



# Federal Compliance Materials 2014



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Academic  
Quality Improvement  
Program

The Higher Learning Commission HLC

## FEDERAL COMPLIANCE MATERIALS

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### ASSIGNMENT OF CREDITS, PROGRAM LENGTH, AND TUITION

#### 1. Assignment of Credit Hours

The assignment of credit hours is the responsibility of the Academic Affairs and Standards (AASC) Committee, which makes all curriculum related decisions. The College's policy regarding assignment of credit hours is set forth in LSC policy [3.18](#).

#### Related Attachments:

- Appendix A: Assignment of Credit Hours Worksheet
- Appendix B: Course Schedules (Spring, 2013 and Fall, 2013)
- Appendix C: List of Courses in Non-Standard Terms or Compressed Formats
- Appendix I: LSC Catalogue (Course Descriptions and Credit Hour Assignments)
- Appendix N: LSC Policy 3.18 – Assignment of Student Credits

Note: The Clock Hour Worksheet is not applicable to LSC.

#### 2. Program Length and Tuition

##### PROGRAM LENGTH

Program length is controlled by MnSCU board policy ([3.36](#)) and procedure ([3.36.1, Part 3](#)), which is mirrored by LSC policy ([3.36](#)) and procedure ([3.36.1](#)). The following is a list of awards LSC offers, showing their length, in credits:

- A.A. Degree – 60-64 Credits
- A.A.S. Degree – 60-72 Credits (may exceed 72 credits when longer length is required by employer, licensing body, or regulatory agency)
- A.S. Degree – 60-64 Credits
- A.F.A. Degree – 60-64 Credits
- Diploma – 31-72 Credits (may exceed 72 credits when longer length is required by employer, licensing body, or regulatory agency)
- Certificate – 9-30 Credits

### PROGRAM INVENTORY

A copy of LSC's program inventory, listing all programs LSC is authorized by MnSCU to offer, is attached as Appendix D.

### TUITION DIFFERENTIAL

LSC's Minnesota Resident Tuition rate for the 2013-14 academic year is \$147.25 per credit.

MnSCU board policy and procedure ([5.11.1](#)) authorizes system colleges to charge differential course and program tuition rates "when there is an extraordinary cost of offering the course or academic program (i.e. need for specialized equipment, required expensive supplies; accreditation standards, delivery methods; program expansion/enhancement)." Requests to charge differential tuition must be submitted to and approved by the MnSCU Board of Trustees.

LSC's current board-approved tuition differentials are as shown:

Online Course tuition: \$184.07 per credit

Per credit surcharges:

\$20.80 – Architectural Drafting	\$46.80 – Massage Therapy
\$41.60 – Auto Body Technology	\$20.80 – Media Production
\$41.60 – Auto Service Technology	\$46.80 – Medical Assistant
\$31.20 – Building Construction	\$46.80 – Medical Lab Technician
\$31.20 – Civil Engineering Technology	\$67.60 – Nursing AAS (NURS)
\$31.20 – Commercial and Residential Wiring	\$15.60 – Nursing Assistant
\$31.20 – Computer Information Systems	\$46.80 – Physical Therapist Assistant
\$52.00 – Dental Hygiene	\$67.60 – Practical Nursing (NUPN)
\$31.20 – Electronics/Industrial Controls	\$52.00 – Radiologic Technology
\$20.80 – Engineering CAD	\$46.80 – Respiratory Care Practitioner
\$41.60 – Fire Technology	\$46.80 – Surgical Technician
\$41.60 – Integrated Manufacturing	\$31.20 – Truck Driving
\$41.60 – Machine Tool	\$41.60 – Welding

## INSTITUTIONAL RECORDS OF STUDENT COMPLAINTS

### 1. Process for Handling Complaints

Student complaints and grievances are governed by LSC Policy ([3.8](#)) and Procedure ([3.8.1](#)). The policy and procedure are both reproduced in print and online in the LSC Student Planner and the LSC Catalog. Complaints of discrimination or harassment, known as 1B1 complaints, are governed by a separate LSC Policy ([1B.1](#)) and Procedure ([1B.1.1](#)).

