



Federal Compliance Filing by Institutions

Effective September 1, 2018 – August 31, 2019

This document outlines the information institutions should provide as part of their comprehensive evaluation. Institutions should answer the questions below and provide supporting documentation where necessary. A list of required and optional appendixes is provided at the end of the document. Please keep answers brief and succinct, and only provide information in the appendixes that is specifically requested.

The institution should refer to the [Federal Compliance Overview](#) in completing this form. The overview document identifies applicable HLC policies and provides an explanation of each requirement.

Note that some federal requirements are related to the 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 them. The document also provides cross-references to the Code of Federal Regulations; while these cross-references will provide context for HLC's requirements, it is important that institutions write to HLC's requirements and not to the federal regulations cited.

Submission Instructions

This form and all appendixes should be uploaded as a single PDF file in the Forms section of the Assurance System no later than the institution's lock date, unless otherwise noted. The PDF file should include section headings and bookmarks, with titles, for navigation.

Institution name: **Jefferson College**

Main contact in the financial aid office: **Sarah Bright, Director of Student Financial Services**

Number of staff members in the financial aid office: **7**

Identify when the last U.S. Department of Education training for the staff of the financial aid office occurred: **The Director of Student Financial Services attended the U.S. Department of Education's Federal Student Aid Conference in November 2018. In addition, each fall, three staff attend the Missouri Association of Student Financial Aid Personnel Conference, which includes a federal track led by a U.S. Department of Education trainer.**

Assignment of Credits, Program Length and Tuition

1. Complete the [Worksheet for Institutions on the Assignment of Credit Hours and Clock Hours](#). Submit the worksheet and the attachments listed in it as **Appendix A**.

Appendix A.1 Assignment of Credit Hours Worksheets is an evaluation of the institution's credit hour assignments, course modalities, weeks, frequency, and length of instruction.

2. What is the length in semester or quarter hours or other applicable units of each of the institution's degree programs? Institutions offering programs at a single degree level may be able to identify a specific number of semester or quarter hours to which all their programs conform; institutions with programs at different degree levels may need to expand their answer, and if so should include a list in Part A, Section 1 of the *Worksheet for Institutions on the Assignment of Credit Hours and Clock Hours* (Appendix A).

For a list of course offerings, see **Appendix A.2 Course Schedule**. Jefferson College abides by the federal definition of the credit hour. See **Appendix A.3 Credit Hour Policy**. For the credit hours and duration in weeks of Jefferson College's degree and certificate programs, see **Appendix A.4 Eligibility and Certification Approval Report**. Total credit hour requirements for each academic plan are determined by each discipline and details are reflected in **Appendix A.5 College Catalog**. The institution's Curriculum Committee confirms credit hour allocations have been considered when new courses and programs are developed and the institution's Interim Associate Deans confirm credit hour statements are included in course syllabi. See **Appendix A.6 Course Syllabus Statement** and **Appendix A.7 Sample Syllabi for a Multiple Modality Course**. Though full-time enrollment is defined as 12 credit hours or more, the average credit load for full-time students at Jefferson College is 15, and students wishing to exceed 19 credit hours must obtain permission from the Vice President of Student Services. See **Appendix A.8 Academic Load Policy** and **Appendix A.9 Headcount Exceeding Academic Load 2017-2018**.

3. Are there any differences in tuition for specific programs?

Yes

No

If so, please identify the programs and explain the rationale for the difference in tuition.

Unique tuition is charged to students in the Law Enforcement Academy (LEA), Peace Officer Standards and Training (POST) certificate program, and the Licensed Practical Nursing (LPN) certificate program. See **Appendix A.10 Tuition and Fees**.

The fees charged for the LEA and POST only students reflect (1) tuition charged per credit hour, and (2) additional fees to offset the cost of materials and equipment needed to deliver the MO Department of Public Safety (DPS) Peace Officer Standards and Training (POST) basic recruit training curriculum. This curriculum is required for the students to be eligible to test for MO Peace Officer License. Resources needed for these programs are specific and costly, including adequate Glock 9mm pistols, Mossberg 870 shotguns, H & K Patrol rifles, 9mm ammunition, buckshot & slug ammunition, .223 ammunition, firearms targets and cleaning supplies, Tasers, Taser cartridges required for certification testing, vehicles designated for patrol operation curriculum and driver training, mock 9mm weighted training weapons,

web gear and 'duty' belt items, batons, strike pads, and inert OC spray canisters for OC certification. Although with careful maintenance, durable items are used for multiple classes, it is expensive to replace and/or repair them. There are also scheduled maintenance agreements for some unique training resources, such as the state-of-the-art Virtra firearms system and the Omnigo Report Writing system.

Historically, Jefferson College's Licensed Practical Nursing (LPN) program has charged a unique tuition for its certificate training to include all expenses associated with providing this specialized education. With advances in nursing education, Jefferson College's LPN program has found it necessary to add certain course fees to offset the increase in expenses. A specific example of this was the need to increase clinical simulation in response to a decline in clinical facility availability.

For more information see Federal Requirements 34 CFR §602.16(a)(1)(viii), 34 CFR §602.24(f), 34 CFR §600.2, and 34 CFR §668.8(k) and (l).

Related HLC Requirements: Core Component 3.A. and Assumed Practice B.1.

Institutional Records of Student Complaints

4. What is the institution's process for handling student complaints?

For informal complaints that do not fall into a predefined category, Jefferson College students are advised to first attempt to resolve the matter with the faculty or staff member, or a department supervisor. If the student cannot resolve the issue informally, the student may submit a formal complaint to the Vice President of Student Services. The complaint is then reviewed and action is taken for resolution. Students may also visit the Office of the Vice President of Student Services for advice related to a complaint, to request a matter be investigated, and to work toward resolution of a complaint. Similarly, a Jefferson College student may appeal any instance of misapplication of College policies, procedures, and practices which adversely affects them. Jefferson College's website lists **Appendix B.1 Policy on Complaint Resolution**, as well as contact information for the Higher Learning Commission, Missouri Department of Higher Education, and the National Council for State Authorization Reciprocity Agreements. Additional information can be found in **Appendix B.2 Student Handbook - Student Appeal Process for Misapplication of College Policies, Procedures, & Practices**.

With regards to higher level matters, Jefferson College has multiple policies and procedures in place for addressing formal student complaints and grievances concerning discrimination and harassment, behavioral concerns, and academic issues. For example, **Appendix B.2 Student Handbook - Non-Discrimination and Complaint Procedure** supports that "no person shall, on the basis of age, ancestry, color, creed, disability, genetic information, marital status, national origin, race, religion, sex, gender identity or expression, sexual orientation, or veteran status, be subject to discrimination in employment or in admission to any educational program or activity of the College". In compliance with federal regulations, Jefferson College has adopted a procedure for resolving complaints of discrimination. The procedure is available to any Jefferson College student, employee, or applicant who feels that they have been discriminated against in employment, student programs, or student activities.

