.
3. The Financial Aid Office strongly encourages and may require the completion of the Budget Calculator and Loan Repayment Estimator tools. The purpose of each worksheet is to ensure you are choosing a loan amount that meets and does not exceed your financial need or your projected ability to successfully manage repayment. The budget worksheet serves two additional purposes: it is used to estimate the annual cost of living allowances included in the annual Cost of Attendance, and it is used as a reference if/when a student appeals for a budget increase. The Budget and Loan Worksheets are due prior to the first disbursement of loan funds.
4. The Financial Aid Office encourages borrowers to attend a Financial Aid Workshop or to complete Financial Aid Awareness Counseling at least once in the course of a student’s program. A workshop may focus on a specific topic such as scholarship research, budgeting, or loan repayment strategies. Scheduled financial aid workshops are announced to all borrowers through the Financial Aid Important Dates and Events, school e-newsletters and by mail.
5. All borrowers are invited to seek Financial Aid/Loan Counseling for personal assistance in understanding available financial aid and loan repayment options. To make an appointment with a member of the Financial Aid staff, a student may contact the office by phone or email. Please visit the Federal Student Aid website at: www.studentloans.gov for access to the Loan Repayment Estimator to get an idea of what your monthly loan payment may look like, depending on the repayment plan you choose. When it comes time to repay your loans, we suggest a plan that allows you to pay off your loans the fastest. Remember, the longer you take to pay off our loans, the smaller your monthly payment, but the more you will pay back in total dollars.

FINANCIAL CIRCUMSTANCES APPEAL POLICY

Special circumstances are defined as an unexpected event or situation beyond one’s control. The federal government allows Financial Aid Offices to use professional judgment on a case-by-case basis to reevaluate a student’s financial aid award in certain situations when the extenuating circumstance is well documented. Circumstances that may be considered are: loss of employment, significant and prolonged loss of income, loss of Social Security or child support benefits, disability, separation or divorce, or death of a spouse after filing the FAFSA, or unusual and necessary expenses.

The Expected Family Contribution (EFC) formula is the same for all applicants. However, we do understand that a student may have difficulty managing their expected family contribution due

to changes in financial circumstances. You may appeal your student contribution if there was a change in financial circumstances beyond your control from January 1, 2015 to the present.

Some items that may not be considered in a financial circumstances appeal:

- Consumer debt (credit card or educational loan debt)
- Routine personal living expenses (car payments, insurance, mortgage/rent)
- Unusual personal living expenses (wedding costs, legal expenses)
- Reduction in overtime pay
- Bankruptcy
- One-time income from gambling earnings
- Job loss of less than six months
- Requests to exclude retirement assets that are not invested in a traditional retirement account
- Student merit or achievements
- Aid or scholarships awarded at another institution

In order to review a Financial Circumstances Appeal, the following is required:

- An accepted financial aid award:
 - Appeals will only be considered for students who have accepted their current financial aid award in WebAdvisor.
- A completed Financial Circumstances Appeal form:
 - Identify the reason for the appeal and include all supporting documentation
- Submit any supplemental or new tax documentation, if not already submitted;
 - Amended tax return form 1040x
 - IRS tax data through FAFSA Data Retrieval Tool (DRT) or as a tax transcript; and
- Additional information and/or documentation may be requested after submission of your appeal and supporting documentation.

Once your appeal has been evaluated, you will be notified in writing of your circumstances appeal decision. Please note that submission does not guarantee a change in your financial aid award. All requests are handled on a case-by-case basis and additional institutional aid is only provided if funds are available. Please allow 30 days for review. Additional time may be needed for review if the Financial Aid Office requests additional documentation. If we are able to make an adjustment, we will submit corrections to your FAFSA data. If you qualify for additional aid based on your adjusted financial need, we will award the additional aid when the correction process is complete. Conversely, if the tax information reported on the FAFSA was underestimated, submission and evaluation may result in a decrease of financial aid.

FINANCIAL AID BUDGET ADJUSTMENT POLICY

The Cost of Attendance (COA) or “student budget,” is the cornerstone of establishing a student's financial need and financial aid package. It sets a limit on the total aid that a student may receive for purposes of the federal student aid programs, e.g. Federal Work Study and Federal Direct Loans. A student’s total financial aid package, including scholarships, grants, other outside aid and federal student aid should not exceed the COA.

Each year, the Financial Aid Office determines the standard COA budget for financial aid applicants based on average allowable expenses for the four month academic term and nine month academic year. The Free Application for Federal Student Aid (FAFSA) includes a modest income protection allowance (IPA) for these basic living expenses in its federal methodology calculation. The budget components are costs that relate to the individual student and are educational in nature as specified by Section 472 of the Higher Education Act and include: tuition and fees, room and board, books, supplies, transportation, student health insurance, and personal expenses.

We provide estimated costs based on averages from the Bureau of Labor Statistics for the geographic location of the institutions in the Consortium and cannot ensure that all students incur the same cost of living nor that students will arrive with the same financial resources. Budgeting is an exceedingly individual process and a significant part includes ones available resources, such as personal assets and financial assistance.

An adjustment to an individual student’s Cost of Attendance is not a standard practice. Financial Aid Administrators have the authority to use professional judgment to make some adjustments to allowable expenses for special circumstances on a case-by-case basis.

Students who face higher education-related expenses above the standard cost of attendance may request a budget increase by submitting the requisite Financial Aid Budget Adjustment Request and supporting documentation of expenses. Budget adjustments can only be made to cover costs incurred during the enrollment periods or 9 month academic year. If approved, the budget increase would allow students to borrow additional federal loan funds, which may be subject to credit approval. Incomplete budget appeals will not be processed until all supporting documentation is received. Once a determination has been made, all decisions are final.

Specific Expenses Allowed in a Budget Appeal

The following types of expenses can be included for consideration in a budget adjustment:

1. Rent (documentation required);
 - for costs higher than the standard budget figure
 - if housing is shared, the student share is considered to be proportional to the number of adults living in the household
2. One-time computer purchase;
 - Over the course of a student’s academic program, expenses related to the purchase or upgrade of a computer will be considered

3. Out-of-pocket medical, dental, or optical expenses not covered by insurance;
 - Procedures deemed medically necessary by a medical physician, dentist, or optician will be considered
 - Only out-of-pocket expenses not covered by insurance will be allowed and receipts and other supporting documentation is required
4. Transportation costs to and from school or school-related activity higher than the standard budget (documentation required);
 - In general it is assumed that students may rely on public transportation for attending school. If you drive and are requesting an adjustment due to automobile expenses, you must explain the necessity for using private rather than public transportation where private transportation costs are allowed for consideration in a budget appeal, gas usage related to school functions will be allowed and calculated at the current IRS mileage rate
5. Childcare expenses
 - Students with dependent children under the age of 12 may request consideration for childcare expenses related to school attendance. GTU uses the federal definition of a credit-hour to calculate childcare costs (*34 CFR 600.2 defines a credit-hour as one hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for a total of three hours.*)

Specific Expenses Not Allowed in a Budget Appeal

There are many types of expenses incurred by students that are not necessarily part of a student's allowable cost of attendance for financial aid purposes. The following expenses are not considered a necessary part of a student's educational cost related to the pursuit of their academic degree and are therefore not allowed for consideration as part of a budget appeal.

- Moving expenses and security deposits;
- Storage for personal belongings;
- Prior year expenses;
- Credit card or other consumer debts;
- Summer expenses;
- The purchase of an automobile, car payments, or insurance;
- Homeowners, rental, or life insurance;
- Discretionary medical, dental or optical procedures;
- Non-prescription medicines, including vitamins and supplements;
- Holistic health care;
- Job interview expenses or non-degree expenses related to ordination;
- Cost incurred outside of the current academic year, including costs incurred before matriculation or after the final day of the term;
- Costs incurred by a family member or other people, including a spouse or a roommate's portion of rent or mortgage;
- Child support or other childcare expenses (other than day care);
- Legal fees, bail, traffic or parking tickets, or fines.

- Pet care, unless for a service animal; and,
- Luxury items, such as premium cable channels and high speed internet.

Deadlines

We understand that students may not know their specific costs until after they begin attendance for the academic year. Therefore, 2016-2017 Budget Adjustment Requests will be accepted between the following time-periods:

<i>Fall 2016 semester:</i>	September 6 - November 4, 2016
<i>Spring 2017 semester:</i>	January 30 - April 14, 2017

Review Period

The review process for budget appeals typically begins two weeks after the end of the late registration period, each semester. Please allow ten to fifteen business days for the completion of the process upon receipt of all documentation requested.

Budget Adjustment Considerations

Budget adjustments arise when a student is requesting additional loans. Please keep in mind that student loans are limited to your educational expenses and it is best to borrow only what is needed to cover your educational costs in order to minimize your overall student loan debt obligation. Remember that loan increases lead to larger cumulative debt. Explore and maximize all resources that you have as well as those that you anticipate in the coming academic year. It is recommended that students review their budget to consider how they can reduce their reliance on loan funds through increased income, adjustment of priorities, or reduced expenses. It is in the student's best interest to borrow conservatively, budget wisely, and plan ahead not only for the current year but for future academic years.

When determining unmet need and the amount of additional loan aid desired, consider how much you can afford to borrow. Refer to a loan repayment chart to estimate future monthly payments or use the loan calculator at <http://www.finaid.org/calculators/loanpayments.phtml>.

Budget Adjustment Restrictions

The Financial Aid Office typically will not approve a Budget Adjustment Request for a student loan borrower who has an outstanding federal student loan balance that meets or exceeds the aggregate limit of \$138,500 and/or the student's recent Graduate PLUS loan application was denied by the Department of Education.

How to Submit a Budget Adjustment Request

To request a budget appeal, complete and submit the Financial Aid Budget Adjustment Request form along with supporting documentation of your expenses. Additional documentation that covers a time period of up to three months or ongoing documentation of expenses projected to take place over several months may be required.

Upon submission of supporting documentation, your request will be reviewed and the Financial Aid Administrator will determine the action to be taken. If your request results in an increase to your cost of attendance and additional federal student aid eligibility, a revised financial aid award notification will be sent to your school email address with further instructions. Please note: If you are determined to be eligible for additional federal student loans based on projected expenses, the Financial Aid Office will schedule aid disbursements to coincide with the timing of your expenses. Documentation confirming the payment of future expenses must be submitted.

FEDERAL GRADUATE PLUS LOAN BORROWING POLICY

The Graduate Theological Union and its member schools participate in the William D. Ford Direct Loan programs. The Graduate PLUS Loan is a non-need based, low interest loan made to graduate and professional students making Satisfactory Academic Progress (SAP) in a qualified degree program and must be enrolled at least-half time in order to maintain eligibility. Students may apply for the academic year; fall and spring, and must have borrowed the full annual maximum in unsubsidized loan eligibility. The maximum Grad PLUS loan limit that a student may borrow in an academic year is up to unmet cost of attendance, the difference between a student's standard cost of attendance and the sum of all financial aid assistance received. Understandably, Graduate PLUS loans increase overall loan indebtedness. Whenever possible, it is recommended that students review their budget to consider how they can reduce their reliance on loan funds through increased income, adjustment of priorities, or reduced expenses.

Interest rates on federal student loans are determined by federal law and set by Congress. The interest rate varies by the type of loan and the date of the first disbursement. While federal student loans have a fixed interest rate for the life of the loan, interest rates may change beginning on July 1 each year. Under section 455(b)(7) of the Higher Education Act (HEA), interest rates on Federal Direct Loans are set according to a formula that is based upon an auction of 10-year Treasury Notes. Separate interest rates are established each year for Direct Unsubsidized and PLUS Loans for which the first disbursement is made on or after July 1 through the following June 30. Interest begins accruing from the date the loan is first disbursed, and includes periods of deferment or forbearance until it is repaid in full. If you do not pay the interest as it is charged, the Direct Loan Servicing Center will capitalize the interest, by adding it to the unpaid principal amount of your loan when repayment begins. Capitalization increases the unpaid principal balance of your loan, and interest will then be charged on the new, increased principal amount. You may opt to pay down any accrued interest while you are in school.