Both formal and informal student complaints are logged and tracked in the office of the Vice President of Academic and Student Affairs, which is the primary repository of complaint records. Copies of the log are sent out to the Academic and Student Affairs leadership team regularly to ensure timely and appropriate responses. For each student complaint, the log shows:

- the complaining student's name
- the date of the complaint
- the type of complaint
- a short description of the complaint
- the administrator responsible for handling the complaint
- the required resolution date
- the actual resolution date

1B1 complaints of discrimination or harassment are routed to the Diversity Director for investigation and further handling. Those complaints are logged and tracked in the office of the Diversity Director. Handling of 1B1 complaints, including processing, investigation, resolution, and appeals, is undertaken in strict compliance with MnSCU board policy and procedure ([MnSCU Procedure 1B1.1.](#)).

The College also tracks the number and type of student petitions for exceptions to academic policies. While petitions are not usually in the nature of student complaints, monitoring petitions helps identify policies or processes that are not working well and could be improved.

Finally, the Human Resources office investigates and maintains files on formal employee complaints. Formal complaints include union grievances. Informal employee complaints that are not specific to one employee are solicited by the Campus Climate committee through a new "what's on the radar process" designed to identify and address issues that affect the campus climate.

Copies of LSC's complaint handling flowcharts and complaint forms are attached in Appendix E.

### 2. Summary of Number and Type

The College's records of student complaints are incomplete between 5/31/07 and 1/1/13.

From 5/31/07 through 12/31/10, student complaints were logged and tracked in the Office of the Vice President of Student Affairs. When the Vice President of Student Affairs position was eliminated and the incumbent laid off in late 2010, those records were misplaced or lost and the College has been unable to locate them despite a diligent search.

When the Vice President of Student Affairs position was eliminated, administrative responsibility for Student Services was transferred to the Vice President of Academic Affairs, who became the Vice President of Academic and Student Affairs. Subsequent to that change, student complaints were still handled, but there was no formal tracking.

In January, 2013, the College realized that student complaints were not being tracked centrally, and a new tracking process was immediately put in place. Since that time, all student complaints have been logged and tracked in the Academic Affairs Office. Administrators who receive or become aware of complaints forward essential information about them to Academic Affairs and the Academic Affairs office routinely sends out a spreadsheet. The spreadsheet shows all active and recently closed complaints. This helps to ensure that all complaints are properly handled in a timely manner.

LSC's complaint log has been recreated, to the extent possible, back to 1/1/10 using available files and records. The following table summarizes the number and subject of student complaints logged from 1/1/10 to 12/31/12 (incomplete) and 1/1/13 to 2/15/13 (complete):

	1/1/13 to 2/15/14	1/1/10 to 12/31/12
Subject	# of Complaints	# of Complaints
Faculty	29	11
Grades	18	13
Admissions	0	10
(FN) Attendance Policy	4	0
Registration	2	9
Career Services	1	4
Misc. Academic	7	9
Misc. Services	1	2
Misc. Other	6	4
Unknown/Other	4	4
Notes: • Misc. Academic includes: Student Success Day, Deans List (2), Suspension, Closed Program, Academic Performance, Study Abroad, Graduation (3), Testing Program (2), and Lab Availability (3) • Misc. Services includes: Financial Aid (2), Advising • Misc. Other includes: Safety (3), Parking, Bus Pass, Another Student, Foundation, Facilities (2), Discrimination		

### 3. Use of Complaints for Improvement.

When the College's current complaint tracking process was established in January 2013, it was determined that administrators would be periodically notified of the number and status of current and recent complaints. That has occurred.

It was also decided that all complaints, even those of a seemingly minor or vague nature, would be reported and that the Academic and Student Affairs team would undertake an annual review of the complaints filed in the previous year to identify patterns or areas of concern. Due to a temporary change in the Vice President of Academic and Student Affairs duties and lines of reporting, the Academic and Student Affairs team has not been meeting. Those meetings will resume in mid-2014, at which time reviewing the College's recent history of complaints will be a priority.

Beginning in the summer of 2013, the complaint policy, procedure, and forms were reviewed by the academic administrators. While the policy was not changed, new forms were developed and are now being implemented. The new forms are designed to make it both easier for students to accurately report complaints and more likely that administrators will properly follow the procedure in handling complaints.