Upon enrolling in the College, each student assumes an obligation to conduct themselves in a manner compatible with the College's function as an educational institution and to comply with laws enacted by federal, state, and local governments. Additionally, as members of the academic community, students are expected to conduct their affairs in accordance with the standards set forth in **Appendix B.2 Student Handbook - Student Code of Conduct**. If these obligations are neglected or ignored by the student, the College institutes appropriate disciplinary action. Examples of misconduct subject to disciplinary action at

Jefferson College are academic dishonesty, interference with the educational mission of the College, and behavioral misconduct. **Appendix B.2 Student Handbook** - Rules of Procedure in Student Disciplinary Matters are adopted to ensure that requirements of due process in student disciplinary proceedings are fulfilled by Jefferson College and that procedures are definite and determinable. Processes are also defined in Board policies and procedures.

In Jefferson's 2009 Assurance Report, HLC stated:

*Evidence that one or more specified Core Components need organizational attention: A. In relation to students' acquisition of knowledge and the importance of academic integrity, there is evidence that students are advised by faculty in the syllabi for classes and called upon in the Agreement for Success "to be honest and maintain the highest level of integrity." (Catalog 2008-09, 26 and Handbook 2008-09, 53). The academic honesty statement has been included in all new and revised syllabi as the result of the recommendations of the Academic Affairs Committee in 2003. The COL 101 course "addresses the seriousness of academic honesty with all new first year students." Violations of academic integrity are addressed under the general Student Conduct Code and the Rules of Procedure under Student Disciplinary Matters (Handbook 2008-09, 26-28; 31-41). **Currently there are no formal processes to track academic dishonesty cases.** With its resolve to add an integrity element to its values statement, the College has an opportunity to clarify and make consistent a process to be applied to all violations of academic integrity, **including a uniform hearing process, clear guidelines for consequences of first and subsequent infractions, and a database that allows the College to identify repeat offenders.***

During 2011-2012, the Academic Integrity Subcommittee comprised of 10 faculty and a division chair updated the academic honesty policy and recommended that a tracking system be utilized to report and store events related to academic dishonesty. See **Appendix B.2 Student Handbook** - Student Conduct Code. In 2013, software for managing behavioral records, titled Maxient, was implemented. From this system, the Behavioral Concerns and Student Conduct Coordinator receives all submitted reports of academic dishonesty. See **Appendix B.3 Behavioral Concerns & Student Conduct** and **B.4 Academic Affairs Committee Meeting Minutes and Maxient System**. For a first offense, the report is forwarded to the appropriate Interim Associate Dean. If a student has multiple reports of academic dishonesty, the coordinator contacts the student directly for a meeting.

As stated in **Appendix B.2 Student Handbook** - Sexual Violence Awareness and Reporting Procedure, Jefferson College recognizes sexual violence as a serious campus concern and a violation of the rights and dignity of the individual. This behavior is not tolerated on College property or at any College-sponsored activity. As stated in **Appendix B.5 Title IX**, Jefferson College is committed to preventing sexual violence through incorporation of educational programming and the adoption of clear guidelines informing students, faculty, and staff of the College's procedures in handling such cases. Sexual violence is a serious violation of the Student Code of Conduct and violators are subject to disciplinary action including suspension or expulsion.

If a student with a disability feels they experience discrimination, the student is entitled to an attempt of resolution. The process begins with the individual of concern. See **Appendix B.6 Disability Support Services Policies and Procedures**. If the student remains dissatisfied with the outcome through Disability Support Services, the student can proceed by following **Appendix B.2 Student Handbook** - Student Appeal Process for Misapplication of College Policies, Procedures, & Practices.

Regarding grade concerns, students are encouraged to speak with the instructor first. If the student wishes to pursue a grade appeal, see **Appendix B.2 Student Handbook** - Grade Appeal Process, the student must do so through the appropriate Interim Associate Dean who oversees the student's course or program area.

Appendix B.7 Student Complaint Flow Charts provides an illustrated version of the processes.

5. Provide the institution's complaint policy and procedure and the web address where the public can find this information. Enter this information in the space below or attach as **Appendix B**.

The public can view policies and procedures for institutional complaints and appeals online. See **Appendix B.1 Policy on Complaint Resolution**.

6. Provide an aggregated report of the number and type of complaints received since the last comprehensive evaluation by HLC and explain their resolutions. Attach as **Appendix C**.

See **Appendix C.1 Complaints and Resolutions** for the number and types of complaints received since Jefferson College's last comprehensive evaluation by HLC.

7. How does the institution integrate what it has learned from the complaint process into improvements in services or in teaching and learning?

Formal requests are entered into the Maxient system for review by administration who identifies trends and then makes recommendations within their divisions for improvements to co-curricular and curricular areas. For example, **Appendix C.2 Gender Identity in the Non-Discrimination Policy** describes a student led request that influenced campus policy.

For more information see Federal Requirement 34 CFR §602.16(a)(1)(ix).

Related HLC Requirements: Core Component 2.A and Assumed Practice A.3, A.4.

Publication of Transfer Policies

8. Where are the institution's transfer policies published?

Links to transfer policies and an explanation of transfer credit processes, including Missouri CORE42 and options for obtaining credit for prior learning, are available in multiple locations on the Jefferson College website including within the webpages for admissions, credit for prior learning, Missouri CORE42, and consumer information.

Provide copies of the published transfer policies (such as those included in the institution's catalog, on the website or in other appropriate publications) as **Appendix D**.

Determination of transferability of incoming coursework, course equivalency information, transfer course credit policies, and credit for prior learning are listed in **Appendix D.1 Transfer Credit Procedures**.

9. How does the institution disclose articulation agreements, at both the institutional level and the program level, to current and prospective students? (Ensure that the disclosures clearly identify whether the institution 1) accepts credits from the other institution(s) through the articulation agreement; 2) sends credits to the other institution(s) through the articulation agreement; 3) both offers and accepts credits with the institution(s) in the articulation agreement; and 4) what specific

credits articulate through the agreement [e.g., general education only; pre-professional nursing courses only; etc.]

Jefferson College partners with several institutions for seamless transfer upon completion of the Associate degrees. Jefferson College posts admissions and transfer links to many area colleges and universities, in addition to other transfer resources. See **Appendix E.1 List of Articulation Agreements and Transfer Resources**. Furthermore, Jefferson College has multiple 2+2 agreements where students can seamlessly earn both an Associate and Bachelor degree at a reduced cost at a Jefferson College location, including teacher education and business related programs of study through Missouri Baptist University and a Bachelor of Science in Nursing with Central Methodist University. See **Appendix E.2 University Partnership 2+2 Programs**. Additionally, Missouri Reverse Transfer allows former students who have completed credits for an associate degree to receive that degree even if they have transferred to a different college or university, or stopped out of higher education. See **Appendix E.3 Missouri Reverse Transfer**. Lastly, to facilitate transfer among Missouri's public institutions of higher education, a Missouri Higher Education Core Transfer Curriculum, known as Missouri CORE42, was adopted in 2018-2019. A recommended lower-division core curriculum of forty-two semester credit hours now seamlessly transfers to all other Missouri public colleges and universities. See **Appendix E.4 Missouri Core 42**.

Provide a list of articulation agreements as **Appendix E** and the web address where the public can access this list. Note that you do not need to provide the full articulation agreements, only the list of agreements that you make public.

10. What is the process implemented by the institution to align the disclosed transfer policies with the criteria and procedures used by the institution in making transfer decisions?

Jefferson College's Transfer Credit Procedures detail the process for making a determination of transferability, determination of course, credit, and grade equivalencies, applicability of coursework to a degree, and defines the method for granting credit for prior learning and credit for approved examinations and portfolios. See **Appendix F.1 Evidence that Transfer Decisions Align with Policy**.

