

2-11-2010

Self-Study Draft: Our Bridge to the Future: Chapter 6: Federal Compliance

Indiana University-Purdue University Fort Wayne

Follow this and additional works at: http://opus.ipfw.edu/ncaselfstudy2010_report

Opus Citation

Indiana University-Purdue University Fort Wayne (2010). Self-Study Draft: Our Bridge to the Future: Chapter 6: Federal Compliance. *Self-Study Draft: Our Bridge to the Future: Chapter 6: Federal Compliance*. Draft 2-11-2010 ed. 1-24. Fort Wayne, Indiana: Indiana University-Purdue University Fort Wayne.
http://opus.ipfw.edu/ncaselfstudy2010_report/8

This Report is brought to you for free and open access by the North Central Accreditation Self-Study 2010 at Opus: Research & Creativity at IPFW. It has been accepted for inclusion in Draft Self-Study Report by an authorized administrator of Opus: Research & Creativity at IPFW. For more information, please contact admin@lib.ipfw.edu.

Chapter 6

February 11, 2010



Comprehensive ▼ Innovative ▼ Excellent
OUR BRIDGE TO THE FUTURE



Chapter 6: Federal Compliance

Information in this chapter has been developed using the HLC Federal Compliance Guide for 2009-10 and those sets of federal regulations related to the Higher Education Opportunity Act of 2008, as amended by the Higher Education Technical Corrections Law of 2009, that have been released as either proposed or final. Updates to this chapter, and to the University's compliance strategies, will be made as additional final regulations are released.

Introduction

Indiana University – Purdue University Fort Wayne (IPFW) is committed to operating in compliance with federal laws and regulations, as well as with state laws and regulations. The University monitors both federal and state legislative and administrative actions and develops implementation plans accordingly. The University has important sources of support in these efforts, including notices from various professional associations, the HLC, higher education publications, and related offices in the IU and Purdue systems.

The information presented in this section of the self-study report is divided into three broad areas: disclosure, reporting, and compliance. Disclosure requirements describe information that the University must make available to current and prospective students, or to others, and which is generally treated as making the information public. Reporting requirements describe information that must be provided to the U.S. Department of Education or other agencies. There is sometimes overlap between disclosure and reporting requirements. Compliance requirements define policies and practices which the University is required to establish and sometimes define specific expectations for these policies and practices. In turn, the University is frequently required to provide assurances that its policies and practices comply with the applicable laws and regulations.

This chapter generally does not address compliance in operations. The University's operations are designed to be compliant with related regulations and legal obligations. Information about disclosures, reporting requirements, and compliance requirements is generally addressed at the level of the topic, without reference to the related details.

Significant amounts of information in this chapter have been developed using the guidance provided by the National Postsecondary Education Cooperative in the updated edition of the report “Information Required to be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination” that was released in November, 2009. Compliance guides from various other professional associations were also referenced, along with the related federal regulations.

Note: Entries with a notation of **DM** are included in a direct mailing to students and employees in addition to the public posting of the information on a web site.

Institutional General Information

IPFW’s process for disseminating general institutional information has been designed to satisfy federal requirements (FERPA, Student Right to Know Act, Title IV regulations, etc.) in providing information to current and prospective students and parents and to the public. Topics are highlighted below, and the web site for the information is also shown.

Designated Representatives for Providing Information ^{DM}

IPFW has designated the Office of Financial Aid and Scholarships as the office that students should contact for more information about financial aid programs. This designation is included in the annual notice and is also publicly announced at

<http://www.ipfw.edu/registrar/consumer/>

***** incomplete - need to add registrar for general institutional information, and locations in which the designees may be contacted by students and prospective students who are seeking information required by this subsection; each entry should have the title of the leader “and other staff in the office.”

Financial Aid Information ^{DM}

IPFW provides information about available federal, state, and other financial aid programs through the annual notice and publicly at

<http://www.ipfw.edu/financial/pay/aid.shtml>

This site also provides links to the steps involved in applying for aid, accepting offers of

aid, and the requirements, terms and conditions, and responsibilities related to receiving aid. Satisfactory academic progress standards and rules related to return of Title IV funds are also available via this site.

The University's public notice that students participating in study abroad programs are eligible for financial aid is published at

<http://www.ipfw.edu/registrar/consumer/>

Satisfactory Academic Progress

The University has established policies for satisfactory academic progress and class attendance and has made these policies publicly available. The satisfactory academic progress policies are published at

<http://www.ipfw.edu/financial/aid/sap.shtml>.

