CHAPTER 8

Federal Compliance

Public Notification of the Evaluation Visit: Third Party Comment Process and Documentation

Monroe County Community College adhered to the Higher Learning Commission’s guidelines for soliciting third party comment by publicly announcing its institutional self-study and evaluation visit during the summer of 2009.

Table 8.1 Third Party Comment Communications Plan

<table>
<thead>
<tr>
<th>Constituent Group</th>
<th>News Release</th>
<th>Print Ad in Monroe Evening News</th>
<th>Campus Information Boards</th>
<th>E-mail or Letter</th>
<th>MCCC Web Site</th>
<th>Career Focus Magazine (Summer/Fall 2009)</th>
<th>MCCC Facebook Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Prospective Students</td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Employees</td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>MCCC Board Members</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Members of Program Advisory Committees</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Employers</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Alumni</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Community</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>The Foundation at MCCC Board of Directors</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Alumni Association Board of Directors</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Date of Completion</td>
<td>June 11, 2009</td>
<td>Ads ran June 11, June 14, June 17, 2009</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Date of Completion</td>
<td>June 15, 2009</td>
<td>June 18, 2009</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Date of Completion</td>
<td>June 30, 2009</td>
<td>June 12, 2009</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Credits, Program Length, and Tuition

Monroe County Community College primarily uses a traditional semester structure, including a 15-week fall semester, a 15-week winter semester, a 6-week spring
semester, and a 6-week summer semester. Classes can be structured as lecture, lab, or lecture/lab. One credit is awarded for at least 800 minutes of instructional time. Classes may start at different times but will meet for the minutes indicated above.

Specific program requirements and lengths vary. Certificates require varying numbers of credits, and programs leading to an associate degree generally require 60-70 credit hours. Information on all programs is available in the MCCC Catalog and on the College website.

Tuition and fees are determined by the Monroe County Community College Board of Trustees and are accessible on the College website and in the class schedules printed each semester. Tuition is charged by the credit hour, and for the 2008-2009 academic year is $67 for in-district students. The rate is $115 for non-residents and $128 for out-of-state students. A $25 registration fee is charged for each semester registered. A $6-per-credit-hour technology fee is also charged per credit hour. Lab fees vary, depending on the class. The College does not charge program- or course-specific differential tuition.

**Organizational Compliance with the Higher Education Reauthorization Act**

Monroe County Community College participates in the following Federal financial aid programs: Pell Grant, SEOG (Supplemental Educational Opportunity Grants), Federal College Work Study Program, ACG (Academic Competitiveness Grant), Stafford Loan, and FFEL PLUS Loan. In addition, the College participates in the following Michigan financial aid programs: MEOG (Michigan Educational Opportunity Grant), Michigan Work Study, Michigan Adult Part-time Grant, Michigan Nursing Scholarship, Michigan Competitive Scholarship Program, Michigan Merit Award Program, MI Promise Scholarship, and Tuition Incentive Program.

**Table 8.2 Total Federal Aid Applicants and Awards**

<table>
<thead>
<tr>
<th>Year</th>
<th>Unduplicated Applications Received</th>
<th>Number of Students Receiving Federal Aid</th>
<th>Percentage of Students Awarded</th>
<th>Total Federal Funds Awarded</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008-2009</td>
<td>3,365</td>
<td>1,637</td>
<td>48.65</td>
<td>$6,146,062</td>
</tr>
<tr>
<td>2007-2008</td>
<td>2,844</td>
<td>1,356</td>
<td>47.68</td>
<td>$4,700,487</td>
</tr>
<tr>
<td>2006-2007</td>
<td>2,744</td>
<td>1,109</td>
<td>40.42</td>
<td>$3,635,061</td>
</tr>
<tr>
<td>2005-2006</td>
<td>2,761</td>
<td>1,135</td>
<td>41.11</td>
<td>$3,549,486</td>
</tr>
</tbody>
</table>

