

The Higher Learning Commission Action Project Directory

Gogebic Community College

Project Details			
Title	Institutional Compliance	Status	COMPLETED
Category	2 - Meeting Student and Other Key Stakeholder Needs	Updated	12-08-2015
Timeline		Reviewed	04-20-2016
	Planned Project Kickoff 08-13-2013	Created	11-03-2014
	Actual Completion 05-01-2016	Version	2

1: PROJECT SUMMARY

A: This project is a continuation of our efforts to systematically organize our federal, state, and Accreditation Agency compliance activities. Because this is a broad reaching undertaking, representatives of all administrative departments (HR, IR, IT, Student Services, Financial Aid, and Instruction) are represented on the Action Project Committee.

2: PROJECT RATIONALE

A: This project was initiated as a means to review and update all compliance related policies and centralize these policies in one accessible location. This project was initiated as an informal undertaking during the 2013-14 AY while preparing for our Quality Checkup visit. It is now formalized as an Action Project because the committee and administration have recognized the value and potential benefit of an organized and accessible compliance process. The project is anticipated to be active until May of 2016. At the conclusion of the project, the team will have the necessary processes in place and procedures required to sustain this initiative. As pointed out during our Quality Checkup Visit, we are systematic and organized, however improving our documentation was recommended.

3: PROJECT GOALS AND DELIVERABLES

A: The goal of this project is to review and update, as necessary, all institutional policies and processes related to federal, state, and Accreditation Agency compliance and disclosure. Due dates and deadlines for the assessment of this project are driven primarily by the regulations associated with each disclosure and policy. The Action Project Committee meets a minimum of five times per academic year (more if needed).

4: INSTITUTIONAL INVOLVEMENT

A: As stated above, all administrative departments are represented. The representatives closest to each initiative take responsibility for policy review, update, and disclosure.

5: PROJECT CONTROL

A: Progress is monitored at every meeting. If a report is incomplete, support is offered to help the responsible party complete that portion of the project. Follow-up occurs at the next scheduled meeting. Each policy is evaluated by committee team members for accuracy, completeness, and compliance with standards established through respective federal, state, or Accreditation Agency bodies.

6: ANTICIPATED CHALLENGES TO PROJECT SUCCESS

A: This project is a very large but necessary undertaking. The time investment on the part of the project committee members is considerable. Finding the time to complete these initiatives is our biggest challenge, yet we are confident that through our collective diligent effort that the project will be highly successful.

7: ADDITIONAL INFORMATION

A: To date, this project has been very successful and helpful. We are continuing with it as an Action Project because there is still lots to do. In May of 2016, the group responsible for this project will become a standing committee and continue to meet as needed from that point forward.

Project Update

1: CURRENT PROJECT STATUS SUMMARY

A: General Project Status: _____ Completed In-progress _____ Suspended _____ Reopened
Original Project Start Date: 08 / 13 / 2013
Originally Projected End Date: 05 / 01 / 2016
Anticipated Completion Date If Not Completed: 05 / 01 / 2016

Briefly describe the current status of the project.

Explain how this project relates to any strategic initiatives or challenges described in the institution's most recent or soon-to-be submitted systems portfolio, if applicable:

This project remains very active. As indicated above, this project will close by the originally anticipated deadline. It has been decided by the Gogebic Community College Administration that the work done by this committee is valuable and necessary. As a result, this Action Project team will form a standing committee within the organization once the Action Project is formally closed. Our next Systems Portfolio is not scheduled for submission to the HLC until June of the 2017 - 18 Academic Year. The work being done by this committee will ensure that we have all the necessary systems in place for a successful portfolio review. The intent is not to develop a better Systems Portfolio, but rather to have the portfolio reflect our commitment to systematic processes and data driven decision making. This project spans all areas of the college as compliance requirements are continually changing and becoming more and more time consuming. It is not financially feasible to hire a staff to handle compliance requirements. It therefore falls on individuals and departments to update (as reviewed by this committee) policies and data disclosures within their respective areas.