Financial Aid Award Information

Information about average grant and loan awards is provided on the College Navigator web site at

<http://nces.ed.gov/collegenavigator/?q=wayne&s=all&id=151102>

Financial Aid Penalties for Drug Law Violations ^{DM}

The financial aid web site does not include the required notice that conviction of a drug offense during enrollment will result in loss of eligibility for federal aid and notice to any student who loses eligibility of the conditions for regaining eligibility. This is one of the items that must be distributed directly to enrolled students. Students who have lost eligibility must also be notified of the ways that eligibility can be regained, and this is another item that must be distributed directly to affected students.

*****to be added to web site and annual notice

Attendance Policies

The attendance policy is an academic regulation that is published at

http://www.ipfw.edu/senate/acadregs.htm#ARTICLE3_10

and is shown below:

Every student is expected to attend every meeting of the classes for which the student is enrolled. Work missed during absences may be made up

with the instructor's permission. At the beginning of the academic session, each instructor shall make a clear statement to all students regarding the instructor's policy for handling absences. Any student who discontinues class attendance and does not meet course requirements shall receive a grade of F for unauthorized withdrawal.

FERPA Notice ^{DM}

IPFW's FERPA notice is included in the annual notice and is publicly available at

<http://www.ipfw.edu/registrar/consumer/>

Special Facilities and Services Available to Students with Disabilities

The Services for Students with Disabilities office is the University's point of coordination of these services, including services for students with intellectual disabilities. Special facilities and services are described at

<http://www.ipfw.edu/ssd/graphics-version/services.shtml>

The public notice of facilities and services available to students with disabilities is provided at

<http://www.ipfw.edu/registrar/consumer/>

Student Body Diversity and Geographic Origin

The diversity and geographic origin of the student body is reported in institutional enrollment reports at

<http://www.ipfw.edu/ir/statistical-reports/default.shtml>

The information is also available on the College Navigator web site at

<http://nces.ed.gov/collegenavigator/?q=wayne&s=all&id=151102>

The College Navigator data will be updated to also include the newly required information on the number of students who receive a Federal Pell Grant.

Cost of Attendance

The cost of attendance includes (i) tuition and fees, (ii) books and supplies, (iii) estimates of typical student room and board costs or typical commuting costs, and (iv)

any additional cost of the program in which the student is enrolled or expresses a specific interest. Cost of attendance information is publicly available at www.ipfw.edu/financial/assets/files/forms/gen/0910budget.pdf

The only program which has a unique tuition and fee rate is the Accelerated MBA program. Costs for that program are shown at

www.ipfw.edu/bms/mba/accelerated/faq/default.shtml#cost

The University has special fee rates for distance education and School-Based Program courses. These fee schedules are disclosed at

Distance Education: <http://www.ipfw.edu/dcs/credit/tuition.shtml#distance>

School-Based Programs: <http://www.ipfw.edu/cconnect/fees/default.shtml>

Net Price Calculator

IPFW will post a Net Price Calculator on its web site before the November 2011 deadline.

(Forthcoming)

Refund Policy

The University's refund policy is published in the *Schedule of Classes* and the Bulletin. The information is also available at

<http://www.ipfw.edu/financial/billing/refund.shtml>

Withdrawing from the University

The requirements for officially withdrawing from a class or from the University are described at

www.ipfw.edu/registrar/faqs/registration.shtml

The impact of withdrawing from the University on a student's financial aid is described at

www.ipfw.edu/financial/policies/dropping.shtml

The impact of withdrawing from the University on students who live in student housing is described in materials signed at the time of leasing the housing unit.

Textbook Information

Textbook information will be a new category of disclosure for Fall 2010. It includes required and recommended textbooks and supplemental materials, with ISBN number (if known), retail price, author, title, publisher, and copyright date. The information will be presented as an enhancement to the IPFW Bookstore web site, based on textbook information provided by IPFW faculty, at

www.bkstr.com/CategoryDisplay/10001-9604-10185-1?demoKey=d

The published Schedule of Classes includes the web address of the internet schedule.

Academic Programs

The academic programs offered by IPFW are listed and described in the *Undergraduate Bulletin* and the *Graduate Bulletin* at

<http://bulletin.ipfw.edu/index.php?catoid=13>

<http://bulletin.ipfw.edu/index.php?catoid=11>

Non-credit instructional programs are described at

<http://www.ipfw.edu/dcs/>

The instructional, laboratory, and other physical plant facilities which relate to the academic program are described at

***** to be added to the IR compliance web site

The University's technology resources are described

for students at www.its.ipfw.edu/students/

and for faculty and staff at www.its.ipfw.edu/facstaff/default.shtml

The faculty and other instructional personnel are listed in the Bulletins at

<http://bulletin.ipfw.edu/content.php?catoid=13&navoid=339>

The University has not declared any formal plans for improving the academic program of the institution. If such formal plans are established, they will be made publicly available as required.

