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Turtle Mountain Community College
2014 Federal Compliance Worksheet



Federal Compliance Filing by Institutions

Effective September 1, 2013 – August 31, 2014

This document outlines the information institutions should provide in a separate federal compliance section of its comprehensive PEAQ self-study report or AQIP Quality Check Up. Institutions must address the **federal requirements** in the information they submit to the Commission **before** the visit and additional supporting information on federal compliance in the Resource Room during the visit. Institutions should address these requirements with brief narrative responses and provide supporting documentation, where necessary. (Institutions participating in the Standard or Open Pathway will provide all of their information through the Assurance System.) The information requested in this document should be provided in the separate federal compliance document **before** the visit unless otherwise noted. The institution should refer to the Federal Compliance Guide for Institutions and Evaluation Teams in completing this template. The Guide identifies applicable Commission policies and an explanation of each requirement. Note that some federal requirements are related to the Commission's Criteria for Accreditation or Assumed Practices. This document identifies those related Criteria and Assumed Practices so that the institution may cross-reference any material it prepares to address those Criteria and Assumed Practices.

Institution under review: Turtle Mountain Community College

Assignment of Credits, Program Length, and Tuition

1. Complete the *Worksheet for Use by Institutions on the Assignment of Credit Hours and on Clock Hours* attached to this document, and submit the worksheet and the attachments listed in it.
2. Provide information about the length of the institution's degree programs and identify and justify any difference in tuition for specific programs.

Institutional Records of Student Complaints

1. Explain the process for handling student complaints.
 2. Summarize the number and type of complaints and track their resolutions since the last comprehensive evaluation by the Commission.
 3. Explain how the institution integrates what it has learned from the complaint process into improvements in services or in teaching and learning.
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Publication of Transfer Policies

1. Demonstrate that transfer policies are disclosed in the institution's catalog, on the web site, or in other appropriate publications.
2. Demonstrate that articulation agreements, at both the institutional level and the program level, are disclosed to students. Ensure that the disclosures clearly identify whether the institution under review: 1) accepts credit from the other institution(s) in the articulation agreement; 2) sends credits to the other institution(s) in the articulation agreement that it accepts; or 3) both offers and accepts credits with the institution(s) in the articulation agreement.
3. Demonstrate that the disclosed transfer policies align with the criteria and procedures actually used by the institution in making transfer decisions.

Practices for Verification of Student Identity

1. Identify whether students are enrolled in distance or correspondence courses.
2. Demonstrate that the institution verifies the identity of students enrolled in these courses, that any additional costs to the student because of this method are disclosed to students prior to enrollment, and that the method of verification makes reasonable efforts to protect student privacy.

Title IV Program Responsibilities

This requirement has several components the institution must address. The institution staff compiling this information should work with the financial aid office and the chief financial officer or comptroller.

1. General Program Responsibilities

- a. Provide information regarding the status of the institution's Title IV program; in particular, submit information about recent findings from Title IV program reviews, inspections, or audits.
- b. Disclose any limitation, suspension, or termination actions that the U.S. Department of Education has undertaken and the reasons for those actions.
- c. Disclose any fines, letters of credit, or heightened monitoring arising from the Department of Education. Explain the consequences of these challenges for the institution's short- and long-term financial health.
- d. Discuss the institution's response and corrective actions to these challenges.
- e. Provide information about findings from the A-133 portion of the institution's audited financial statements that identify any material weaknesses in the processing of financial aid.

2. **Financial Responsibility Requirements.** Provide information about the Department of Education's review of the institution's composite ratios and financial audits.

The Commission also annually analyzes each institution's financial ratios to determine whether there might be financial concerns. The team will check with the institution and with Commission staff regarding whether the Commission or the Department has previously raised concerns about an institution's finances based on these ratios. If so, the institution should have addressed in its documents the actions it has taken and plans to take in response to these concerns. *Related Commission Requirements: Core Component 5.A, 2.B; Assumed Practice D.1.*

3. Default Rates

Note for 2012 and thereafter institutions and teams should be using the three-year default rate based on revised default rate data published by the Department in September 2012.

The institution should take steps to avoid excessive loan default rates.