2: ORIGINAL PROJECT GOALS AND DELIVERABLES

A: The original goal of the project was to review and update institutional policies related to federal, state, and accreditation body disclosure and compliance requirements. This aspect of the project has not changed. The specific metrics used to determine compliance are individually determined by the agency we are reporting to. As each policy is updated by representatives of the responsible parties within the college, it is reviewed by the committee with the specific requirements related to the policy in question in mind.

3: ACCOMPLISHMENTS OVER THE PAST YEAR

A: As a means of expediting the identification and update of reporting requirements our Director of Financial Aid distributed the following document along with activity sheets to ensure the requirements were being adequately addressed: "Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination – A Supplemental Report", Consumer Information Disclosures At-A-Glance, and Consumer Information (along with Activities 1-11.) See Question 4. In addition to the disclosure worksheets mentioned above and presented in question 4, we have made substantial progress in the update of our policies and procedures related to the following:

- Factors of financial responsibility
- Gainful Employment
- Teach out plans
- Placement and Employment
- Vaccination Policy
- Student withdrawal from college
- Civil Rights Act
- Title IX Education Amendment of 1972
- Rehabilitation Act
- Age Discrimination Act
- Factors of Administrative Responsibility

- Code of Conduct
- Voter registration
- Class attendance
- Copyright Policy

4: INSTITUTIONAL INVOLVEMENT

A: The committee currently consists of the Director of Financial Aid (Committee Chair), All Deans, AQIP Coordinator, IT, IR, HR, the campus bookstore manager, and a member of the English Faculty.

The committee reviews all information updated by various members. Below are some of the current items under review along with the assignment of the responsible parties. (taken from the October 9, 2015 minutes):

Activity 1: Institutional and Financial Assistance Information for Students

Topic – Method of Disclosure 668.41(b)(c)

Office Responsible:

Topic – Financial Assistance Information 668.42

Office Responsible: Sue Forbes, Director of Financial Aid

Topic – Institutional Information 668.43

Office Responsible: Jeanne Graham, Dean of Students

Jeanne Graham, Dean of Students

- The cost of attending school
- The requirements and procedures for officially withdrawing from the school
- The names of associations, agencies and/or governmental bodies that accredit, approve, or license the school and its programs
- A description of the services and facilities available to students with disabilities
- A description of the transfer of credit policies
- The school must make a good faith effort to distribute a mail voter registration form

Erik Guenard, Dean of Business

- Any refund policy with which the school is required to comply for the return of unearned tuition and fees or other refundable portions of costs paid to the school
- The school must make available to current and prospective students information about its vaccinations policies

Sue Forbes, Director of Financial Aid

- A summary of the requirements for the return of Title IV grant or loan assistance
- The titles of persons designated to assist enrolled or prospective students in obtaining school information
- A statement that a student's enrollment in a program of study abroad
- The school must post a net price calculator on the Web site
- The school must provide to each student upon enrollment, a separate, clear, and conspicuous written notice with information on the penalties associated with drug-related offenses
- Disbursement of books and supplies policy for Pell eligible students must be provided to students in their consumer information

Dean of Instruction

- The academic program of the school, including the current degree programs and other educational and training programs
- School policies and sanctions related to copyright infringement
- The school must make available for review to any enrolled or prospective student a copy of the documents describing the school's accreditation, approval or licensing
- The school must make available as soon as practicable the school's course schedule for the subsequent academic period, the recommended textbooks and supplemental materials for each course or class, the number of students enrolled in each

course or class and the maximum student enrollment for each course or class.