Provide evidence (e.g., charts, data, etc.) that institutional decisions regarding transfer of academic credit align with the policy. Provide this information in the space below or attach as **Appendix F**.

For more information see Federal Requirement 34 CFR §668.43(a)(11). *Related*

HLC Requirements: Core Component 2.A and Assumed Practice A.5.D.

Practices for Verification of Student Identity

11. Does the institution have students enrolled in distance or correspondence courses, as defined in federal definitions?

Yes

No

12. How does the institution verify the identity of students enrolled in these courses?

In an effort to ensure academic integrity and proper application of credit to students who have successfully enrolled and completed courses, Jefferson College requires identification be provided at time of admission into the College. Once admission is completed, each student is given a unique identifier and password to gain access to educational materials and services. At present, Jefferson College does not require face recognition or digital signature for all assessments. For higher stakes assessments in online courses, students are required to complete the assessment at a certified testing center within their service area, including at the Hillsboro and Arnold locations. Students are required to present a Jefferson College student picture identification with verification of current enrollment on the back or current state identification. The certified testing centers then proctor the faculty-provided assessment consistent with faculty-provided parameters. Jefferson College has strict academic integrity guidelines available to students in the Student Conduct Code section of the Student Handbook and in course syllabi.

13. Are there any additional costs (e.g., fees associated with test proctoring) charged directly to the student because of this method?

Yes

No

14. What are these additional costs?

However, an online fee is charged for each distance-learning course, including hybrid courses. Fees vary and begin at \$46.00 per three credit hour online course and \$19.00 per hybrid course. This covers the cost of the online licensing for the class. At this time, there is no additional charge for test proctoring administered by Jefferson College.

15. How are the additional costs disclosed to students prior to enrollment in a distance or correspondence course?

Charges for distance learning classes are identified in Jefferson College's Tuition and Fees and Course Schedule details.

Provide copies of the disclosures and the web address where the public can access such information as **Appendix G**.

For **Appendix G.1**, see **Appendix A.10 Tuition and Fees** and **Appendix A.2 Course Schedule**.

16. How does the method of verification make reasonable efforts to protect student privacy?

Student log-ins are password protected, unique log-in permissions are granted for each course's participants, and exams are proctored, which includes the presentation of a photo ID from the test taker. Additionally, student data such as enrollment information is only shared on a need to know basis and FERPA guidelines are followed. See Consumer Information disclosure **Appendix G.2 Privacy of Student Records – FERPA** and **Appendix G.3 - Testing Center Policies and Procedures**.

For more information see Federal Requirement 34 CFR §602.17(g).

Related HLC Requirement: Core Component 2.A.

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. For more information see Federal Requirement 34 CFR §602.16(a)(1)(x).

17. General Program Responsibilities

- a. What is the current status of the institution's Title IV program (e.g., recertified on date x, provisionally certified on date x, etc.)?

During the institution's most recent Title IV recertification, Jefferson College's status was provisionally approved through September 30, 2019 due to owing a program review debt to the U.S. Department of Education. See **Appendix I.1 Title IV Program Participation Agreement**.

- b. When was the institution's most recent Title IV program review?

The U.S. Department of Education conducted a Title IV program review at Jefferson College from May 21, 2012 to May 25, 2012. The institution's prior review occurred 19 years earlier.

In November 2012, Jefferson College received a Title IV Program Review Report identifying 22 findings, with the largest being "Attendance Not Verified Prior to Disbursement." Throughout the next year, the U.S. Department of Education required Jefferson College to rebuild 2009-2010, 2010-2011, and 2011-2012 financial aid files and provide a Federal Student Aid lead with bi-monthly progress reports. A written response from Jefferson College regarding its position on each finding and corrective action was submitted in October 2013.

Two years later, in September 2015, Jefferson College received a Final Program Review Determination. The final determination stated that 17 of the 22 findings were resolved without further action required. However, five remained with liabilities, specifically Attendance Taking, Return to Title IV, Verification, Cost of Attendance Budgets, and Un-Negotiated Checks.

Beginning October 2015, Jefferson College appealed part of the liability connected to Attendance Taking, Return to Title IV, and Verification. Jefferson College has since revised policies and procedures to meet the requirements of an institution required to take attendance. In November 2015, the U.S. Department of Education responded to the institution's request for appeal, agreeing to schedule an administrative hearing. From December 2015 through August 2016, proceedings and settlement negotiations occurred. In November 2016, Jefferson College's Board of Trustees approved the final settlement and repayment agreement for 75% of the original liability.

The closeout process began in January 2017. Through April 2017, Jefferson College adjusted previously disbursed Pell grant awards, issued checks to student loan servicers on behalf of borrowers, made an initial down payment on the liability, and established a payment plan for the remaining liability.

In May 2017, Jefferson College received a letter from the U.S. Department of Education confirming that the institution had addressed all requirements of the Final Program Review Determination and that no further action was required of Jefferson College or the Federal Student Aid staff assigned to the case.

- c. Has the institution been audited or inspected by the Office of the Inspector General of the U.S. Department of Education since the last comprehensive evaluation by HLC?

Yes

No

- d. Attach the most recent Title IV program review, or other inspection or audit reports since the last comprehensive evaluation by HLC, as **Appendix H**.

See **Appendix H.1 Title IV Program Review Report, Appendix H.2 Jefferson’s Response to the Title IV Program Review Findings, Appendix H.3 Final Program Review Determination Report, and Appendix H.4 Program Review Closeout Letter.**

- e. List any limitation, suspension or termination actions imposed on the institution by the U.S. Department of Education (hereafter referred to as “the Department”) since the last comprehensive evaluation by HLC and the reason for such actions.

The U.S. Department of Education did not take additional action against Jefferson College.

- f. List any fines, letters of credit or heightened monitoring imposed on the institution by the Department since the last comprehensive evaluation by HLC and the reason for such actions.

In September 2015, a Final Program Review Determination with liability associated with the institution’s May 2012 Title IV program review was issued. During 2015 and 2016, Jefferson College appealed a portion of the liability. For the reduced \$1,823,827 liability, the institution entered into a repayment agreement with the U.S. Department of Education effective February 1, 2017 through January 1, 2020.

- g. What response and corrective actions has the institution taken in regard to these Department actions?

In 2013, Jefferson College created a student participation tracking system that identifies students who have failed to begin participation in a course. Instructors indicate the academically related activity completed by each student each day and a no-show report identifies students who have failed to begin attendance. For courses utilizing the Blackboard learning management system, participation information is tracked automatically. This system is also used to identify students who begin attendance but later cease participation in all courses during a period of enrollment. As such, Return to Title IV amounts are now calculated using last dates of attendance for both official and unofficial withdrawals. This system was presented by Jefferson College at the 2014 Higher Learning Commission Conference. Concerning the cost of attendance finding, aid recipients are now assigned unique budget components based on enrollment level. For escheated checks, Jefferson College’s Business Office now returns uncashed Title IV refunds to the U.S. Department of Education.

