



## Federal Compliance

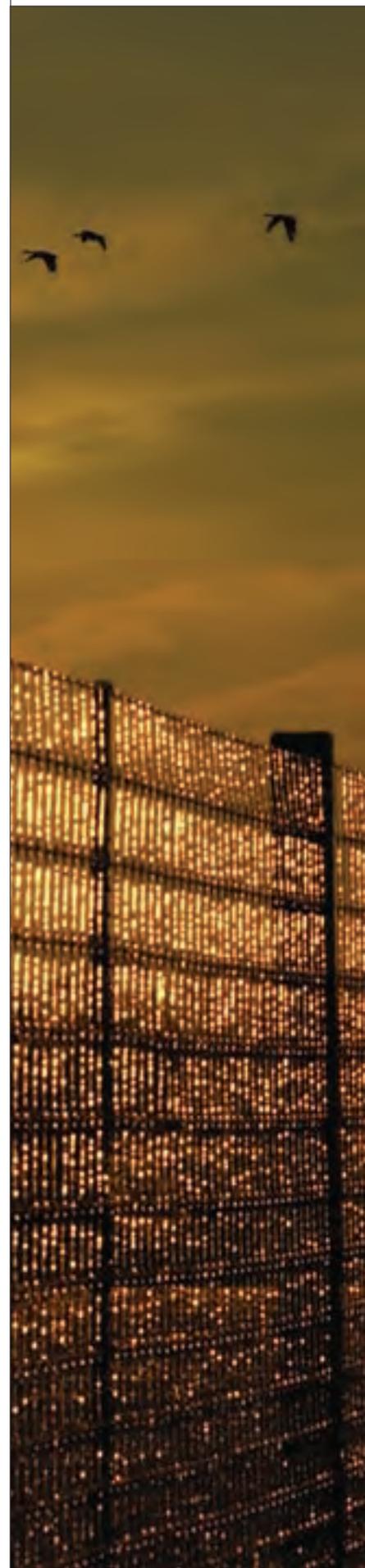
## Federal Compliance

Southern Illinois University Carbondale takes seriously its various federal (and state) mandates to ensure the highest quality education at reasonable cost to its students. As a public institution, SIUC must work within a wide range of requirements imposed by the Illinois Board of Higher Education, but also by the U.S. Department of Education. The Higher Education Opportunity Act of 2008 in particular brings additional scrutiny to eight areas to account for the wise stewardship of public aid to those students enrolled in the university supported by federal sources. For this reason, this section of “Southern at 140” attends to the specific requirement of federal compliance in accordance with the understandings established by the Higher Learning Commission of the North Central Association of Colleges and Schools with the U.S. Department of Education in 2009. Documentation of the university’s appropriate policies and practices is provided below as a matter of public record.

One supplemental component of this chapter on compliance concerns distance education. Southern Illinois University Carbondale is formally seeking to offer distance learning degree programs, without prior HLC program-by-program approval, as an integral part of the university’s commitment to serving state, national, and international needs. SIUC is well versed in offering programs at a distance; it has done so for more than 30 years in its Division of Continuing Education and its Office of Military Programs at military bases throughout the United States. Although much of SIUC’s distance education has been brick-and-mortar programs delivered by faculty on-site, the time has arrived to expand the university’s efforts to meet the educational needs of its clientele, both military and civilian, by delivering more programs anytime, anywhere, tailored to address students’ time and location constraints. A formal letter requesting this approval, to be duly noted on SIUC’s institutional profile, is included with the additional materials accompanying this self-study.

### 1. Credits, Program Length, and Tuition

Since fall 1974, SIUC has transcribed all academic credit in semester-hours for each and every course counted towards a degree or certificate. These student credit-hours are consistent with standard practice at all colleges and universities on the semester system based on the number of contact hours per week for a 15-week term. Transfer credits earned by SIUC students before fall 1974, when the university counted credit-hours by



quarters, are converted at a ratio of 3:2. Transfer credits from other institutions using the quarter system are treated in the same way.

The number of credit hours required for all degrees awarded at SIUC are typical of comparable programs offered at other universities and colleges, and no SIUC degree takes significantly longer time to complete. These requirements are posted in the annual editions of the Undergraduate, Graduate School, SIU School of Law, and SIU School of Medicine catalogs (available in the Resource Center) for all appropriate degree programs.