- a. Disclose student loan default rates as provided by the Department for the three years leading up to the visit.
- b. If the default rates are higher for the institution than its peer institutions, if rates are rising, or if rates have exceeded Departmental thresholds or triggered a Department review, then the institution should address the actions it has taken in response and submit to the team any corrective plan filed with the Department.
- c. Submit information about the institution's participation in private loan programs and any loan services that it provides to students directly or that a related corporation provides to its students.

4. Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures. Title IV responsibilities include the legal obligation to disclose information to students and to the public about campus crime, athletic participation and other information. Identify any findings from the Department regarding these disclosures.

Supporting information: Provide samples of those disclosures in the Resource Room.

5. Student Right to Know. Title IV responsibilities require that institutions provide graduation/completion for the student body by gender, ethnicity, receipt of Pell grants, and other data as well as information about the process for withdrawing as a student, cost of attendance, refund and return of Title IV policies, current academic programs and faculty, names of applicable accrediting agencies, description of facilities for disabled students, and the institution's policy on enrollment in study abroad. In addition, certain institutions need to disclose their transfer-out rate.

Supporting information: Identify any findings from the Department regarding these disclosures. Provide samples of these disclosures in the Resource Room.

Related Commission Requirements: Assumed Practice A.6.

6. Satisfactory Academic Progress and Attendance Policies. The institution is required to have a Satisfactory Academic Progress policy and an attendance policy as part of the Title IV program. Document that these policies are readily available to students, satisfy state or federal requirements, and are being appropriately applied by the institution in individual student situations. (Note that the Commission does not necessarily require that the institution take attendance but does anticipate that institutional attendance policies will provide information to students about attendance at the institution.)

7. Contractual Relationships. Disclose contracts with third-party entities not accredited by a federally recognized accrediting agency. (The institution should have previously disclosed to the Commission all existing contracts in the 2010 and 2011 Annual Institutional Data Updates and received approval for those contracts. The Commission's substantive change policy requires that the institution notify the Commission of any new contracts for up to 25 percent of an academic program, that the institution obtain prior Commission approval before initiating any contract for 25 to 50 percent of a program, and that the Commission approve contracts for more than 50 percent of a program only in exceptional circumstances under strict scrutiny. The institution should review the document, *"Information on Contractual and*

Consortial Arrangements,” for more information. Related Commission Requirements: Assumed Practice A.10.)

- 8. Consortial Relationships.** Disclose consortial relationships with other entities accredited by a federally recognized accrediting agency. (The institution should have previously disclosed all consortial relationships to the Commission in the 2010 and 2011 Annual Institutional Data Updates. The Commission’s substantive change policy requires that the institution notify the Commission of any new consortium for 25 to 50 percent of an academic program and that the institution obtains prior Commission approval for any consortium that offers 50 percent or more of an academic program. The institution should review the document, “*Information on Contractual and Consortial Arrangements*,” for more information. *Related Commission Requirements: Assumed Practice A.10.*)

Required Information for Students and the Public

1. Submit course catalogs and student handbooks to the team.
2. Identify sections of the web site that include required disclosure information.

Advertising and Recruitment Materials and Other Public Information

1. Demonstrate that advertisements and recruiting materials provides accurate, timely, and appropriately detailed information to current and prospective students and that information about the institution’s accreditation status with the Commission and other accrediting agencies is clear and accurate.
2. Demonstrate that the institution provides such information to current and prospective students about its programs, locations, and policies.
3. Provide the team with a link to the Mark of Affiliation on the institution’s web site.

Review of Student Outcome Data

1. Demonstrate that the institution collects information about student outcomes.
2. Provide evidence that information collected about student outcomes informs planning, program review, assessment, etc.

Standing with State and Other Accrediting Agencies

1. Disclose information about any relationship with a specialized, professional, or institutional accreditor and with all governing or coordinating bodies in states in which the institution has a presence.

Supporting information: Provide the team in the Resource Room with the most recent comprehensive evaluation report and action letter from each institutional or specialized accrediting agency as well as any interim monitoring prepared for that agency.

