Federal Compliance Filing Report

Prepared for the Higher Learning Commission
AQIP Check Up Visit – Baldrige Option
April 2 – 4, 2014
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:  Grand Rapids 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.

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.
2. Provide information about the length of the institution’s degree programs and identify and justify any difference in tuition for specific programs.

Appendix A includes: Assignment of Credit Hours includes Institutional Calendar, Term Lengths, Type of Credit, Reports on Credits Awarded, and Grand Rapids Community College Credit Hour Definition.

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.

  www.grcc.edu/catalog; Also, see Appendix A.

- 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.

  See Appendix B.

- 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.

  See Appendices C and D.

- 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 you 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
Institutional Records of Student Complaints

1. Explain the process for handling student complaints.

- The College has clearly defined processes for handling student complaints including: Academic Concerns, Academic Standing Concerns, Grade Appeal Process, Student Service Concerns, Student Behavior Concerns, Ethics Concerns, Americans with Disabilities Act Accommodation Concerns, and Safety Concerns.

- We have a "Student Concern & Complaint Processes" guide designed for employees, to describe how and where students can resolve various concerns/complaints. Those processes are also outlined on the "Complaint Process" webpage for access by all stakeholders, located within the Dean of Student Affairs page (http://www.grcc.edu/studentaffairs/studentcomplaintprocess).

- We have an established Student Feedback Management Team (SFMT).
  - Team is comprised of twelve cross-campus employees (and one student when feasible)
  - A position was created in 2009 that included oversight of this team – Associate Director of Student Conduct and Student Satisfaction Initiatives. (In 2012, this position turned into Director of Student Life and Conduct, but oversight of the SFMT remained with the position.)
  - The team collects student feedback through on-campus suggestion boxes, an online comment form, and input collected from the mandated tracking areas. The team also coordinates student feedback initiatives to solicit more in depth input, such as the annual Student Feedback Fairs.
  - The team meets together a minimum of four times per year, more when necessary, to discuss trends in student complaints and concerns.
  - The team reports trends in a report for Deans Council, where actionable items are discussed and assigned.
  - The team delivers annual training (with original focus on mandated areas, but being opened up to all employees next year) to create a culture of responding to complaints with care and civility.
  - "GRCC Service Excellence Guidelines" (Appendix E) are distributed at various times throughout the year (SFMT trainings, New Employee Orientation, Student Employment Services customer service training and additional communication methods throughout the year.)

- For concerns or complaints that are outside the complaint categories, they are filtered to the Complaint Management Team. The College identified twenty-nine mandated tracking areas/departments on campus that were identified as high traffic/high complaint intake areas.

- Institution-level complaints are reported to the SFMT. Three times per year, the SFMT chair requests reports noting complaints of this nature. These reports are included in the data the SFMT reports to Deans Council each year.
2. Summarize the number and type of complaints and track their resolutions since the last comprehensive evaluation by the Commission.

- For the number and type of complaints received – please see the attached documents "Unsolicited Complaint Trends by Year" (Appendix F) and "Response to Historical/Ongoing Top Level Complaint Trends" (Appendix G).
- If a complaint is received, the process that employees follow is dependent upon the complaint category, as outlined in the "Student Concern & Complaint Process" guide (Appendix H).
- We encourage employees to resolve issues at the lowest level possible, responding to the initial complaint within two business days or sooner.
- For Academic Concerns and the Grade Appeal Process, there are informal and formal complaint processes. Students are encouraged to utilize the informal resolution process first. If not successful, they move into the formal process. The Grade Appeal Process is well-defined, with requirements and timelines. These processes are outlined in the Catalog (pg. 23) and online through the Dean of Student Affairs webpage, at http://www.grcc.edu/studentaffairs/studentacademicgrievanceprocedure.
- For Service area complaints, those that cannot be resolved at the lowest level are referred to the manager of that area.
- The "Complaint Management Process" document (Appendix I) was expanded to reach all employees and endorsed by Cabinet in Fall 2013. All employees are provided this document, as well as the "Student Concern & Complaint Processes" and "GRCC Excellence Guidelines" annually.

3. Explain how the institution integrates what it has learned from the complaint process into improvements in services or in teaching and learning.

The SFMT intakes complaints through a variety of sources (both solicited and unsolicited.) Issues are reviewed quarterly to determine those that can be resolved and/or those that are demonstrating a trend on campus. Trends are reported annually to Deans' Council and reviewed for improvement recommendations to services or in teaching and learning.

The "Improvements Made Based on Trends/Complaints" document highlights changes brought about each year as a result of this process (Appendix J).

Individual departments are asked to track complaints for their own areas, in order to review for trends and improvements. To improve our ability to verify this is occurring as it should, we have added a reporting through Department Plans starting Winter 2014 that will require areas to identify how they track complaints, what trends they have seen in their area and what they are doing to address those trends.