Additionally, a loan origination fee is charged against the total amount borrowed and is deducted from loan proceeds by the federal processor before each disbursement, so the net loan amount received will be less than the gross amount you have to repay. For more

information with regard to the current interest rate and loan origination fee, please visit:
[https://studentaid.ed.gov/sa types/loans/plus](https://studentaid.ed.gov/sa/types/loans/plus).

Federal regulations require credit checks with the US Department of Education for all graduate students seeking a federal Graduate PLUS loan. If your credit has been approved it remains valid for up to 180 days. A financial aid applicant is considered to have adverse credit history if they have one or more debts with a total combined outstanding balance greater than \$2,085 that is 90 days or more delinquent, or that has been placed in collection or charged off during the two years preceding the credit report, or has been determined to be in default, debts that have been discharged in bankruptcy, or has been the subject of foreclosure, repossession, tax lien, wage garnishment, or write off of any federal student aid debt within the last five years. Students will be notified by Direct Loans if their application is denied and will include the reason for denial and the name of the credit bureau from which the denial was obtained.

If you do not meet the credit requirements, you can still obtain the loan by:

- Appealing the credit decision at www.studentloans.gov or by calling Direct Loans at (800) 557-7394;
- Providing documentation to the Direct Loan Servicer if you have extenuating circumstances by logging in to www.studentloans.gov and select, “Document Extenuating Circumstances on the left navigation bar. Follow the directions and a representative from the Department of Education’s Applicant Services will contact you with further instructions; or,
- Obtaining a credit worthy endorser to cosign on the Graduate PLUS loan application with you.
- Please Note: If you request a PLUS loan for more than one loan period your credit record may be accessed more than one time by Department of Education.

Students with adverse credit history that obtain the loan through one of the three methods listed above are required to complete online **PLUS counseling** at www.studentloans.gov as mandated by federal law.

To reapply with an endorser (co-signer):

- The endorser must login to www.studentloans.gov using their own information (SSN and Department of Education FSA ID);
- Select the, “Endorse PLUS Loan” link under the PLUS Process section on the left navigation bar;
- Follow the instructions provided to complete the endorser process. The Loan Award Identification Number was provided during your original credit check. If you do not have this information, you may contact the Federal Loan Origination Center at (800) 557-7394; and,

- The student borrower is required to complete a **new** PLUS Master Promissory Note (MPN) for Graduate/Professional Students at www.studentloans.gov.

Applicants are required to accept their maximum annual eligibility for federal unsubsidized loan BEFORE applying for a Graduate PLUS loan. If you have not applied for and accepted your unsubsidized loan for the current academic year, please review and follow the necessary steps online on the *How to Apply for Financial Aid* webpage at <http://gtu.edu/admissions/financial-aid/Fmancial-aid-how-to-apply>.

To apply for a federal Graduate PLUS Loan, complete the following steps:

- Log in to www.studentloans.gov and select the, “Apply for a PLUS Loan” link under the PLUS Loan Process section on the left navigation bar and complete the PLUS Loan Application. Typically, you should receive an email notification of your credit decision within 15 minutes of completion. You may view your credit decision by selecting the “PLUS Correspondence” link, under “My Loan Documents” on the left navigation bar. If you have adverse credit history, you may appealing the credit decision or obtaining an endorser.
- Complete the PLUS Master Promissory Note (MPN) for Graduate/Professional Students at www.studentloans.gov. Select the, “Complete MPN” link under the Master Promissory Note section on the left navigation bar. Please Note: If you have an active Direct PLUS MPN you may not be required to complete a new MPN. It is your responsibility to check with Direct Loans.
- At www.studentloans.gov select the, “Repayment Estimator” link under the Tools and Calculators section on the left navigation bar and email a copy of the *summary of your repayment information* to finaid@gtu.edu.
- Complete requisite Entrance Counseling at www.studentloans.gov. Select the, “Complete Counseling” link under the Counseling section on the left navigation bar and complete Entrance Counseling as a graduate professional student. You are only required to complete Entrance Counseling as a new student borrowing for the first time at your institution. If you have already completed this step, you may proceed to the next step.
- Complete and submit the **Graduate PLUS Loan Request** form to the GTU Consortial Financial Aid Office. PLUS loan request forms that are incomplete will not be processed. The PLUS request may be submitted electronically to finaid@gtu.edu with the subject line, “Grad PLUS Request.” Keep in mind that student loans are limited to your educational expenses and it is best to borrow only what is needed to cover your educational costs in order to minimize your overall student loan debt obligation.
- When your Graduate PLUS loan eligibility has been determined by the Financial Aid Office, a revised award notification will be sent to your school email address. Once notified, you may review and accept or reject your PLUS loan by logging into your WebAdvisor account.

You have the right to decline or reduce the amount of your loan by notifying the Financial Aid Office in writing up to 120 days of the date of the disbursement, listing the exact amount you wish to return. Your loan will be adjusted to eliminate any interest and loan fee amount that applies to the amount of the loan you cancel or return during this timeframe. Please note that if you have already received a loan credit refund, you must return all or a portion of the refund to your Business Office.

By federal law, student loans are to be used exclusively for educational purposes for the student only. Allowable costs include tuition, room and board, books, health insurance, and transportation costs. Like the unsubsidized loan, PLUS loans typically disburse in two, equal installments; one at the beginning of the fall and spring semesters and will be applied toward payment of tuition, room and board (if applicable), and all education-related school charges, first. If you have a remaining credit balance after tuition and fees are assessed, a loan credit refund is issued to the student borrower by the Business Office via paper check or direct deposit, if you have opted in via your WebAdvisor account.

You will receive a Federal Direct Loan Disclosure Statement from the DL Servicing Center, up to thirty calendar days before the first anticipated disbursement. It identifies the loan type, anticipated disbursement amounts and dates, anticipated net disbursement amounts, loan fee and other important information regarding your loan.

The federal government requires all federal student aid borrowers to participate in loan exit counseling prior to taking a leave of absence, withdrawing, graduating or enrolling less than half-time so that you will know your rights and responsibilities. During exit counseling, you will be given information with regard to deferment and forbearance options and will inform you of your repayment options. Failure to complete this requirement will result in a hold being placed on further registration, or release of transcripts and/or diploma.

Repayment of the Federal Direct Loan begins six months after a student graduates or ceases to be enrolled at least half-time. Borrowers typically have between 10 and 25 years to repay federal loans, dependent upon which repayment plan you choose. The Direct Loan Servicing Center will notify you when your first payment is due. If you do not choose a payment plan, the US Department of Education will automatically place you in the Standard Repayment Plan, with fixed monthly payments for up to ten years. For additional information about the various repayment plans available, as well as, a repayment plan calculator, visit www.studentloans.gov or www.studentaid.ed.gov.

A deferment is a postponement of payment on a loan. If you are unable to make your scheduled loan payments but do not qualify for a deferment, you may be able to receive a forbearance. A forbearance allows you to make smaller payments, extend the time for making payments, or stop making payments your loan temporarily.

To access your complete federal student loan history and loan servicer information, log onto the National Student Loan Data System at www.nslds.ed.gov. You will need your US Department of Education Federal Student Aid (FSA) ID, this is the same ID used to electronically sign FAFSA.

Students should notify the GTU Consortial Financial Aid Office if you:

- Take a leave of absence;
- Drop below half-time enrollment;
- Graduate;
- Withdraw;
- Transfer to another school; or,
- Have any other change in status that may affect your loan eligibility.

Student loan recipients must notify the Direct Loan Servicing Center if you:

- Change your address or telephone number;
- Change your name (for example, maiden to married name); and,
- Change employers, or if your employer's address or phone number changes.

RETURN OF TITLE IV FUNDS POLICY

The Higher Education Act of 1998, as well as integrity regulations in 2010, set forth regulations governing the treatment of Title IV funds when a student cancels enrollment, takes a leave of absence, withdraws, or is dismissed. Federal student aid funds, formally referred to as Title IV funds, are awarded to a student under the assumption that they will be in attendance for the entire period for which the assistance is awarded. The term "Title IV" refers to the federal financial aid programs authorized under the Higher Education Act of 1965 as amended (HEA) and includes the following programs: Unsubsidized, Graduate PLUS and Perkins Loans. The Title IV funds outlined in this policy are the William D. Ford Direct and Federal Perkins Loan programs.

The Code of Federal Regulations, CFR 668.22, mandates that a Return of Title IV funds calculation be performed when any student who received, or was eligible to receive, Title IV aid ceases attendance in all classes prior to completing the payment period or semester. A return calculation is not required if a student never began attendance; continues to attend at least one Title IV eligible class; is on an approved leave of absence; or did not receive and is not eligible to receive any Title IV aid.

A student who never began attendance in any classes is not eligible for Title IV funds. If a disbursement was made prior to determining that the student never began attendance, all funds must be returned to the Department of Education and a Return to Title IV funds calculation is unnecessary.

This policy provides information regarding the GTU and member schools Return to Title IV funds calculation for students who cease enrollment before completing the semester. When a student withdraws, a refund of tuition and fees must be calculated by the Business Office and the Financial Aid Office must calculate the Return of Title IV funds.

You may receive a full or partial refund of your tuition and fees based on the date you cease to be enrolled. This refund calculation will not impact the Return of Title IV funds calculation, but does affect the amount of money you may owe back to the school for terminating enrollment. Students should review their school's Tuition Refund Policy and may contact their school with questions.

The Return to Title IV (R2T4) calculation is completed in accordance with federal regulations set forth in the HEA and the Return to Title IV Worksheet provided by the Department of Education. Within thirty (30) calendar days of a student's withdrawal, leave of absence or termination the Financial Aid Office must perform an R2T4 calculation to determine how much aid, if any, must be returned to the Title IV loan programs. R2T4 is a prorated calculation based on the portion of the term during which the student earned Title IV funds. A student is only eligible for the percentage of Title IV aid disbursed that is equal to the percentage of the semester that was completed by the student. If more than sixty (60%) percent of the semester has been completed, no Title IV aid needs to be returned.

The R2T4 calculation identifies two types of federal aid, earned and unearned. Earned aid is based on a percentage calculated by dividing the number of days the student completed by the number of days in the payment period. The number of days counted includes all calendar days in the semester including weekends and holidays, but excludes college breaks of five or more days. A student who remains enrolled beyond the sixty (60%) percent point of the payment period or semester is considered to have earned all received and disbursable aid. Disbursable aid includes aid received and the aid that could have been but was not disbursed as of the withdrawal date. If earned aid exceeds disbursed aid, a post-withdrawal disbursement may be made.

If the student receives less federal student aid than the amount earned, the school must offer a disbursement of the earned aid that was not received. This is called a post-withdrawal disbursement. The school must offer any postwithdrawal disbursement of loan funds within thirty (30) calendar days of the date it determined that the student withdrew. No post-withdrawal disbursement will be made if the student does not respond affirmatively within

fourteen (14) calendar days of the notification date. In the event that there are outstanding charges on the student's account, the school will credit the student's account for all or part of the amount of the post-withdrawal disbursement up to the amount of the allowable charges.

Unearned aid is any disbursed aid that exceeds the amount of Title IV aid the student earned. The unearned aid amount is to be returned to the loan servicer, a responsibility shared by the school and the student. The school is responsible for returning the lesser of the total amount of unearned aid or the school's institutional charges multiplied by the percentage of unearned aid. The school's charges used in the R2T4 calculation include the amount that had been applied to the student's account before the student's withdrawal.

If any amount of aid is determined unearned, institutional charges are then used to determine the portion of the unearned Title IV aid that the school is responsible for returning. Schools must ensure the inclusion of all appropriate tuition and educational fees in the R2T4 calculation. The institutional charges used in the calculation are those that were initially assessed for the entire semester or payment period.

The school must return its share of unearned funds no later than forty-five (45) calendar days after it determines that the student has ceased enrollment in all classes. If the student receives more Title IV aid than the amount earned, the school, the student, or both must return the unearned funds in a specified order as follows:

1. Federal Unsubsidized
2. Federal Perkins
3. Federal Graduate PLUS

Students must provide official notification of their intent to either take a leave of absence (leaving with a firm and stated intention of returning) or by withdrawing (leaving without intent to return). Students choosing to take a leave of absence or withdraw should follow the official leave or withdrawal processes as defined by their school. Official notification from the student is any notification that is provided orally or in writing to a designated campus official acting in their official capacity in the leave or withdrawal process.