Regarding the personnel needs of the office, during the 2009-2012 award years, Jefferson College experienced a surge in enrollment resulting from the 2008 recession. Consequently, the volume of federal student aid issued during those years is the highest on record for Jefferson College. At this same time, significant transformation occurred in Title IV program administration. Furthermore, in 2011-2012, a

combined Admissions and Financial Aid department was split into two service areas, now known as Enrollment Services and Student Financial Services. In 2012, a Director of Student Financial Services with dedicated oversight of financial aid was hired, as was a full-time Financial Aid Specialist for the verification process. Prior to this, the director managed multiple areas of Student Services and the position had been vacant during 2011. In addition, a position exclusively focused on verification did not exist, although it had been a component of multiple jobs. In 2013, the Office of Enrollment Services provided added support for basic financial aid needs as part of the College's One Stop Shop. Additionally, in 2018, Student Financial Services hired a third-party verification service provider, ProEducation Solutions, to deliver a secure electronic portal for completing verification files, allowing students and parents to upload and sign all financial aid materials online, further dedicating staff to financial aid counseling duties. The combination of these efforts allowed Student Financial Services to increase coverage, enhance customer service, and focus on processing with appropriate implementation of regulations.

- h. What are the consequences of these challenges for the institution's short- and long-term financial health?

The Title IV Program Review findings affected Jefferson College beginning FY13, and will continue to through FY20. The immediate impact was approximately \$671,000. This included a \$200,000 down payment and the first eight months of repayments. In each of the next two fiscal years, repayments equaled approximately \$504,000 per year. In the last fiscal year, the remaining four months of repayment will equal approximately \$168,000. In total, Jefferson College will have repaid approximately \$1.8 million. However, because Jefferson College accrued \$23,000 in interest and expended \$161,000 in legal fees, the total cost of the Title IV program review findings will be \$2 million. This represents approximately 25% of Jefferson's Unrestricted Reserve. If funded all at once, this expenditure would have reduced Jefferson College's reserves to approximately \$5.95 million, or about 19.5% of our Unrestricted Revenues. While not a critical level, because it was below Jefferson's targeted reserve percentage, funding the liability over multiple fiscal years allowed time to build the reserves up through increased revenue and reduced expenses.

- i. What are the findings from the OMB Circular A-133 portion of the institution's three most recent audited financial statements, which identifies material weaknesses in the processing of financial aid?

There were no weaknesses identified in the institution's FY17 audit. In addition, the FY18 audit, pending Board of Trustees approval, also had no findings or questioned costs. The FY16 and FY15 audits reflect a deficiency resulting from the College's late preparation of financial statements and filing of the 2013-2014 single audit with the Federal Audit Clearinghouse after the deadline. As indicated on **Appendix H.5 A-133 Audits for FY17, FY16, and FY15** in the Schedule of Findings and Questioned Costs summary, this finding was resolved in FY15. Though believed to be an isolated incident, the responsibility for this task was moved to another individual in Jefferson College's Business Office. As reflected in FY17, the College reconciled financial statements in a timely manner, met the deadline for submission of the auditor's report, and the institution returned to its classification as a low-risk auditee.

- j. In which of the following Title IV federal financial aid programs does the institution participate? Select all that apply:

Pell Grant

Federal Family Education Loan

- Federal Direct Stafford Loan
- Direct PLUS Loan
- Federal Supplemental Educational Opportunity Grant
- Federal Work Study
- Perkins Loans
- Academic Competitiveness Grant

Provide all correspondence with the Department and other documents that explain the above responses as **Appendix I**.

For more information see Federal Requirement 34 CFR §668.16.

See **Appendix I.1 Title IV Program Participation Agreement**.

18. Financial Responsibility Requirements

- a. What were the outcomes of the three most recent Department reviews of the institution's composite ratios and financial audits?

Jefferson College had clean financial audits during the three most recent years, and the institution's CFI outcomes were as follows:

<i>Including GASB 68</i>	FY17	FY16	FY15
Primary Reserve	(0.05)	0.11	0.40
Net Operating Revenue	0.30	(0.40)	0.43
Return on Net Assets	0.43	(0.80)	0.75
Viability	(0.02)	0.16	0.47
Total CFI	0.66	* (0.93)	2.05
<i>Excluding GASB 68</i>	FY17	FY16	FY15
Primary Reserve	1.08	1.10	0.23
Net Operating Revenue	0.40	(0.13)	0.42
Return on Net Assets	0.50	(0.80)	2.00
Viability	1.54	1.61	0.47
Total CFI	3.52	* 1.78	3.12

* The dip in ratios were primarily due to the expense recorded for the Title IV program review settlement.

- b. Have there been any fines, penalties, letters of credit or other requirements imposed by the Department as a result of these reviews?

The Department has imposed no fines, penalties, letters of credit, or other requirements on Jefferson College.

Note: HLC also annually analyzes each institution's financial ratios to determine whether there might be

financial concerns. The peer review team checks with the institution and the HLC staff to determine whether HLC or the Department has previously raised concerns about the institution's finances based on these ratios.

- c. What actions has the institution taken or does it plan to take in response to any concerns raised by HLC or the Department? (*Related HLC Requirements: Core Components 5.A, 2.B; Assumed Practice D.1.*)

An oversight pertaining to financial data submitted for FY16 as part of Jefferson College's 2017 Annual Institutional Data Update (AIDU) resulted in notification of an HLC concern that the institution might be experiencing some financial difficulty. However, it was determined that the low composite scores reflecting that the institution was performing "below the zone" were the result of data entry errors. In November 2017, clarification and updated figures were provided to HLC identifying the correct CFI for Jefferson College as above the zone. After which, HLC confirmed that no further action was required.

Provide all correspondence with the Department and other documents that explain the above actions as **Appendix J**.

See **Appendix J.1 HLC Notice of CFI Concern**.

For more information see Federal Requirements 34 CFR 668.15, 34 CFR 668.23, 34 CFR 668.171, 34 CFR 668.173, and 34 CFR 668.174.

Related HLC Requirements: Criterion 5, Core Components A (resources) and B (administrative capacity).

19. Default Rates. The institution should take steps to avoid excessive loan default rates. *Institutions and teams should use the three-year default rate to complete this section.*

- a. What are the student loan default rates as provided by the Department for the three years leading up to the visit? (Institutions with evaluations after September must include the most recent cohort default rate in the Federal Compliance Filing or ensure that the most recent rate is provided to the team on-site if the rate was not available when the Federal Compliance Filing was submitted.)

Year 1: FY15, 13.7%

Year 2: FY14, 17.3%

Year 3: FY13, 20.1%

- b. If the institution's default rates are higher than those of its peer institutions, if the institution's rates are rising, or if the rates have exceeded Departmental thresholds or triggered a Department review, what actions has the institution taken in response?

Jefferson College's student loan cohort default rate is well below the U.S. Department of Education's 30% threshold, less than the national student loan cohort default rate for two-year public sector institutions, and lower than all but two other Missouri community colleges.

Provide any correspondence with the Department related to default rates and any default rate management plan required by the Department as **Appendix K**.

See **Appendix K.1 U.S. Department of Education Notice of Cohort Default Rate**. Through a variety of student loan default prevention efforts, Jefferson College's cohort default rate decreased. See **Appendix K.2 Missouri Department of Higher Education Student Loan Default Prevention Grant Activities**.

- c. Does the institution participate in private loan programs or any loan services that it provides to students directly or that a related corporation provides to its students?

Yes

No

If yes, provide a list of companies that provide loan services to the institution's students and explain the relationship of these companies to the institution.