Transfer of Credit Policies

IPFW policies related to transfer of credit are published at

(<http://www.ipfw.edu/admissions/requirements/transfer.shtml>).

***** incomplete (see notes below)

IPFW also provides information about the transfer of courses that are included in the Indiana Core Transfer Library through the CTL web site at

<http://www.transferin.net/index.aspx>

(1) DISCLOSURE.—Each institution of higher education participating in any program under this title shall publicly disclose, in a readable and comprehensible manner, the transfer of credit policies established by the institution which shall include a statement of the institution's current transfer of credit policies that includes, at a minimum—

(A) any established criteria the institution uses regarding the transfer of credit earned at another institution of higher education; and

(B) a list of institutions of higher education with which the institution has established an articulation agreement.

Accreditation Information

The University discloses its accreditation status with the HLC through its web page

<http://www.ipfw.edu/ir/accreditation/>

and lists its professional program accreditations on this same page. This same page provides the public notice that a copy of the related documents is available for review in the Office of Institutional Research and Analysis or in the office of the academic department offering the accredited program.

The University's HLC accreditation is also cited in the Undergraduate Bulletin and Graduate Bulletin

<http://bulletin.ipfw.edu/content.php?catoid=13&navoid=322>
<http://bulletin.ipfw.edu/content.php?catoid=13&navoid=322>

and in various other publications.

The Department of Theatre is a candidate for accreditation from the National Association of Schools of Theatre

***** to be updated after Feb 2010 visit

IPFW has also earned accreditation from the Association for Assessment and Accreditation of Laboratory Animal Care for its animal care facility. Information about the association is available at

<http://www.aaalac.org/>

Copyright Infringement

***** to be added to the web site and the Student Handbook
(see notes below)

Purdue University related sites:

<http://www.lib.purdue.edu/uco/CopyrightBasics/penalties.html>

Copyright Infringement Penalties

Copyright infringement is the act of violating any of a copyright owner's exclusive rights granted by the federal Copyright Act. There are three elements that must be in place in order for the infringement to occur.

1. The copyright holder must have a valid copyright.
2. The person who is allegedly infringing must have access to the copyrighted work.
3. The duplication of the copyrighted work must be outside the exceptions.

The legal penalties for copyright infringement are:

1. Infringer pays the actual dollar amount of damages and profits.
2. The law provides a range from \$200 to \$150,000 for each work infringed.
3. Infringer pays for all attorneys fees and court costs.
4. The Court can issue an injunction to stop the infringing acts.
5. The Court can impound the illegal works.
6. The infringer can go to jail.

The information must include institutional policies and sanctions related to copyright infringement, including—

- (i) an annual disclosure that explicitly informs students that unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, may subject the students to civil and criminal liabilities;
- (ii) a summary of the penalties for violation of Federal copyright laws; and
- (iii) a description of the institution's policies with respect to unauthorized peerto-peer file sharing, including disciplinary actions that are taken against students who engage in unauthorized distribution of copyrighted materials using the institution's information technology system;

(30) The institution—

- (i) Has developed and implemented written plans to effectively combat the

unauthorized distribution of copyrighted material by users of the institution's network, without unduly interfering with educational and research use of the network, that include—

- (A) The use of one or more technology-based deterrents;
 - (B) Mechanisms for educating and informing its community about appropriate versus inappropriate use of copyrighted material, including that described in §668.43(a)(10);
 - (C) Procedures for handling unauthorized distribution of copyrighted material, including disciplinary procedures; and
 - (D) Procedures for periodically reviewing the effectiveness of the plans to combat the unauthorized distribution of copyrighted materials by users of the institution's network using relevant assessment criteria. No particular technology measures are favored or required for inclusion in an institution's plans, and each institution retains the authority to determine what its particular plans for compliance with paragraph (b)(30) of this section will be, including those that prohibit content monitoring; and
- (ii) Will, in consultation with the chief technology officer or other designated officer of the institution—
- (A) Periodically review the legal alternatives for downloading or otherwise acquiring copyrighted material;
 - (B) Make available the results of the review in paragraph (b)(30)(ii)(A) of this section to its students through a Web site or other means; and
 - (C) To the extent practicable, offer legal alternatives for downloading or otherwise acquiring copyrighted material, as determined by the institution;

The Helmke Library provides extensive information about copyrights, fair use, the TEACH Act and related topics at <http://www.lib.ipfw.edu/1070.o.html> .