We are not aware of any data that suggests we are out of compliance with the Criteria for Accreditation or Assumed Practices.
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.

Disclosure of Transfer Policies

Detailed Transfer Policy information is available to students via the catalog. The College also provides general transfer policy information in new student orientation, the Grand Rapids Community College Transfer Guide, The Counseling and Career Center web site at www.grcc.edu/transfer, individual and Group Advising sessions facilitated by faculty in the Counseling and Career Center, on the Student Records web site at www.grcc.edu/student-records/transfer-credit, on the Articulation web site at www.grcc.edu/articulation and on a dedicated Michigan Association of Collegiate Registrars and Admissions Officers (MACRAO) website at www.grcc.edu/macrao. [The MACRAO Transfer Agreement is a state-level agreement designed to facilitate transfer from community colleges to baccalaureate colleges and universities in Michigan.]

Transfer information is also included in the College Catalog on pages 6 and 31.

A Transfer Guide may be accessed at:
http://www.grcc.edu/aboutus/academiccatalog/transferguide

Additionally, the Office of the Provost requires an annual Teaching & Learning Quality Model Report that provides information regarding transfer credit to that office and to its Deans’ Council (Appendix K).

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.

Articulation agreements may be reviewed at:
http://www.grcc.edu/articulation

Grand Rapids Community College abides by transfer policies created by the governing bodies of the institution and in accordance with all federal compliance guidelines (see pages 6 & 31 in the College Catalog). Grand Rapids Community College Transfer Policies incorporate policies regarding credit awarded from accredited and non-accredited institutions, foreign institutions, experiential learning and non-traditional adult learning programs. Grand Rapids Community College offers full disclosure of all transfer policies and also lists all articulation agreements with other institutions online:

http://www.grcc.edu/counselingandcareercenter/generaltransferinformation
Grand Rapids Community College encourages students to verify transfer credits by contacting the college or university to which they wish to transfer. We inform students that each institution reserves the right to make changes in transfer requirements without prior notification. Through the student engagement activities listed above, the College encourages students who intend to transfer to:

1. Utilize the GRCC Transfer Guide and online resources such as the GRCC Counseling and Career Center webpage. The Michigan Transfer Network is also useful as an online source to verify transferability and equivalencies

2. Discuss transfer requirements with a GRCC counselor/advisor

3. Confer with college representatives who visit GRCC

4. Apply for transfer admission well in advance of the anticipated date of transfer

5. File a request with the Student Records/Office of the Registrar that an official transcript be mailed to the transfer institution

6. Be aware that the transfer institution reserves the right to recalculate grades and grade point averages

7. Request the Student Records/Office of the Registrar to note that MACRAO\(^1\) has been met, if applicable, on the GRCC transcript

All Grand Rapids Community College Transfer policies contain a statement of criteria established by the institution regarding transfer of credit earned at another institution.

3. Demonstrate that the disclosed transfer policies align with the criteria and procedures actually used by the institution in making transfer decisions.

Transfer Policies Review

GRCC's transfer policy is monitored by the Transfer and Articulation Coordinator that reports to the Registrar. The Coordinator is in charge of monitoring the accurate implementation of our policies and reports about it once a year to the Deans Council. The Coordinator works with Department Heads and Program Directors in order to update and maintain incoming transfer course equivalencies and external test and certification equivalencies.

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\(^1\)The Michigan Association of Collegiate Registrars and Admissions Officers (MACRAO) have approved changes to their policies and practices. Those changes have resulted in the phasing out of the acronym MACRAO used to describe students’ completion of required general education courses and the subsequent introduction of the Michigan Transfer Agreement (MTA). More information about these statewide changes may be found at https://www.macrao.org
GRCC curriculum is intentionally developed in alignment with the MACRAO transfer standards. GRCC offers several degrees which allow students to transfer to four-year institutions to seamlessly continue their education, these degrees are: Associate of Arts, Associate of Science, Associate of Business, Associate of Music, and Associate of Fine Arts. Additionally, the programs which lead to the Associate of Applied Arts & Sciences degree are highly transferable if MACRAO is embedded, or if they have been articulated with a 4-year institution.

The Transfer and Articulation Coordinator also works with Department Heads and Program Directors to develop and maintain articulation agreements with four year universities and colleges and to update four year universities and colleges about GRCC curricula. The GRCC Curriculum Specialist works with Department Heads and Program Directors to design and develop curriculum specifically intended for transfer. Additionally, the previously referenced Teaching & Learning Quality Model Report on Transfer was completed. That report is included here as Appendix K.
Practices for Verification of Student Identity

1. **Identify whether students are enrolled in distance or correspondence courses.**

Online courses are differentiated from on-ground courses by the intentional omission of date and time on the course schedule. For a student who is looking through the schedule of classes, those classes that are delivered via distance are clearly marked as "online." Further, the student information system can be queried to extrapolate students enrollment based on delivery modality (e.g., "web-based"). For Winter 2014, a total of 4085 unique students (26% of all students) were enrolled in distance learning classes. The number of distance learning students for Fall 2013 was 3831 (23% of all students).