If a student begins to attend class, receives federal Title IV aid, but then ceases to attend class without providing official notification to the school, the school and the Federal Government considers this to be an unofficial leave or withdrawal.

Federal regulations consider students that receive all non-passing grades or a combination of non-passing and withdrawal (W) grades, as an unofficial withdrawal. When the student has failed to earn a passing grade in at least one class for the term, federal regulations require the school to determine whether the student established eligibility for funds disbursed by attending at least one class or participating in an academically-related activity. If the school cannot verify that the student attended, all financial aid must be repaid to the federal and institutional programs and the student will be responsible for any balance due. Students who are able to verify attendance may submit supporting documentation to their school within thirty (30) days from the last day of the semester. Recalculations for aid eligibility will not be performed for

documentation received after that date. Once grades are posted for a student who receives all non-passing grades, the school will return all unearned aid back to the federal and institutional programs and the student will be charged.

The GTU and the member schools are not required to take attendance, therefore the date of determination varies depending on the type of leave or withdrawal: official or unofficial. When a student provides official notification through the formal processes, the withdrawal date is the student's last day of attendance in an academically-related activity or the date of notification, whichever is later. Schools that are not required to take attendance must select a method to determine the student's last day of attendance when the leave or withdrawal are considered unofficial. For Title IV aid purposes, the withdrawal date is the midpoint of the semester, the date the school becomes aware that the student ceased attendance in an academically-related activity, or the date an event occurred which prevented the student from officially withdrawing from the institution. Such events include illness, grievous personal loss, or other circumstances beyond the student's control.

Please note that a key component of Satisfactory Academic Progress (SAP) is course completion. A total withdrawal contributes no completed units toward the completion of a student's program. Absence of course completion during a semester could be viewed as negative progress towards degree completion. Students should review their school's SAP policy and contact their school with questions.

Academically-related activities include but are not limited to:

- Physically attending a class where there is an opportunity for direct interaction between the instructor and students;
- Submitting an academic assignment;
- Taking an exam, completing an interactive tutorial, or participating in computer-assisted instruction;
- Attending a study group that is assigned by the school;
- Participating in an online discussion about academic matters; and,
- Initiating contact with a faculty member to ask a question about the academic subject studied in the course.

Academically-related activities do not include activities where a student may be present but not academically engaged, such as:

- Living in institutional housing;
- Participating in the school's meal plan;
- Logging into an online class without active participation;
- Participating in academic advising or counseling.

The school's responsibility as it pertains to R2T4 include:

- Making this policy available to all federal aid recipients;
- Identifying students who are affected by this policy and completing the Return to Title IV Federal Funds calculation for those students; and,
- Making the required returns of Title IV funds.

The school will return all excess funds, including funds the R2T4 calculation identifies as the student's responsibility to return.

The student's responsibility with regard to the return of Title IV include:

- Notifying the school of intent to withdraw or take a leave of absence;
- Following the procedures for officially withdrawing or taking a leave of absence; and,
- Returning to the Title IV federal programs any funds that were disbursed directly to the student by which the student was determined to be ineligible;
- Paying any outstanding balance owed to the school resulting from an R2T4 calculation.

Return to Title IV Funds Calculation Example

A full-time student was registered for the fall 2016 term. There are 103 days in the semester. The student withdrew or took a leave of absence on 09/28/16. Including 09/28/16, the student attended 21 days of the semester.

Step 1: Types and amounts of Title IV aid received (Net disbursement amounts)

\$10,141
Unsubsidized
Stafford Loan
\$10,141 Total aid
received

Step 2: Percentage of Title IV earned/unearned

21 days attended divided by 103 days in semester = 20.6%. The percentage of aid the student earned for the semester is 20.6%. The percentage of unearned aid is 79.4% (100% - 20.6%).

Step 3: Net amount of Title IV aid earned by the student

20.6% of the \$10,141 aid received = \$2,089

Step 4: Total aid to be returned (unearned) by school and student

\$10,141 (aid received) minus \$2,089 (earned aid) = \$8,052 Total aid to be returned to Title IV = \$8,052

Step 5: Net amount to be returned by the school

Multiply institutional charges of \$15,204 by 79.4% = \$12,072. The school is responsible for returning the lesser of this amount or the amount from Step 4 (\$8,052). In this case, the school must return \$8,052 to the loan servicer.

Step 6: Allocation of funds

\$8,052 in unsubsidized loans will be returned to the student's loan servicer.

Step 7: Unearned net amount due from student

Subtract the school portion to be returned (Step 5) from the total amount to be returned (Step 4).

$\$8,052 - \$8,052 = \$0$. In this example, the student is not required to return funds to the loan servicer.

Once we determine the amount of unearned aid that the school is responsible for returning, the student and the Business Office will be notified. An email to the student will specify the amount of aid that must be returned by the school and will identify the Title IV loan program(s) to which the funds will be credited. The email will also specify the amount of aid that must be repaid by the student in accordance with the terms and conditions outlined on the federal Master Promissory Note the student signed. That is, the student must make scheduled payments to the holder of the loan over a period of time. If the school's portion of the funds to be returned creates a balance due on the student's account, the student will be billed. Students must pay the outstanding balance in full before registering for additional classes and requesting official transcripts.

Withdrawing may affect your eligibility to receive federal aid in subsequent terms. Notify your school if you are planning to return. Anytime a student ceases to be enrolled at least half-time, the grace period begins. The grace period for loan repayment for Federal Direct Unsubsidized and Graduate PLUS loans will begin as of the day of the withdrawal from school. If the student is not enrolled at least half-time for more than six (6) months, the loans will enter repayment. It is important to make on-time payments to prevent default. If you default on a federal loan, your credit will be adversely affected and you will lose your eligibility for future financial aid. A high percentage of federal loan default may impact the school by preventing its ability to continue to participate in the Title IV federal student aid programs.

Students should refer to their Student Handbook to review the requirements and procedures for officially taking a leave of absence or withdrawing. Before considering a leave of absence or withdrawal, we highly recommend that federal student aid borrowers consult with the Financial Aid Office to discuss possible implications.

The policies and procedures listed are subject to change without advance notice based on changes to federal laws, federal regulations, or school policies. If changes are made, students must abide by the most current policy. The Return to Title IV calculation is very encompassing and this is intended to be an overview of the policies and procedures that govern regulations pertaining to R2T4.

THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)

For purposes of this statement, “students” will include only those individuals who are or have been enrolled in the Master of Divinity, Master of Arts in Community Leadership, or ABSW/GWU Master of Arts degree programs. MA students affiliated with ABSW are governed by ABSW policies.

The term “student” includes an individual who has been admitted to and has enrolled in or registered with, an academic program at ABSW, as defined above. The term “student” does not include an individual who has not been in attendance at ABSW. An individual who is or has been enrolled in one program of an institution, who applies for admission to a second program, has no right to inspect the records accumulated for the second program until enrolled therein.

The Family Educational Rights and Privacy Act of 1974, as amended, is a Federal law which states (a) that a written institutional policy must be established and (b) that a statement of adopted procedures covering the privacy rights of students be made available. The law provides that the institution will maintain the confidentiality of student education records.

ABSW accords all the rights under the law to students who are declared independent. No one outside the institution shall have access to nor will the institution disclose any information from students’ education records without the written consent of students except to personnel within the institution, to officials of other institutions in which students seek to enroll, to persons or organizations providing students financial aid, to accrediting agencies carrying out their accreditation function, to persons in compliance with a judicial order, and to persons in an emergency in order to protect the health or safety of students or other persons. All these exceptions are permitted under the Act.

Within the ABSW community, only those members, individually or collectively, acting in the students’ educational interest are allowed access to student education records. These members include personnel in the Dean’s office (including the Registrar/Admissions/Financial Aid Offices) and the Business Office, and academic personnel within the limitations of their need to know. Educational records are available in the Registrar’s office.

At its discretion the institution may provide public information in accordance with the provisions of the Act to include: student name, address, telephone number, date of birth and place of birth, year in school, dates of attendance, degree program(s), religious affiliation, scholarships and honors, most recent previous degree and school, country of citizenship, school/schools of affiliations. **Students may withhold public information by indicating it on the Student Information Form completed upon matriculation.**

Request for non-disclosure will be honored by the institution for **only one academic year**; therefore, authorization to withhold public information must be filed annually in the Registrar’s office. **Exception:** If during the senior or last year of attendance, the student requests on the

Non-disclosure Form that certain information not be given out, **that information cannot be disclosed thereafter to anyone**, including prospective employers, other schools, persons wishing to award scholarships, etc. The school's alumni office would also not be allowed to give any information. ABSW response to all inquiries would be that we have no information. **Non-disclosure is in effect until the student rescinds the request.**

The law provides students with the right to inspect and review information contained in their education records, to challenge the contents of their education records, to have a hearing if they are dissatisfied with the outcome of the challenge, and to submit explanatory statements for inclusion in their files if they are dissatisfied with decisions of the hearing panels. The ABSW Registrar has been designated by the institution to coordinate the inspection and review procedures for student education records, which include admissions, personal, academic, and financial and placement records. Students wishing to review their education records must make written requests to the head of the appropriate office as listed in the Directory of Student Educational Records, listing the item or items of interest. Only records covered by the Act will be made available within forty-five days of the request. Students may have copies made of their records with certain exceptions (e.g., a copy of the academic record for which a financial "hold" exists, or a transcript of an original or source document which exists elsewhere). Student education records **do not include** records of instructional, administrative, and educational personnel which are the sole possession of the maker and are not accessible or revealed to any individual except a temporary substitute for the person who made the record; do not include employment records; and do not include alumni/ae records.

Students **may not** inspect and review the following as outlined by the Act: confidential letters and recommendations associated with admissions, employment or job placement, or honors to which they have waived their rights of inspection and review; or education records containing information about more than one student, in which case the institution will permit access **only** to that part of the record which pertains to the inquiring student. The institution is **not required** to permit students to inspect and review confidential letters and recommendations placed in their files prior to January 1, 1975, provided those letters were collected under established policies of confidentiality and were used only for the purposes for which they were collected.

Students who believe that their education records contain information that is inaccurate or misleading, or is otherwise in violation of their privacy or other rights may discuss their problems informally with the Dean. If the staff decisions are in agreement with the students' requests, the appropriate records will be amended. If not, the students will be notified within a reasonable period of time that the records will not be amended; and they will be informed by the Dean of their right to a formal hearing. Student requests for a formal hearing must be made in writing to the Dean, who, within a reasonable period of time after receiving such requests, will inform students of the date, place, and the time of the hearings. Students may present evidence relevant to the issues raised and may be assisted or represented at the hearings by one or more persons of their choice, including attorneys, at the students' expense.

The hearing panels which will adjudicate such challenges will be appointed by and chaired by the Dean. The hearing panel will consult with legal counsel as appropriate.

Decisions of the hearing panels will be final, will be based solely on the evidence presented at the hearing, and will consist of written statements summarizing the evidence and stating the reasons for the decisions, and will be delivered to all parties concerned. The education records will be corrected or amended in accordance with the decision of the hearing panels, if the decisions are in favor of the students. If the decisions are unsatisfactory to the students, the students may place with the education records statements commenting on the information in the records, or statements setting forth any reasons for disagreeing with the decisions of the hearing panels. The statements will be placed in the education records, maintained as part of the students' records, and released whenever the records in questions are disclosed.

Students who believe that the adjudications of their challenges were unfair or not in keeping with the provisions of the Act may request, in writing, assistance from the President of the institution to aid them in filing complaints with the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202-5920. For more information see: <http://www2.ed.gov/policy/gen/reg/ferpa/index.html>

VOTER REGISTRATION

Schools in most states and the District of Columbia must make a good faith effort to distribute voter registration form to their students. This voter registration requirement was included in the National Voter Registration Act of 1993. In essence, if a Title IV (Federal Student Act) participating school is located in a state that requires voter registration prior to Election Day and/or does not allow the ability to register at the time of voting, then the school must make a good faith effort to distribute voter registration forms to its federal student aid eligible students. At the American Baptist Seminary of the West, voter registration forms are distributed through the Office of Registrar.