Teacher Preparation Program Report

The University provides the required report about its teacher education programs to the Department of Education and makes this report available to the general public. The IPFW report is available at

http://www.ipfw.edu/educ/assets/documents/Title2_report_2007_08.pdf

The U. S. Department of Education makes state-level Title II reports available to the public at

<https://title2.ed.gov/Title2DR/CompleteReport.asp>

Drug and Alcohol Abuse Prevention Policy Review

The University must complete a biennial review of drug and alcohol abuse prevention policy effectiveness that includes numbers of drug and alcohol-related violations and fatalities, the number and types of sanctions imposed, and conclusions about the consistent enforcement of sanctions. The report must be provided on request to the public and to the Department of Education.

***** to be completed and added to Dean of Students web site

Vaccinations Policy

IPFW's vaccination policy is disclosed at

<http://www.ipfw.edu/ir/consumer/default.shtml>

There are some degree programs which do have vaccination requirements, and these requirements are disclosed in departmental materials.

Annual Security Report ^{DM}

The IPFW Annual Security Report is prepared and disseminated to students and employees using procedures designed to meet federal requirements. The report is publicly available at

http://www.ipfw.edu/police/reports/IPFW_Current_Annual.pdf

The report includes crime statistics and policy information encouraging timely reporting of all crimes to the campus police and information about crime prevention programs, Clery Act and other investigatory procedures, security awareness, personal safety, responses to active shooter situations, emergency preparedness, and the emergency notification system. The report also provides notice of the University's processes for issuing "timely warnings." It also provides drug and alcohol prevention information, as required by Public Law 101-226, and contact information for health and safety agencies and offices. The report also serves as the University's report on drug and alcohol policies. Most recently, the report has been expanded to include the required information related to fire safety and information relating to processes for reporting missing persons. The report is also available in paper form on request.

The 2010 edition of the report will include the required additional information related to emergency response and evacuation procedures, missing student notification procedures and confidential emergency contacts, testing of the emergency response and evacuation procedures and documentation of these tests, fire statistics and publicly-

accessible fire log, fire safety system descriptions, fire-related policies for student housing, student housing evacuation policies, and a statement of the enforcement authority of campus police, of their relationships with area police agencies, and of their agreements with area police agencies. The 2010 edition will also include the additional crime and category information required by the HEOA.

The University will make reference to the updated Handbook for Campus Crime Reporting in making the required amendments to its crime reports.

Graduation and Retention Rates ^{DM}

IPFW's graduation and retention rates are available on the College Navigator web site at

<http://nces.ed.gov/collegenavigator/?q=wayne&s=all&id=151102>

The information is disaggregated by gender and by each major racial and ethnic group. It will be updated, as required by the HEOA, to incorporate the new requirements to provide disaggregated graduation rates by recipients of a Federal Pell Grant, by non-Pell recipients of a loan made under part B or D (other than a loan made under section 428H or a Federal Direct Unsubsidized Stafford Loan), and by non-Pell, non-loan recipients.

Athletics Program Participation and Graduation Rates ^{DM}

IPFW athletics participation and graduation rates are published by the NCAA at

<http://www.ncaa.org/wps/ncaa?ContentID=38757> .

The University provides this information to prospective student-athletes. The NCAA's processes satisfy the requirements for disclosure of graduation rate information to the prospective student-athlete's parents and their high school coach and guidance counselor.

Placement and Employment Information

***** to be developed and published

Information must include a statement that the University does not calculate or advertise placement rates.

Information about types of employment obtained by graduates of the institution's degree or certificate programs can be gathered from such sources as alumni surveys, student satisfaction surveys, the National Survey of Student Engagement, the Community College Survey of Student Engagement, State data systems, or other relevant sources; must also provide the source of the information, the timeframe, and the methodology used.

Graduate and Professional School Information

***** to be developed and published

Information must include the types of graduate and professional education in which graduates of the institution's four-year degree programs enrolled, gathered from such sources as alumni surveys, student satisfaction surveys, the National Survey of Student Engagement, State data systems, or other relevant sources.

Equity in Athletics Information ^{DM}

IPFW complies with the reporting requirements in the Equity in Athletics legislation and regulations. The federal Department of Education makes the report public, and it is available at

<http://ope.ed.gov/athletics/>

As required, the University includes notice of the availability of the report in the annual mailing to students.

