

Standards XI, XII, XII, XIV, & XV

Amanda Harrison, Cummings Graduate Institute and Commissioner

Jim Killin, Consultant

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Standard XI

Recruitment and Enrollment

Amanda Harrison



Standard XI

Recruitment and Enrollment

The institution adheres to applicable state, federal, and international law, as well as DEAC's Code of Ethics, in its recruitment efforts. Enrollment agreements comply with DEAC's Enrollment Agreements Disclosures Checklist. Scholarships and discounts conform to DEAC definitions and are applied consistently.

Standard XI

A. Student Recruitment

The institution demonstrates that **ethical processes and procedures** are followed throughout the recruitment of prospective students. **The qualifications and experience of the institution’s recruitment personnel are aligned to identified roles and responsibilities.** Recruitment personnel are trained in the tasks and expectations of their positions. Authorized recruitment personnel **are provided with appropriate materials to perform their tasks and are routinely monitored to ensure compliance with laws applicable to the jurisdiction(s) in which the institution operates, the DEAC Code of Ethics, and institutional policy .** The institution takes full responsibility for the actions of its recruitment personnel, whether internal or third party.

A. Student Recruitment Exhibits

- Exhibit 28 - Student Recruitment Personnel Job Descriptions
- Exhibit 28 - Student Recruitment Policies and Procedures
- Exhibit 28 - Signed Code of Ethics

CUMMINGS
GRADUATE INSTITUTE FOR BEHAVIORAL HEALTH STUDIES

Cummings Graduate Institute for Behavioral Health Studies
2111 East Baseline Road, Suite E1, Tempe, AZ 85283
Office - (480)-285-1761 Fax - (480)-999-5641
www.cgi.edu

Effective Change Date: Monday, January 8, 2024

Job Summary:
Provide coordination for the day-to-

Essential Duties and Responsibilities

- Coordinate application proc website pages, marketing m requirements, and admission

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Code of Ethics

Policy Overview

Cummings Graduate Institute (CGI) requires its employees and contracted employees to review the Code of Ethics annually. All employees of CGI have the opportunity to interact with students enrolled or potentially enrolled students and thus, all employees of CGI are required to review the Code of Ethics for admissions and enrollments and sign each year.

Initials	Acknowledgments
	Observe fully the rights of all applicants and commit no action that would be detrimental to any applicants opportunity to enroll because of race, sex, color, creed, or national origin.
	Never knowingly make any false or misleading representation to any applicant nor use any coercive practices in presenting information.

B. Verification of Student Identity

Student identity verification processes **begins during the enrollment and onboarding** of students and continue with respect to the student’s **enrollment in subsequent programs/classes.**

B. Verification of Student Identity Exhibits

- Exhibit 29 – Student Identity Verification Policy

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Student Identity Verification

Policy Overview

To meet industry standards for an online institution, Cummings Graduate Institute takes measures to verify the identity of students including the following:

1. Submission of a government-issued ID
2. Video or phone admissions interview
3. Access to a secure Learning Management System (LMS) with user-name and strict password requirements

Standard XI

C. Compulsory Age

Institutions enrolling students under the compulsory school age **obtain permission from responsible parties** to assure that the pursuit of the educational offerings is not detrimental to any compulsory schooling.

C. Compulsory Age Exhibits

- No exhibits are required for this section

D. Enrollment Agreements

The institution's enrollment agreements/documents are in the **language of instruction** and **clearly identify the educational offering and the credential awarded**. The agreements inform applicants of the rights, responsibilities, and obligations of both the student and the institution prior to applicant signature. **The institution complies with the DEAC Enrollment Agreements Disclosures Checklist.**

D. Enrollment Agreement Exhibits

- Exhibit 30 – Enrollment Agreements
- Exhibit 30 – Enrollment Agreement Checklist
- Exhibit 30 – Payment Contracts or Documentation