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.**

GRCC is using the following student identity verification methods:

1) Student ID/User ID and password or passphrase for all users,
2) Physical proctoring for exams is offered (e.g. Testing Center),
3) Writing style software for anti-plagiarism based is offered (e.g. SafeAssign),

In addition to the above verification methods, students taking online courses from GRCC through the Michigan Community College Virtual Learning Collaborative (MCCVLC) are required to verify their credentials through the MCCVLC web site or their home institution before they receive a GRCC student ID number and campus user ID. In addition, student photo ID pictures are posted inside the Learning Management System, associated with the class roster. Finally, in addition to the existing physical proctoring services currently offered, the College offers online test proctoring through a product called Respondus Monitor.
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.

Grand Rapids Community College is eligible to participate in Title IV programs. Copies of GRCC’s Department of Education Eligibility and Certification Approval Report (ECAR) and Program Participation Agreement (PPA) effective through March 2015 are available for review (See Appendices L and M). The ECAR and PPA document our approval for participation in the Federal Pell Grant Program, the Federal Direct Student Loan Program, the Federal Supplemental Educational Opportunity Grant Program, and the Federal Work-Study Program.

A federal program review was conducted by the U.S. Department of Education’s Chicago/Denver School Participation Division in August 2011. In the course of this review, which covered the 2009-2010 and 2010-2011 academic years, four findings were identified. These findings related to enrollment reporting, Fiscal Operations Report and Application to Participate (ISAP) expenditure reporting, Title IV funds disbursement, and drug and alcohol prevention policies. The final program review determination outlines these findings and their resolution, and is included in this report (Appendix N).

b. Disclose any limitation, suspension, or termination actions that the U.S. Department of Education has undertaken and the reasons for those actions.

Currently our Program Participation Agreement (PPA) is provisional. The provisional status is the result of past Perkins loan default rates and an open federal program review. Grand Rapids Community College no longer participates with the Perkins Loan Program. All related loans have been liquidated and final Perkins loan data were submitted on the FISAP prior to October 1, 2013. On February 4, 2014, the College received the Department of Education’s final program review determination (dated January 30, 2014). Previously referenced as Appendix N.

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.

As a result of the Title IV funds disbursement finding, GRCC has been assessed a fine of $3,004.87, which will be paid to the U.S. Department of Education on or before March 16, 2014. The assessed fine will have negligible impact on the College’s short- and long-term financial health. Due to identified deficiencies in GRCC’s drug and alcohol prevention policy
and biennial review report, the College must provide additional materials to the Clery Act Compliance Division (CACD) for their review during the months of March and April 2014.

d. Discuss the institution’s response and corrective actions to these challenges.

We have drafted and implemented a corrective action plan which has been accepted by the U.S. Department of Education. A letter from the U.S. Department of Education indicating acceptance is also included in this report (Appendix N).

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.

No material weaknesses were found during the most recent audit (June 30, 2013).


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.

Grand Rapids Community College contracts with the independent auditing firm of Plante and Moran, PLLC, to conduct an annual audit of the College. A copy of our June 30, 2013, Financial Statements and Independent Audit report, along with our Statement of Federal Awards is included (Appendix O). Our annual financial statements can also be found on our website.

http://www.grcc.edu/sites/default/files/docs/GRCC%202013%20AFS.pdf

We have consistently received clean audit opinions, with no weaknesses or deficiencies in internal controls over financial reporting noted.

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.

Grand Rapids Community College’s 3-year default rate remains within federal compliance standards; however it has been steadily increasing over the last three years:

a. 2008 3-year trial default rate: 19.3%
b. 2009 3-year official rate: 21.9%
c. 2010 3-year official rate: 26.0%

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.

The College’s current cohort default rate (CDR) is below the 30% threshold. Consequently, no sanctions have been imposed. Due to rising rates, however, loan default reduction has been identified as a key action project in the 2013-14 Enrollment Management/Financial Aid Department Plan. Grand Rapids Community College’s ongoing, new, and future default aversion initiatives are documented below.