Public Notification of Opportunity to Comment

1. Determine what constituencies should receive the notice of opportunity to comment. These groups should include students, parents, alumni, taxpayers, donors, community groups, local businesses.
2. Determine what media the institution will use to solicit comments. Local newspapers, institutional web sites, and alumni magazines are appropriate choices. The notices should reach all constituencies but should not unduly burden the institution.

The notices should include: the purpose and dates of the visit, the institution's accreditation status with the Higher Learning Commission, an invitation to send written, signed comments directly to the Commission, and contact information for the Commission.

The notices should specify that comments must be sent to the Commission no later than four weeks before the start of the visit.

3. Publish the notices of the visit following the prescribed format; a sample notification is provided below.
4. The institution must send copies of its notices to the Commission in .pdf format to legalaffairs@hlcommission.org at least a month before the comprehensive evaluation visit. Commission staff will compile the comments and the notices and send them to the evaluation team and to the institution three weeks prior to the visit. The Commission will also review and forward comments received after the deadline lapses and even during the visit, as third party comments are an important part of the comprehensive evaluation visit process.
5. In cases where comments are of a sensitive nature, the Commission staff will ensure that the commenter is aware that comments are typically forwarded to the institution and the evaluation team with identifying information intact. In some cases, Commission staff may redact the identifying information of the commenter or summarize the comment.

SAMPLE NOTICE

John Dewey College is seeking comments from the public about the College in preparation for its periodic evaluation by its regional accrediting agency. The College will host a visit November 7-9, 2014, with a team representing the Higher Learning Commission of the North Central Association. John Dewey College has been accredited by the Commission since 1967. The team will review the institution's ongoing ability to meet the Commission's Criteria for Accreditation.

The public is invited to submit comments regarding the college:

Third Party Comment on John Dewey College
The Higher Learning Commission
230 South LaSalle Street, Suite 7-500
Chicago, IL 60604-1411

The public may also submit comments on the Commission's Web site at www.ncahlc.org.

Comments must address substantive matters related to the quality of the institution or its academic programs. Comments must be in writing.

All comments must be received by October 10, 2014

Worksheet for Use by Institutions on Assignment of Credit Hours and on Clock Hours

Instructions

This worksheet should be completed by the person(s) at the institution who know the most about the institution's calendar and credit hour assignments; at many institutions the registrar may be the appropriate person to complete this assignment. The person(s) completing the assignment should work closely with the institution's financial aid officer to ensure consistency between what is reported to the Commission on this form and what is reported to the U.S. Department of Education.

Purpose of this form. This form provides the evaluation team with a single source of information about the institution's calendar, credit hour policies, and total credit hour generation related to the courses for which it provides instruction, and an overview of the institution's pattern of distribution of credit hour assignments. **It is not an inventory of every course the institution offers.** The institution should:

- report on academic terms and credit for courses that support the institution's certificate and degree programs;
- include notes or other brief explanation in this form where appropriate to explain the allocation of credit hours;
- estimate or round off where appropriate;
- **not** include prior learning, transfer, etc., wherein the institution awards credit but does not provide instruction associated with that credit.

Appendix A. Credits and Program Length. All institutions must complete Appendix A. Institutions that use multiple calendars may need to complete more than one section of Part One.

Appendix A includes these sections:

Part One. Institutional Calendar, Term Length, and Type of Credit

Part Two. Format of Courses and Number of Credits Awarded

Part Three. Policy on Credit Hours

Part Four. Total Credit Hour Generation

Part Five. Clock Hours

Supporting Materials

Appendix B. Clock Hour Worksheet. Institutions should complete Appendix B only if they offer clock-hour courses/programs or are required by the U.S. Department of Education to report certain courses/programs to the Department in clock-hours for Title IV purposes.

Appendix A: Assignment of Credit Hours

Part One: Institutional Calendar, Term Length, and Type of Credit

Institutions that use multiple calendars across the institution may need to complete more than one section below. For more information about the terminology and calendaring units referenced in this form, see 2011-2012 Federal Student Aid Handbook, Volume 3, Chapter 1, Academic Calendar, Payment Periods and Disbursements. Definitions in this section are taken from that Handbook.

