



**FILE COPY**

April 11, 2013

Joe Lubow  
President  
Sarasota School of Massage Therapy  
5899 Whitfield Avenue, Suite 300  
Sarasota, Florida 34243-6130

RE: **Final Program Review Determination**  
OPE ID: 02517100  
PRCN: 2013-2-04-28176

Dear President Lubow:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on March 5, 2013 covering Sarasota School of Massage Therapy's (SSMT) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2012-2013 award years. ~~The institution's final response was received on April 1, 2013.~~

The School Participation Division – Atlanta has reviewed SSMT's response to the Program Review Report. A copy of the program review report (and related attachments) and SSMT's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by SSMT upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

SSMT's response has resolved all findings. In addition SSMT has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, SSMT may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION  
School Participation Division – Atlanta  
61 Forsyth Street, SW Room 18T40  
Atlanta, Georgia 30303-8930  
StudentAid.gov

Sarasota School of Massage Therapy

02517100

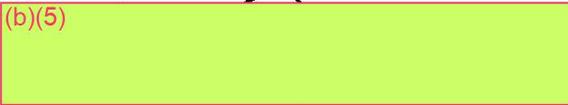
2013-2-04-28176

Page 2 of 2

If you have any questions please call Lonnie Seal at (404) 974-9240.

Sincerely,

(b)(5)

A large rectangular area of the document is redacted with a solid black fill. The text "(b)(5)" is written in red at the top left corner of this redacted area.

Charles Engstrom  
Division Director

Enclosure: Program Review Report (with attachments)  
SSMT's Response to the Program Review Report

cc: Stephanie King, Financial Aid Administrator  
FL Commission for Independent Education - Florida Department of Education,  
Council on Occupational Education



F Y I

March 5, 2013

Joe Lubow  
President  
Sarasota School of Massage Therapy  
5899 Whitfield Avenue, Suite 300  
Sarasota, Florida 34243-6130

UPS Tracking Number:  
1ZA5467Y0194176665

RE: **Program Review Report**  
OPE ID: 02517100  
PRCN: 2013-2-04-28176

Dear President Lubow:

From January 14, 2013 through January 18, 2013, Lonnie Seal conducted a review of Sarasota School of Massage Therapy's (SSMT) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by SSMT. The response should include a brief, written narrative for each finding that clearly states SSMT's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, SSMT must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
  - a. A written statement addressing the institution's response;
  - b. A written statement of the basis for such report or determination; and
  - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written

<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

response will not be attached to the FPRD. However, it will be retained and available for inspection by SSMT upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Lonnie Seal of this office within 30 calendar days of receipt of this letter.

**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Lonnie Seal at 404-974-9240 or [Lonnie.Seal@ed.gov](mailto:Lonnie.Seal@ed.gov).

Sincerely,

(b)(5)

Christopher Miller  
Compliance Manager

cc: Stephanie King, Financial Aid Administrator

Enclosure:  
Protection of Personally Identifiable Information

## PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for  
**Sarasota School of Massage Therapy**

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION

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OPE ID 02517100  
PRCN 2013-2-04-28176

Prepared by  
U.S. Department of Education  
Federal Student Aid  
School Participation Division-Atlanta

## Program Review Report

March 5, 2013

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**A. Institutional Information**

Sarasota School of Massage Therapy  
5899 Whitfield Avenue, Suite 300  
Sarasota, Florida 34243-6130

Type: Proprietary

Highest Level of Offering: Diploma

Accrediting Agency: Council on Occupational Education

Current Student Enrollment: 56

% of Students Receiving Title IV: 87.5%

Title IV Participation (PCNet):

	<u>2011/2012</u>
Direct Loans (DL)	\$520,312
Federal Pell Grant (Pell)	\$244,626
Federal Supplemental Education Opportunity Grant (FSEOG)	\$ 10,340

Default Rate (DL)	2010	4.5%
	2009	5.4%
	2008	3.3%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at SSMT from January 14, 2013 to January 18, 2013. The review was conducted by Lonnie Seal.

The focus of the review was validating compliance of Gainful Employment Disclosures. The review consisted of an examination of SSMT's homepage and/or direct link to the webpage(s) that contained all of the required information for the institution's gainful employment programs.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning SSMT's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve SSMT of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

### C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by SSMT to bring operations of the financial aid programs into compliance with the statutes and regulations.

#### Finding 1. Reporting and Disclosure of Information Error

##### Citation: Reporting and Disclosure of Information

34 C.F.R. (2012) § 668.41(c)(2) states that an institution that discloses information to enrolled students as required under paragraph (d), (e), or (g) of this section by posting the information on an Internet website or an Intranet website must include in the notice described in paragraph (c)(1) of this section—

(i) The exact electronic address at which the information is posted; and

(ii) A statement that the institution will provide a paper copy of the information on request.