- Ongoing Initiatives:
  - Default Management Team: Meets monthly to evaluate progress of existing default initiatives/explore future initiatives
  - American Student Assistance (ASA)-$ALT Partnership: Multi-year contract with GRCC. Services include:
    - Delinquent borrower outreach
    - $ALT’s My Money 101 online financial literacy tools www.saltmoney.org
    - $ALT Student Ambassador Program - GRCC students are recruited to educate other students regarding financial literacy services
  - Loan Disbursement Practices: GRCC exceeds federal requirements for institutions with CDRs of 15% or more by issuing two disbursements per semester for all loans regardless of the length of the loan period and by delaying loan disbursements by 30 days for all loan recipients, not just first-year, first-time borrowers
  - Class Participation Confirmation Process: Grant/loan funds are released after faculty confirm student course participation. Confirmation takes place at the beginning and mid-point of each semester
  - Loan Requirements: To charge tuition/fees against direct loans, students must actively accept loans through their online student center, and complete a master promissory note/entrance loan counseling at www.studentloans.gov
  - Loan Increase Process: For consideration, students complete the GRCC Loan Increase Request form and Financial Awareness Counseling at www.studentloans.gov
• Student Orientation: Reshaped orientation content focuses on financial aid responsibilities/financial literacy

• GradFest: Customized one-on-one exit loan counseling/financial literacy information provided during event

• Exit Loan Counseling: A communication is sent to students who have ceased enrollment. Instructions guide students to complete exit loan counseling at www.studentloans.gov and provide loan default information

  o New Initiatives for 2013-14:
    • Financial Literacy Course Content: $ALT My Money 101 learning modules have been incorporated into College Learning Studies 100 course content (CLS 100), a mandatory course for incoming first-time in college students with fewer than 12 college credits

    • Financial Aid Cost of Attendance Budgets: Loans are awarded/adjusted based on a student's enrollment level, rather than the assumption of full-time status. Further, a maximum of $3500 is awarded initially to first-year students and $4500 to second-year students. Students who wish to be awarded greater amounts may submit a loan increase request form

    • In-house email/text campaigns to delinquent and defaulted students to complement existing ASA outreach efforts

    • The addition of loan repayment plan information and a repayment calculator link to the GRCC Financial Aid and Scholarship webpage http://cms.grcc.edu/financialaidscholarships/studentloans/repayingyourfederalstudentloans

  o Future Initiatives Under Consideration:
    • Profiling of Delinquent/Defaulted Borrower Groups

    • Additional Counseling for Financial Aid Warning Students

    • Additional Loan Information Added to Student Responsibilities Affidavit

    • Packaging Loans for Only Those Who Actively Request

    • Piloting In-person Loan Counseling

    • 3-Year Cohort Default Rate Review/Challenge

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.

• Federal Direct Student Loan Program Compliance
GRCC complies with the following requirements for schools with cohort default rates in excess of 15%:

- Issues one-semester loan funds to students in two equal disbursements
- Delays the first loan disbursement to first-time, first-year borrowers by 30 days.

Because GRCC's cohort default rate is below 30%, the U.S. Department of Education has issued no sanctions pertaining to the Direct Student Loan Program.

- Federal Perkins Loan Program

  - Due to low participation and high default rates associated with this program:
    - GRCC is currently under a provisional Program Participation Agreement (Appendix M).
    - GRCC submitted intent to withdraw from program and liquidate related loans on December 19, 2011.
    - Perkins loan data will appear for the last time on the FISAP submitted September 2013.

Areas for Concern:

- Continued rise of Cohort Default Rates over the past three years
- Provisional Program Participation Agreement

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.

In addition to the samples provided in the Resource Room, the College maintains a dedicated website that discloses crime statistics:

https://www.grcc.edu/campuspolice/cleryactandcrimestatistics

There were no findings from the Department regarding these disclosures.

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.**

There is a link from the “About Us” menu on the banner of the GRCC home page that provides a centralized web source for student consumer information. It is also possible to use the site search box with phrases such as “title iv” or “student right to know” or “refund policy”. The person responsible for the student consumer information links on http://cms.grcc.edu/about-us/student-consumer-information is a paralegal who reports to the Office of General Counsel.

In terms of printed disclosures, “Academic Policies, Procedures, and Regulations” are printed on the last three pages of the Student Handbook and Planner, which is updated annually. There is also a section of the 2013-2014 College Catalog labeled “Transfer, Test and Articulation Credit” (http://catalog.grcc.edu/content.php?catoid=2&navoid=50#Transfer__Test_and_Articulation__Credit) to help distribute policies broadly in commonly consulted documents.

There were no findings from the Department regarding these disclosures.

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.)

   Academic progress is addressed through Policy 8.17 Academic Standing (Appendix P). College policies are scheduled for periodic review by members of the AGC. Policy updates are posted on the College’s website. The Academic Standing policy was adopted in September 2008.