Enrollment Agreement Disclosures	Elements	Page Number	Yes	No	N/A
Language of Instruction	Enrollment Agreement is provided to students in the language(s) of instruction	Response	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heading	Statement indicating document is an enrollment agreement or similar contractual document	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Institution Name and Address	Institution full street address, telephone number, and website address	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student's Information	Student's full name, address, and any other applicable contact information	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Name of Educational Offering	Full name of course/program	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Name of Credential Awarded	Full name of the credential awarded upon course/program completion	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Institution's Obligations	Summary of education and services provided under the enrollment agreement (e.g., tuition, fees, services, instruction)	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student's Rights, Responsibilities, and Obligations	Expectations of students	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Term Length of Agreement	Indication of the enrollment agreement's term length via termination date and conditions for extending or reinstating agreement or statement of maximum program length. Maximum program length can be no more than 1.5 times the typically required time to complete the program and not less than one year.	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student's Signature and Date	Students must sign and date the enrollment agreement or similar contractual document	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complaint/Grievance Policy	Student complaint/grievance policy, including DEAC contact information (if accredited)	Page Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Standard XI

E. Financial Disclosures

All costs relative to the education provided by the institution are **disclosed to the prospective student in an enrollment agreement** or similar contractual document before enrollment. Costs must include tuition, educational services, textbooks, and instructional materials; any specific fees associated with enrollment, such as application and registration fees; and fees for required services such as student authentication, proctoring, technology access, and library services.

E. Financial Disclosures Exhibits

- No exhibits are required for this section, but the Enrollment Agreement is apart of this section.

F. Scholarships

Scholarships are awarded **either for merit or based on need**. Merit-based scholarships **must be based on definable achievement at the time of enrollment or within the program of study**. Merit-based scholarships are evaluated by **qualified individuals using an institution -approved rubric**. Need-based scholarships **must be based on a discernable and consistent economic standard**. Scholarships must **indicate the actual reduction in the costs** that would otherwise be charged by the institution.

F. Scholarships Exhibits

- Exhibit 31 – Merit Based Scholarship Rubrics
- Exhibit 31 Sample Scholarship Award Documentation

G. Discounts

Tuition reductions other than scholarships are considered discounts. **Discounts are permitted for well -defined groups, for specific and bona fide purposes, or for a specified period**. Discounts must indicate the actual reduction in the costs that would otherwise be charged by the institution.

G. Discount Exhibits

- No exhibits are required for this section.

Standard XI

H. Admission Process

The institution verifies that all admissions requirements are **met prior to admission** and **collects appropriate evidence**, such as official transcripts and English language proficiency documentation, to support eligibility. **English language proficiency is verified for applicants whose native language is not English and who have not earned a degree from an appropriately accredited institution where English is the principal language of instruction**. Such verification procedures **align with DEAC's guidance on English Language Proficiency Assessment located in Appendix IX**. The institution documents the basis for any denial of admission. Official transcripts, if required for admission, **must be received within a defined enrollment period not to exceed 12 semester credit hours**. Students who do not submit required official transcripts within the prescribed period are administratively withdrawn.

H. Admission Process Exhibits

- Provide a link to the admission requirements
- Provide a link to the admission policy for verifying English or other language proficiencies

The screenshot displays the website for Cummings Graduate Institute, specifically the 'Degree Seeking Admissions' page. The page title is 'Degree Seeking Admissions' and it lists several links: 'Degree-Seeking Admissions Requirements', 'Professional Licensure and Admissions', 'Degree-Seeking Admissions Process', and 'Exceptions for Degree-Seeking Admissions Policies'. Below these links, the page details the requirements for the Doctor of Behavioral Health (DBH) Program. It states that applicants must meet the following requirements:

1. Master's Degree or higher from an accredited college or university with a cumulative GPA of 3.0 (B average) or better in the field of Behavioral Health or similar (Counseling, Social Work, Marriage and Family Therapy). * See Exception for Admissions policy.
2. Two (2) or more years of experience in the Behavioral Health Field.
3. Technology equipment and basic computer skills to be successful in the online Doctoral of Behavioral Health Program. To view Technology Requirements, visit: cgi.edu/technology.

No competency examinations are required for admission.