A recent change to LSC's Attendance Policy was prompted by a grade appeal that disclosed deficiencies in the existing policy.

## PUBLICATION OF TRANSFER POLICIES

1. Transfer Policies – Comprehensive information regarding transferring in and out of LSC is provided on the LSC [Transfer Services](#) page. Information regarding transfer and links to transfer resources are posted in the academic information section of LSC's [Consumer Information and Disclosures](#). LSC's Undergraduate Course Transfer Policy ([3.21](#)) and Undergraduate Course Transfer Procedure ([3.21.1](#)) are both posted online with all LSC policies and procedures.
2. Disclosure of Articulation Agreements – A complete list of LSC's articulation agreements is publicly posted on the [Minnesota Transfer](#) web site. A copy of each articulation agreement is available through that site as well: e.g. Business Administration AS Degree from [LSC to College of St. Scholastica](#). LSC has posted links to the Minnesota Transfer Web Site [here](#) and [here](#).
3. Alignment of Transfer Policies with Transfer Decisions – Transfer evaluations are overseen by a dedicated full-time transfer specialist. The transfer specialist has oversight responsibility for the College's articulation agreements, credit for prior learning processes, and transfer evaluations. The transfer specialist also participates in transfer policy development.

## PRACTICES FOR VERIFICATION OF STUDENT IDENTITY

1. LSC offers distance education courses online using the D2L (Desire to Learn) learning management system.
2. Student identity is verified through secure log-ins. Each student has a single set of log-in credentials — the StarID system — that are created as part of the new student orientation and registration process. Students must use their unique StarID user name and password to access virtually all IT related services, including their online courses in D2L, student email accounts, business office accounts, classroom and lab computers, library services, and network printing services.

Some instructors require proctored exams in online courses; especially in the high stakes science courses that are pre-requisites for most health programs. Some health programs have begun using proctored exams in online courses as well, and the English department now requires a uniform proctored exit exam for College Composition I. Ultimately, whether to require proctoring is left to the instructor's discretion.

LSC has small class sizes and its faculty collectively has substantial online teaching experience. Instructors get to know their students' styles and personalities so that they recognize work that is not done by the student. Group assignments and discussion board activities also discourage cheating by making it impractical. Most instructors use frequent small assessments spread over the course of the semester to make it more difficult for students to have someone else complete their quizzes or tests for them.

The College logs the IP addresses students use to access D2L, which facilitates investigation of suspicious activity within online courses.



**TITLE IV PROGRAM RESPONSIBILITIES****1. General Program Responsibilities**Title IV Program Reviews, Inspections, or Audits

Auditing of LSC's Title IV program is conducted by CliftonLarsonAllen LLP as part of its annual financial reporting and compliance audit for the Minnesota State Colleges and Universities Board of Trustees. The Legislative Auditor relies on this audit in producing Minnesota's [Federal Single Audit Report](#).

Audit findings are reported to individual institutions as appropriate. All past audit findings specific to LSC have been corrected. A copy of the report for the year ended June 30, 2012 is attached in Appendix F. The report for the year ended June 30, 2013 has not yet been issued.

Provisional Program Participation Agreement

Since July, 2013, the College has been operating under a Provisional Program Participation Agreement with the U.S. Department of Education as a result of sanctions imposed on all 37 institutions in the Minnesota State Colleges and Universities System due to the State of Minnesota's late filing of its Federal Single Audit Report. The late filing was due to a new financial system and does not suggest any financial instability on the part of Lake Superior College, MnSCU, or the State of Minnesota.

A copy of the Provisional Participation Agreement is attached in Appendix F.

**2. Financial Responsibility Requirements**

LSC's financial ratios have been healthy and neither the Department of Education nor the Higher Learning Commission has expressed any financial concerns about the institution. The College's Composite Financial Index ratios for the past three years are as follows:

Fiscal Year	CFI
2013	2.50
2012	2.67
2011	3.60

**3. Default Rates**

LSC's official three year cohort default rates for the most recent three years for which the rate is available are shown below:

Fiscal Year	Default Rate
2011	8.5
2010	15.2
2009	16.7

LSC has a voluntary default prevention plan in place.