   A culture of continuous learning ensures adherence to federal and state regulations. Grand Rapids Community College Financial Aid staff actively participate in professional development (e.g., attend training sessions and webinars throughout the year offered through the Michigan Association of Financial Aid Administrators (MSFAA), the Midwest Association of Financial Aid Administrators (MASFAA) and the U.S. Department of Education’s Federal Student Aid (FSA) Program). These professional development events ensure that staff are knowledgeable about the most current federal compliance issues including satisfactory academic progress and attendance. Additionally, staff members receive weekly “Information for Financial Aid Professionals” email updates from the U.S.
Department of Education and daily newsletters from the National Association for Student Financial Aid Administrators (NASFAA). They also regularly consult the U.S. Department of Education’s federal student aid handbook and website for financial aid professionals (www.ifap.ed.gov). The Financial Aid Office’s policy and procedures manual is reviewed and updated annually, as are informational handouts that are provided to students. The Financial Aid webpage is reviewed each semester and updated as necessary. The manual and webpage may be updated more frequently if notice of a regulatory change is received.

Standards of Academic Progress (SAP) Requirements

In keeping with federal requirements:

- **A college’s financial aid SAP policy must be at least as strict as that for students not receiving FSA funds.** At GRCC the qualitative (GPA) measure is more rigorous for a financial aid student than for a student not receiving FSA funds. Financial aid students who have attempted 1-14 credits must maintain a 1.5 GPA or higher. The College’s academic requirement is that students who have attempted 12-14 credits must maintain a 1.5 GPA or higher.

- **A college’s SAP policy must be consistently applied to all educational programs and to all categories of students (full-time, part-time, undergraduate, and graduate).** At GRCC, the SAP policy is applied consistently to all students regardless of their enrollment status.

- **Colleges must evaluate SAP annually for programs longer than one year in duration and after every payment period for programs of one year or less.** Grand Rapids Community College conducts an academic progress evaluation at the end of each payment period for students in all programs of study regardless of program length. Because GRCC evaluates SAP following the conclusion of each semester, the College is able to provide a warning semester of financial aid to students not maintaining standards of academic progress.

- **A college’s SAP policy must have a qualitative component.** Grand Rapids Community College’s policy specifies the qualitative standard (GPA) required for federal financial aid recipients based on credit hours attempted. Students who have attempted: 1-14 credits, must maintain a 1.5 GPA; 15-28 credits, a 1.75 GPA; 29+ credits, a 2.0 GPA.

- **A college’s SAP policy must specify a quantitative standard.** Grand Rapids Community College’s published policy includes references to both pace (completion rate) and maximum program length. Students must successfully complete a minimum of 67% of
the courses they attempt and must complete their declared program of study within 150% of the published length of the program in order to retain financial aid eligibility.

- A college’s SAP policy must explain how GPA and pace are affected by incompleted, withdrawals, repeated courses, remedial, and transfer credits. Grand Rapids Community College’s policy explains the potential impact of incomplete grades, withdrawals, repeated course, developmental education (remedial) coursework and transfer credits through the Financial Aid webpage and the College Catalog.

- A college’s SAP policy must explain warning, suspension and probation to students and notify students if they are failing to maintain standards of academic progress. Grand Rapids Community College’s SAP policy explains financial aid warning, suspension and probation status, as well as how students may once again regain financial aid eligibility. The policy also provides an explanation regarding how a student may appeal the decision to suspend his/her financial aid. It is GRCC’s policy that all students on financial aid probation follow a prescribed academic plan. Students must receive a passing grade in 100% of the courses they attempt while on probation, earn a minimum of a 2.0 GPA each semester and meet standards of academic progress within four semesters. Notices are mailed to students to inform them if they are on warning or suspension. Students appealing their suspension are also notified by mail if they have been denied or approved for financial aid probation.

Attendance Requirements

College policies 8.8A Faculty Attendance and 8.8B Student Attendance were instituted to support student success and to ensure accurate student attendance records are maintained in keeping with federal and state regulations. In December 2013, the College’s Academic Governing Council (AGC) voted to revise policies 8.8A and 8.8B resulting in one policy rather than two. This revision process has included approval by members of AGC and final approval by the Office of the Provost. This newly revised and approved policy is available in our Resource Room.

The appropriate application of these policies and practices can be demonstrated through the following examples:

Standards of Academic Progress: At the conclusion of each semester, after grades have been posted, Financial Aid staff members run a series of queries to determine which students are maintaining standards of academic progress for financial aid recipients. Students may receive notification that they have entered a warning period or are on suspension based on the outcome of this review. Those on suspension will have federal, state and institutional aid canceled and will be informed of their option to appeal this determination. The grades of students on financial aid probation are also reviewed to determine if they met the conditions of their academic plan. Those that have met the conditions are allowed to retain financial aid for
another semester. Aid is canceled for those students who fail to meet the established conditions.

**Class Participation Confirmation:** According to College Policy 8.8A Faculty Attendance: “Each faculty member shall maintain an accurate daily record of the attendance of each student enrolled in each of the faculty member’s classes. This record should include date of last attendance when necessary” (See Appendix Q). In accordance with this policy, faculty members are required to confirm class participation for all students at the beginning and again at the midpoint of each course. Class participation confirmations are submitted electronically to the Financial Aid Office. Following receipt of confirmations, excess financial aid funds are released to eligible students.