Kathie Munn, Director of Computer Services

- The school must post a net price calculator on the Web site

Miranda Law ver, Institutional Researcher

- The school is required to report information to NCES in IPEDS for posting to the College Navigator Website.
- The school must make available to current and prospective students information about student body diversity

Brian Panich, Bookstore Manager

- The school must disclose on the school's internet course schedule used for preregistration and registration purposes, the ISBN and retail price information or required and recommended textbooks and supplemental material for each course listed.
- The school must make available as soon as practicable the school's course schedule for the subsequent academic period, the recommended textbooks and supplemental materials for each course or class, the number of students enrolled in each course or class and the maximum student enrollment for each course or class.
- Disbursement of books and supplies policy for Pell eligible students must be provided to students in their consumer information

Topic – Availability of Employees for Information dissemination purposes 668.44

Office Responsible: Sue Forbes, Director of Financial Aid

Topic – Constitution and Citizenship Day Federal Register 5/24/2005

Office Responsible: Jeanne Graham, Dean of Students

Activity 2: Drug and Alcohol Abuse Prevention Information

Drug and Alcohol Abuse Prevention Information 668.14(c); 34 CFR 86

Office Responsible: Jeanne Graham, Dean of Students/Ashley Paquette, Director of Human Resources

Activity 3: Consumer Information For Student Athletes

Activity-Equity in Athletics Disclosure Act 668.47

Office Responsible: Jeanne Graham, Dean of Students/Miranda Law ver, Institutional Researcher

Disclosure of the Report 668.47

Office Responsible: Miranda Law ver, Institutional Researcher

Activity – Completion/Graduation Rates for student athletes 668.48

Office Responsible: Miranda Law ver, Institutional Researcher

Activity 4: Student-Right-To-Know Act

Completion-Graduation Rates 668.45

Office Responsible: Miranda Law ver, Institutional Researcher

Activity 5: Consumer Inforamtion: Clery Act (Campus Security)

Annual Security Report 668.46(b)

Office Responsible: Erik Guenard, Dean of Business/Miranda Law ver, Institutional Researcher

Timely Warning and Emergency Notification 668.46(e)

Office Responsible: Erik Guenard, Dean of Business//Miranda Law ver, Institutional Researcher

The Daily Crime Log 668.46(f)

Not applicable

Emergency Response/Evacuation 668.46(g)

Office Responsible: Erik Guenard, Dean of Business

Missing Student Notification Policy 668.46(h)

Office Responsible: Jeanne Graham, Dean of Students

Programs to prevent dating violence, domestic violence, sexual assault, and stalking 668.46(j)

Office Responsible: Jeanne Graham, Dean of Students

Procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking 668.46(k)

Office Responsible: Jeanne Graham, Dean of Students

Submitting Crime Statistics to the U.S. Department of Education 668.46(c); 34 CFR 668.41(e)

Office Responsible: Miranda Law ver, Institutional Researcher

Activity 6: FERPA (Family Educational Rights and Privacy Act)

FERPA 34 CFR 99.30; 34 CFR 99.31

Office Responsible: Jeanne Graham, Dean of Students

Request to Disclose Information 34 CFR 99.30

Office Responsible: Jeanne Graham, Dean of Students

Consent not required 34 CFR 99.31

Office Responsible: Jeanne Graham, Dean of Students

HIPPA & FERPA 45 CFR Part 160; 45 CFR Part 162; 45 CFR Part 164

Office Responsible: Jeanne Graham, Dean of Students/Erik Guenard, Dean of Business/ Nicole Rowe, Director of Allied Health

Health and Safety Exemption Requirement 34CFR 99.31(a)(10) & 34 CFR 99.36

Office Responsible: Nicole Rowe, Director of Allied Health/Jessica Leinon-Novascone, Director of TRIO Program Disability Services

Activity 7: Safeguarding Customer Information

Office Responsible: Kathie Munn, Director of Computer Services

Activity 8: Fire Safety Reports on Student Housing

Institutional fire safety policies and fire statistics 668.49

Office Responsible: Erik Guenard, Dean of Business/Rod Smith, Head of Maintenance

Activity 9: Misrepresentation

Misrepresentation 668.74; 668.72; 668.73; 668.74; DCL GEN-11-05

Office Responsible: Jeanne Graham, Dean of Students

Activity 10: Loan Disclosures

Office Responsible: Sue Forbes, Director of Financial Aid

Activity 11: Gainful Employment Disclosures

Office Responsible: Miranda Lawver, Institutional Researcher

5: EFFECTIVE PRACTICES

A: We have learned that dividing the workload can be an efficient way to deal with an enormous undertaking such as this provided that the committee is there to review the documents. Additionally, we have learned to become proactive in regards to updating and adopting policies and procedures related to compliance issues.