The screenshot also shows a section titled 'Admissions Requirements for Applicants Whose Native Language is Not English'. It explains that international applicants can meet the English requirement by submitting official documentation with minimum scores. For doctoral degree applicants, the requirements are:

- A minimum score of 65 on the paper-delivered Test of English as a Foreign Language (TOEFL PBT);
- Or a minimum score of 80 on the Internet Based Test (IBT);
- Or a 6.5 on the International English Language Test (IELTS);
- Or a 58 on the Pearson Test of English Academic Score Report;
- Or a 105 on the Duolingo English Test;
- Or a 55 on the 4-skill Michigan English Test (MET);
- Or 650/LP on the Michigan Examination for the Certificate of Competency in English (ECCE);
- Or 650/LP on the Michigan Examination for the Certificate of Proficiency in English (ECPE).

For master degree applicants, the requirements are:

- A minimum score of 60 on the paper-delivered Test of English as a Foreign Language (TOEFL PBT);
- Or a minimum score of 71 on the Internet Based Test (IBT);
- Or a 6.5 on the International English Language Test (IELTS);
- Or a 50 on the Pearson Test of English Academic Score Report;
- Or a 100 on the Duolingo English Test;
- Or a 55 on the 4-skill Michigan English Test (MET);
- Or 650/LP on the Michigan Examination for the Certificate of Competency in English (ECCE);
- Or 650/LP on the Michigan Examination for the Certificate of Proficiency in English (ECPE).

English proficiency scores, if English was not the language of instruction, must be sent from the testing agency to the Registrar. Use the mailing or email address below for English Proficiency test scores:

Cummings Graduate Institute
Attn: Registrar
2111 East Baseline Road, Suite E1
Tempe, AZ 85283
registrar@cgi.edu

International applicants who do not provide documentation of acceptable US or Canadian course/degree equivalency will not receive any transfer credits, and are not admitted without documentation that meets admission.

Visa Sponsorship
Cummings Graduate Institute does not participate in the student visa/I-20 program.

Standard XII

Student Support Services

Traci Lee

Standard XII

Student Support Services

The institution's policies, procedures, and internal systems optimize interaction between the institution and students and actively promote student-faculty interactions, program completion, and educational success. The institution uses technology effectively to support such policies, procedures, and systems, including ensuring that student-facing applications are user friendly and accessible through the institution's website. The institution also provides staffing to adequately support the foregoing policies, procedures, and systems and respond to student inquiries, educational needs, and individual differences to facilitate program completion and educational success.



Standard XII

3 Core Components:

- A. Student Inquiries and Requests for Assistance
- B. Individual Differences
- C. Student Support



A. Student Inquiries and Requests for Assistance

The institution must provide **readily accessible methods through which students can submit inquiries, report issues or concerns (whether or not filing a formal complaint), request assistance, or otherwise communicate with institution faculty and/or staff.** The institution responds promptly and thoroughly to all student inquiries.

B. Individual Differences

Academic advising and instructional support are readily available to assist students in achieving institutional and program requirements, program outcomes, course learning outcomes, and educational goals as required by laws **applicable to the jurisdiction(s) in which the institution operates.**

C. Student Support

The institution's policies and procedures optimize interaction between the institution and students. The interaction proactively promotes student completion and success.

Standard XIII

Fair Practices

Traci Lee

8 Core Components

- A. Confidentiality and Privacy
- B. Complaint Procedures
- C. Cancellations and Withdrawals
- D. Refunds
- E. Performance Disclosures
- F. Advertising and Promotion
- G. Institution and Course Accredited-Status Recognition
- H. Truth in Lending

Standard XIII

Fair Practices

The institution's policies promote transparency, fairness, and respect for privacy and confidentiality. The institution's cancellation and refund policies must be fair, equitable, clear, and unambiguous.

Standard XIII

8 Core Components

A. Confidentiality and Privacy

B. Complaint Procedures

C. Cancellations and Withdrawals

D. Refunds

E. Performance Disclosures

F. Advertising and Promotion

G. Institution and Course Accredited - Status Recognition

H. Truth in Lending

Confidentiality and Privacy

"...laws applicable to the jurisdiction(s) in which the institution operates".