Name of Institution: **Turtle Mountain Community College**

Terms		Column 1 Term Length: Number of weeks	Column 2 Number of Starts
Semester / Trimester Calendar	Standard Format: 14-17 week term	16	1
	Compressed Formats: 4, 8 or other week terms within the semester calendar ¹	0	0
	Summer Term	8	1
Quarter Calendar	Standard Format: 10-12 week term	0	0
	Compressed Formats: 2, 5, or other week terms within the quarter calendar ¹	0	0
	Summer Term	0	0

Non-Standard Terms (terms that are not semester, trimesters, or quarters. A non-standard term may have the following characteristics: courses do not begin and end within a set period of time; courses overlap terms, including self-paced and independent study courses or sequential courses that do not begin and end within a term; terms may be of equal or unequal length.)

Term		Column 1 Term Length: Number of weeks	Column 2 Number of Starts	Column 3 Type of Credit
Non-Standard Term Calendar	Term One	0	0	0
	Term Two	0	0	0
	Term Three	0	0	0
	Summer Term	0	0	0

Part Two. Format of Courses and Number of Credits Awarded

Guide to Completing this Section

Purpose of this section

This section asks the institution to provide a broad overview of the pattern of instructional hours required for the credit hours it awards. The chart provides a suggested approach for conveying that information to the evaluation team. The institution should feel free to make modifications in the chart or add brief notes as appropriate to explain credit hour awards, particularly in non-standard or compressed format classes.

If the institution offers multiple terms, such as a compressed format term and a regular semester term, it should separate that information, typically by providing a separate chart for each term, so that the team can understand how instructional time is related to credit hour awards in each term. It is important to emphasize that the information in this section need not be extensive as long as it explains credit hour awarding across various formats at the institution.

The institution should not use this section to demonstrate that it assigns credit hours appropriately relative to non-contact hour requirements such as out-of-class group meetings or homework assignments. That issue may be addressed in the institution's credit hour policy, and the team may consider it in the sample of institutional programs it will examine more carefully during the evaluation visit.

Period Reported

An institution may use any recent term that provides a reasonable picture of their credit hour allocations as the basis for reporting in the Form for Reporting an Overview of Credit Hour Allocations and Instructional Time for Courses. The institution should identify on the form what term is being reported. **The institution should complete a separate form for each type of term identified in Part One.**

Key to Rows

- **# of Courses**—Count each course offered by the institution in the row corresponding to the number of credits awarded and the column or columns representing the format of delivery through which the course or a section of that course is offered. Do not count sections of the same course if the sections are offered in the same delivery format.
- **# of Meetings**—Enter the total number of class meetings (or equivalent) provided in each course with that credit award during that term; if the number of class meetings varies, enter a range. For distance, correspondence or other formats report on instructional time. Do not include study or other time where students work independently or with other students even though such time may be provided to replace time with a faculty member. Instructional time need not be limited to time spent with all students in the class in a single format.

Include lab or discussion in the number of meetings if they are a required element of the course, do not have a separate course number or credit hour allocation, and if the presence of a lab or discussion is considered significant when the institution assigns credit hours to the course. If lab or discussion does meet these considerations, it need not be reflected in this chart.
- **Meeting Length**—Enter the range (shortest to longest) of meeting times in each category. (*Note that one hour may be 50 minutes of actual instructional time.*)

Key to Columns

- **Column 1–FTF:** For courses where instructors interact with students in the same physical space for approximately 75% or more of the instructional time.
- **Column 2–Mixed FTF:** For courses where instructors interact with students in the same physical space for less than 75% of the instructional time with the remainder of the instructional time provided through distance or correspondence education.

Note that the above explanations arise from the Commission's distance education protocol.

Institutions may use other thresholds for FTF and Mixed FTF provided that they define them clearly and include the definition on this worksheet.

- **Column 3–Distance:** For courses where instructors interact with students through one or more forms of distance delivery.
- **Column 4–Correspondence:** For courses where instructors interact with students through mail or electronic interface according to a typically self-paced schedule.