To meet this requirement, federal student aid recipients attending American Baptist Seminary of the West will receive an annual reminder via email of the following ways to complete voter registration:

- To register to vote in the State of California using the online application, visit: http://www.sos.ca.gov/elections/elections_vr.htm.
- Voter registration forms are available at the Registrar of Voters Office located in the Alameda County Courthouse at 1225 Fallon Street, Room G-1, Oakland, California 94612
- Forms are also available at all offices of the Department of Motor Vehicles, all city clerks offices, public libraries and post offices.
- Individuals may also call the Registrar of Voters at 510-267-8683 or the Secretary of State at 1-800-345-VOTE in order for a registration form to be provided by mail.

To successfully register to vote, it is important that the voter registration application be filled out completely and be postmarked or hand-delivered to the county elections office at least 15 days before the election.

FORMS

The Following forms are available at: <http://www.gtu.edu/admissions/financial-aid/applying-for-financial-aid/application-process> or <http://www.absw.edu/prospective-students/financing-a-seminary-education/>

- Financial Aid Application for Domestic Students
- Financial Aid Application for International Students
- Verification Worksheet
- Selective Service Verification
- Financial Circumstances Appeal Form
- Budget Calculator
- Loan Repayment Estimator
- Graduate PLUS Loan Request Form
- Outside Resources Form

APPENDIX

STUDENT RIGHTS AND RESPONSIBILITIES

YOU HAVE THE RIGHT:

1. To know what financial aid programs are available at your school.
2. To know the deadline for submitting applications for each of the programs available.
3. To know how financial aid will be distributed, how decisions are made, and the basis for these decisions.
4. To know how your financial need was determined. This includes costs for tuition, fees, books and supplies, room, food, personal, medical, miscellaneous expenses, and travel expenses.
5. To know how much of your financial need has been met, as determined by the FA officer.
6. To know what portion of the financial aid you receive must be repaid, and what portion is grant aid. If the aid is a loan, you have the right to know what the interest rate is, the total amount that must be repaid, the payback procedures, the length of time you have to repay the loan, and when repayment is to begin. This information is normally available through your lender.
7. To know how the school determines whether you are making satisfactory progress, and what happens if you are not.
8. To request an explanation of the various programs in your student aid package.
9. Under the GSL (Government Guaranteed Student Loan) program, if you cannot meet the repayment schedule you may request that the loan payments be reduced for a specific period of time if it will assist you in avoiding default.
10. Under the GSL program, you must receive pre-acceptance counseling and exit counseling interviews before your loan check can be disbursed.

YOU HAVE THE RESPONSIBILITY TO:

1. Complete all application forms accurately and submit them on time to the right place.
2. Provide correct information. In most instances, misreporting information on financial aid applications is a violation of law and may be considered a criminal offense.
3. Promptly return all additional documentation, verification, corrections, and/or new information requested by either the GTU Financial Aid Office or the agency to which you submitted your application.
4. Read and understand all forms that you are asked to sign and keep copies of them.
5. Accept responsibility for all arrangements that you sign.
6. Perform the work that is agreed upon in accepting a work/study assignment.
7. Be aware of and comply with the deadlines for application or reapplication for aid.
8. Be aware of your school's refund procedures.
9. All schools must provide information to prospective students about the school's programs and performance. You should consider this information carefully before deciding to attend a school.
10. If you wish to take a Government Guaranteed Student Loan while you are a student at ABSW, you must apply for this loan at the GTU Financial Aid Office . Special rules apply.
11. Notify the school (if you have a loan) and lender of changes in your name, permanent mailing address, marital or enrollment status.
12. Repay your student loans. Some lenders now offer incentives for borrowers who repay their loans on time.
13. File for a deferment or forbearance if you need to, to avoid default.
14. If you have a previous GSL loan for your undergraduate degree, and you are still paying on this loan, you may apply for a deferment while you are attending ABSW. Please contact the GTU Financial Aid office for details.

FINANCIAL AID AWARD CHECKLIST

To accept a financial aid award, the following steps must be completed:

1. Carefully review the Financial Aid Terms and Responsibilities. By accepting institutional and/or federal financial aid, a financial aid applicant is agreeing to the **Financial Aid Terms and Responsibilities**.
2. Log in to **WebAdvisor** and select “Prospective Student” or “Student” based on your current status. Use the “Accept or Reject My Financial Aid Awards” menu item to accept or decline the financial aid awards you have been offered. Federal Student loan borrowers may select “Change My Requested Loan Amount” to enter an alternative loan request for the academic year.
3. If you anticipate receiving an outside award or other financial support that is currently not included in your financial aid package, complete the **Outside Resources Form** to report this information to the Consortial Financial Aid Office.
4. Complete a **Master Promissory Note (MPN)** at <https://studentloans.gov> if you wish to borrow federal loans and you have not previously borrowed with the William D. Ford Federal Direct Loan program. **Sign in to “Manage My Loans” to complete the MPN.** To request a paper copy or PDF version of the MPN, contact the Consortial Financial Aid Office. The Direct Loan MPN is a multi-year promissory note good for a period of ten years.
5. Complete the online **Entrance Counseling** session at <http://studentloans.gov> if you wish to borrow federal loans and you have not previously completed entrance counseling for the school with which your latest financial aid award is associated. Sign in to “Manage My Loans” to complete the Entrance Counseling.
6. Complete and submit the **Budget and Loan Planning Worksheets**. You may return the forms electronically or by hardcopy. Loan funds may not be certified prior to the receipt of your worksheets, if required. Read the **Student Loan Borrowing Policy** for a description of the Consortial Financial Aid Office’s efforts to assist students in managing student loan debt.

ABSW GRANT IN AID SCHOLARSHIPS:

ABSW Grant in Aid Scholarships do not have to be repaid. Scholarships are awarded according to financial need, merit, and funds available. ABSW GIA Scholarships are available to both domestic and international students who are enrolled at least half-time and maintain Satisfactory Academic Progress. Students must apply annually by submitting a FAFSA and Domestic or International Student Financial Aid Application (see above)

CAMPUS WORK STUDY JOBS

Work-study jobs are another source of financial aid, and a limited number of positions are available on campus. For information regarding work-study positions, please contact the ABSW Business Office.

FEDERAL STUDENT AID (Loans)

Eligibility Requirements:

1. Applicant must be a U.S. citizen or an eligible non-citizen;
2. Be enrolled as a regular student and working toward an eligible degree;
3. Be enrolled at least half-time;
4. Must have a valid Social Security Number;
5. Be registered with Selective Service (if required);
6. Maintain satisfactory academic progress (Please note: A student who completes the academic requirements for a program, but does not yet have the degree or certification is not eligible for further additional aid for that program);
7. Certify that no federal student loan is in a default status and no money is owed on a federal student grant.

Federal Direct Loans

The American Baptist Seminary of the West participates in the William D. Ford Federal Direct Loan program. Through the Direct Loan Program, an eligible graduate student may borrow an Unsubsidized Direct Loan and/or a Direct Graduate PLUS loan to help finance the cost of education including the costs for books and supplies, room and board, transportation, and other expenses related to a student's education that are part of the official cost of attendance. These are loans that must be repaid. The lender is the US Department of Education. Students may borrow directly from the federal government through the Direct Loan servicer assigned to the student by the Department of Education.

The Direct Loan Program offers several repayment plans that are designed to meet the different needs of individual borrowers. Generally, borrowers have 10 to 25 years to repay a loan, depending on the repayment plan chosen. The standard payment begins six months

after the student graduates or is no longer enrolled at least half-time in a qualified degree program, and up to 10 years may be allowed to repay the loan(s). Students who meet eligibility requirements may request a deferment or forbearance of their loan payment. A borrower will receive more detailed information about repayment options during the required student loan entrance and exit counseling sessions, by contacting the Financial Aid Office, or by visiting the US Department of Education's Federal Student Aid website at: www.studentaid.ed.gov or www.studentloans.gov.

The Budget and Control Act of 2011 eliminated subsidized loan eligibility for graduate and professional students for loan periods of enrollment beginning on or after July 1, 2012.

Unsubsidized Federal Direct Loan

A student is not required to demonstrate financial need to borrow a Direct Stafford Unsubsidized Loan. The annual loan limit, the maximum amount a graduate or professional student may borrow, is \$20,500 in direct Unsubsidized Loans in a single academic year. The maximum outstanding total borrowing limit for a graduate or professional student (inclusive of subsidized and unsubsidized loans borrowed at the undergraduate level, excluding capitalized interest) is \$138,500. No more than \$65,500 of this aggregate amount may be in the form of subsidized loans. A borrower who has reached his or her aggregate borrowing limit may not receive additional loans. Once loans are repaid, in full or in part, the borrower may apply for additional loans.

The interest rate for a Direct Stafford Unsubsidized Loan disbursed on or after July 1, 2015 is fixed at 5.84%. Interest accrues (accumulates) on an unsubsidized loan from the time it is first paid out. The interest may be paid while the borrower is in school and during the grace periods and deferment or forbearance periods, or the interest may accrue and be capitalized (that is, added to the principal amount of the loan). Choosing not to pay the interest as it accrues will increase the total amount a borrower will have to repay. Accrued interest is capitalized once the loan enters repayment. Repayment begins 6-months after a borrower graduates or otherwise drops below half-time enrollment.

An obligation loan fee of at least 1.073% is deducted from the total amount of each Direct Stafford Unsubsidized Loan Disbursement.

Federal Direct Graduate PLUS Loan

An additional loan provided under the Direct Loan Program is the Direct PLUS Loan for graduate and professional students. The terms and conditions include: a determination that the applicant does not have an adverse credit history and a fixed interest rate of 6.84% for loans disbursed on or after July 1, 2015. An origination loan fee of at least 4.288% is deducted from the total amount of each loan disbursement. Before a student will be considered for a PLUS Loan, the Financial Aid Office must determine the student's

maximum eligibility for Direct Unsubsidized Stafford Loans. The maximum PLUS Loan amount an eligible student can borrow is the cost of attendance minus any other financial assistance received.

The repayment period for a Direct PLUS Loan begins at the time the PLUS loan is fully disbursed, and the first payment is due within 60 days after the final disbursement. However, a borrower may defer repayment while enrolled at least half-time. For Direct PLUS Loans first disbursed on or after July 1, 2008, a borrower may also defer repayment for an additional six months after ceasing to be enrolled at least half-time

SEMINARIAN SUPPORT PROGRAM

In addition to tuition aid grants, the American Baptist Home Missions Societies in Valley Forge, PA administers the Seminarian Support Program for American Baptist students who have been members of an American Baptist church for a minimum of one year. Information for this denominational grant can be found at www.abhms.org/education/financial_aid/

VA YELLOW RIBBON PROGRAM

The American Baptist Seminary of the West participates in the VA Yellow Ribbon Program. The seminary has agreed to provide a tuition scholarship of 50% to a maximum of 3 qualifying veterans during the Academic Year.

Students will be considered to receive the Yellow Ribbon Award on a first come first serve basis. Students who are eligible for the Yellow Ribbon program must submit a copy of their Certificate of Eligibility (COE) to the Office of Vice President. The priority deadline is August 1. Students will receive notification from the American Baptist Seminary of the West if they are selected to receive the Yellow Ribbon Award.

OTHER SCHOLARSHIPS

Additional information on available scholarships is available through the ABSW Business Office; weekly student ABSW e-newsletter and the Graduate Theological Union Scholarships Newsletter

STUDENT SEXUAL MISCONDUCT POLICY

I. INTRODUCTION

American Baptist Seminary of the West (also referred to as “ABSW”) is committed to maintaining its campus and programs free from all forms of sexual misconduct.

This Policy prohibits all forms of sexual misconduct, including sexual and gender-related: violence, assault, harassment, domestic violence, dating violence, and stalking.