6: ANTICIPATED CHALLENGES TO PROJECT SUCCESS

A: The major challenge associated with this Action Project is to keep focused and on task. Each committee member has many other job related responsibilities to perform. This committee meets five times a year. If a policy update gets missed it has the potential to hold up the project when there are overlapping concerns.

7: PLANNED NEXT STEPS AND TIMELINE

A: The vast scope of this project makes this question difficult to answer. We have learned that this project will never go away and that a standing committee to which different areas of the College report their compliance related activities to help keep the updates on schedule.

8: ADDITIONAL INFORMATION, QUESTIONS, OR CONCERNS

A: NA

Update Review

1: CURRENT PROJECT STATUS SUMMARY

A: The institution is on target to complete this action project on schedule by May 2016 and have made the commitment to make this a standing committee moving forward. This will be an excellent opportunity to demonstrate in your upcoming Systems Portfolio how you integrated your action project into a system-wide cultural change. Congratulations!

2: ORIGINAL PROJECT GOALS AND DELIVERABLES

A: The original goal of this project has not changed.

3: ACCOMPLISHMENTS OVER THE PAST YEAR

A: The institution has demonstrated progress in reviewing and revising their policies and procedures related to compliance. Are these reviewed annually as the College's catalog/student handbook and website are updated?

4: INSTITUTIONAL INVOLVEMENT

A: The institution has demonstrated strong cross-departmental involvement in the project planning and review of these regulations. This

should increase the awareness and understanding of compliance to a broader team of employees. Having a document such as this, and a strong team monitoring reviews, should ensure that timelines are met successfully.

5: EFFECTIVE PRACTICES

A: The institution brought together a large group of employees to complete the project in a timely manner and recognized the need for the ongoing management of compliance reporting. It should be commended for recognizing that "many hands lighten the load" for everyone. This nicely demonstrates the AQIP Category of Valuing Employees and the Principles of a High Performing Organizations, Respecting People and Broad-based Involvement. Well done!

6: ANTICIPATED CHALLENGES TO PROJECT SUCCESS

A: Federal and state compliance deadlines may address this anticipated challenge. With the new compliance document listing review timelines and responsible person in place, the institution may find that these challenges do not materialize.

7: PLANNED NEXT STEPS AND TIME LINE

A: It may be valuable to have the meeting dates of the committee scheduled in advance based on the reporting timeline you have established. Only those departments with upcoming reports would need to present and some of this sharing may be accomplished electronically. The institution may consider regularly reporting to the President's Cabinet and/or Board of Trustees to keep the committee focused and on task.

8: ADDITIONAL INFORMATION, QUESTIONS, OR CONCERNS

A: The document you have outlined here would be valuable for any institution because it is easy to become reactive to compliance reporting. Good work!

Project Outcome

1: REASON FOR COMPLETION

A: This project is being closed because it has accomplished its stated goals. We designed this project to develop a sustainable, systematic approach to compliance requirements for the college. Realizing that we do not have the resources to hire staff specifically for the purposes of compliance, we have opted to involve all those who are affected by these requirements. This Action Project Team has now become a standing institutional committee and will continue their work.

2: SUCCESS FACTORS

A: The development of a team of people who routinely address compliance related issues has made the work a more manageable task. We have accomplished all of the goals stated at the beginning of the project.

3: UNSUCCESSFUL FACTORS

A: Time remains an issue. Having a committee, rather than a compliance office, handle these matters is beneficial in that a greater proportion of the college becomes aware of the requirements. This approach however, puts an additional burden on the committee members.