Federal Definitions of Distance/Correspondence Education:

Distance education/course means education that uses one or more of the {following} technologies (i) to deliver instruction to students who are separated from the instructor: and (ii) to support regular and substantive interaction between the students and the instructor, synchronously or asynchronously. The technologies used may include: (i) the internet; (ii) one way and two way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; (iii) audioconferencing; or (iv) videocassettes, DVDs, and CD-Roms, if the videocassettes, DVDs or CD-Roms are used in conjunction with any of the technologies listed in clauses (i) through (iii).

Correspondence education/course means: (1) Education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. (2) Interaction between the instructor and the student is not regular and substantive, and is primarily initiated by the student. (3) Correspondence courses are typically self-paced. (4) Correspondence education is not distance education.

- **Column 5–Independent/Directed Study:** For courses where instructors interact with students through a flexible format.
- **Column 6–Weekend College:** Some institutions may have an evening or weekend college that, while on the same calendar, may structure its courses and credit assignments differently than the same courses offered during the regular day; institutions that offer courses in the evening or on the weekend as another scheduling option for students, but the courses provide similar class meetings or instructional time as those courses offered by the institution during the regular day need not report evening or weekend courses in this category.
- **Column 7–Internships/Practica:** Some institutions may provide internship or practica experiences for which credits are awarded by the institution. Institutions that have professional schools in medicine, law, nursing, physical therapy, etc. that often require internships or practica with high credit allocations should provide brief summative information about the internships but not need include them in the report form.

Some Examples

- *If the institution offers Calculus 210, a three credit-hour course, in FTF and distance formats as well as through the Weekend College, the course should be reported in the row for 3 credits and once in each of those columns.*
- *If the institution offers that course in a full 14-17 week standard format as well as in a compressed format, the course should be reported on one form for the standard form and in a separate form for the compressed format.*
- *If in the FTF format instructors meet with students two times per week for 1.5 hours per meeting for the 14 weeks of the term, report the # of meetings as 28 meetings, and the length of each meeting as 1.5 hours.*

Form for Reporting an Overview of Credit Hour Allocations and Instructional Time for Courses

Complete a separate form for each term length specified in Part One, Columns 1 and 2 above.

Term and Length: Fall 2013 – 16 weeks

# Credits Awarded	Instructional Time	Course Formats						
		1. FTF Courses	2. Mixed FTF Courses	3. Distance Courses	4. Corresp Courses	5. Independent / Directed Study Courses	6. Weekend College	7. Internship/ Practica Courses
Sample Row: 3 Credits	# of courses	119	24	57	14	2	20	4
	# of meetings	15-45	15-30	15	4-8	3-14	6	6-10
	Meeting length	1-3 hrs.	1-2 hrs.	1 hr.	1-2 hrs.	.5-3 hrs.	4 hrs.	1-4 hrs.
1 Credit	# of courses	22	0	0	0	0	0	0
	# of meetings	16						
	Meeting length	1-2 hours						
2 Credits	# of courses	19		3				
	# of meetings	16-32		0				
	Meeting length	1-2		0				
3 Credits	# of courses	95	4	30				
	# of meetings	16-32	16	0				
	Meeting length	1.5-3	1-2	0				
4 Credits	# of courses	31		6				
	# of meetings	16-48		0				
	Meeting length	1.5-3		0				
5 Credits	# of courses							
	# of meetings							
	Meeting length							
6 Credits ¹	# of courses	1						
	# of meetings	96						
	Meeting length	1-3						
12 Credits ¹	# of courses							3
	# of meetings							10
	Meeting length							1

¹ Institutions offering courses with **six or more credits awarded** should list those courses in these spaces. Identify the number of credits awarded in the first column. Add additional rows, if needed. **In a separate attachment, identify the course(s) and explain the reasoning behind the credit allocated to those courses.**

Other Courses Not Reported Above

List below any other courses that were not included in the Form for Reporting an Overview of Credit Hour Allocations and Instructional Time for Courses. Identify the course names and the number of credits allocated to them along with a brief description of how instruction takes places in these courses and how many hours of instruction are provided. (Such courses might include travel, summer term, or other courses that do not fit in the columns above because they have a different delivery format. However, if this activity is a small part of the institution's offerings, it should be reported on with brief information.)