This Policy applies to misconduct directed against ABSW students whether it occurs on ABSW property or in relation to ABSW-sponsored events or programs. Off-campus conduct that is likely to have a substantial effect on on-campus activity or that poses a threat or danger to the ABSW community also may be addressed under this Policy.

Getting Help: ABSW encourages all members of the ABSW community who believe they have been victims of sexual misconduct to report these incidents to local law enforcement authorities and to seek medical attention as needed.

- For Emergencies call: 9-1-1
- City of Berkeley Police Department: Emergency (510) 981-5911
- Rape Crisis Center 24-hour helpline: 1-800-670-7273
- Bay Area Women Against Rape 24-hour hotline: (510) 845-7273
- National Domestic Violence hotline: 1-800-799-SAFE (7233)
- Alameda County Medical Center, Highland Hospital Sexual Assault Center: (510) 437-4688
- For additional resources, please see section XIV below.
- For additional reporting options, please see section VI below.

II. NOTICE OF NON-DISCRIMINATION

ABSW does not permit discrimination or harassment in its programs and activities on the basis of race, color, national origin, ancestry, sex, gender, gender identification or expression, sexual orientation, disability, age, religion, medical condition, veteran status, marital status or any other characteristic protected under law.

III. SCOPE OF THE POLICY

This Policy sets forth the policies and procedures for reporting incident(s) of possible *sexual misconduct that occurs toward any ABSW student*.

Persons who believe that an incident of possible sexual misconduct has occurred against a student of ABSW, by another student, faculty member, administrator, or any other individual

that a student comes into contact with by way of any ABSW administered program, job or activity, including but not limited to, a student, faculty member or administrator of a member school or affiliated school, center or institute, should follow this Policy. Please see pages 7-12 for information on how to report incident(s) of possible sexual misconduct, against a student.

For information related to academic misconduct, or other misconduct that is not sexual misconduct, please refer to the applicable sections of the student handbook for your program.

As to faculty and employees of ABSW who may have experienced sexual misconduct, please consult your faculty or employee handbooks for the relevant reporting policies and procedures that apply; and persons may also contact the Title IX Coordinator for assistance. See below.

IV. TITLE IX COORDINATOR AND INTAKE OFFICERS

Title IX of the Education Amendments of 1972 (“Title IX”) is a federal law that prohibits discrimination on the basis of sex (or gender) of students and employees of educational institutions that receive federal financial assistance.

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance...” 20 U.S.C. §1681.

The Title IX Coordinator is the person designated by ABSW to oversee ABSW’s Student Sexual Misconduct Policy and to whom anyone with questions about this Policy may be referred.

The Title IX Coordinator at ABSW is Michelle M. Holmes, Vice President and Chief Financial Officer. Rev. Holmes can be reached at (510) 841-1905, mmholmes@ABSW.edu and Business Office, 2606 Dwight Way, Berkeley.

V. PROHIBITED CONDUCT AND DEFINITIONS

Sexual Misconduct: ABSW prohibits all forms of sexual misconduct, which includes sexual and gender-related violence of any form: assault, harassment, domestic violence, dating violence, and stalking. Each of these terms encompasses a broad range of behavior.

The following are among the forms of sexual misconduct that violate ABSW policy and the associated definitions:

1. Sexual Assault: Having or attempting to have sexual contact with another individual:
 - By force or threat of force;
 - Without effective consent; or
 - Where the individual is incapacitated.

2. **Non-Consensual Sexual Contact** (or attempts to commit the same): Any intentional sexual touching, however slight, with any object, by any person upon any other person, that is without consent and/or is by force. "Person" is regardless of gender status.
3. **Non-Consensual Sexual Intercourse** (or attempts to commit the same): Any sexual intercourse, with any object or body part, by any person upon any other person, that is without consent and/or is by force. "Person" is regardless of gender status.
4. **Sexual Exploitation**: Taking non-consensual or abusive sexual advantage of another person for one's own advantage or benefit, or to the benefit or advantage of another person. Examples of sexual exploitation include:
 - Causing or attempting to cause another person to become drunk, drugged or otherwise incapacitated with the intent of engaging in a sexual behavior;
 - Recording, photographing or transmitting images of sexual activity and/or the intimate body parts (groin, genitalia, breasts or buttocks) of another person without their consent;
 - Allowing third parties to observe sexual acts and voyeurism (spying on people who are engaging in sexual acts or who are doing other intimate activities such as undressing, showering, etc.);
 - Exposing one's genitals in non-consensual circumstances or inducing someone to expose their genitals;
 - Knowingly transmitting a sexually transmitted disease or virus to another person without his or her knowledge; or
 - Sexually-based stalking and/or bullying.
5. **Domestic Violence**: Violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
6. **Dating Violence**: Violence committed by a person –
 - (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - (B) where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship.
 - (ii) The type of relationship.
 - (iii) The frequency of interaction between the persons involved in the relationship.

7. **Stalking:** A course of physical or verbal contact directed at another individual that would cause a reasonable person to-
 - (A) Fear for his or her safety or the safety of others; or
 - (B) Suffer substantial emotional distress.
8. **Retaliation:** Action which is taken against a person because of the person's participation in a complaint or investigation of sexual misconduct, including but not limited to, Complainants, Respondents, witnesses, or others involved in the complaint, investigation and/or resolution of the alleged sexual misconduct. Retaliation can take many forms, including threats, intimidation, pressuring, continued abuse, violence or other forms of harm to others.
9. **Sexual Harassment** is unwelcome, gender-based verbal or physical conduct that is sufficiently severe, persistent or pervasive to interfere with, deny or limit a person's ability to participate in or benefit from ABSW's education program and/or activities. Sexual harassment has many forms. Sexual harassment is harmful regardless of gender of the perpetrator or the victim.

One form is quid pro quo or "this for that." Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature constitutes sexual harassment when it is implicitly or explicitly suggested that submission to or rejection of the conduct results in adverse educational or employment action. An example is a student advisor asking a student to have sex in exchange for keeping quiet about a student's violation of the plagiarism policy.

Another form of sexual harassment involves hostile environment. It is sexual harassment when an individual receives unwelcome sexual advances, unwanted verbal, physical, or visual behavior of a sexual nature, or is made to feel uncomfortable because of their gender or sexual orientation. Conduct that may constitute sexual harassment may include one or more of the following:

- Physical conduct: unwanted touching, blocking normal movement, or interfering with studies or work;
- Verbal conduct: epithets, derogatory comments, slurs, or humor of a sexual nature;
- Visual conduct: leering, making sexual gestures, displaying suggestive objects or pictures, cartoon posters in a public space or forum;
- Written conduct: letters, notes, or electronic communications containing comments, words or images as described above.

10. **Close Personal Relationships Affecting Teaching, Mentoring and Supervisory Functions.** Except where explicit and advanced authorization has been obtained in writing from the Vice President and Chief Financial Officer, no person who is employed by ABSW may

participate in a close personal relationship with an individual who is a member of the ABSW community for whom the person provides or may (by virtue of ABSW assigned position or functions) reasonably be expected in the future to provide teaching, mentoring or supervision. Supervision includes grading or other academic evaluation, job evaluation, and decisions pertaining to promotion, the direct setting of salary or wages, and job, internship, educational, or employment references or recommendations.

Close personal relationships include dating, sexual and similar close personal relationships that are or are not consensually undertaken by the supervisor and the individual. Such relationships do not include the usual and customary socializing at ABSW of teacher-student; mentor-mentee; supervisor-employee; faculty member-graduate student; co-workers; and supervisor-student employee. A person provides supervision when s/he oversees, directs or evaluates the work of others, including but not limited to, managers, administrators, coaches, directors, deans, chairs, advisors.

The following are additional definitions used under this Policy:

- 1. Consent** means “affirmative consent,” which means affirmative, conscious, and voluntary agreement to engage in sexual activity. It is the responsibility of each person involved in the sexual activity to ensure that he or she has the affirmative consent of the other or others to engage in the sexual activity. Lack of protest or resistance does not mean consent, nor does silence mean consent. Affirmative consent must be ongoing throughout a sexual activity and can be revoked at any time. The existence of a dating relationship between the persons involved, or the fact of past sexual relations between them, should never by itself be assumed to be an indicator of consent.

In the determination of whether consent was given to sexual activity, it shall not be a valid excuse to an alleged lack of affirmative consent that the person whose conduct is at issue (“Respondent”) believed that the person who experienced the Respondent’s conduct (“Complainant”) consented to the sexual activity under either of the following circumstances:

- (A) The Respondent’s belief in affirmative consent arose from the intoxication or recklessness of the Respondent.
- (B) The Respondent did not take reasonable steps, in the circumstances known to them at the time, to ascertain whether the Complainant affirmatively consented.

In the evaluation of complaints under this Policy, it shall not be a valid excuse that the accused believed that the Complainant affirmatively consented to the sexual activity if the accused knew or reasonably should have known that the Complainant was unable to consent to the sexual activity under any of the following circumstances:

- (A) The Complainant was asleep or unconscious.

(B) The Complainant was incapacitated due to the influence of drugs, alcohol, or medication, so that the complainant could not understand the fact, nature, or extent of the sexual activity.

(C) The Complainant was unable to communicate due to a mental or physical condition.

2. **Coercion** is a form of force which comprises unreasonable pressure for sexual activity. When someone makes clear that they do not want to participate in a sexual activity, that they want to stop, or that their limit is at a certain point, continued pressure to act beyond that point can be coercive.
3. **Force** is the use of physical violence and/or imposing on someone physically to gain sexual access. Other forms of force include intimidation (implied threats), threats and coercion that overcome resistance or produce consent. For example, "Have sex with me or I'll hit you." "Okay, don't hit me; I'll do what you want."
4. **Incapacitation** is a state where someone cannot knowingly give consent. It may occur as the result of alcohol or other drug use. This Policy also applies to a person who is incapacitated as a result of sleep, mental disability or from taking rape drugs (Rohypnol, GHB, Burundanga, Ketomine, etc.).
5. **Sexual Contact** is the intentional touching of the intimate body parts (breast, buttocks, groin, and genitalia) or touching another person intentionally with these body parts. It is also using force (physical force, violence, threat, intimidation, coercion) to cause a person to touch his or her or another person's intimate body parts, or any intentional bodily contact in a sexual manner.
6. **Sexual Intercourse** is penetration (oral, anal or vaginal) by a tongue, mouth, penis, finger or an object.
7. **Complainant** refers to the individual who may identify him/herself as having experienced, or being a victim or survivor of possible sexual misconduct and who makes a report of sexual misconduct under this Policy. A Complainant can also be a person who reports his/her knowledge of an incident of possible sexual misconduct but is not a victim, such as an ABSW student, staff member, faculty, teacher, or administrator.
8. **Respondent** refers to the individual whose conduct is at issue, under this Policy. A Respondent may be a current or former student, staff member, faculty, teacher, administrator, visitor, alumni, and contractor of ABSW or one of its member schools, someone from an affiliated school, center or institute, or any other person. A Respondent may be a stranger or a non-stranger person.
9. **Witness** refers to any individual who either witnessed an incident or who has relevant information regarding a case that is being investigated under this Policy.

10. Advisor or Support Person is a person who provides emotional support to a Complainant or Respondent and who may be present in a non-participating role to provide moral support during any meeting or proceeding under this Policy. The advisor or support person may be a currently enrolled student, parent of the student, or a ABSW faculty or staff member. Non-participating means that the advisor or support person is silent and does not speak or present information during the meeting or proceeding under this Policy. [Attorneys are not permitted to participate in any Campus meeting or proceeding under this Policy, absent advance written consent of the Title IX Coordinator and agreement to terms.]

11. Clergy Member means “a priest, minister, religious practitioner, or similar functionary of a church or of a religious denomination or religious organization.” California Evidence Code § 1030. Communications made in confidence with a clergy member may be privileged under the “clergy-penitent privilege” described in Evidence Code sections 1032-1034. A person who meets this statutory definition may also meet the definition of a pastoral counselor for purposes of Title IX and Clergy Act, which dictate various campus officials’ obligations to report sexual assault to campus authorities.