Complaint Procedures

1. Policies and procedures to receive, respond, and address.
2. Instructions to file and max timeline to resolve.
3. Resolved in timely, fair, and equitable manner.
4. Guidance to file with state and accreditor.
5. Retains complaint records for longer of 5 years or completion of next accreditation evaluation cycle.

Cancellations and Withdrawals

Maintain, publish, and consistently apply fair and equitable that meet or exceed state, federal, DEAC, or other industry regulators. Student notification methods must be reasonable and comply with other regulators. **Administrative cancellation and/or withdrawal policies must be published and require prompt notification when enforced.** Five-day minimum cancellation period after signing enrollment agreement for full refund required.

Standard XIII

D. Refunds

Institutions must implement fair and equitable refund policies that meet or exceed the requirements of their government regulators, including consumer rights and protection policies. In the absence of such requirements, the institution follows DEAC's refund policy requirements in Appendix XIV. Refund policies include procedures for students who enroll but do not start coursework and students failing to persist or make satisfactory academic progress. Refund policies must be clearly stated and transparently disclosed, including the use of sample calculations. Any money due to a student must be refunded within 30 days of the student's notice of cancellation or withdrawal; refunds due to funding agencies must be returned in compliance with their respective requirements.

Meet or exceed other regulators

- State agencies
- Funding agencies
- Industry regulators

Refund timing

Refunds due to student within 30 days of notice of cancellation or withdrawal.

Must address

1. Students who enroll but do not start
2. Students who do not persist
3. Student who do not make satisfactory academic progress

Refunds (returns) to funding agency within their respective requirements.

Institutional Refunds vs. Return of Funds

- Institutional refunds are actually the adjustment applied to the student ledger, reducing the charge in accordance with the policy to reflect the net charge for the period/course/program.
- The return of funds may be based on impact to eligibility based on the period attended or based on the credit balance after applying the institutional refund.
 - Title IV, DoD, and VA base funding eligibility on dates attended within the certification period. Thus, the institutional refund is independent of the eligibility calculation.
 - “Return to Title IV” (R2T4) calculations are performed, funds are returned accordingly, and the resulting balance remaining on the student ledger could be a balance owed by the student or a stipend paid to the student. The same is now true of how the VA handles funding, as of 2022.

Standard XIII

8 Core Components

A. Confidentiality and Privacy

B. Complaint Procedures

C. Cancellations and Withdrawals

D. Refunds

E. Performance Disclosures

F. Advertising and Promotion

G. Institution and Course Accredited -Status Recognition

H. Truth in Lending

Performance Disclosures

Routinely discloses on its website reliable, current, and accurate information on its performance in accordance with **state, federal, and other relevant regulatory agencies** and in accordance with **DEAC's student achievement disclosure format**.

Advertising and Promotion

Conforms to ethical practices in all advertising and promotion to prospective students. The institution's processes and procedures ensure that all advertisements, website content, and other marketing collateral is truthful, accurate, and clearly stated. The institution complies with DEAC's Catalog and Website Disclosures Checklists

Accredited -Status Recognition

Accurately discloses its accredited status and uses the official DEAC accreditation logo and/or statement of accreditation when publishing its accreditation status DEAC's name, address, telephone number, and web address are published in the institution's catalog.

Institutions publish a statement of accreditation only as follows:

- Accredited by the Distance Education Accrediting Commission
- DEAC Accredited

Truth in Lending

Complies with all applicable Truth in Lending Act (TILA) requirements, including those under Regulation Z, and state requirements for retail installment agreements.

Standard XIV

Finance

Jim Killin

Standard XIV

At least 64 public or nonprofit colleges have closed, merged, or announced closures or mergers since March 2020.