Part Three: Policy on Credit Hours

The institution has a policy specific to the assignment of credit:

☒ Yes* ☐ No

The institution has policies specific to the assignment of credit at the following levels (check all that apply):

☒ Institution-wide ☒ Delivery format specific
☐ Department-specific ☐ Program specific

**Include the institution's credit hour policy in the attachments to this worksheet.*

Part Four: Total Credit Hour Generation

Identify the typical number of credits of a full-time or part-time undergraduate and graduate student takes during a regular term.

Typical credits of a full-time undergraduate student = 12

Typical credits of a part-time undergraduate student is less than 12

Provide the headcount of students earning more than this load in the most recent fall and spring semesters/trimesters or the equivalent for quarters or non-standard term institutions.

181 Most Recent Fall Term 2013-14 (identify the year)

94 Most Recent Spring Term 2012-13 (identify the year)

Part Five: Clock Hours

IMPORTANT. THIS WORKSHEET DOES NOT APPLY TO ALL INSTITUTIONS. It is not intended for institutions to demonstrate that they have assigned credit hours relative to contact hours in accordance with the Carnegie definition of the credit hour. This worksheet solely addresses those programs reported to the Department of Education in clock hours for Title IV purposes. Institutions that do not have such programs should not complete this worksheet.

Answer YES to the statement below **only if the institution offers any programs in clock hours OR that must be reported to the U.S. Department of Education in clock hours for Title IV purposes even though students may earn credit hours for graduation from these programs.** For example, any program that prepares students for a licensed or professional discipline may need to be reported in clock hours to the Department.

Check with the institution's financial aid officer to determine if the institution has programs of this nature. Such programs typically include those required to be identified in clock hours for state licensure of the program or where completing clock hours is a requirement for graduates to apply for licensure or authorization to practice the occupation. Such programs might include teacher education, nursing, or other programs in licensed fields.

The institution reports clock hours to the U.S. Department of Education with regard to some programs for Title IV purposes:

☐ Yes

☒ No

If the answer is Yes, complete Appendix B, Clock Hour Worksheet, and attach it to this report.

Supporting Materials

The institution should include with this document the following supporting materials:

- Copies of all applicable policies related to the assignment of credit in .pdf format.
- A copy of the catalog or other document in .pdf format that contains course descriptions and applicable credit hour assignments.
- The catalog or other document in which the institution has marked or highlighted any course that is provided by the institution in non-standard terms or compressed format for the term reported. This information can also be provided on a separate list that identifies those courses and how to find them in the course catalog.
- The course schedule for the most recent completed fall and most recent completed spring terms with times and meeting dates for all classes at all locations and by delivery format. If the course schedule is not available as a separate document, include a URL to access this information online. If a password is required to access this information, include that password.

Note that the team may ask for additional data to examine credit hour production by educational program and by course. These data may include separate breakdowns for general education as well as by delivery format and by course academic unit (semester, quarter, etc.), by level, by location or by delivery format.

Appendix B: Clock Hour Worksheet

**Important. Please review the following instructions.
Only certain institutions must complete this worksheet.**

Complete this worksheet **ONLY IF** the institution answered YES in Part 5 of Appendix A indicating that the institution offers any programs in clock hours OR that must be reported to the U.S. Department of Education in clock hours for Title IV purposes even though students may earn credit hours for graduation from these programs. For example, any program that prepares students for a licensed or professional discipline may need to be reported in clock hours to the Department.

Check with the institution's financial aid officer to determine if the institution has programs of this nature. Such programs typically include those required to be identified in clock hours for state licensure of the program or where completing clock hours is a requirement for graduates to apply for licensure or authorization to practice the occupation. Such programs might include teacher education, nursing, or other programs in licensed fields.

Federal Formula for Minimum Number of Clock Hours of Instruction (34 CFR §668.8) 1 semester or trimester hour must include at least 37.5 clock hours of instruction 1 quarter hour must include at least 25 clock hours of instruction
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Name of Institution: _____

Identify the academic programs that are reportable in clock hours based on the information above. (The institution may attach a separate list.)

Explain the institution's credit to clock hour conversion policy.

If the credit to clock hour conversion numbers are less than the federal formula, indicate what specific requirements there are, if any, for student work outside of class.