12. Pastoral Counselor means a person who is associated with a religious order or denomination, is recognized by that religious order or denominations as someone who provides confidential counseling, and is functioning within the scope of that recognition. 34 C.F.R. §§ 668.46(a). In this context, a pastor who is functioning as an administrator of ABSW or as a student advocate would not be exempt from the reporting obligations under Clergy and Title IX.

VI. REPORTING INCIDENTS THAT MAY BE SEXUAL MISCONDUCT

1. General Information:

ABSW encourages all individuals to seek assistance from a medical provider and/or law enforcement as soon as possible after an incident that may be sexual misconduct. Prompt reporting is the best option to ensure preservation of evidence and for the identification and location of witnesses.

ABSW also encourages all persons to make a report of the incident(s) to ABSW and to do so to ABSW’s designated officers as described below. Making a report means telling someone in authority what is known or believed to have happened. Persons should make reports of the incident(s) as soon as the incident(s) of sexual misconduct become known.

ABSW will promptly review and thoroughly consider all reports of incidents that may be sexual misconduct under this Policy, including any misconduct alleged to have been taken by ABSW students, faculty, staff, or visitors, or by any student, faculty, staff or visitor of one of ABSW’s member schools, or by any person from a ABSW-affiliated school, center, or institute.

Instructions for how to report these types of incidents are explained more fully below. ABSW will take prompt action to prevent, correct and discipline behavior that is found to violate this Policy, where appropriate, in the judgment of ABSW.

The filing of a report under this Policy is independent of any criminal investigation or proceeding that may take place by governmental authorities or law enforcement, and both ABSW and criminal investigations may be pursued simultaneously.

2. Reporting Procedures:

If you are a person who believes there has been an incident of possible sexual misconduct against an ABSW student by another student, faculty or staff member, or visitor of ABSW, or by a student, faculty, staff member or visitor of a *ABSW affiliated school or program*, you should report such conduct as follows:

A. Emergency and External Reporting Options (non-ABSW):

- Emergencies: 9-1-1
- City of Berkeley Police Department: Emergency (510) 981-5911 or Non-Emergency (510) 981-5900
- Rape Crisis Center 24-hour helpline: 1-800-670-7273
- Bay Area Women Against Rape 24-hour hotline: (510) 845-7273
- National Domestic Violence hotline: 1-800-799-SAFE (7233)
- Community Overcoming Relationship Abuse (CORA) 24-hour hotline: 1-800-300-1080
- National Sexual Assault hotline: 1-800-656-HOPE (4673)

Note: The Title IX Coordinator will assist persons who wish to make a report to law enforcement authorities in doing so if the person so chooses. Persons may also choose to decline to notify law enforcement authorities; however, as explained in Section G below, ABSW may be required by law to report incidents that involve violence, hate violence, and/or sexual assault, to law enforcement authorities, including those incidents that occur on-campus and off-campus. Except if required by governmental agencies, ABSW will not disclose a victim's identity unless the victim consents to being identified after being informed of his or her right to have identifying information withheld. If a victim does not consent to disclosing his or her identity, the alleged perpetrator's identity will not be disclosed either, unless required by governmental authorities.

In any case, under state and federal law, a victim has: (1) the right to a Sexual Assault Forensic Medical Examination at no cost to the victim/patient; and (2) the right to participate or not participate with the local law enforcement agency or the criminal justice system, either prior to the examination, or at any other time. Additionally, a victim may agree to engage with local law

enforcement and participate in the investigation and prosecution using a pseudonym (i.e., Jane or John Doe) instead of his or her true name.

B. Reporting Options at ABSW:

Incident(s) of possible sexual misconduct against ABSW students may be reported as follows:

- By submitting a written complaint by email or US postal service to the Title IX Coordinator:
- Michelle Holmes, Title IX Coordinator: mmholmes@absw.edu; 2606 Dwight Way, Berkeley, CA 94704-3029
- OR
 - By submitting a report using the online reporting form available through GTU's webpage, <http://gtu.edu/contact>, and available at this link: <https://secure.ethicspoint.com/domain/media/en/gui/33916/index.html>

Note: The online reporting tool of GTU is hosted by EthicsPoint, a third-party company contracted by GTU to administer its online reporting tool option.

All reports of incidents of possible sexual misconduct will be reported to the Title IX Coordinator.

C. Specific Information Regarding Incidents Occurring at or Involving Persons From a ABSW Member School or Affiliated School, Center, or Institute:

The Reporting Procedures for ABSW students who are taking courses at or offered by a member school or an affiliated school/center/institute of ABSW, is the same as the Reporting Procedures outlined in Sections A and B above.

ABSW will do everything feasible to address and prevent recurrence of any misconduct committed by a person of another affiliated school of ABSW (such as a student, faculty, third-party contractor, staff member), however, ABSW may be limited in what actions it can take.

ABSW will consider all reported incidents that occur in connection with a ABSW student taking courses at or offered by a member school or affiliated school of ABSW, and will take interim measures and corrective action, as deemed appropriate by ABSW, for any sexual misconduct found to be in violation of this Policy, including such measures as no-contact orders, changes in classes or programs of study, temporary leaves of absence, changes in student advisors, and so forth.

In addition, ABSW students who are taking courses at or offered by a member school or affiliated school of the Graduate Theological Union (GTU), may also (in addition to reporting to ABSW) choose to report incident(s) of sexual misconduct that occur in connection with their taking courses at or offered by a member school or affiliated school, by using the policies and procedures of a member school or affiliated school/center/institute. ABSW may work in

conjunction with another school in investigating and resolving reported incidents and will so notify the student if it does on a case-by-case basis.

The following is a list of member schools of the Graduate Theological Union:

- **American Baptist Seminary of the West (ABSW)**-2606 Dwight Way, Berkeley, CA 94704
- **Church Divinity School of the Pacific (CDSP)**-2451 Ridge Road, Berkeley, CA 94709-1211
- **Dominican School of Philosophy & Theology (DSPT)**-2301 Vine Street, Berkeley, CA 94708
- **Graduate Theological Union (GTU)**-2400 Ridge Road, Berkeley, CA 94709
- **Jesuit School of Theology in Berkeley of Santa Clara University (JST-SCU)**-1735 LeRoy Avenue, Berkeley, CA 94709
- **Pacific Lutheran Theological Seminary (PLTS)**-2770 Marin Avenue, Berkeley, CA 94708
- **Pacific School of Religion (PSR)**-1798 Scenic Avenue, Berkeley, CA 94709-1323
- **San Francisco Theological Seminary (SFTS)**-105 Seminary Road, San Anselmo, CA 94960
- **Starr King School of Ministry (SKSM)**-2441 LeConte Avenue, Berkeley, CA 94709
- The following is a list of affiliated schools/centers/institutes of ABSW:
 - **Center for Arts, Religion, & Education (CARE)**-2400 Ridge Road, Berkeley, CA 94709
 - **Center for Islamic Studies (CIS)**-2452 Virginia Street, Berkeley, CA
 - **Center for the Study of Religion and Culture**
 - **Richard S. Dinner Center for Jewish Studies (CJS)**-2465 Le Conte Avenue, Berkeley, CA 94709
 - **Center for Theology and the Natural Sciences (CTNS)**-2400 Ridge Road, Berkeley, CA 94709

- **Institute of Buddhist Studies (IBS)**-2140 Durant Avenue, Berkeley, CA 94704
- **Institute of Salesian Studies (ISS)**-1831 Arch, Berkeley, CA
- **New College Berkeley**-2029 Durant Avenue, #300, Berkeley, CA 94704
- **Patriarch Athenagoras Orthodox Institute (PAOI)**-2311 Hearst Avenue, Berkeley, CA 94709
- **School of Applied Theology (SAT)**-5890 Birch Court, Oakland, CA 94618

The following is a list of additional schools that offer cross-registration to ABSW students:

- **Dominican University**-50 Acacia Avenue, San Rafael, CA 94901
- **Holy Names University**-3500 Mountain Boulevard, Oakland, CA 94619
- **Mills College**-5000 MacArthur Boulevard, Oakland, CA 94613
- **University of California at Berkeley**-University of California at Berkeley, Berkeley, CA 94720

D. Anonymous Reporting:

Anonymous reports, or reporting without disclosing the reporter’s name, can be made, but anonymous reporting is not the preferred way. Depending on the information received, ABSW’s ability to respond to an anonymous report may be limited. The Title IX Coordinator will review anonymous reports received by ABSW and determine whether an investigation and response is appropriate.

E. Alcohol, Drugs and/or Other Misconduct:

ABSW encourages the reporting of conduct prohibited under this Policy. An individual who reports sexual misconduct, either as a Complainant or a third-party witness, will not be subject to disciplinary action by ABSW for his/her own personal consumption of alcohol or drugs, or other non-sexual misconduct, that happened at or near the time of the incident, unless ABSW finds the violation(s) to be egregious, including but not limited to, an action that places the health or safety of any other person at risk or involves plagiarism, cheating or academic dishonesty.

F. Prohibition Against Retaliation:

It is a violation of ABSW policy to retaliate against any person making a report of possible sexual misconduct, or against any person cooperating in the investigation of any report of possible sexual misconduct. Retaliation against any member of the ABSW community may result in disciplinary action, including termination of employment or expulsion from ABSW.

G. Possible Disclosure By ABSW of Information Pertaining to Reports of Possible Sexual Misconduct:

ABSW is committed to assisting students throughout the processes outlined in this Policy. Efforts will be made to respect the privacy of all individuals involved in this process in a manner consistent with the need for a thorough review of the report and carrying out the processes.

This means that the information related to a report under this Policy will only be shared with a limited circle of individuals who, in the judgment of ABSW, have a “need to know” basis in order to assist ABSW and/or its designees in its investigation and response and to prevent the recurrence of any such conduct found to have been committed.

If there is a request that the names remain confidential, ABSW will take steps to investigate and respond to the report in a manner that is consistent with that request. However, ABSW’s ability to fully respond to the incident may be limited and ABSW thereby cannot guarantee complete confidentiality.

ABSW is required by law to report certain types of reported sexual misconduct in its annual crime statistics report. Neither names, nor other identifying details of the incident, will be made public in the annual crime report.

ABSW is also required by law under certain circumstances to report any incident which might be classified as a violent crime, hate crime, or sexual assault to law enforcement. However, it is up to the Complainant on whether or not to separately file his or her own report with the Police and/or to contact Rape Trauma Services.

Except if required by governmental agencies, ABSW will not disclose a victim’s identity unless the victim consents to being identified after being informed of his or her right to have identifying information withheld. If a victim does not consent to disclosing his or her identity, the alleged perpetrator’s identity will not be disclosed either, unless required by governmental authorities.

H. Discussing An Incident(s) of Possible Sexual Misconduct, Without Making a Report or Record of the Incident

If a person would like to discuss the details of an incident of possible sexual misconduct, without making a report or record of the incident, or in an otherwise confidential manner, the person should speak with persons who hold a relationship with the person of which there is a legal duty of confidence, such as with their physicians, mental health therapists, priests, or clergy members. These persons generally will maintain confidentiality if they are acting in their capacity as your physician, mental health therapist, or clergy member, except in extreme cases of immediacy of threat or danger, or abuse of a minor.

Generally speaking, the faculty and administrators of ABSW, even if they are ordained clergy or pastoral counselors, are not acting in their capacity as members of the clergy and do not have such a relationship with ABSW students, and thus, they are required under this Policy to promptly forward all reports of possible sexual misconduct to the Title IX Coordinator for consideration and response.

VII. INTAKE MEETINGS

1. Intake Meeting with Complainant:

Upon receipt of a report of an incident, a designated person will promptly schedule a meeting with the Complainant to take place as soon as possible to go over this Policy and to identify possible forms of support for the student (see the Resources section below). The initial intake meeting shall be conducted by the Title IX Coordinator or by an external designee selected by ABSW, each of whom shall have training in victim-centered approaches (hereinafter, “Intake Officer”).

At this meeting, the Intake Officer will discuss whether there are any interim measures (see Interim Measures section below) that may be implemented at the discretion of ABSW. The preferences of the Complainant and the Respondent on such measures may be stated and will be taken into consideration by the Intake Officer.