Preferred Lender Arrangement Disclosures ^{DM}

IPFW has established a preferred lender list for its Federal Family Education Loan (FFEL) Program , which is available at

<http://www.ipfw.edu/financial/loans/promissory.shtml>

The list includes at least the required minimums of three FFEL lenders that are not affiliates on the preferred list and at least two private loan lenders if the institution includes private loan lenders on the preferred list. The preferred lender list also includes the required content, including

(1) Why the institution participates in a preferred lender arrangement with each lender on the preferred lender list, particularly with respect to terms and conditions or provisions favorable to the borrower; and

(2) That the students attending the institution, or the families of such students, do not have to borrow from a lender on the preferred lender list.

(3) Whether lenders on the list are affiliated and describe the details of such affiliations, if any.

(4) The method and criteria used by the school in selecting lenders for the list, including payment of origination or other fees on behalf of the borrower; highly competitive interest rates or other terms, conditions, or provisions; high-quality servicing of loans; or other additional benefits provided to the borrower.

Since IPFW has a preferred lender list, IPFW is obligated to, and does disclose annually:

- (1) the maximum amount of title IV grant and load aid available to students [a student]
- (2) the information identified on the model disclosure form developed by the Secretary for each type of education loan that is offered pursuant to a preferred lender arrangement
- (3) a statement that the institution is required to process the documents required to obtain a loan under the FFEL program from any eligible lender the student selects.
- (4) the disclosures required under section 128(e)(11) of the Truth in Lending Act for each type of private education loan offered pursuant to a preferred lender arrangement.

These disclosures are available at

***** to be developed and published

The disclosures are also included in informational materials prepared by the Financial Aid office.

Student Loan Administration

IPFW provides information about annual and aggregate loan limits at

<http://www.ipfw.edu/financial/loans/application.shtml>.

This site will be updated to reflect the increased loan limits established by the HEOA. The University provides information about state grant assistance to eligible borrowers at

<http://www.ipfw.edu/financial/scholar/state.shtml>

Student Loan Code of Conduct

The University has developed a Student Loan Code of Conduct that is designed to satisfy federal requirements, including the publication of the code. It is available at

***** code established, to be published

and the University provides an annual notice to affected employees of the code.

Private Education Loan Disclosures to Students

The University provides the required disclosures to prospective borrowers, including the information published by the U.S. Department of Education, information required under the Truth in Lending Act, and the possibility that the prospective borrower may qualify for Title IV aid and may qualify for more favorable loan terms. The information

is provided at

<http://www.ipfw.edu/financial/loans/application.shtml>

Borrowers also receive the required notice that loan information will be reported to the NSLDS and will be accessed by

***** to be developed and published, and see Financial Aid Information in the Compliance Section for remainder of statement

Student Loan Deferments for Performed Services

The University provides the required disclosures about deferments for service in the Peace Corps, under the Domestic Volunteer Service Act of 1973, or comparable volunteer services for a tax-exempt organization in community service. Borrowers should seek applications and detailed information from their lender.

***** to be developed and published

Student Activities

The University provides the required disclosure about student activities at

<http://www.ipfw.edu/stulife/>

This information is also disclosed on the College Navigator site at

<http://nces.ed.gov/collegenavigator/?q=wayne&s=all&id=151102>

Career and Placement Services

The University provides the required disclosure about career and placement services at

<http://www.ipfw.edu/career/>

Voter Registration ^{DM}

The University provides voter registration forms electronically at

<http://www.ipfw.edu/registrar/services/voter.shtml>

and at various locations on the campus. The voter registration notice to enrolled students is transmitted as a separate notice, as required by the regulations.

REPORTING

IPEDS Reports

The University completes all parts of the IPEDS reporting cycle each year. The institution's reports include the information that is used, in turn, by the Department of Education for publication of information about the University on the College Navigator web site. IPFW information is available at

<http://nces.ed.gov/collegenavigator/?q=wayne&s=all&id=151102>

The University is aware of the upcoming expansions of IPEDS reporting in support of HEOA requirements for further enhancements to the College Navigator web site.

Equity in Athletics Report ^{DM}

The University submits the federal version of the EADA report to the Department of Education each year. The information is made public by the Department of Education at

<http://ope.ed.gov/athletics/>

Notice of the availability of the report must also be provided to students in the annual notice.

Teacher Preparation Program Report

The University submits the annual Teacher Preparation Program Report to the Indiana Department of Education. In turn, the state provides a compiled report to the U.S. Department of Education.