Jefferson College does not participate in a private lending program. However, when students do not qualify to borrow federal loans and wish to seek assistance through a private alternative loan company, they are directed to the list of lenders who have provided non-federal educational loans to Jefferson College students during the past three years.

Provide samples of the loan agreements and disclosure information as **Appendix L**.

See **Appendix L.1 Private Student Loan Lenders List**.

For more information see Federal Requirements 34 CFR §668.201, §668.204, and §668.217.

Related HLC Requirements: HLC Criterion 2, Core Component A (integrity); Criterion 5, Core Components A (resources) and B (administrative capacity); Assumed Practices D.1–5.

20. 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 financial aid.

- a. What administrator or office on campus is responsible for ensuring that these disclosures are regularly compiled and published and that the data are accurate?

Campus Police, the Offices of the Vice President of Student Services, Institutional Effectiveness & Strategic Planning, Athletic Department, and Student Financial Services are responsible for compiling and publishing these disclosures.

- b. Has the institution been the subject of any federal investigation related to any of the required disclosures listed in question 20?

Yes

No

c. Does the institution have any findings from the Department regarding these disclosures?

Yes

No

Explain any findings related to any of the required disclosures listed in question 20 and corrective action plans the institution may have put together to remedy the findings.

As a component of the Title IV program review, in April 2016, Jefferson College had a Clery fine pertaining to the institution's prior sexual assault policy and a fine for the lack of a biennial review of alcohol and drug prevention. This motivated the institution to take several actions. One example is that the institution became an affiliate member of the Missouri Partners in Prevention, a statewide consortium dedicated to creating healthy and safe college campuses. Internally, the institution worked to address the sexual assault policy by revising it to specify that both the accused and the accuser may have an individual accompany them throughout the hearing process and that both will be informed of the outcome of the hearing, including the final determination and any sanction imposed against the accused. Additionally, the Title IX Coordinator, Deputy Title IX Coordinators/Lead Investigators, Title IX Investigators, and On-Campus Advocate attended ATIXA, Heartland Campus Safety Summit, and D. Stafford & Associates training to enhance the campus understanding of current data and disclosure requirements. In continued efforts toward improvements, in October 2018, Jefferson College hired a firm to conduct a mock Clery audit on the institution to identify steps that can be taken to strengthen institutional compliance. Additionally, Jefferson College applied for and was awarded a federal Office of Violence Against Women campus program grant to enhance efforts toward addressing dating violence, domestic violence, sexual assault, and stalking.

d. Provide copies of the information disclosed to students and provide the web address where this information is made available to the public as **Appendix M**.

Appendix M.1 Consumer Information provides disclosures. Furthermore, **Appendix M.2 Federal Compliance Matrix** helps new staff identify reporting requirements.

For more information see Federal Requirements 34 CFR §668.40, 668.41, 668.42, 668.43, 668.44, 668.46, and 668.49.

21. Student Right to Know/Equity in Athletics. Title IV responsibilities require that institutions provide to students and the public graduation/completion rates 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, policies on refund and return of Title IV financial aid, 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. Also, institutions with athletic programs are required to disclose athletic participation rates and financial support data.

a. What administrator or office on campus is responsible for ensuring that these disclosures are regularly compiled and published and that the data are accurate?

The Athletic Department, Institutional Effectiveness & Strategic Planning, and Student Financial Services are responsible for compiling and publishing these disclosures.

b. Has the institution been the subject of any federal investigation related to any of the required disclosures listed in question 21?

Yes

No

c. Does the institution have any findings from the Department regarding these disclosures?

Yes

No

d. Explain any findings related to any of the required disclosures listed in question 21 and corrective action plans the institution may have put together to remedy the findings.

During the Title IV program review, Jefferson College was cited as having failed to disaggregate all required data elements within the Student Right to Know/Equity in Athletics disclosures. Data is now disaggregated by gender, ethnic subgroup, recipients of a Federal Pell Grant, recipients of a Direct Subsidized Loan who did not receive a Federal Pell Grant, and by recipients of no form of Title IV. The results are disclosed as Consumer Information for current and prospective students. In addition, included as an addendum in athletic letters of intent, students sign a statement acknowledging the availability of the Equity in Athletics Report.

e. Attach copies of the information disclosed to students and provide the web address where this information is made available to the public as **Appendix N**.

See **Appendix N.1 Student Right to Know/Equity in Athletics Disclosures** within **Appendix M.1 Consumer Information**.

For more information see Federal Requirements 34 CFR §668.41, 668.45, 668.48, and 668.8.

Related HLC Requirement: Assumed Practice A.6.

22. 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.

a. Are these policies readily available to students?

Yes

No

b. Do they satisfy state or federal requirements?

Yes

No

c. Does the institution have any findings from the Department regarding these disclosures?

Yes

No

Explain any findings related to any of the required disclosures listed in question 22 and corrective actions that may have been required by the Department related to these findings.

Not applicable.

d. Attach copies of the information disclosed to students and provide the web address where this information is made available to the public as **Appendix O**.

Each student who receives federal aid at Jefferson College is required to maintain satisfactory academic progress (SAP) toward completion of their program of study. Progress is measured at the end of each semester. The SAP policy is based upon cumulative progress and is applied consistently to all programs and equally to new, continuing, and transfer students. See **Appendix O.1 Minimum Standards of Academic Progress**. Concerning individual student scenarios, in the event of extenuating circumstances, a student on financial aid suspension may request to remain in the federal aid program through written appeal to the Director of Student Financial Services. The Financial Aid Appeals Committee reviews all appeals and notifies the student of the results.

Such sources as Jefferson College's **Appendix O.2 Financial Aid Attendance Reminder** and **Appendix O.3 Financial Aid Disbursement Schedule** provide attendance policy information to students. Each emphasize that regulations require students earn financial aid by actively participating in courses and that if a student fails to begin attendance in a course, Jefferson College will reduce the student's financial aid enrollment level and eligibility. Additionally, any student who fails to begin attendance, ceases participation for at least two consecutive weeks, or has sporadic participation in a course resulting in the student missing 15% or more of the coursework may be administratively withdrawn, thereby earning a grade of WX. Students are notified of the consequences of ceasing participation in all courses and that as an institution taking attendance, student participation records are routinely monitored to determine the student's last date of attendance for Return to Title IV federal overpayment calculation purposes. See **Appendix O.4 Federal Overpayment Policy**.

e. Are the policies being appropriately applied by the institution in individual student situations?

Note: HLC does not necessarily require that the institution take attendance unless required to do so by state or federal regulations but does anticipate that institutional attendance policies provide information to students about attendance at the institution.

Yes

No

For more information see Federal Requirement 34 CFR §668.34.

Related HLC Requirements: Criterion 3, Core Component A; Assumed Practice A.5.

23. Contractual Relationships. List any contracts related to academic programs with third-party entities not accredited by a federally recognized accrediting agency. Attach as **Appendix P**. Include the name of the provider, the name of the relevant academic program, what the provider does, the dates when the relationship starts and ends, and the date it was approved by HLC if required.

(The institution should have previously disclosed to HLC all existing contracts and received approval for those contracts as required by HLC policy. Institutions can see the list of HLC-approved contractual arrangements on its Institutional Status and Requirements (ISR) Report. HLC's substantive change policy requires that the institution notify HLC of any new contracts for up to 25 percent of an academic program, that the institution obtain prior HLC approval before initiating any contract for 25 to 50 percent of a program, and that HLC approve contracts for more than 50 percent of a program only in exceptional circumstances under strict scrutiny.)