At the intake meeting, the Intake Officer will also discuss the following:

- A student’s right to report the incident(s) to local law enforcement agencies;
- A student’s right to seek medical treatment and the importance of preservation of evidence;
- Requests for confidentiality, if any;
- ABSW’s obligation to consider all reports of incidents and the inability of ABSW to guarantee complete confidentiality;
- ABSW’s policy against retaliation of any person making a report or participating in the investigation or adjudication of an incident under this Policy;
- The possibility of an investigation by an outside impartial and neutral fact-finder selected by ABSW;
- The possibility for sanctions as determined by ABSW;
- The use of an Advisor or Support Person in any meeting or proceeding under this Policy; and
- ABSW’s obligation to report crime statistics into its daily crime log.

2. Intake Meeting with Respondent:

If the Respondent is a student of ABSW, the Intake Officer will also meet with the Respondent after receiving the report of the incident. If the Respondent is a faculty or staff member of ABSW, the Title IX Coordinator for faculty and employees will meet with the Respondent.

At this meeting, the Intake Officer will go over this Policy and also discuss whether there are any interim measures that may be implemented at the discretion of ABSW during the investigation and resolution of the report. The preferences of the Complainant and the Respondent on such measures may be stated and will be taken into consideration by the Intake Officer.

At the intake meeting, the Intake Officer will also discuss the following

- A student's right to report the incident(s) to local law enforcement agencies;
- A student's right to seek medical treatment and the importance of preservation of evidence;
- Requests for confidentiality, if any;
- ABSW's obligation to consider all reports of incidents and the inability of ABSW to guarantee complete confidentiality;
- ABSW's policy against retaliation of any person making a report or participating in the investigation or adjudication of an incident under this Policy;
- The possibility of an investigation by an outside impartial and neutral fact-finder selected by ABSW;
- The possibility for sanctions as determined by ABSW;
- The use of an Advisor or Support Person in any meeting or proceeding under this Policy; and
- ABSW's obligation to report crime statistics into its daily crime log.

3. Initial Witness Interviews

The Intake Officer may also collect additional information or speak with any person(s) he or she thinks may have relevant information concerning a reported incident, in an effort to gather preliminary information to make an initial assessment of the matter. The preferences of the Complainant and the Respondent on witnesses to be interviewed may be stated and will be taken into consideration by the Intake Officer.

4. Initial Assessment By The Title IX Coordinator

The Intake Officer will then consider the nature of the report, the safety of the individuals involved and of the campus community, the Complainant and Respondent's expressed preferences for resolution, and if the Intake Office is not the Title IX Coordinator, they will make a recommendation to the Title IX Coordinator on whether the matter can be resolved or whether

to refer the matter for further investigation. Sexual assault cases will not be resolved through mediation.

The Title IX Coordinator will make the final decision on whether to refer the matter for further investigation. If the matter is resolved, the matter will be deemed closed, and the decisions final and binding, with no further rights of appeal. If the matter is referred for further investigation, the matter will follow the procedures for investigation and resolution described below.

The Title IX Coordinator will inform the Complainant and Respondent in writing if the matter will be referred for further investigation.

5. Possible Interim Measures

Interim measures will be considered and implemented at the discretion of ABSW. Interim measures, which may be applied to the Complainant and/or the Respondent, include such things as:

- Issuance of a “no-contact” order or directive that restricts persons from having contact with one another in person or through electronic means;
- Change in class schedule;
- Change in student-related employment;
- Rescheduling of exams or assignments (in conjunction with appropriate faculty);
- Voluntary leave of absence;
- Providing escort services for movement between classes and ABSW activities;
- Interim suspension or ABSW-imposed leave;
- Administrative hold on student accounts, including a hold on the release of transcripts while an investigation is pending;
- Denial of access to campus, campus facilities and/or ABSW activities; and
- Other measures.

VIII. EXTERNAL INVESTIGATIONS INITIATED BY ABSW

Following the initial assessment, the Title IX Coordinator shall decide whether to refer the matter for further investigation, and if so, he or she shall designate an impartial investigator who has specific training and experience. The investigator may be an employee of ABSW or be an external investigator engaged to assist ABSW in fact gathering. ABSW retains the right to designate an external investigator of its own choice at all times.

The role of the investigator is to be a neutral fact-finder. The investigator may also designate another trained colleague to assist in interviewing parties, identifying and locating witnesses, and in gathering other facts and evidence. The investigator will conduct an investigation in a manner deemed appropriate in light of the circumstances of the case and will cooperate with law enforcement authorities to the extent necessary.

A typical investigation will include interviews with the Complainant, the Respondent and third-party witnesses, and of the collection of available physical, documentary and other evidence. Photographs may be taken. The Complainant, the Respondent and any third-party witnesses may present witnesses or other evidence to the investigator for consideration. Information collected during the initial intake and assessment will be forwarded to the investigator. If any law enforcement agency is also investigating the incident, the ABSW investigator may defer to the police department for the collection and preservation of evidence.

The investigator will compile the details of the investigation into an investigative report, which will contain summaries of the interviews, photographs (if available) and other related evidence or duty logs and also a detailed analysis of the events. Before finalizing a witnesses' statement, the investigator may send a draft of the statement to the individual to allow them a chance to add to it or make any suggested changes to their statement.

The investigative report will be prefaced with a summary of findings and recommended actions. In this summary the investigator will:

- State the initial complaint;
- Outline the details of the investigation;
- State, whether, using a preponderance of the evidence standard, it is more likely than not that policy violation(s) occurred; and
- If requested by the Title IX Coordinator, include any recommended sanctions or corrective actions to be taken.

If requested by the Title IX Coordinator to make a recommendation, the investigator may recommend that ABSW impose certain sanctions or take certain corrective action; however, the decision to select and implement, appropriate sanctions or corrective action, if any, remains at all times within the authority of ABSW.

The completed investigative report normally will be submitted to ABSW within sixty (60) days of the intake. However, depending on the complexity of the case, additional time may be needed to complete the investigation.

IX. RESOLUTION

The investigative report will be forwarded to the Title IX Coordinator of ABSW. He or she will review the fact-finding determination by the impartial investigator and take any recommendations for sanctions or corrective action into consideration.

The Title IX Coordinator will decide whether the matter requires further proceedings; whether to accept the recommendations for sanctions/corrective action (if any); or whether to issue or recommend to an officer of ABSW, different or alternative sanctions/corrective action.

The Title IX Coordinator can issue – or recommend to an ABSW officer – any sanctions which he or she believes is appropriate based on the results of the investigation, including but not limited to, warnings, censure, disciplinary probation, suspension, expulsion, revocation of admission and/or degree, or withholding a degree.

A preponderance of the evidence standard will be used under this Policy, that is, whether it was more likely than not that the conduct prohibited under the Policy occurred. All proceedings under this Policy will be prompt, fair, impartial, and conducted by those who are adequately trained.

Past violations of the responsible student may be considered in the determination of an appropriate resolution. ABSW will also consider whether the action will bring an end to the violation in question, whether it will reasonably prevent a recurrence of a similar violation and/or whether it will mediate any effects the violation had on the Complainant and the ABSW community.

Within ten (10) business days of the decision, both the Complainant and the Respondent will be notified in writing of the results of the investigation, including any sanctions or remedies imposed with notification of the rights to appeal the resolution (“Outcome letter”) as described below.

The Title IX Coordinator, or any designee of the Title IX Coordinator, also may meet separately with the Complainant or the Respondent to discuss the results of the investigation and explain any resolution action that will be taken or imposed. The summary of the investigative report will be available for review by both the Complainant and the Respondent, if so requested.

Any sanctions under this Policy are effective immediately.

X. APPEALS

If the Respondent or Complainant is dissatisfied with the resolution, either party may appeal. An appeal must be made in writing, within ten (10) business days of the Outcome Letter. The appeal should clearly state the remedy sought by the appealing party. The written appeal must be delivered to the President of ABSW, who will delegate review of the appeal as follows:

- If the Respondent is a student of ABSW, the Chair of the Academic Committee and Academic Dean shall review the appeal and make a recommendation in writing to the President.
- If the Respondent is a faculty member of ABSW, the Chair of the Academic Committee and Academic Dean shall review the appeal and make a recommendation in writing to the President of ABSW.
- If the Respondent is a non-faculty staff member of ABSW, or any other person not identified above, the President will assign one of ABSW’s Officers (who does not have a conflict of interest) to review the appeal and make a recommendation in writing to the President.

The President will make the final decision on the appeal, in writing. A copy of the final determination and appeal decision are final and binding, except as described in section XI below.

Appeals should normally be completed within three weeks unless there is good reason to extend the time necessary to review the appeal. Normally, the grounds for granting an appeal will be limited to the following considerations:

- Is there compelling new evidence that was not available previously? Was the decision based on use of the proper criteria? Were improper or extraneous facts used that substantially affected the decision?
- Were there procedural irregularities that substantially affected the outcome of the investigation and decision for action that were detrimental to the Respondent or Complainant?
- Was the decision that someone in possession of the facts, criteria and procedures at the time one that a decision maker might reasonable have made?

XI. ARBITRATION

If either the Complainant or the Respondent is not satisfied with the decision following a timely appeal in section XI above, s/he may request review by an impartial arbitrator under the Rules of the American Arbitration Association by submitting a request in writing to the President of ABSW, no later than forty-five (45) calendar days after issuance of the decision following a timely appeal.

The request shall consist of a plain, concise and complete written statement outlining the grounds for disagreement with the outcome and all relevant information to substantiate the basis for doing so.

The President of ABSW will then decide whether the case is suitable for arbitration; if so, under written agreement between ABSW and the party seeking arbitration review, providing as a final and binding alternative to civil litigation, an arbitrator will be mutually selected between the parties, and the costs of the arbitrator's fees shall be agreed to in writing by an authorized representative of the parties.

Any matter submitted to binding arbitration under this Policy shall be submitted in accordance with the Rules of the American Arbitration Association. Attorneys or advisors of the party's choice may be present at and participate in the binding arbitration review process. This binding arbitration review process is the exclusive method of external review and is final and binding on both ABSW and the student, and the arbitrators' award shall be final, binding and conclusive upon the parties and may be entered in any state or federal court having jurisdiction.

XII. PRIVACY OF RECORDS

The Title IX Coordinator will retain records of reports and related documents under this policy. In addition, records relating to reports of incidents of possible sexual misconduct under this Policy may become a part of a students' academic record.

Documents which are prepared in anticipation of the investigation and resolution of the matter (including the investigative report and any other documents) will not be disclosed outside of the review process, except as required by law.

The final Outcome Letter will be issued concurrently to both the Complaining and the Respondent. ABSW neither encourages nor discourages the further disclosure of the final Outcome Letter by either the Complainant or the Respondent. ABSW acknowledges that sharing the final outcome letter with others may be an important part of a student's healing process.

XIII. DISSEMINATION OF POLICY; TRAINING AND PREVENTION

As a part of ABSW's commitment to maintaining its campus and programs free from sexual misconduct, this Policy shall be disseminated widely to the ABSW community through publications, websites, student orientations, and other appropriate channels of communication.

The Title IX Coordinator is responsible for overseeing the ABSW's efforts at training, prevention and education as it relates under this Policy. The Title IX Coordinator will receive appropriate training for the intake and handling of reports of sexual misconduct under this Policy, including those that are victim-centered and trauma informed.

ABSW will also provide all other employees with online training relating to this Policy every two years.

In addition, in an effort to prevent all forms of sexual misconduct from occurring on ABSW campus or within the ABSW community, ABSW will provide all incoming students and faculty, at the start of the academic year, with a copy of this Policy, and may also provide additional materials designed to educate students on sexual misconduct and how to prevent it from occurring. Education programs shall promote the awareness of rape, acquaintance rape, domestic violence, dating violence, sexual assault, and stalking, and shall be designed to prevent all misconduct prohibited under this Policy from occurring, to empower victims, to identify safe and positive options for bystander intervention, and to help recognize warning signs of abusive behavior and how to avoid potential attacks.

Students, faculty and staff of ABSW are all encouraged to take part in education and training designed to prevent sexual misconduct.