All costs for tuition and fees are similarly published in the relevant catalogs. Policies concerning differential tuition, however, have been the subject of recent Illinois legislation. The university is required to comply with Public Act 93-0228, widely known as the "Truth in Tuition Act." This legislation stipulates that the tuition charged a first-time undergraduate public university student who is an Illinois resident must remain at the same level for four continuous academic years following initial enrollment, beginning in fall 2003. The result is evident in the different tuition rates that each succeeding class of entering undergraduate students pays.

As for non-resident tuition, the university has a policy that allows an alternate tuition rate for special populations, especially in states bordering southern Illinois. Beginning in fall 2009, new entering undergraduate and graduate students from Missouri, Kentucky, Indiana, Tennessee, and Arkansas are assessed an alternate tuition rate equal to one time the in-state rate. The program was designed to provide students from these states access to the university to increase enrollment and to offset the migration of Illinois students. Otherwise, the non-resident tuition is 2.5 times the in-state rate. This tuition holds for residents of all other states and countries, unless they are subject to policies 4A.4.e. of the SIU Board of Trustees. BOT Policy 4A.4.e. authorizes the chancellor to enter into contracts with agencies, institutions or organizations, or to establish instructional programs for specified groups for instructional delivery at off-campus locations not owned or leased by the university, (i.e., off-campus cost recovery programs offered at military bases) at a tuition rate that is less than the current out-of-state tuition. The chancellor must ensure that charges are sufficient to meet the instructional costs of delivering the program.

Program-specific tuition, especially for the Graduate School, the professional schools of Law and Medicine, and the M.S. Physician Assistant program, is widely accepted in higher education as justified by their higher expense ratios. In April 2008, however, the university adopted a policy that allows for differential tuition for certain other academic programs,

such as those in the College of Business (CoB). Beginning in fall 2008, the CoB started charging a 15 percent tuition surcharge for all entering declared undergraduate majors and a program fee for students with a declared CoB minor. The rationale for the tuition surcharge is to assist the CoB in maintaining the quality of its programs and to improve student services through increased scholarships and enhanced advising, career preparation and placement, retention services, curricular innovation, professional development, instructional technology, and other student-related services.

To date no other undergraduate programs have been allowed to adopt differential tuition, even though the SIU Board of Trustees Policies 4A.3.c. permit the chancellor to authorize course-specific fees which are necessary to the pursuit or completion of an instructional program. Course-specific fees are implemented to cover expenses such as consumable items, required field trips, laboratory and studio expenses, guest speakers, and equipment use, particularly in those degree programs, such as aviation flight and physicians assistance, where these expenses exceed the norm.<sup>532</sup>

## 2. Student Complaints

Student complaints are systematically and promptly handled through the administrative structure of the university. All concerns students have about academic matters, including advisement, instruction, course work, degree programs, graduation requirements, transcripts and records, begin in the appropriate academic unit. Students may address their complaints directly to staff, instructors, chairs and directors, deans, and, ultimately, the provost and vice chancellor, the university's chief academic officer. Student complaints about other matters, such as admission, housing, student services, judicial affairs, financial aid, and the like, may be filed through the appropriate office, using a standard "Student Assistance Form" for this purpose found in the Office of the Assistant Vice Chancellor for Enrollment Management, which reports to the provost and vice chancellor.<sup>533</sup>

All students have access to two university officials to resolve their complaints wherever they may originate: the university ombudsman and the associate provost for academic affairs. Reporting directly to the chancellor each month, the ombudsman – "an independent, neutral, and informal resource for problem or conflict resolution" – addresses student complaints of all sorts and provides information on general trends of student concerns

<sup>532</sup> Further information about the university's policies concerning tuition, fees, and charges, including tuition and fee waivers policies and procedures, from the Office of the SIU Board of Trustees, available in the Resource Center.

<sup>533</sup> See Student Assistance Form and the Procedures Chart from the Office of Assistant Vice Chancellor for Enrollment Management, available in the Resource Center.

that may not come to the attention of another university official.<sup>534</sup> During the first three quarters of calendar year 2009, the university ombudsman has helped 120 students with their problems, as a matter of university policy.