LSC does not participate in any private loan programs; however, the LSC Foundation administers an emergency loan fund that makes short term no-interest loans in modest amounts to students faced with such short term financial needs as vehicle repairs, rent assistance, cost of books and classroom supplies while awaiting financial aid, and other generally unforeseen “emergency” expenses. During the 2013 academic year, 57 individual students borrowed a total of \$15,544.79 (an average of \$272.72 per loan) from the fund.

#### 4. Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures

LSC does not offer intercollegiate athletics. [Campus crime information](#) is posted on the LSC web site.

At the beginning of each semester, LSC sends an “annual notification to all students” email that includes the following notices:

Campus Security Report - This report provides information about crime prevention programs, crime reporting procedures, emergency response, and a three-year statistical history of criminal activity on campus. A copy of the Campus Security Report is available at: <http://www.lsc.edu/security/crime-statistics/>

Directory Information – The following is designated as Directory Information: student name, major field of study, enrollment status, dates of attendance, degrees or awards received, date of graduation, photographs, and LSC student e-mail address. LSC may disclose any of these items without prior written consent unless notified to the contrary. For more information see: <http://www.lsc.edu/about-lsc/academic-information/> (Click on “Student Privacy Rights”)

Drug Free Workplace and School – This policy is in accordance with the Drug Free Workplace Act of 1988 and Drug Free Schools and Communities Act Amendment of 1989 (Public Laws 100-690 and 101-226). Lake Superior College is committed to providing an environment free of alcohol and illegal drugs for its students, employees, and visitors. See: <http://www.lsc.edu/about-lsc/health-and-safety-information/> (Click on “Drug, Alcohol, and Tobacco Free Campus”)

Family Education Rights and Privacy Act (FERPA) – The purpose of the Family Rights and Privacy Act is to afford certain rights to students concerning their educational records. For more information, see: <http://www.lsc.edu/about-lsc/academic-information/> (Click on “Student Privacy Rights”) and to review the complete federal policy, go to: <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Student Right to Know: The purpose of this information is to disclose annual student completion and graduation rates. You may view the entire Student Right to Know information here: LSC Link: <http://www.lsc.edu/about-lsc/educational-outcome-information/> (Click on “Student Right to Know”)

Emergency Notification: LSC uses the Star Alert emergency notification system. Sign up or learn more here: [Lake Superior College WENS](#)

A copy of the most recent student email notice is in Appendix G.

5. Student Right to Know – See “annual notification to all students” above. [Student Right to Know](#) information is posted in the Consumer Information and Disclosures section of the LSC Web Site under the “Student Right to Know” tab.

6. Satisfactory Academic Progress and Attendance Policies

The College's Academic Standing & Financial Aid Satisfactory Academic Progress policy ([2.9](#)) requires student to make satisfactory academic progress toward a degree, diploma, or certificate to remain in good standing. The policy is applied through the Academic Standing & Financial Aid Satisfactory Academic Progress procedure ([2.9.1](#)). See Appendix H for a flow chart showing describing application of the policy and procedure.

LSC does not require instructors to take daily attendance in their classes. However, under the College's Non-attendance policy ([3.17.4](#)) instructors assign a grade of FN (failure for non-attendance) to students who fail to engage in any academically-related activity for 14 consecutive calendar days.

7. Contractual Relationships

LSC currently has one contractual relationship with a third party that requires notice or approval by HLC pursuant to HLC policy:

HLC has a contract with Lake Superior Helicopters, LLC, pursuant to which students in LSC's professional pilot program may pursue an option leading to FAA certification as a helicopter pilot. Students pursuing helicopter pilot certification within the AAS degree earn 8% of their credits total credits and students pursuing helicopter pilot certification within the Diploma program earn 15% of their credits through flight training provided by Lake Superior Helicopters. LSC provided HLC with notice of this contractual relationship by letter dated 5/29/13 and will note it in the College's upcoming 2013-2014 Institutional Update.

8. Consortial Relationships

LSC currently has no consortial relationships requiring notice or disclosure to HLC pursuant to HLC policy.