COMPLIANCE

Credits, Program Length, and Tuition

The University defines its certificate and degree requirements in terms of semester credit hours, and its assignment of credit hour values generally follows the traditional Carnegie unit definitions. Thus, one weekly hour of study in a classroom context, or 2-3 weekly hours in a laboratory context, equates to one semester credit hour.

The University's Academic Regulations

http://www.ipfw.edu/senate/acadregs.htm#content10_o

require an associate degree program to include a plan of study of at least 60 credit hours

and require a bachelor's degree program to include a plan of study of at least 120 credit hours. These are traditional standards for associate and bachelor's programs throughout higher education. The longest bachelor's programs are in music, requiring as much as 140 credits, and it is common for programs in music to require more than the minimum number of credits. The longest associate's degree program is dental hygiene, requiring 26 credits in pre-requisite courses, academic performance sufficient to warrant admission in a competitive admission context, and completion of a 61 credit curriculum. Again, programs in this discipline frequently require more than the minimum number of credits for an associate degree.

The University also follows customary practice in establishing degree requirements at the master's degree level, with most programs requiring 30-36 credits at the graduate level. Graduate programs in nursing have slightly higher levels of credit hour requirements, and the programs in counselor education require 54-60 credits. Requirements in these latter examples are related to professional accreditation standards.

The University's requirements for certificate programs, at both the undergraduate and graduate levels, generally include 12 - 29 credits in the program of study. This pattern reflects both historical practice at the University and a state law that gives the Indiana Commission for Higher Education authority to approve new programs that require one year or more of study.

The University is aware of the HLC standards for substantive change in the credit hour requirements for degree programs. No such change is planned or anticipated.

The University establishes tuition and fee schedules for enrollment in its certificate and degree programs that are based on the level of the program and the state residency of the student. This generates fee schedules for undergraduate and graduate programs and for resident and non-resident students. The University's standards for establishing resident student status are customary for public institutions and are available through the Registrar's office, which also administers the process for reclassification from non-resident to resident student status.

Since 1995, the University has generally avoided establishing program-specific tuition and fee schedules, but a separate rates schedule has been established for the new Accelerated MBA program. The standard fee per credit hour for a resident student at the graduate level is \$298.85. The comparable fee for the Accelerated MBA is \$500 per credit hour. The separate fee schedule recognizes the unique costs of offering the program in an accelerated time period. The costs of the program are not unusual when compared to the costs of similar accelerated and executive MBA programs at other universities. The degree requirements are the same for the traditional and the accelerated MBA programs, and the accelerated program has been designed to support the continued accreditation of the bachelor's and master's programs by the AACSB.

The University's published fee schedules do include special rates for some categories of courses. Distance education course fees include a special fee related to services provided to these students. School-Based Programs courses, which are taught in high schools, have a lower-than-normal fee rate in recognition of the role of the high school teacher in these classes.

Changes in Mission or Institutional Characteristics

The University is aware of the federal and HLC requirements related to changes in mission or institutional characteristics. The only such change is being considered is the establishment of IPFW's first doctoral program(s). If the University decides to pursue this initiative, appropriate state, HLC, and federal approvals will be sought prior to implementation.

Institutional Records of Student Complaints

Earlier sections of this self-study report have included information about student complaints. The University has a record of seriously considering student complaints that are raised through administrative offices and the Campus Appeals Board. In addition to processes for responding to student complaints, processes are in place for responding to student appeals of grades and of administrative decisions such as residency classification, fee refunds, financial aid awards, etc. Student-athletes also can contact the Faculty Athletics Representative and the Senior Women's Administrator for help with concerns relate to their participation in intercollegiate athletics.

Transfer Policies

IPFW has established a policy for accepting credit earned at other colleges and universities and publishes this information on the admissions web site. Generally, credit can be transferred from regionally accredited institutions when completed with a grade of C- or better. Credit earned at other institutions can be considered by the department teaching courses in that discipline, and transfer credit can be awarded. Credit is also awarded for satisfactory performance on Advanced Placement and similar exams.

Advanced Placement information:

<http://www.ipfw.edu/admissions/credits/ap.shtml>

CLEP information:

<http://www.ipfw.edu/admissions/credits/clep.shtml>

Verification of Student Identity

The University relies on systems of logins and passwords to provide verification of student identity in registration, course activities, and examinations. Some courses use proctored examinations, for which participants must show proof of student identity. The University does monitor emerging technology and the practices of other institutions

in its efforts to improve its verification processes.