**Return of Funds Calculations:** Federal regulations state that if “a school requires its faculty to take attendance, whether at the program, department, or institutional level, then those attendance records must be used by the school in determining a student’s date of withdrawal (FSA HB May 2013, 5-49).” In accordance with the College’s attendance policy and federal regulations, last date of attendance information is collected from faculty members when a student in credit or clock hour courses withdraws prior to the end of the payment period or period of enrollment. Faculty enter last date of attendance for all E, withdraw passing (WP) and withdraw failing (WF) grades when posting student grades. This information is used by Financial Aid staff to determine the percentage of financial aid earned by the student prior to withdrawn and to ascertain how much, if any, financial aid funding must be returned to the federal government.

Provide verification that these policies are available to students (either in the course catalog or student handbook):

Information regarding standards of academic progress and attendance are conveyed to GRCC students in the following ways:

- Individual meetings with Enrollment Services, Financial Aid and Counseling staff (includes phone conversations, emails, text messages, etc.)

- New student orientation sessions

- The Academic Policies, Procedures and Regulations section of the GRCC student handbook ([http://cms.grcc.edu/handbook](http://cms.grcc.edu/handbook))

- The Academic Policies and Procedures and the Financial Aid sections of the GRCC College Catalog ([http://cms.grcc.edu/catalog](http://cms.grcc.edu/catalog))

- The following links on the Financial Aid and Scholarships webpage ([http://cms.grcc.edu/financialaid](http://cms.grcc.edu/financialaid))
  - Information Station Questions/Answers
  - Satisfactory Academic Progress Policy/Completion Rate Chart
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.**)

Grand Rapids Community College has no contracts with third-party entities not accredited by a federally recognized accrediting agency. A spreadsheet that documents all contractual relationships entered into by the College is maintained by General Counsel (See Appendix R).

The College holds a contract with Ed To Go/Cengage for non credit training in our continuing education area.

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.**)

GRCC has no consortial agreements with third-party entities not accredited by a federally recognized accrediting agency.
Required Information for Students and the Public

1. **Submit course catalogs and student handbooks to the team.**

   Course catalogs and student handbooks will be made available in the Resource Room.

2. **Identify sections of the web site that include required disclosure information.**

   See Table 1.0:

   **Table 1.0**

   Grand Rapids Community College – Information for Mandatory Public Disclosure

   | The Institution’s Calendar | - The Academic Calendar is posted online at [www.grcc.edu/calendar](http://www.grcc.edu/calendar)
   | - A printed version is also provided to faculty each year by Institutional Research and Planning in an 11x17 format that also includes elements of the College’s strategic plan (mission, vision, values, ends) |

   | Grading Policies and Procedures | - The College’s grading policies and procedures are included in the College Catalog. See this link for the specific information: [http://catalog.grcc.edu/content.php?catoid=2&navoid=52](http://catalog.grcc.edu/content.php?catoid=2&navoid=52) |

   | Academic Program Requirements | - Academic program requirements are included in the College Catalog. See this link: [http://catalog.grcc.edu/content.php?catoid=2&navoid=64](http://catalog.grcc.edu/content.php?catoid=2&navoid=64) |

   | Tuition and Fees | - The College’s tuition and fees are posted at: [http://www.grcc.edu/cashier/tuitionratesfees](http://www.grcc.edu/cashier/fees) |

   | Refund Policies | - Information and policies about payments and refunds can be found at: [http://www.grcc.edu/cashier/paymentsrefunds](http://www.grcc.edu/cashier/paymentsrefunds) |
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.

Section: Advertising and Recruitment Materials and Other Public Information

Grand Rapids Community College is committed to keeping up-to-date information on accreditation and membership status easily available to the public. Accreditation status with the Higher Learning Commission (HLC), program accrediting agencies, and other professional bodies are all available on the college web site. Current HLC accreditation status and contact information for the HLC is available and may be viewed at this link:

http://cms.grcc.edu/accreditation

We also maintain a summary document that discloses information about GRCC’s relationship with specialized and professional accrediting agencies. This document and information is available here:


Membership status with other relevant professional organizations is available here:

http://cms.grcc.edu/node/8616

Grand Rapids Community College recognizes the importance of informing potential and current students about educational programming for which licensure/certification is required for employment or further training. Programs that require certification or licensure for employment/further training are indicated as such in the program documentation.