## REQUIRED INFORMATION FOR STUDENTS AND THE PUBLIC

1. Links to the [LSC Catalog](#) and [Student Handbook](#) are posted in the Student Portal. Academic information that is accessible through the LSC public home page includes information on [Programs & Degrees](#), the [Course Schedule](#), and [Course Outlines](#). Copies of the most recent LSC Catalog and Student Handbook are attached as Appendix I (Catalog) and Appendix J (Handbook).
2. Required disclosure information is posted in various places on the LSC web site. All such places are collected and linked to in the [Consumer Information and Disclosures](#) pages. Links to the Consumer Information and Disclosure pages are posted in the [Student Portal](#) under the “Information” heading and in the [About LSC](#) section of the public web site.

## ADVERTISING AND RECRUITMENT MATERIALS AND OTHER PUBLIC INFORMATION

### 1. Advertisements and Recruiting Materials

LSC generally does not use advertising to promote specific programs. Rather, advertising is used to promote the College’s image, specific events such as open houses, or types of services, such as customized training. Examples of typical print advertising are included in Appendix K. The College does a very limited amount of broadcast advertising; typical examples can be viewed [here](#), [here](#), and [here](#).

### 2. Info to Current and Prospective students

The College’s primary recruiting tool is a view book that is distributed as part of high school visits, college fairs, and open houses. The College also uses cluster brochures to distribute information about related programs. A typical example is the health care careers brochure. Finally, the College has program specific fact sheets available for each program area. The fact sheets for Civil Engineering Technology and the Associate in Arts Degree. Electronic copies of the materials referred to are included in Appendix K.

Information made available to current students includes the fact sheets and program planners for all programs. Extensive academic information, including program information, program planners, course outlines, and the course schedule, is readily available online to current students through the student portal by accessing the Academics page.

### 3. The HLC Mark of Affiliation appears at the bottom of the LSC public home page.

## REVIEW OF STUDENT OUTCOME DATA

Student outcome data that is collected and used for planning and evaluation include the following:

1. **Placement Data:** Each year, the College undertakes a MnSCU required graduate placement survey based on information obtained from or about at least 85% of graduates one year after graduation yields. The survey yields summary graduate placement data ([Status of Graduates Summary](#)) and graduate job placement data by program ([Graduate Job Placement History](#)). Programs with falling or inconsistent placement results are targeted for review and improvement.
2. **Awards Data:** The number of awards granted by program each year for the past five years is one of the data elements provided as part of the College's program review process. The instructors responsible for the program review are expected to address notable trends or obvious deficiencies.
3. **Licensure Exam Pass Rates:** Programs whose students must take licensure exams track the percentage of their graduates who pass the exam and this data is watched carefully. Recently, LSC's pass rates on the National Council Licensure Exam for Registered Nurses (NCLEX) have been falling. In response, the College is implementing a competitive application process to ensure that students admitted to the program have the skills necessary to succeed. A summary of LSC's licensure exam rates is attached in Appendix L.
4. **Gateway Course Inventory and DFWI Results**

As part of a grant funded project, the College developed a list of its 25 highest enrollment courses and calculated DFWI rates (reflecting the percentage of students who were not deemed successful in the course because they earned a grade of D or F, withdrew, or were given an incomplete.) The results are included in Appendix L.

The results for certain courses, especially developmental education courses, were troubling and have prompted further discussion in a number of contexts. Faculty have begun asking for the DFWI rates for courses offered by their departments as part of the program review process and complete DFWI results for all courses will be distributed to faculty and discussed at one of the Spring, 2014 faculty development days.

### 5. Community College Survey of Student Engagement (CCSSE)

LSC administers the Community College Survey of Student Engagement in odd numbered years. The results are analyzed and shared with the administration and faculty on an administrative duty day. The analysis typically compares LSC's results to the entire CCSSE cohort as well as the MnSCU cohort, noting the highest and lowest rated items as well as progress on areas that have received focused attention (e.g. increasing the number of students who report making a class presentation). The tables used to share LSC's 2013 results with the faculty are included in Appendix L.