No third-party entities offer programs on behalf of Jefferson College in the manner defined above.

For more information see Federal Requirements 34 CFR §668.5 and 602.22(a)(2)(vii).

Related HLC Requirements: Assumed Practices A.10–11.

24. Consortial Relationships. List any consortial relationships with other entities accredited by a federally recognized accrediting agency. Attach as **Appendix Q**. Include the name of the provider, the name of the relevant academic program, what the provider does, the dates when the relationship starts and ends, and the date it was approved by HLC if required.

(The institution should have previously disclosed to HLC all existing consortiums and received approval for those consortial arrangements as required by HLC policy. Institutions can see the list of HLC-approved consortial arrangements on its Institutional Status and Requirements (ISR) Report. HLC's substantive change policy requires that the institution notify HLC of any new consortiums for up to 25 percent of an academic program, that the institution obtain prior HLC approval before initiating any consortiums for 25 to 50 percent of a program, and that HLC approve consortiums for more than 50 percent of a program only in exceptional circumstances under strict scrutiny.)

No third-party entities offer programs on behalf of Jefferson College in the manner defined above.

For more information see Federal Requirement 34 CFR §668.5.

Related HLC Requirements: Assumed Practices A.10–11.

Required Information for Students and the Public

25. Provide course catalogs and student handbooks. Attach as **Appendix R**.

See **Appendix R.1 College Catalog and Student Handbook**.

26. Which sections of the institution's website include required disclosure information? Provide the webpage name and link for each.

See **Appendix M.1 Consumer Information**.

27. What policies and processes does the institution have in place to ensure required information for current and prospective students about institutional programs, fees, policies and related required

information is accurate, timely and appropriate? Attach copies of these policies and procedures as **Appendix S**.

See **Appendix S.1 Procedures for Gathering Consumer Information**. In addition, Board Policy and Procedure states that Jefferson College's President has responsibility for keeping college policy in compliance and that federal and state reporting take priority over all requests.

For more information see Federal Requirement 34 CFR §602.16(a)(1)(vii).

Related HLC Requirements: Core Component 2.A, 2.B; Assumed Practice A.5.

Advertising and Recruitment Materials and Other Public Information

28. Do the institution's advertisements and recruiting materials provide accurate, timely and appropriately detailed information to current and prospective students, and is information about the institution's accreditation status with HLC and other accrediting agencies clear and accurate? If the institution has been placed on a sanction or its programmatic accreditation has been withdrawn, do the disclosures accurately explain this information?

Yes

No

Provide copies of these advertising and recruiting materials as **Appendix T**.

29. Which sections of the institution's website include advertising and recruiting information? Provide the webpage name and link for each.

Jefferson College makes every effort to provide accurate, timely, and appropriate information to prospective students, current students, and the public. See **Appendix T.1 Sample Advertising and Recruitment Materials** and **Appendix T.3 Locations/Maps**. **Appendix A.5 College Catalog** is the official resource for information about the College's credit programs. Annual review and updates reflect changes in academic policies and program requirements. In addition, each degree and certificate program has a webpage. See **Appendix T.2 Programs and Departments**.

30. What policies and processes does the institution have in place to ensure advertising and recruiting information to current and prospective students about its programs, locations and policies is accurate, timely and appropriate? Provide copies of these policies and procedures as **Appendix U**.

As identified in **Appendix U.1 Advertising and Recruitment Policy**, Jefferson College's Public Relations and Marketing team work closely with administrators, faculty, and staff to ensure that information released to the public is accurate and informative. All institutional advertising is coordinated via the Public Relations and Marketing Department. To ensure that advertising and recruiting information to current and prospective students is accurate, timely, and appropriate, Administrative Policy VIII-005 was adopted in 2009 such that all marketing and advertising representing Jefferson College follow defined guidelines for accuracy, accountability, professionalism, and compliance with statutes and College policies and procedures.

Recruitment publications, such as the General Catalog and Student Handbook, are revised annually to ensure that information is accurate and appropriate. Other information sources, such as the Jefferson College website, are continually monitored and updated as warranted.

In addition to Administrative Policy VIII-005, the Public Relations and Marketing Department follows an institutional code of ethics listed on the Jefferson College website pertaining to accuracy and timeliness of marketing and advertising activities. The webpage states that marketing and promotional materials shall be clear, accurate, and current, and should emphasize the educational programs and services available. Materials shall not, by commission or omission, provide false, incomplete, or misleading information. As an added measure of oversight, the process of reviewing and updating advertisements includes sharing and discussion with administrators and Registrar before information is disseminated.

31. What webpage displays the Mark of Affiliation on the institution's website? Provide a link.

Jefferson College's accreditation status with the Higher Learning Commission and other accrediting agencies is publicized on Jefferson College's website within **Appendix V.5 Accreditation Statement**. The HLC Mark is hyperlinked to the College's Statement of Affiliation Status on the HLC website. The Public Relations and Marketing Department annually verifies the College's status with accrediting bodies for updating as needed.

For more information see Federal Requirements 34 CFR §602.16(a)(1)(vii) and 602.23(d).

Related HLC Requirements: Core Component 2.B; Assumed Practices A.5, A.7.

Review of Student Outcome Data

Institutions in their program review and institutional improvement processes are required to consider student outcome or performance data on the full range of their offerings where such data are available. Data can be at the institutional or the program level. Student achievement data typically includes retention rates, graduation rates, licensure exam pass rates, employment rates, acceptance to further study or other similar information.

32. How does the institution gather or receive information about student outcomes from academic programs across the institution?

Queries have been developed to pull student outcome data from the student information system. Reporting requirements are defined, prioritized, and reviewed by administrators, reviewed by the Strategic Enrollment Management and Retention Committee, and regularly scheduled items are listed on the institution's federal compliance matrix maintained by Institutional Effectiveness & Strategic Planning. See **Appendix M.2 Federal Compliance Matrix**.

A combination of data captured from the National Student Clearinghouse and Career and Technical Education graduate follow-up surveys are used to report student outcomes. Data is linked to Career and Technical Education Carl D. Perkins Act funding and Department of Labor reporting requirements, as well as the Student Right to Know Act, the Equity in Athletics Disclosure Act, and Integrated Postsecondary Education Data System (IPEDS).

33. List the types of student outcome data available to the institution. Provide this information in the space below or attach as **Appendix V**.

The Office of Institutional Effectiveness & Strategic Planning posts student outcome data pertaining to Performance Funding in Missouri, Federal IPEDS, the National Community College Benchmark Project, Complete College America, and the Graduating Student Opinion Survey taken by students after completion of the institution's exit exam or WorkKeys assessment. See **Appendix V.1 College Reports**. Licensure pass rates are posted on the relevant Career and Technical Education program webpages. Additionally, student outcome data for Gainful Employment, Student Right to Know, and results of student satisfaction surveys, including SB389 Faculty Survey and Noel Levitz are shared. Furthermore, the Strategic Enrollment Management and Retention Committee reviews student outcome data. See **Appendix V.2 Strategic Enrollment Management and Retention Plan**.

34. Explain how information about student outcomes informs planning, academic program review, assessment of student learning, consideration of institutional effectiveness, and other topics.