The following table identifies programs that require licensure/certification for employment or further training, and where this information is linked to the GRCC program website:

<table>
<thead>
<tr>
<th>School/Program</th>
<th>Cert/license required for employment</th>
<th>Associated Department/Program website</th>
</tr>
</thead>
<tbody>
<tr>
<td>School of Arts &amp; Sciences</td>
<td>CDA Credential</td>
<td><a href="http://cms.grcc.edu/education-and-child-development/child-development-associate-credential-cda">http://cms.grcc.edu/education-and-child-development/child-development-associate-credential-cda</a></td>
</tr>
<tr>
<td>Pre-Professional</td>
<td>Michigan Test</td>
<td><a href="http://cms.grcc.edu/academics/education-and-child-">http://cms.grcc.edu/academics/education-and-child-</a></td>
</tr>
<tr>
<td>Program</td>
<td>Certification/Qualification</td>
<td>Website</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>----------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Elementary Education</td>
<td>for Teacher Certification: Basic Skills</td>
<td><a href="http://cms.grcc.edu/academics/education-and-child-development/pre-professional-secondary-education">development/pre-professional-elementary-education</a></td>
</tr>
<tr>
<td>School of Workforce Development</td>
<td>Automotive Service Excellence (Not required for employment, but offered at GRCC).</td>
<td><a href="http://cms.grcc.edu/automotive/programs/automotive-servicing">http://cms.grcc.edu/automotive/programs/automotive-servicing</a></td>
</tr>
<tr>
<td>Dental Hygiene</td>
<td>National Dental Hygiene Board Exam and Northeast Regional Board Exam</td>
<td><a href="http://cms.grcc.edu/dentalhygiene">http://cms.grcc.edu/dentalhygiene</a></td>
</tr>
<tr>
<td>Dental Assistant</td>
<td>National Dental Assisting Board Examination or Michigan RDA Examination</td>
<td><a href="http://cms.grcc.edu/academics/dental-programs/dental-assisting">http://cms.grcc.edu/academics/dental-programs/dental-assisting</a></td>
</tr>
<tr>
<td>Associate Degree Nursing</td>
<td>National Council of Licensure Examination for Registered Nurses</td>
<td><a href="http://cms.grcc.edu/nursing-programs/associate-degree-nursing">http://cms.grcc.edu/nursing-programs/associate-degree-nursing</a></td>
</tr>
<tr>
<td>Occupational Therapy Assistants</td>
<td>National Board for Certification in Occupational Therapy (NBCOT)</td>
<td><a href="http://cms.grcc.edu/occupational-therapy/certification-exam-results">http://cms.grcc.edu/occupational-therapy/certification-exam-results</a></td>
</tr>
<tr>
<td>Police Academy</td>
<td>Michigan Commission on</td>
<td><a href="http://cms.grcc.edu/policeacademy">http://cms.grcc.edu/policeacademy</a></td>
</tr>
</tbody>
</table>
The GRCC course catalog is maintained and updated annually by the Office of the Provost. Recent system upgrades improve the direct linkage between catalog content and updated curriculum documentation. Advising and Curriculum guides are reviewed each year by the Counseling area, and new transfer guides are published annually. The MACRAO guide is reviewed annually through the Office of the Registrar and updated as necessary.

Finally, materials circulated within the community for advertising, recruiting and marketing contain information that is accurate and unambiguous. Examples of these materials are available for review in Appendices S & T.

2. Demonstrate that the institution provides such information to current and prospective students about its programs, locations, and policies.

Materials used for advertising, recruiting and marketing

The Communications Department has historically branded the College using various advertising and sponsorship opportunities throughout West Michigan, and supported the creation of printed and electronic outreach materials. In more recent years, the Department has been asked to make an equal priority of supporting the recruitment activities of the Admissions Office. Lastly, we support department programs by advertising program specific recruitment campaigns and events, such as Manufacturing Career Day. Both campus-wide recruitment and program-specific promotions are supported with advertising by placing ads in traditional media and in social media, with specific messages targeting traditional high school students, parents of high school students and non-traditional students. These target populations may be narrowed further depending on the promotion.

To ensure that our outreach efforts occur at the correct time we begin a campaign based on a point in the admissions recruitment calendar or a mutually agreed upon timeline and outreach goal. This is accompanied by a list of details specific to the recruitment event or program. We then plan the entire outreach campaign, which includes advertising.

The amount of information contained in an ad is determined by established GRCC brand elements and ad copy standards relative to the medium in which the ad is placed. Our goal is to capture the audience’s attention, make a compelling argument and provide a clear call-to-action. An ad always includes a web address where more information is available and where current or potential students (or parents) can connect with someone at the College. This process also involves vetting the information on those webpages. Once the ad is created it goes through departmental and internal client approval processes.
The time an ad runs in a campaign is determined by weighing the point in time (buying cycles, recruitment cycles, etc.) which the target audience would be interested, with the milestones and deadlines of the campaign, and with the need for immediacy in the ad’s call-to-action.

See 2012-13 Recruitment and Program Advertising Spreadsheet (Appendix U).