- **Roughly 46,720 students have been impacted by private nonprofit college closures since 2020..**
- **Just over half of students who experienced a college closure did not re-enroll (52.9%).**
- **7 in 10 students impacted by a college closure experienced an abrupt closure.**
- **For-profit colleges are far more likely to close abruptly than public and nonprofit colleges.**

Standard XIV

Why Standard XIV is important

- Risk management for all stakeholders
- School Closures
- For Profit Domino Effect
- Financial Reliability and Sustainability
- Includes:
 - Financial reporting
 - Financial management
 - Financial position today and in the future
 - Funding Sources-Related Parties
 - Risk management
 - Collections

Why Is Jim presenting – Multiple Lenses

- School President and CFO
- CEO, CFO, COO of 1 startup and 2 Turnaround universities
- DEAC evaluator
- DEAC school board member
- CPA (inactive)

Standard XIV

Finance

The institution's financial policies, processes, and procedures are sufficient to ensure sound financial practices, fiscal management, and financial sustainability and stability. The institution's budgeting process is aligned with the strategic plan. Budgeting processes and financial reporting conform to best practice. The institution's financial position is sufficient to sustain operations and meet its obligations. Financial operations are overseen by qualified and experienced personnel. Collections processes are monitored and respect the rights and interests of students.

Standard XIV A.

The institution provides on an annual basis complete, comparative financial statements covering its two most recent fiscal years' financial statements that are audited and prepared in conformity with generally accepted accounting principles (GAAP) in the United States of America or the International Financial Reporting Standards (IFRS). In the event the operations of the institution are supported in whole or in part by a parent company or a third party, the Commission may require audited financial statements from the parent or third party to demonstrate that the entity possesses sufficient financial resources to provide the institution continued financial sustainability. If the institution's financial performance is included within the parent corporation's statements, a supplemental schedule for the individual institution is appended to the parent statement, and inter-company transactions are clearly identified and defined. The institution's budgeting processes demonstrate that current and future budgeted operating results are sufficient to allow the institution to accomplish its mission and goals.

Concept 1

Provides on an annual basis complete, comparative financial statements covering its two most recent fiscal years' financial statements that are audited

Standard XIV A.

Audit - Benefit vs. Burden (ROI)

- Reviewed Statement Weaknesses
- Financial Reliability and Sustainability
 - Financial Metrics
 - Financial Consistency and Accuracy
- Internal Controls
- External Reliance
 - Loans
 - M&A
 - DEAC and others
- Cost and Time

Audit –Quick Transition thoughts

Selecting the Right Auditor

- Expertise
- Quality
- Cost
- Think - can they add value to us

Preparing For an audit

- Beginning Balance Sheet
- Internal Controls
- Risk Management

DEAC Support

Standard XIV A. cont.

Audited Financial Statements-Transition

Fiscal Year Ending	Audited Financials Due
January 1 – June 30, 2025	December 31, 2025
July 1 – December 31, 2025	June 30, 2026
For FY 2025 only, the requirement for comparable statements is waived.	
Single year, FY 2025 financial audit is acceptable.	
Future submissions of audited statements must be prepared on a comparable basis.	

Standard XIV A.

The institution provides on an annual basis complete, comparative financial statements covering its two most recent fiscal years' financial statements that are audited and prepared in conformity with generally accepted accounting principles (GAAP) in the United States of America or the International Financial Reporting Standards (IFRS). In the event the operations of the institution are supported in whole or in part by a parent company or a third party, the Commission may require audited financial statements from the parent or third party to demonstrate that the entity possesses sufficient financial resources to provide the institution continued financial sustainability. If the institution's financial performance is included within the parent corporation's statements, a supplemental schedule for the individual institution is appended to the parent statement, and inter-company transactions are clearly identified and defined. The institution's budgeting processes demonstrate that current and future budgeted operating results are sufficient to allow the institution to accomplish its mission and goals.

Concept 2

Prepared in conformity with generally accepted accounting principles (GAAP) in the United States of America or the International Financial Reporting Standards (IFRS)

Concept 4

If the institution's financial performance is included within the parent corporation's statements, a supplemental schedule for the individual institution is appended to the parent statement, and inter-company transactions are clearly identified and defined.

Concept 3

In the event the operations of the institution are supported in whole or in part by a parent company or a third party, the Commission may require audited financial statements from the parent or third party to demonstrate that the entity possesses sufficient financial resources to provide the institution continued financial sustainability.