Title IV Program Administration and Related Responsibilities

The University satisfies the requirements for administration of Title IV federal student aid programs and was re-certified for participation in Title IV programs in September, 2009. Individual components of these responsibilities are addressed individually in the compliance and disclosure sections of this chapter of this self-study report.

The University is aware of the restrictions on gifts and services provided by a private education loan lender.

The University is also aware of the required reporting to the federal Department of Education related to reimbursement of expenses for service on an advisory board.

The University is aware of its obligation to report to the federal Department of Education any foreign donation to the institution that is greater than \$250,000.

The University is aware of current discussions about moving from private education loan providers to the federal direct loan program and will comply with emerging laws and regulations. This includes the disclosure requirements for schools participating in the direct loan program.

The University is prepared to provide the required annual report to the Department of Education related to its preferred lender list and the reasons why the preferred lender arrangement is beneficial to students. The University will also make this information available to the public, to students attending or planning to attend, and to the families of such students.

Private Education Loan Self-Certification Forms

The University provides the self-certification form for private loans that has been developed by the Secretary of the federal Department of Education, as well as the information necessary to complete the form.

Title IV Financial Responsibility Requirements

The University's A-133 audit report is available in the Resource Room and online at

<http://www.purdue.edu/sps/pdf/A133.pdf>

The Department of Education has not raised any concerns about the University's financial management as a result of reviewing the audit materials.

Student Loan Default Rates

The University's student loan default rates are published by the federal Department of Education at

<http://www2.ed.gov/offices/OSFAP/defaultmanagement/cdr.html>

The three most recent annual rates are also summarized below:

Fiscal Year 06-07	7.4%
Fiscal Year 07-08	5.9%
Fiscal Year 08-09	4.7%

The Department of Education has not raised any concern about the University's default rates. The University is aware of the changes in the methods used to calculate the cohort default rates and the special requirements for institutions with high default rates.

Campus Crime Information and Related Disclosures

The University's policies related to crime prevention, campus safety, and related topics comply with federal requirements. Related disclosures are discussed in the Disclosures section of this chapter. The University also provides the required report to the federal Department of Education, and this federal report is then made public via the College Navigator web site. IPFW's report is available at

<http://nces.ed.gov/collegenavigator/?q=wayne&s=all&id=151102>

Contractual Relationships

The University does not contract with any third-party entity to provide 25% or more of any of its academic programs. The University formerly contracted with the Fort Wayne School of Radiography, an accredited school of radiography, to provide the clinical portion of the Associate of Science in Radiography, but this arrangement has been re-structured as of 2010-11 to make the faculty regular university appointees and to treat the clinical sites simply as course sites. The University also has some cooperative agreements with other accredited universities, e.g. Purdue University at West Lafayette and at Calumet. The University does not anticipate entering into any contracts for academic programs with non-accredited entities in the future.

Advertising and Recruitment Materials

The University makes extensive efforts to assure the accuracy of its advertising and recruitment materials. Samples of current materials are available in the Resource Room. The University also describes its programs and services on its web site (www.ipfw.edu) and reviews this information regularly.

Relationship with Other Accrediting Agencies and State Regulatory Bodies

As reported above, the University discloses its professional program accreditations through the undergraduate and graduate bulletins, the University web site, and various other publications. IPFW does not have sites in other states or foreign sites, and thus is not subject to requirements for approval in other states or countries. The University has not experienced any adverse action from any of these agencies and is aware of its obligations should such action take place.

Public Notification of Comprehensive Evaluation Visit and Third Party Comment

The University is developing a plan for public announcement of the HLC site visit and will provide a description of the announcement process and samples of announcement materials. The University is also prepared to address any third party comments that may be received.

Family Educational Rights and Privacy Act (FERPA)

IPFW has established a policy on release of student information that complies with FERPA regulations. The policy is published in schedules of classes and university bulletins. The policy was updated in September, 2009 to comply with recent changes to the law, and the updated policy is published at

<http://www.ipfw.edu/senate/referenc/2008-09/SR08-21a.pdf>.

Financial Aid Programs

The University describes available federal, state, institutional, and selected outside financial aid programs on the financial aid web site at

<http://www.ipfw.edu/finaid/>

and in various publications. The published information includes the required statements about the availability of financial aid for study abroad programs and about the availability of deferments of loan repayment for those serving in the Peace Corps, Domestic Volunteer Service programs, and comparable settings.

The University is implementing the HEOA amendments to student loan administrative processes, including entrance and exit counseling.