Outcomes including retention, transfer, and graduation rates are key performance indicators that inform planning. As part of Jefferson College's 2015-2020 Strategic Plan, the first aim identified is to "facilitate positive learning outcomes through quality curriculum, excellent instructional strategies, and comprehensive support services." See **Appendix V.3 Strategic Planning Documents**. To do this, data informs decisions through:

1. Institutional Committees including Strategic Enrollment Management and Retention, Curriculum, and Student Learning and Support
2. Yearly Planning for each Institutional Division
3. Departmental Institutional Assessment Reports, see **Appendix V.4 Institutional Assessments**
4. Program Accreditations and Affiliations, see **Appendix V.5 Accreditation Statement**
5. Institutional Reporting to the National Center for Educational Statistics, which includes comparison numbers based on admissions, student enrollment, charges and net price, awards, student financial aid, military benefits, retention and graduation rates, finance, staff, and the library. The National Community College Benchmark Project which collects data to help community colleges conduct a well-rounded analysis of their progress, and the Missouri Department of Higher Education's performance funding, which is used to financially reward institutions for providing quality services.

35. The federal government is increasingly concerned that institutions and accreditors are taking into account federal metrics in the review of student outcome data. These metrics are best found in the [College Scorecard](#). Explain how information from the Scorecard is incorporated in the institution's review of its student outcome data. Please note the loan repayment rate identified on the Scorecard and explain how the institution uses this metric in its review of its own data.

Prospective students in their decision to attend Jefferson College may use the institution's College Scorecard results. On average, 20% of Jefferson College students receive federal loans. Scorecard results reflect that 39% of borrowers begin repayment on their federal loan within three years of leaving the institution. Because many students continue their education beyond Jefferson College, some borrowers will enter repayment later. Furthermore, completion totals are reviewed for both Strategic Enrollment Management and Retention and Strategic Planning purposes, as is academic year tuition and required fees. Salary after graduation is referenced in the College's Gainful Employment disclosures, and

student loan data is reviewed annually to develop loan default prevention efforts.

For more information see Federal Requirement 34 CFR 602.16(a)(1)(i).

Related HLC Requirements: Core Components 4.A–C; Assumed Practice C.6, C.7.

Publication of Student Outcome Data

Student outcome data should be made available to the public through the institution's website—for instance, linked to from the institution's home page, included within the top three levels of the website or easily found through a search of related terms on the website—and should be clearly labeled as such. Any technical terms in the data should be defined, and any necessary information on the method used to compile the data should be included. Data may be provided at the institutional or department level or both, but the institution must disclose student outcome data that addresses the broad variety of its programs.

36. Are student outcome data published on the institution's website following the specifications above?

Yes

No

37. How does the institution ensure that the publication of these data accurately reflects the range of programs at the institution?

Student outcome data reports include fall-to-fall cohort information encompassing all first-time, full-time, degree-seeking students and are directly linked to IPEDS reporting requirements.

38. Provide a link to the webpage(s) that contains the student outcome data.

See **Appendix M.1 Consumer Information**, **Appendix V.1 College Reports**, and **Appendix V.3 Strategic Planning Documents**.

Related HLC Requirement: Assumed Practice A.6.

Standing With State and Other Accrediting Agencies

39. List any relationships the institution has with a specialized, professional or institutional accreditor or with any governing or coordinating bodies in states in which the institution has a presence. Note whether the institution or any of its programs is on a sanction, is provisionally approved or has lost status with any state agency or accrediting body.

As identified on **Appendix V.5 Accreditation Statement**, multiple career and technical education programs, and a few other areas of the College, have specialized accreditations and affiliations. Below is a review schedule for each area.

Provide 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. Attach as **Appendix W**.

Jefferson College's Nursing program, though in good standing with full approval by the Missouri State Board of Nursing, has an interim monitoring report due March 2019 because first time pass rates fell below 80% for the second consecutive year. In addition, the Paramedic program has a progress report due March 2019, resulting from a September 2017 initial accreditation status pertaining to two items: (1) transition of a new medical director; and (2) proof of training for all preceptors. For program status details, see **Appendix W.1 Specialized Accreditation**.

School	Program	PresentStatus	AccredBody	AccredCycle	NextAccred
CTE	Automotive Technology	Accredited (2017)	NATEF	Every 5 years	2022
CTE	Law Enforcement Academy	Accredited (2016)	CALEA (Voluntary), Licensed by the MO Dept of Public Safety	Every 4 years	2020
CTE	Emergency Medical Technology/ Paramedic	Accredited (2017)	CoAEMPSE	Every 5 years	2022
CTE	Health Information Technology	Accredited (2016)	CAHIIM	CAHIIM Accreditation is not time limited. Once achieving accreditation, the program's accreditation continues until there is cause to change its status. The program will submit the APAR annually.	N/A
CTE	Heating, Refrigeration, and Air Conditioning	Accredited (2018)	HVAC Excellence	Every 6 years	2025
CTE	Nursing	LPN- Full Approval RN- Full Approval	MO State Board of Nursing	Every 5 years	2020
CTE	Occupational Therapy Assistant	Full Accreditation	ACOTE	Every 7 years	2020
CTE	Physical Therapist Assistant	Full Accreditation	CAPTE	1st = 5 years	2019
CTE	Radiologic Technology	Full Accreditation	JRCERT	1st = 3 years	2026
CTE	Veterinary Technology	Accredited (2016)	AVMA	Every 6 years	2022

CTE	Welding Technology	SENSE	AWS	Seeking Accredited Test Facility Status	
Arts and Science Education	Teacher Education	AAT - approved	DESE	As the Missouri Department of Elementary and Secondary Education deems necessary	N/A
Arts and Science Education	Dual Credit Program	Accredited (2015)	National Alliance of Concurrent Enrollment Partnerships (NACEP)	Every 7 years	2023
Student Services	Child Development Center	Accredited (2017)	Missouri Accreditation of Programs for Children and Youth	Every 4 years	2021

40. Explain how the institution makes its standing with state agencies and accrediting bodies available to students. Provide samples of those disclosures as **Appendix X** and indicate the web address where students and the public can find these disclosures.

Accreditation and program approval information is located on **Appendix V.5 Accreditation Statement**, in **Appendix A.5 College Catalog**, and on the unique career and technical education program webpages within **Appendix T.2 Programs and Departments**. See **Appendix X.1 Sample Disclosures of Program Accreditation**.

For more information see Federal Requirements 34 CFR §602.28, 34 CFR 668.41, and 668.43.

Related HLC Requirements: Core Component 2.B; Assumed Practices A.7, C.4.

Public Notification of Opportunity to Comment

The institution is responsible for publishing a notice about the visit to its constituents no later than two months before the peer review team's on-site visit and instructing constituents that they can send comments to HLC. Local newspapers, institutional websites and alumni magazines are appropriate choices of media in which to solicit public comments. Notices of the opportunity to comment should reach all constituencies but should not unduly burden the institution. Notices of the visit should be published following the format prescribed in the [Procedure on Third-Party Comments](#).

Notices should include:

- The purpose and dates of the visit.
- The institution's accreditation status with HLC.
- An invitation to send written, signed comments directly to HLC.
- Contact information for HLC.

Notices should specify that comments must be sent to HLC no later than four weeks before the start of the visit. The comments are compiled by HLC staff members and sent to the evaluation team and the institution three weeks prior to the visit. As third-party comments are an important part of the comprehensive evaluation, HLC also reviews and forwards comments received after the deadline has passed and during the visit.