Concept 5

The institution's budgeting processes demonstrate that current and future budgeted operating results are sufficient to allow the institution to accomplish its mission and goals.

Standard XIV B.

Individuals overseeing the fiscal and budgeting processes are qualified by education and experience. The institution maintains adequate administrative staff and other resources to operate effectively within fiscal and budgeting constraints, consistent with its representations of the scope and quality of its educational offerings as guided by its mission statement and strategic plan. Any risk that exists is adequately monitored, manageable, and insured. The institution has adequate administrative resources for effective operations, and at least one person is qualified and able to prepare accurate financial reports in a timely manner. Documentation protocols and controls are in place to assure that finances are properly managed, monitored, and protected.

Concept 1

Individuals overseeing the fiscal and budgeting processes are qualified by education and experience.

Concept 3

Any risk that exists is adequately monitored, manageable, and insured

Concept 4

The institution has adequate administrative resources for effective operations, and at least one person is qualified and able to prepare accurate financial reports in a timely manner.

Concept 2

Maintains adequate administrative staff and other resources to operate effectively within fiscal and budgeting constraints, consistent with its representations of the scope and quality of its educational offerings as guided by its mission statement and strategic plan

Concept 5

Documentation protocols and controls are in place to assure that finances are properly managed, monitored, and protected.

Standard XIV C.

Financial statements must reflect that the institution has sufficient resources to meet the institution's financial obligations to provide quality instruction and service to its students for the full period of each student's enrollment, consistent with the institution's program representations.

Concept 1

Sufficient resources to meet the institution's financial obligations and service to its students

Concept 3

Consistent with the institution's program representations

Concept 2

For the full period of each student's enrollment

Standard XIV D.

Annual financial statements are prepared in conformity with generally accepted accounting principles in the United States of America, often referred to as “GAAP”, including the accrual method of accounting. An independent certified public accountant (CPA) audit report accompanies these statements. At its discretion, the Commission may require additional financial reporting from the institution.

Concept 1

Prepared in conformity with generally accepted accounting principles

Concept 3

An independent certified public accountant (CPA) audit report accompanies these statements