Similarly, the associate provost for academic affairs has the responsibility to address all complaints that are not adequately adjudicated elsewhere and therefore is the last administrative official to review problems, the majority of which are matters of referral to the appropriate officials on campus. The associate provost for academic affairs maintains files of all such activity in the office (for 2005, there are 7; 2006, 114; 2007, 123; 2008, 106; and 2009, 59). The associate provost for academic affairs reports regularly to the provost and vice chancellor the results of his or her investigations of those cases that require the provost's attention. The university is currently creating a spreadsheet to provide better accountability of all complaints that come to the associate provost for academic affairs.

### 3. Transfer Policies

Transfer policies for all prospective and current SIUC students are posted in the undergraduate, graduate, and professional school catalogs. Additional information is provided undergraduate students on the university's webpages dedicated to this purpose, including a link to the Illinois Board of Higher Education's iTransfer homepage for all transfer credits from public institutions in the state.<sup>535</sup> Students are provided additional advice to more specific concerns through their academic advisers. As noted above on student complaints, final adjudication of individual cases is the purview of the provost and vice chancellor's office. In every instance, the criteria used in making transfer decisions are clearly explained publicly to ensure that SIUC remains the most "transfer-friendly" four-year public institution in the state of Illinois; the instructional faculty members, who offer the relevant courses, determine the transferability of credit to satisfy the relevant requirements for graduation and the major.

### 4. Verification of Student Identity

As a matter of university policy, all students must be properly enrolled to take a course, whether it is offered on- or off-campus. Student identification is checked at registration. In the Division of Continuing Education (DCE), which is overseen by the Office of the Associate Provost for Academic Affairs, all Individualized Learning Program (ILP)

<sup>534</sup> See <http://ombudsman.siu.edu> for more information about the Office of the University Ombudsman.

<sup>535</sup> For transfer student information, see <http://registrar.siu.edu/eval/transfer.htm>. For specific transfer credit information, including course work done at out-of-state institutions, see <http://registrar.siu.edu/eval/articpg.htm>. And for more information about Illinois state policies and procedures for transfer credits among state institutions, see <http://www.itransfer.org>.

students, who are engaged in either print-based or web-based versions of a course, sign two forms when they register. One form is maintained in the student's file. On-line semester-based students sign a form at registration, as well. Password verification is required each time a student logs into Blackboard, the university's primary courseware platform.

In the DCE's on- and off-campus testing centers, a testing administrator checks identification upon the students' arrival to take an examination. The students sign in, and their signature is compared with the ones on the forms signed at registration or on a proctor agreement form. All proctors are checked and approved by a staff member in the DCE. The proctor must be unrelated to any currently enrolled students, and s/he must hold an accountable position such as librarian, certified teacher, educational officer, instructor, and the like. Proctors administering on-line tests are provided a password, which the student does not have, for access to the examination on Blackboard.<sup>536</sup>

Because the U.S. Department of Education's on-going interest in student verification, the DCE is developing a more rigorous mechanism in conjunction with the offices of Instructional Support Services and Information Technology.

### **5. Title IV Program and Related Responsibilities**

#### **a. General Program Responsibilities**

The university sustains an audit every year from the U.S. Department of Education to ensure its compliance with Title IV regulations. In the past ten years, SIUC has received a total of five findings (two in 2007 and three in 2008). The most recent findings concern inadequate controls over loan reporting, untimely return of Title IV funds, and failure to follow requirements for Perkins loans under repayment and default. In 2007, the findings noted the university's failure to follow requirements for Perkins loans under repayment and default, and inaccurate Pell reporting. In each case, the university accepted the finding and has taken active steps to address it, including the requirements for Perkins loans in 2007 and 2008.<sup>537</sup>

#### **b. Financial Responsibility Requirements**

As required by the Illinois Board of Higher Education, the Southern Illinois University system is audited by firms contracted by the state Auditor General's office. In 2009, Crowe Horwath provided the latest report of the university's finances, for which there were no

---

<sup>536</sup> Email communication from the Director, Division of Continuing Education, to Self-Study Coordinator, 12/2/2009, in the Resource Center.