In cases where comments are of a sensitive nature, HLC ensures that the commenter is aware that comments are typically forwarded to the institution and the evaluation team with identifying information intact. In some cases, HLC may redact the identifying information of the commenter or summarize the comment.

41. Submit a list of constituencies that have received the notice of opportunity to comment. (These groups may include students, parents, alumni, taxpayers, donors, community groups and local businesses.)

Students, employees/retirees, alumni, taxpayers, donors, legislators, community groups, area school superintendents, and local businesses received notice of the opportunity to comment to HLC regarding Jefferson College.

42. What media did the institution use to solicit comments?

During fall 2018 and early spring 2019, Jefferson College notified constituents via KJFF and KFMO Radio, JCTV cable channel, The Windjammer institutional newsletter, emails sent through the MyJeffco portal to all employees and students, emails sent through VerticalResponse to Foundation donors and board members, social media including Jefferson College's Facebook, Twitter, and LinkedIn pages, on the Jefferson College homepage, and on HLC re-accreditation related webpages. In addition, a paid advertisement was published in the Jefferson County Leader newspaper on December 13th and 20th of 2018 and January 3rd and 10th of 2019. Constituents were able to comment through February 1, 2019.

43. Attach a copy of the notices as **Appendix Y**.

See **Appendix Y.1 Notices to Constituents Regarding Opportunity to Comment to HLC**.

Competency-Based Programs, Including Direct Assessment Programs, and Faculty-Student Engagement

Note: The definition of competency-based and direct assessment programs (as taken from 34 CFR §668.10) can be found on [HLC's website](#).

44. Does the institution offer any direct assessment programs, as defined in 34 CFR §668.10?

Yes

No

Note: HLC policy and federal regulations require that direct assessment programs be reviewed and approved by the accrediting agency before they are initiated. Contact your HLC staff liaison if the institution offers direct assessment programs that have not been approved by HLC.

45. Does the institution offer any competency-based programs?

Yes

No

46. Provide a list of direct assessment or competency-based programs offered by the institution.

Not applicable.

47. How does the institution ensure that faculty in these programs regularly engage with students?
Please respond to the following questions:

- a. Do the faculty members initiate communication on some regular basis with the students in the course(s)? If yes, provide examples of how and when this occurs in each program.
- b. Do the students have a responsibility to initiate communication with the faculty members on some regular basis that is at least equivalent to contact in a traditional classroom? If yes, provide examples of how and when this occurs.
- c. Describe the manner in which faculty respond to questions from students about the academic content of the program. Describe the interaction between faculty and students about demonstrating competencies in the program material.
- d. Demonstrate that in the tasks mastered to assure competency, faculty and students interact about critical thinking, analytical skills, written and oral communication abilities, etc., in the context of the course(s) in question with appropriate guidance by faculty.
- e. Demonstrate that in the tasks mastered to assure competency, faculty and students interact about core ideas, important theories, current knowledge, etc., in the context of the course(s) in question with appropriate guidance by faculty.

List of Appendixes

Please read each section of this document carefully for instructions on the information and material to be included in these appendixes. Appendixes displayed in italics are optional; the institution may provide the required information either by entering it into this form or by attaching it as an appendix.

Assignment of Credits, Program Length and Tuition

- Appendix A.1..... Assignment of Credit Hours Worksheets
- Appendix A.2..... Course Schedule
- Appendix A.3..... Credit Hour Policy
- Appendix A.4..... Eligibility and Certification Approval Report
- Appendix A.5..... College Catalog
- Appendix A.6..... Course Syllabi Statement
- Appendix A.7..... Sample Syllabi for a Multiple Modality Course
- Appendix A.8..... Academic Load Policy
- Appendix A.9..... Headcount Exceeding Academic Load 2017-2018
- Appendix A.10..... Tuition and Fees

Institutional Records of Student Complaints

- Appendix B.1..... Policy on Complaint Resolution
- Appendix B.2..... Student Handbook
- Appendix B.3..... Behavioral Concerns and Student Conduct
- Appendix B.4..... Academic Affairs Committee Meeting Minutes and Maxient System
- Appendix B.5..... Title IX
- Appendix B.6..... Disability Support Services Policies and Procedures
- Appendix B.7..... Student Complaint Flow Charts
- Appendix C.1 Complaints and Resolutions
- Appendix C.2 Gender Identity in the Non-Discrimination Policy

Publication of Transfer Policies

- Appendix D.1 Transfer Credit Procedures
- Appendix E.1..... List of Articulation Agreements and Transfer Resources
- Appendix E.2..... University Partnership 2+2 Programs
- Appendix E.3..... Missouri Reverse Transfer
- Appendix E.4..... Missouri Core 42
- Appendix F.1..... Evidence that Transfer Decisions Align with Policy

Practices for Verification of Student Identity

- Appendix G.1 See Appendix A.10 Tuition and Fees and Appendix A.2 Course Schedule
- Appendix G.2 Privacy of Student Records – FERPA
- Appendix G.3 Testing Center Policies and Procedures

Title IV Program Responsibilities

- Appendix H.1 Title IV Program Review Report
- Appendix H.2 Jefferson's Response to the Title IV Program Review Findings
- Appendix H.3 Final Program Review Determination Report
- Appendix H.4 Program Review Closeout Letter
- Appendix H.5 A-133 Audits for FY17, FY16, and FY15

- Appendix I.1 Title IV Program Participation Agreement
- Appendix J.1 HLC Notice of CFI Concern
- Appendix K.1..... U.S. Department of Education Notice of Cohort Default Rate
- Appendix K.2..... Missouri Department of Higher Education Student Loan Default Prevention Grant Activities
- Appendix L.1 Private Student Loan Lenders List
- Appendix M.1 Consumer Information
- Appendix M.2 Federal Compliance Matrix
- Appendix N.1 Student Right to Know/Equity in Athletics Disclosures
- Appendix O.1 Minimum Standards of Academic Progress
- Appendix O.2 Financial Aid Attendance Reminder
- Appendix O.3 Financial Aid Disbursement Schedule
- Appendix O.4 Federal Overpayment Policy
- Appendix P.1..... Not Applicable – No Contractual Relationships
- Appendix Q.1 Not Applicable – No Consortial Relationships

Required Information for Students and the Public

- Appendix R.1 College Catalog and Student Handbook
- Appendix S.1..... Procedures for Gathering Consumer Information

Advertising and Recruitment Materials and Other Public Information

- Appendix T.1..... Sample Advertising and Recruiting Materials
- Appendix T.2..... Programs and Departments
- Appendix T.3..... Locations/Maps
- Appendix U.1 Advertising and Recruitment Policy

Review of Student Outcome Data

- Appendix V.1..... College Reports
- Appendix V.2..... Strategic Enrollment Management and Retention Plan
- Appendix V.3..... Strategic Planning Documents
- Appendix V.4..... Institutional Assessments
- Appendix V.5..... Accreditation Statement

Standing With State and Other Accrediting Agencies

- Appendix W.1..... Specialized Accreditation
- Appendix X.1..... Sample Disclosures of Program Accreditation

Public Notification of Opportunity to Comment

- Appendix Y.1..... Notices to Constituents Regarding Opportunity to Comment to HLC