The Communications Department also supports the Admissions Office in the creation of materials used for recruitment.

3. **Provide the team with a link to the Mark of Affiliation on the institution’s web site.**

   Please see:

   https://www.grcc.edu/institutionalresearchandplanning/accreditation
Review of Student Outcome Data

1. Demonstrate that the institution collects information about student outcomes.

Collecting and analyzing student retention, persistence, and completion data is primarily the responsibility of the Institutional Research and Planning Office. These data are compiled and disseminated as they become available, typically immediately following a major semester. These data are also reported on the College Dashboard and the Indicator of Success (IOS) report. Data are also disaggregated by a variety of sub-groups as appropriate. Deans, department leaders, and faculty members can also request additional data reports and analysis, beyond those that are regularly provided.

In addition to Institutional Research and Planning, the Dean of Student Success and Retention also analyzes retention, persistence and completion data. In 2010, GRCC was selected as an Achieving the Dream Institution, becoming part of a national initiative that includes more than 130 institutions and reaches more than one million students. Achieving the Dream is focused on creating a “culture of evidence” on community college campuses in which data collection and analysis drive efforts to identify problems that prevent students from succeeding (particularly low-income students and students of color) and develop programs to help them stay in school to receive a certificate or diploma. This initiative has increased GRCC’s capacity to track and monitor student success data from intake to graduation by promoting a culture of inquiry and establishing the practice of evidence-based decision making.

In addition, in late summer 2013 GRCC applied to and was accepted into the HLC Student Persistence and Completion Academy. We attended our first data-oriented session in December, 2013. A full team from GRCC will be attending our first planning workshop in March, 2014.

GRCC collects information regarding student outcomes in a wide variety of ways including:

Persistence: “percentage of students who persist from one semester to the next”
- Persistence rate (fall to next term), State of Michigan Dashboard data for 2007-08 to 2011-12 (all students), GRCC Dashboard/Indicator report, National Community College Benchmarking Project (NCCBP). All data available disaggregated by ethnicity, gender, and Pell status.

Retention: "percentage of first time students who return for subsequent semesters"
- Consortium for Student Retention Data Exchange (CSRDE) data for first time students by full-time/part-time status, ethnicity, and gender for each cohort group 2000-01 to 2011-12
- Fall to winter retention for beginning, degree seeking students by gender, ethnicity, age, full-time/part-time status, Arts and Sciences program students, Workforce Development program students, and Adult and Developmental program students
- Retention rate – Fall to Fall for first time, degree-seeking students (Integrated Postsecondary Education Data System [IPEDS] and GRCC Dashboard/Indicator Report). All data available disaggregated by ethnicity, gender, and Pell status.
Completion: "percentage of students who earn a certificate or a degree"

- Consortium for Student Retention Data Exchange (CSRDE) data for first time students by full-time/part-time status, ethnicity and gender for each cohort group from 2000-01 to 2011-12

- State of Michigan Dashboard data for 6-year completion/transfer rates from 2007-08 to 2011-12 (also on GRCC Dashboard/Indicator Report)

- Completion (150% graduation rate) for first time, full-time students (IPEDS report, GRCC Dashboard/Indicator Report, National Community College Benchmarking Project). All data available disaggregated by ethnicity, gender, and Pell status.

See the following as evidence of the collection and use of data on student retention, persistence and completion:

http://www.grcc.edu/institutionalresearchandplanning/institutionalresultsreports
http://www.grcc.edu/institutionalresearchandplanning/strategicplanning/monitoringreports

**Post-graduation success data**

Data are collected using the GRCC Alumni survey as to the future employment and educational endeavors of GRCC graduates. Former students are asked to indicate whether they are employed in the field of student at GRCC. In addition, data are collected from students who program requires state or national licensure exams prior to working at a job in their field. These results can be found in the following locations:

Licensure exam rate data can be found in the GRCC Indicator Report:
http://www.grcc.edu/officeofthepresident/dashboardindicatorreports

Employment rates in field of study can be found in GRCC Alumni survey report:
http://www.grcc.edu/institutionalresearchandplanning/institutionalresultsreports

2. **Provide evidence that information collected about student outcomes informs planning, program review, assessment, etc.**

**Data Regarding Student Outcomes Used in Strategic Planning**

The GRCC Indicator Report documents and demonstrates the status of those indicators the Board of Trustees has selected to monitor for each of the six college Ends including Student Success. The report provides updated performance levels for each of the Indicators of Success (IOS), historical data reaching back five years, benchmark data, and targets. The data contained in the report are tracked by the relevant Ends Committee of the Strategic Leadership Team. Student outcome data are used to both monitor the success of current College Action Projects and plan needed activity for future projects. Reasonable, attainable targets for these indicators have been determined by the Student Success sub-team of the Strategic Leadership Team.