**Table 8.3 Total Federal Financial Aid Funds Awarded by Program**

<table>
<thead>
<tr>
<th>Year</th>
<th>Pell</th>
<th>Stafford Loans</th>
<th>PLUS</th>
<th>SEOG</th>
<th>ACG</th>
<th>FWS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008-2009</td>
<td>1,310</td>
<td>682</td>
<td>2</td>
<td>258</td>
<td>3</td>
<td>7</td>
</tr>
<tr>
<td>2007-2008</td>
<td>1,123</td>
<td>562</td>
<td>2</td>
<td>215</td>
<td>6</td>
<td>14</td>
</tr>
<tr>
<td>2006-2007</td>
<td>925</td>
<td>405</td>
<td>0</td>
<td>324</td>
<td>2</td>
<td>20</td>
</tr>
<tr>
<td>2005-2006</td>
<td>950</td>
<td>331</td>
<td>3</td>
<td>301</td>
<td>0</td>
<td>29</td>
</tr>
</tbody>
</table>
Monroe County Community College completes verification on 100 percent of federal student aid recipients. This procedure works well with current processing, and the Financial Aid Office is committed to treating each financial aid applicant fairly. The College will continue 100 percent verification while resources allow.

Table 8.4 Total Number of Applicants Verified

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Verified Files</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008-2009</td>
<td>2,225</td>
</tr>
<tr>
<td>2007-2008</td>
<td>1,754</td>
</tr>
<tr>
<td>2006-2007</td>
<td>1,472</td>
</tr>
<tr>
<td>2005-2006</td>
<td>1,476</td>
</tr>
</tbody>
</table>

Monroe County Community College is in full compliance with all requirements of Higher Education Opportunity Act of 2008 that reauthorized the Higher Education Act of 1965. Supporting documentation includes a Program Participation Agreement (PPA), the Eligibility and Certification Renewal (ECAR), the annual Fiscal Operations Report and Application to Participate in Campus-Based Programs (FISAP), cohort default rates, Annual Audit Reports, and a Program Review Report.

The College demonstrates compliance by completing the PPA every five years and was granted eligibility through September 30, 2012. Monroe County Community College operates the federal aid programs with integrity. This is evident by timely completion of the FISAP. The FISAP is the federal application used to report institutional enrollment, student demographics, and funding distribution of the Supplemental Education Opportunity Grant (SEOG), Federal Work Study, Pell Grant, and state financial aid programs.

Monroe County Community College undergoes an annual audit of federal funds and services. This audit is conducted by Cooley Hehl Wohlgamuth & Carlton, P.L.L.C. and is submitted to the Department of Education. The most recent audit was completed in the fall of 2008 and the College qualified as a low-risk auditee. In 2006, the Student Financial Services Bureau Michigan Guaranty Agency conducted a program review of the Federal Family Education Loan Program (FFELP) and state financial aid programs. The audit and program-review staff found that these programs are being administered in compliance with program-review statutes and regulations, and no exceptions were cited.

Monroe County Community College has historically maintained a low FFELP default rate. The most current default rate published by the Department of Education is 2.6. This default rate is lower than the national average of 8.2 for two-year public institutions. Default management conducted by the College includes required annual loan entrance and exit counseling for all student loan borrowers, notification of aggregate debt, and monthly notification for delinquent-status loans, which includes repayment options and contact information. The financial aid packaging policy also includes some components to help defer loan default by not auto-packaging FFELP loans. Students initiate the loan-application process by completing a loan-request form.
Table 8.5 Cohort Default Rates

<table>
<thead>
<tr>
<th>Year</th>
<th>Default Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008-2009</td>
<td>2.6</td>
</tr>
<tr>
<td>2007-2008</td>
<td>7.8</td>
</tr>
<tr>
<td>2006-2007</td>
<td>3.1</td>
</tr>
<tr>
<td>2005-2006</td>
<td>4.5</td>
</tr>
<tr>
<td>2004-2005</td>
<td>3.8</td>
</tr>
<tr>
<td>2003-2004</td>
<td>1.8</td>
</tr>
<tr>
<td>2002-2003</td>
<td>3.4</td>
</tr>
</tbody>
</table>

Loan counseling is conducted in person or online through a web-based product provided by Mapping Your Future 89. Loan counseling must be completed prior to loan certification. The College makes a diligent effort to meet with student borrowers prior to graduation to provide repayment information and education regarding the consequences of default.