Concept 2

Accrual method of accounting

Concept 4

The Commission may require additional financial reporting from the institution

Standard XIV E. Collections

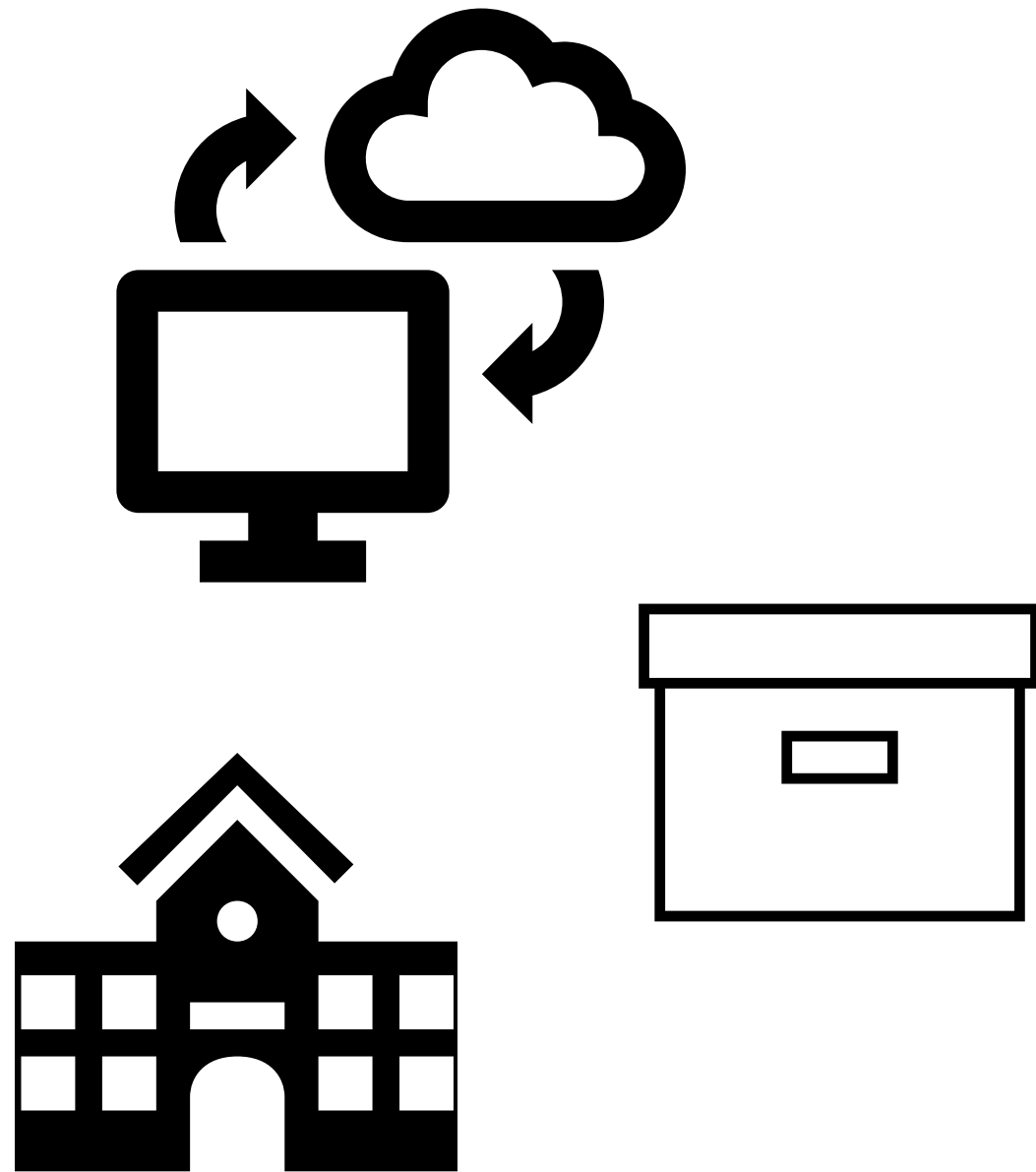
Collection procedures used by the institution or third parties reflect sound and ethical business practices.

Standard XV

Facilities and Records Maintenance

Traci Lee

Standard XV



Facilities and Records Maintenance

The institution has and maintains facilities, equipment, technology, and supplies sufficient to support its operations in compliance with DEAC accreditation standards and consistent with the institution's mission statement and published descriptions of academic programs, program outcomes, and student services. Institutions provide adequate physical and electronic security for student, financial, and administrative records. The physical location and/or virtual workspace infrastructure are adequate to sustain current operations.

Standard XV

5 Core Components

- A. Records Protection
- B. Records Retention
- C. Facilities, Equipment, and Supplies
- D. Protection of Physical Sites and Virtual Infrastructure
- E. In-Residence Program Component

A. Records Protection

Institution's financial, administrative, and student record must be securely and confidentially maintained in accordance with **laws applicable to the jurisdiction(s) in which the institution operates**

B. Records Retention

Institution's financial, administrative, and student record must be retained in accordance with **laws applicable to the jurisdiction(s) in which the institution operates**. Implement document retention policy . **Transcripts maintained permanently and are accessible.**

C. Facilities, Equipment, and Supplies

Primary facility is located in a **professional, institution -branded space authorized by local authorities for mixed use or commercial use**. Written facilities plan and budget allocations for **sustainability to support offerings, services and operations**. Buildings, workspaces, and equipment comply with local fire, building, health, and safety regulations.

D. Protection of Physical Sites and Virtual Infrastructure

Adequate to **secure financial, administrative, and student educational records; reasonably accessible; adequately protected in accordance with laws applicable to the jurisdiction(s) in which the institution operates** . Disaster response and recovery plan that includes mitigation of risks.

E. In-Residence Program Component

Appropriate facilities for students participating in in - residence learning experiences. The facilities comply with all state and federal requirements. Maintain adequate insurance.

Thank You

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