<sup>537</sup> Documentation of these findings from the Office of Financial Aid, is available in the Resource Center.

findings to report. There have, in fact, been no findings in the past ten years.<sup>538</sup>

#### **c. Student Loan Default Rates**

For the past six years, the university has records of the U.S. Department of Education's notification of its students' default rates. In FY 2007, the last year we have official notice, the cohort rate was 4.6; for the previous eight years, it has ranged from a high of 5.7 in 2000 to a low of 3.7 in 2003. In comparison with other Illinois public four-year universities, SIUC's students have defaulted less frequently than students at three other state institutions, according to data compiled by the SIU President's office for FY 1998-2002.<sup>539</sup>

#### **d. Campus Crime Information and Related Disclosure of Consumer Information**

The university's Annual Campus Safety and Security Report, as mandated by the Clery Act, is provided by the Department of Public Safety (DPS) on its webpage.<sup>540</sup> For more than the past three years of data, above and beyond the requirements of the Clery Act, the DPS will respond to specific requests.

#### **e. Satisfactory Academic Progress and Attendance Policies**

Academic status policies for undergraduate, graduate, and professional students are clearly stated in the appropriate student catalogs. Undergraduate students, for example, are required to maintain a 2.0 grade point average in order to remain in good standing, even though some degree programs require a higher g.p.a. for graduation. There is no university-wide attendance policy, other than a resolution passed by the SIUC Faculty Senate in 1999 requiring all instructional faculty to state in their course syllabi what attendance they require of their students. The attendance policies of all University Core Curriculum courses, in particular, are monitored on a regular basis to ensure that the instructors of entry-level classes provide this information. Otherwise, the chairs and directors of all academic units are responsible for enforcing this policy. Similarly, since 1997, the university's instructional faculty have been reporting the last date of attendance for all WF grades at the end of the semester (a failing grade for students who did not officially withdraw from the class, ceased attending and failed to complete requirements for the course).

---

538 Copies of the Financial Reports from the state Auditor General's office for the past three years, maintained in the Office of the Vice Chancellor for Administration and Finance, are available in the Resource Center.

539 Documentation of these findings is in the Resource Center.

540 See [http://www.dps.siu.edu/Documents/2008SafetyReport\\_FINAL.pdf](http://www.dps.siu.edu/Documents/2008SafetyReport_FINAL.pdf).

#### f. Contractual Relationships

No SIUC academic programs, either on- or off-campus, leading to a degree or a certificate is contracted out. The instructional faculty is hired and supervised by the appropriate department.

### 6. Institutional Disclosures and Advertising and Recruitment Materials

In compliance with 34 CFR Part 602.27 (g), SIUC has long had a policy requiring everyone responsible for publishing materials for general distribution to provide addresses and telephone numbers for all associations and agencies accrediting academic programs at SIUC. This includes the Higher Learning Commission of the National Central Association of Colleges and Schools. The policy reads, in part: “The accrediting agency ensures that, if an institution or program elects to make a public disclosure of its accreditation or pre-accreditation status granted by the agency, the institution or program discloses that status accurately, including the specific academic or instructional programs covered by that status and the name, address, and telephone number of the accrediting agency.” A full list of SIUC programs and units, together with their accrediting agencies, is available on the webpage for the Office of Institutional Research and Studies.<sup>541</sup>

### 7. Relationship with Other Accrediting Agencies and with State Regulatory Boards

At SIUC there is no specialized accreditation with a single agency the status of which covers one-third or more of either the institution’s offerings or its students. The College of Education and Human Services, accredited by NCATE, enrolls approximately one-seventh of the SIUC student body. The university is also not accredited by another institutional accrediting body. These relationships are a matter of public record in the Annual Institutional Data Update, available in the Resource Center.

### 8. Public Notification of an Evaluation Visit and Third Party Comment

The university’s self-study marketing plan calls for the posting of two advertisements – one in the local newspaper *The Southern Illinoisan*, the other in the campus student newspaper *The Daily Egyptian*, both in January 2010 – to invite public comment on the institution’s self-study and accreditation status, as required of comprehensive evaluations

<sup>541</sup> See <http://www.irs.siu.edu/webRoot?Accredit.asp>.

by the Higher Learning Commission. Press releases and related stories of the HLC's site team visit in the university's alumni magazine and the campus's web-based newsletter are also inviting Third Party Comment. The results of these complaints are available from the Higher Learning Commission.<sup>542</sup>

---

<sup>542</sup> Documentation of the notices announcing the Higher Learning Commission's site team visit in March 2010 and others requesting Third Party Comment is available in the Resource Center.