(d) *General disclosures for enrolled or prospective students.* An institution must make available to any enrolled student or prospective student through appropriate publications, mailings or electronic media—

(1) Financial assistance available to students enrolled in the institution (pursuant to § 668.42).

(2) The institution (pursuant to § 668.43).

**Noncompliance:** The institution states on the following hyperlink

[http://www.sarasotaschoolofmassagetherapy.edu/disclosure\\_list.html](http://www.sarasotaschoolofmassagetherapy.edu/disclosure_list.html): *The following disclosure can be found on the Net Price Calculator Page.* If a prospective or current student clicks on the *Net Price Calculator Page* hyperlink, it returns the student to the following hyperlink, <http://www.sarasotaschoolofmassagetherapy.edu/mtp.html>, which does not have a Net Price Calculator displayed<sup>1</sup>.

**Required Action:** SSMT must correct the hyperlink which is named, *The following disclosure can be found on the Net Price Calculator Page*, so that it directs the prospective or current student to SSMT's actual Net Price Calculator, which is located in small font near the bottom of the *Financial Assistance* webpage as a hyperlink named, Net Price Calculator and when clicked on will open SSMT's Net Price Calculator located at:

<http://www.sarasotaschoolofmassagetherapy.edu/NetPrice/npcalc.htm>.

<sup>1</sup> To locate SSMT's Net Price Calculator: go to their homepage and click on the *Tuition & Assistance* tab, and when the page opens, click on the *Financial Assistance* tab located near the top center of the homepage just below the *Tuition & Assistance* tab.

In response to this finding, the institution must provide the link to where SSMT's Net Price Calculator is located and ensure that any hyperlinks that are named Net Price Calculator actually open SSMT's Net Price Calculator web-page. Moreover, SSMT must provide a written statement to when this requirement was accomplished.

## **Finding 2. Net Price Calculator Inaccurate**

**Citation:** Higher Education Opportunity Act of 2008 (HEOA)

In accordance with the Higher Education Opportunity Act of 2008 (HEOA), by October 29, 2011, each postsecondary institution that participates in Title IV federal student aid programs must post a net price calculator on its website that uses institutional data to provide estimated net price information to current and prospective students and their families based on a student's individual circumstances. This calculator should allow students to calculate an estimated net price of attendance at an institution (defined as cost (price) of attendance minus grant and scholarship aid) based on what similar students paid in a previous year. The net price calculator is required for all Title IV institutions that enroll full-time, first-time degree- or certificate-seeking undergraduate students.

**Noncompliance:** Because the data on the Net Price Calculator (NPC) at SSMT is from the 2009-2010 academic year, the NPC does not accurately allow students to calculate an estimated net price of attendance at their institution (defined as cost (price) of attendance minus grant and scholarship aid) based on what similar students paid in a previous year.

**Required Action:** SSMT must upload the latest version of the NPC template to ensure that it yields accurate estimates in accordance with the Higher Education Opportunity Act of 2008 (HEOA). For detailed instructions on how to complete this requirement go to: [http://nces.ed.gov/ipeds/resource/net\\_price\\_calculator.asp](http://nces.ed.gov/ipeds/resource/net_price_calculator.asp).

In response to this finding, the institution must provide the link to where the updated Net Price Calculator is located on the SSMT's website and a written statement addressing when this requirement was completed.

## **D. Appendices**

Appendix A includes screenshots from the Net Price Calculator on SSMT's website located at: <http://www.sarasotaschoolofmassagetherapy.edu/NetPrice/npcalc.htm>.

Appendix A  
Net Price Calculator Screenshot

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## Net Price Calculator

Based on the information you have provided, the following calculations represent the average net price of attendance that students similar to you paid in the given year. This information applies only to the **Massage Therapy/Therapeutic Massage** program at the institution, which typically takes an average of 7 months for a full-time student to complete. Prices may vary depending on the program of interest and its expected duration.



### Academic Year: 2009-10

<b>Estimated total price of attendance:</b>	<b>\$27,989</b>
a. Estimated tuition and fees	\$11,375
b. Estimated room and board	\$12,901
c. Estimated books and supplies	\$1,200
d. Estimated other expenses (Personal expenses, transportation, etc.)	\$2,513
<b>Estimated total grant aid:</b> (Includes both merit and need based aid)	<b>\$4,392</b>
<b>Estimated net price:</b> (Price of attendance minus grant aid)	<b>\$23,597</b>

Previous

Start Over

**Please Note:** The estimates above apply to **full-time, first-time degree/certificate-seeking undergraduate students** only. Please note: the estimate for room and board assumes that you are renting a one bedroom apartment near the school without a roommate. Some housing can be more expensive, while students who share apartments with roommates can reduce this cost significantly.

These estimates do not represent a final determination, or actual award, of financial assistance or a final net price; they are only estimates based on price of attendance and financial aid provided to students in 2009-10. Price of attendance and financial aid availability change year to year. These estimates shall not be binding on the Secretary of Education, the institution of higher education, or the State.