The University is aware of the expansion of the loan-cancellation regulations to include some teachers, law enforcement or corrections officers in the Federal Public Defender and Community Defender Organizations, some public service workers, faculty at Tribal Colleges, some librarians, some speech-language pathologists, and some military service veterans.

The University is also aware of the requirement that certification of loans to lenders not on the preferred lender list will not be unnecessarily delayed.

Textbook Information

IPFW made arrangements for the HEOA requirement that additional textbook information be made available by July, 2010. This expanded information includes ISBN numbers and retail prices.

Services and Facilities for Students with Disabilities

The University complies with Section 504 of the Rehabilitation Act of 1973 and The Americans with Disabilities Act of 1990 (ADA). The office of Services for Students with Disabilities (SSD) coordinates university activities for students, and the office of Human Resources provides comparable services for employees. The University's construction and remodeling projects are also designed to comply with the access standards in these laws. The University campus and other course sites are generally accessible.

Students who have registered with the SSD office can receive priority in course registration and permits for parking in areas reserved for those with disabilities. The University also provides auxiliary aids and services and can arrange for academic adjustments when needed.

The SSD in Walb Student Union has talking and large-display computers, a reading machine, electronic spell checkers, cassette transcription machines, specially adapted cassette recorder/players, Braille equipment, carbonless note-taking paper, and more. Test proctoring is available, and text readers meet with students in the office. Specialized counseling and advising related to disability issues is available from the office staff.

University public events also provides signing services for the hearing impaired.

Readmission of Servicemembers

The University is aware of its obligation to promptly readmit servicemembers with the same academic status as they had at the time of departure for service, to provide remedial services as needed for the servicemember to resume study in the same program, and to charge fees during the year of readmission at the same rate as the servicemember would have paid during the year following departure from the institution.

Health Insurance Portability and Accountability Act (HIPAA)

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) rules create a framework to protect the medical privacy of patients and health plan members. In general, HIPAA privacy regulations allow covered health care providers and health

plans to share information for the purposes of treatment, payment, and health care operations. Additional information regarding uses or disclosures of health information is described in the Notices of Privacy Practices. IPFW follows the Purdue University policy for compliance with HIPAA. Additional information is available at

www.purdue.edu/policies/pages/records/vi_2_1.html

In-State Tuition for Armed Services Members, Spouses, and Dependent Children

The University is aware of the requirement that members of the Armed Forces on active duty for more than 30 days, and their spouses and dependent children, may not be charged out-of-state rates for tuition and fees at a public institution in the state where he or she is domiciled or on duty. Further, the right to pay in-state rates continues for as long as the individual remains continually enrolled, regardless of subsequent change of permanent duty station.

Distance Education and Off-Site Program Offerings

The University is aware of its obligations to seek approval for offering 50% or more of any degree or certificate program at an off-campus location or via distance education. IPFW has obtained these approvals for the General Studies programs and the M.S. in Nursing program.

Substantive Change

The University is aware of its obligations under the HLC and federal standards related to substantive change. No substantive changes are being planned, other than planning related to the possible offering of Ed.D. and D.N.P. programs. If the University chooses to proceed with formal degree proposals, appropriate approvals will be sought.

The University is aware of its obligations under the regulations related to teach-out plans. The University does not have any plans which would require the creation of a teach-out plan, and the regulations would be reviewed if the University were to be approached about providing service to another institution through a teach-out plan.

The University is aware of regulations related to the offering of a comprehensive transition and postsecondary education plan. The University does not expect to offer such a program.

The University is aware of the upcoming publication of college affordability and transparency lists by the federal Department of Education and of the reporting that is required of institutions that are identified on the “largest increases” lists.

Gramm Leach Bliley Act (GLBA)

The University has taken steps to comply with the requirements, under the Gramm Leach Bliley Act (GLBA), to protect nonpublic personal information such as addresses and phone numbers; bank and credit card account numbers; income and credit histories; and Social Security numbers from unauthorized access and misuse. The University understands its parallel responsibility to oversee compliance by its service providers with these requirements, and the University includes supplier assurance statements in its contracts with providers.

PCI DSS Compliance

The University requires its service providers to comply with the Credit Card Industry Data Security Standards (PCI DSS) that were developed by the major credit card branding companies to provide security measures for protecting credit card holder information and the merchants who store that sensitive information.

Identity Theft Protection

IPFW complies with the Purdue University Identity Theft Protection policy, which is published at

http://www.purdue.edu/policies/pages/records/vi_2_2.html

The policy includes provisions designed to be compliant with the FTC FACT Act of 2003, including procedures for the identification and resolution of “Red Flags” that may suggest attempts at identity theft.