### 6. Student Satisfaction Inventory

The Noel-Levitz student satisfaction survey is administered to an average of 280 students each spring. In addition to the usual aggregate results, program specific reports are obtained for those programs that request the results for their students. Six programs in the Allied Health and Nursing Division have requested program specific reports in 2014 to assist them in program improvement and reporting to their program accrediting agencies.

The results are analyzed by the Institutional Research office and shared with the administration and faculty. Of particular interest are the results on the ten institution specific items that LSC chooses to include. In recent years, those items have included:

- The tutors in the Learning Center are helpful and approachable.
- The DTA (public bus) provides a reasonable alternative to driving to campus by car.
- I can usually find what I am looking for on the LSC web site.

Through these and related standard items on the survey, LSC was able to determine that students have a high degree of satisfaction with the tutoring services provided in the Learning Center and that public transportation (which is available free of charge) is viewed by students as a reasonable alternative to driving.

As is the case with many commuter campuses, students are perennially unhappy with parking. When the College recently made a major upgrade to one of its primary lots, increased student satisfaction was reflected in the subsequent SSI results.

LSC's SSI results are also being used by the Strategic Enrollment Management Committee in the development of its Enrollment Plan.

**STANDING WITH STATE AND OTHER ACCREDITING AGENCIES**

1. In addition to the Higher Learning Commission, LSC has a relationship with the following specialized accreditors, each of which accredits the programs indicated:
  - a. Auto Service Technology: National Automotive Technicians Education Foundation (NATEF)
  - b. Dental Hygiene: American Dental Association, Commission on Dental Accreditation (ADA-CDA)
  - c. Medical Assisting: Commission on Accreditation of Allied Health Education Programs (CAAHEP), on recommendation of the Medical Assisting Education Review Board (MAERB)
  - d. Medical Laboratory Technician: National Accreditation Agency of Clinical Laboratory Science (NAACLS)
  - e. Physical Therapy Assistant: Commission on Accreditation in Physical Therapy Education (CAPTE)
  - f. Professional Nursing: National League for Nursing Accrediting Commission (NLNAC); Minnesota Board of Nursing
  - g. Practical Nursing: Granted Initial Candidacy by National League for Nursing Accrediting Commission (NLNAC); Minnesota Board of Nursing
  - h. Radiologic Technology: Joint Review Committee on Education in Radiologic Technology (JRCERT)
  - i. Respiratory Care Practitioner: Commission on Accreditation of Allied Health Education Programs (CAAHEP), on recommendation of the Committee on Accreditation for Respiratory Care (CoArc)
  - j. Surgical Technology: Commission on Accreditation of Allied Health Education Programs (CAAHEP), on recommendation of the Accreditation Review Committee on Education in Surgical Technology (ARC-ST)
2. Supporting information regarding LSC's status with the foregoing specialized accrediting agencies is attached as Appendix M.

**PUBLIC NOTIFICATION OF OPPORTUNITY TO COMMENT**

1. LSC solicited third party comments regarding its accreditation through a [public notice](#).
2. The public notice was published in the Duluth News Tribune on four consecutive Mondays (January 20th, January 27th, February 3rd, and February 10th, 2014).
3. A rotating banner linked to the public notice has been displayed on the LSC public home page since Monday, January 20, 2014 and will run until March 4, 2014.
4. A notice was published in [The Wave](#) (blog newsletter for students and the public) on February 13, 2014.
5. A notice was published in The Newsplash (LSC employee email newsletter) on January 22nd and February 17th.
6. A request for third party comments was tweeted to LSC's Twitter account on February 13, 2014 and on several occasions thereafter.
7. A request for third party comments was posted to LSC's Facebook page on February 13, 2014.

Documentation of the foregoing solicitations of third party comments was submitted to legalaffairs@hlcommission.org on February 27, 2014. A copy of that documentation is attached as Appendix N.

**POLICIES**

Copies of all policies and procedures referenced in these materials are attached as Appendix O. The following policies and procedures are included:

1B.1  
1B.1.1  
2.9  
2.9.1  
3.17.4  
3.18  
3.21  
3.21.1  
3.36  
3.36.1  
3.8  
3.8.1