Not all students receive financial aid. In 2009-10, 88% of our full-time students enrolling for college for the first time received grant/scholarship aid. Students may also be eligible for student loans and work-study. Students must complete the Free Application for Federal Student Aid (FAFSA) in order to determine their eligibility for Federal financial aid that includes Federal grant, loan, or work-study assistance. For more information on applying for Federal student aid, go to <http://www.fafsa.ed.gov/>. This estimate is based on costs in 2009-2010. The estimated cost of books and supplies for 2011-2012 has dropped by \$675 now that the school includes a high quality massage table with tuition.

There are many types of aid available that are not included in this estimate. These included tax credits of up to \$2,500, private scholarships, and many types of low

interest loans - from Federal Student Loans, private loans, and low interest SSMT loans. Most people who want to become a massage therapist find some combination of these grants and loans are enough to enable them to pursue their dream.

These numbers are only a very rough estimate. The best way to determine whether or not school will be feasible for you is to complete a FAFSA and then discuss your financial situation, and the aid package available to you, with an advisor at the school. It is our commitment to help people who want to become massage therapists attend school, only if it is right for them.

SARASOTA  
SCHOOL

of  
MASSAGE  
THERAPY

March 27, 2013

Lonnie Seal  
U.S. Department of Education, School Participation Division  
61 Forsyth Street SW, Room 18T40  
Atlanta, GA 30303-8930

RE: **Response to Program Review Report**  
OPE ID: 02517100  
PRCN: 2013-204-28176

Dear Mr. Seal:

Sarasota School of Massage Therapy (SSMT) is in receipt of the Program Review Report dated March 5, 2013. This letter addresses the two findings in that report.

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**Finding 1. Reporting and Disclosure of Information Error**

**Noncompliance**

The institution states on the following hyperlink [http://www.sarasotaschoolofmassagetherapy.edu/disclosure\\_list.html](http://www.sarasotaschoolofmassagetherapy.edu/disclosure_list.html): *The following disclosure can be found on the Net Price Calculator Page.* If a prospective or current student clicks on the *Net Price Calculator Page* hyperlink, it returned the student to the following hyperlink, <http://www.sarasotaschoolofmassagetherapy.edu/mtp.html>, which did not have a Net Price Calculator displayed.

**Corrective Action Taken**

The hyperlink on this page [http://www.sarasotaschoolofmassagetherapy.edu/disclosure\\_list.html](http://www.sarasotaschoolofmassagetherapy.edu/disclosure_list.html) now takes prospective or current students directly to the Net Price Calculator. This correction was made on March 21, 2013.

As noted in the footnote in the Program Review Report, the school's Net Price Calculator has always been available from the *Financial Assistance* page. This page can be found by

clicking on the *Tuition and Assistance* tab in the navigation bar from anywhere in the sight, and then selecting the *Financial Assistance* submenu just below the navigation bar. It can also be accessed directly at the following url:

[http://www.sarasotaschoolofmassagetherapy.edu/tanda\\_fa.html](http://www.sarasotaschoolofmassagetherapy.edu/tanda_fa.html).

The *Net Price Calculator* link is located near the bottom of this page, just above the link "Click for more information on types of financial assistance available." The direct url for the *Net Price Calculator* is:

<http://www.sarasotaschoolofmassagetherapy.edu/NetPrice/npcalc.htm>

All links named *Net Price Calculator* now open SSMT's *Net Price Calculator* page.

## **Finding 2. Net Price Calculator Inaccurate**

### **Noncompliance**

Because the data on the Net Price Calculator (NPC) at SSMT is from the 2009-2010 academic year, the NPC does not accurately allow students to calculate an estimated net price of attendance at their institution (defined as cost (price) of attendance minus grant and scholarship aid) based on what similar students paid in a previous year.

### **Corrective Action Taken**

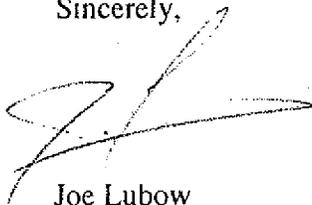
The SSMT NPC was been updated with 2011-2012 data using the the latest version of the NPC template. The SSMT NPC may be found at

<http://www.sarasotaschoolofmassagetherapy.edu/NetPrice/npcalc.htm>. This correction was completed on March 27, 2013.

The correction only created minor changes in the NPC calculations, as neither institutional costs nor grants and scholarships have changed significantly since 2009-2010 at SSMT.

We would like to thank you for the gracious assistance extended to SSMT staff during the review. If you have any questions or need any further information, please contact me at 941-957-0577 or [joe.l@sarasotaschoolofmassagetherapy.edu](mailto:joe.l@sarasotaschoolofmassagetherapy.edu).

Sincerely,



Joe Lubow  
Director

(b)(6); (b)(7)(C),(b)(7)(E)