XIV. RESOURCES

Getting Help: ABSW encourages all members of the ABSW community who believe they have been victims of sexual misconduct to report these incidents to local law enforcement authorities and to seek medical attention where appropriate.

ABSW also encourages all members of the ABSW community to report any incident(s) of possible sexual misconduct to ABSW under these Policies and to get help from as many resources as possible.

For Emergency Needs:

- **911** – Police
- City of Berkeley Police Department: Emergency (510) 981-5911
- Rape Crisis Center 24-hour helpline: 1-800-670-7273
- Bay Area Women Against Rape 24-hour hotline: (510) 845-7273
- National Domestic Violence Hotline: 1-800-799-SAFE (7233)

ABSW does not maintain an on-campus counseling center or staff with professional qualifications to provide counseling. There are however, other services available in the Berkeley area, including:

- Bay Area Women Against Rape provides free 24-hour comprehensive services to victims of sexual assault. Website: <http://www.bawar.org> Telephone: 510/845-7273 or 510/845-RAPE.
- Alameda County Medical Center, Highland Hospital Sexual Assault Center, 1411 E. 31st Street, Oakland provides 24-hour assistance, including medical treatment and examination, advocacy and counseling support for victims of sexual assault. Website: <http://www.highlandahs.org/our-services/specialty-services/medical-counseling>. Telephone 510/437-4688.
- City of Berkeley Adult Clinic, 2640 Martin Luther King Jr. Way 510/981-5290.
- City of Berkeley Domestic Violence Crisis Line 510/562-3731.
- City of Berkeley Mobile Crisis Team (MCT) is available every day from 10:30 AM to 11:00 PM at 510/981-5254.
- Men Overcoming Violence, 1385 Mission Street, Suite 300, San Francisco 415/626-6704. There are also several national organizations that may be able to provide the ABSW community with important information and assistance:
 - National Domestic Violence Hotline, 800/799-SAFE (7233)
 - National Sexual Assault Hotline, 800/656-HOPE (4673)
 - Stalking Resource Center, 202/467-8700
 - National Teen Dating Abuse Helpline, 866/331-9474

ABSW Campus Services:

- Title IX Coordinator: Michelle M. Holmes, (510)841-1905 ext.225, mmholmes@ABSW.edu; Business Office, 2606 Dwight Way, Berkeley, CA 94704.

Off-Campus Counseling Services (Non-ABSW):

While there are many Bay Area resources for counseling services, two Counseling Centers address their services to the ABSW community.

The Interfaith Counseling Center offers a variety of services to promote healing, growth and wholeness of individuals, couples and families. Members of our staff are Certified Pastoral Counselors, Marriage and Family Therapists, Psychologists and Spiritual Directors. People of any or no religious persuasion are welcome. Reduced fees are available to ABSW member school students, faculty, staff and families. The main office is located at the Durant House on the campus of the First Congregational Church of Berkeley: 2345 Channing Way in Berkeley, 94704. Phone: 510-225-5595.

The California Counseling Institute has an office at All Souls Episcopal Church at 2200 Cedar Street, Berkeley and an office in San Francisco located at 4614 California Street. The institute provides psychotherapy for people facing a variety of life situations, including relationship and family concerns, career choices, depression, anxiety, financial pressures, life transitions, losses and grief. The Institute is dedicated to the healing transformation that the disciplines of psychotherapy and religious spirituality can offer. The Institute has its roots within the Judeo-Christian heritage of the Episcopal Church. For information call 510-704-8046.

Confidential Reporting Options:

Persons who would like to speak to someone in confidence about an experience of sexual misconduct or about another's experience of sexual misconduct, should contact off-campus rape crisis counselors, domestic violence resources, private agencies, external mental health agencies and external clergy members.

POLICY ON DRUG FREE CAMPUS

American Baptist Seminary of the West is committed to maintaining community in which students; faculty, administration, staff, residents, and tenants live and work together in an atmosphere free from drugs and alcohol. The Drug Free Schools and Communities Act Amendments of 1989 (PL101-226) requires all schools which receive federal funds of any kind, including federally guaranteed student loans to certify to the U.S. Government that the campus and workplace is in compliance with the law. This policy statement implements ABSW's commitment and the federal law within the ABSW community.

Unlawful possession, manufacture, use, dispensation, or distribution of illicit drugs and alcohol or abuse of drugs or alcohol by students, faculty, administration, staff, residents, and tenants is prohibited on any ABSW or GTU member properties or anywhere as any part of any ABSW or GTU member school activities. As a condition of enrollment in ABSW or employment by ABSW, a member of the student body, faculty, administration, or staff will notify the institution of any criminal drug statute conviction occurring in ABSW no later than five days after such conviction. Any member of the student body, faculty, administration, staff, resident, or tenant who engages in conduct prohibited by this policy may be subject to immediate dismissal from the student's program of study, termination of employment, or cancellation of lease or other rental agreements as applicable.

The Personnel Officer will cause this policy to be read by and acknowledged in writing once each academic year by every member of the student body, faculty, administration, staff, residents, and tenants. Such acknowledgement will be placed in each person's permanent student, personnel, or lease/rental file.

The Personnel Officer will, in cooperation with the GTU and member schools, inform each member of the ABSW community of the legal sanctions which may be imposed upon violators of drug and alcohol laws under local, state, and federal laws; of the descriptions of the health risks associated with drug and alcohol abuse; and of the availability of drug and alcohol counseling, treatment and rehabilitation programs

POLICY ON POSSESSION OF FIREARMS

The American Baptist Seminary of the West does not tolerate firearms on campus. Violators are subject to arrest and prosecution according to federal, state, and local laws.

California State Law and Amendments:

The California Gun Free School Zone Act of 1995 prohibited transportation and possession of firearms on school grounds or within school zones. This legislation and its amendments, chaptered in California Penal Code Section 626.9 states, in relevant part:

Any person who brings or possesses a loaded firearm upon the grounds of a campus of, or buildings owned or operated for student housing, teaching, research, or administration by, a public or private university or college, that are contiguous or are clearly marked university property, unless it is with the written permission of the university or college president...shall be punished by imprisonment in the state prison for two, three, or four years. Cal. Penal Code Section 626.9(h)

Similar prohibitions apply to the transportation and possession of unloaded firearms. Assembly Bill 2609, enacted in 1998, specified that the law applies to off-site seminary properties that may be a part of a central campus or contiguous to a campus, such as off-site student dormitories, campus apartments, staff and student on site houses.

The law also requires that the Seminary post a prominent notice of primary entrances to all clearly marked noncontiguous property stating that unauthorized transportation and possession of firearms on Seminary -owned or operated property is prohibited pursuant to California Penal Code Section 626.9. To comply with this new requirement, such President shall make arrangements to post appropriate signage at subject property.

In limited special circumstances, the President or his/her designees may grant written permission to an individual for lawful possession of a firearm on Seminary property. Law enforcement officers or security guards licensed to carry weapons do not need special permission. The President's staff shall work closely with University of Berkeley campus police and local police departments to identify those circumstances when permission is warranted, such as to University and seminary employees who may work in remote and potentially dangerous locations. Campus police departments are encouraged to develop measures promoting public safety for those instances where authorization is approved, including fingerprinting, weapon inspections and the institution of gun safety measures

VACCINATION POLICY

The American Baptist Seminary of the West does not require students to demonstrate specific vaccination coverage, but recommends that all students are current on all vaccinations recommended by the Centers for Disease Control (<http://www.cdc.gov/>).

ABSW FINANCIAL AID ONLINE RESOURCES



For Financial Aid Forms and Deadlines:

<http://www.gtu.edu/admissions/financial-aid/financial-aid-how-to-apply>

- Programs of Study: <http://www.absw.edu/current-students/programs/>
- Student Handbooks and Checklists:
[http://absw.edu/section/view/student handbooks](http://absw.edu/section/view/student%20handbooks)

FEDERAL STUDENT AID

- Federal Student Aid: <http://studentaid.ed.gov/>
- FinAid: www.finaid.org
- Free Application for Federal Student Aid (FAFSA): www.fafsa.gov
- Federal Student Aid PIN: www.pin.ed.gov
- Direct Loans: www.studentloans.gov
- National Student Loan Data System (NSLDS): www.nsls.ed.gov
- Financial Aid Awareness Counseling:
[https://studentloans.gov/myDirectLoan/
financialAwarenessCounseling.action?execution=e1s1](https://studentloans.gov/myDirectLoan/financialAwarenessCounseling.action?execution=e1s1)
- Federal Student Loan Repayment Estimator:
<https://studentloans.gov/mvDirectLoan/repaymentEstimator.action>

OUTSIDE SCHOLARSHIP RESOURCES

- GTU Consortial Scholarship Link: <http://scholarships.gtu.edu/>
- US Department of Labor Free Scholarship Search:
<http://www.careerinfonet.org/scholarshipsearch/ScholarshipCategory.asp?searchtype=category&nodeid=22>
- FastWeb Scholarship Search: <http://www.fastweb.com/>
- Foundation Center of San Francisco: <http://www.foundationcenter.org/sanfrancisco/>

FREE ONLINE MONEY MANAGEMENT TOOLS

- US Department of the Treasury - Savings Planner:
<http://www.treasurydirect.gov/BC/SBCPIIn>
- Financial Literacy & Education Commission:
<http://www.mvmoney.gov/Pages/default.aspx>
- US Securities and Exchange Commission: <http://www.investor.gov/>
- <http://budgettracker.com>

FREE CREDIT REPORTS

- Free Annual Credit Report: <https://www.annualcreditreport.com/cra/index.jsp>
- To minimize junk mail from creditors: 1-888-5-OPTOUT

OCCUPATION OUTLOOK and SALARY INFORMATION

- O*Net Online: <http://www.onetonline.org/>
- Occupational Outlook Handbook: <http://www.bls.gov/ooh/>
- Salary Information by Occupation: <http://www.salary.com/>

LOAN REPAYMENT INFORMATION

- Federal Student Aid Loan Repayment Information: <http://www.studentaid.ed.gov/repay-loans>
- Project on Student Debt: <http://proiectonstudentdebt.org/>
- IBR Info (income-based repayment): <http://ibrinfo.org/>

LOAN INTEREST SAVINGS CALCULATOR

Interest Savings Calculator: <http://www.mvfedloan.org/make-a-pavment/calculators/interest-savings.shtml>

REPAYMENT CALCULATORS

- Federal Student Aid Loan Comparison Calculator: <http://www.studentaid.ed.gov/repav-loans/understand/plans/standard/comparison-calculator>
- FedLoan Servicing Repayment Estimator: <http://www.mvfedloan.org/billing-pavment/pavment-plans/repavment-schedule-estimator.shtml>
- USA Funds Student Loan Repayment Calculator: <http://calculator.usafunds.org/>
- FinAid Loan Calculators: <http://www.finaid.org/calculators/>

FEDERAL LOAN CONSOLIDATION CALCULATORS

- **Federal Direct Consolidation Loans:** <https://loanconsolidation.ed.gov/loancalc/servlet/common.mvc.Controller7controller/task=startCalculator>
- FinAid.org Loan Consolidation Calculator: <http://www.finaid.org/calculators/loanconsolidation.phtml>

WEBCASTS

- Auburn Theological Seminary - Student Loans and Seminary Costs: How to Keep from Mortgaging your Future: <http://www.auburnseminarv.org/Resources-for-student-financial-planning>
- FSA Webcast - How to Fill Out a FAFSA: <http://www.youtube.com/watch?v=VRvXfUStHO0>
- FSA Webcast - Responsible Borrowing: <http://www.youtube.com/watch?v=mTHtn0FRMWw>

- FSA Webcast - Repayment: What to Expect:
<http://www.youtube.com/watch?v=oJHvSMdXixE>
- FSA Webcast - Repayment: How to Manage Your Student Loans:
<http://www.youtube.com/watch?v=flG4gFlizZU>
- Great Lakes WebCasts:
<https://www.mvgreatlakes.org/borrower/knowledgeCenter/webcasts.html>
- Nelnet Money Monday Webinars: <http://www.nelnetloanservicing.com/financial-literacy/>