Key areas of focus to ensuring compliance are recordkeeping and training. Monroe County Community College handles all financial aid documents with care and confidentiality. Each document is logged into the Financial Aid Management system at the time it is received by the office. This has reduced lost documents and resulted in more timely completion of files. The Student Services area implemented an imaging system during the 2008-2009 year. This substantially reduced the handling of paper documents and is expected to further improve services to students. Monroe County Community College also adheres to the Department of Education’s regulations concerning record retention and storage.

It is crucial that the Financial Aid Office is aware of and competent in handling regulatory updates and changes. The office staff regularly participates in professional development and financial aid update sessions and workshops.

Federal law requires all educational institutions that receive federal funds to present educational programs about the U.S. Constitution. This law designated September 17, the anniversary of the signing of the Constitution, as Constitution Day. Monroe County Community College celebrated Constitution Day on September 17, 2008. The Student Government set up booths that provided students the opportunity to become registered voters, and The Agora, MCCC’s student newspaper, ran an article, “MCCC celebrates history with Constitution Day,” in their September 16, 2008 issue to commemorate the signing of the Constitution. They also printed a 10 question Constitution Day IQ Test regarding facts about the Constitution 888. When September 17 falls on a weekend, institutions may hold events during the preceding or following weeks.


Monroe County Community College keeps written records and web-logs of incident reports and complies with the Jeanne Cleary Disclosure of Campus Security Policy and Crime Statistics Act. Each year, Monroe County Community College maintains
and distributes a College-wide Campus Safety and Crime Awareness Report. The Report is included in the College’s class schedules, and is posted on the College website.


**Drug-Free Workplace**

Monroe County Community College conforms fully with the federal Drug-Free Workplace Act as well as the federal Drug-Free Schools Act. These policies are published in the College’s class schedules and are posted on the College website. Counseling is available for employees and students by a referral service through the Office of Human Resources.

**Student Right-To-Know**

Monroe County Community College complies and reports data throughout the year to the Integrated Post-Secondary Education Data System (IPEDS) of the National Center for Education Statistics (NCES). Information regarding graduation and completion information is reported on the College’s website and in the College’s class schedules.

**Data Privacy**

The College is in compliance with the provisions of the Family Educational Rights and Privacy Act (FERPA) and the State of Michigan Public Act regarding the privacy of student social security numbers. The College website under Students’ Rights and Responsibilities discusses FERPA and other provisions.

**Advertising and Marketing**

Monroe County Community College provides the following marketing material to the external public: credit schedules, noncredit schedules, *MCCC College Catalog*, *MCCC Annual Report*, program sheets, *Career Focus* magazine, *View Book*, *MCCC Season Events Brochure*, brochures on various services (e.g., financial aid, Learning Assistance Lab, summer camps), flyers and postcards for events, campus guides, and much more. Credit schedules include a complete schedule of classes, academic calendars, office directory, registration information, general information, financial aid information, and student rights and responsibilities (fall only). Noncredit schedules include registration information and descriptions for all noncredit programs/courses.

The *MCCC Annual Report* includes an extensive report on activities and finances of the College and The Foundation at Monroe County Community College for the previous fiscal year. The *MCCC Catalog* provides all pertinent information about Monroe County Community College, program offerings and requirements, and credit course descriptions. Program sheets detail information on all credit programs of study. *Career Focus* is a magazine featuring Monroe County Community College graduates/students working in their chosen fields, plus an "A to Z" guide of MCCC.
credit and noncredit offerings. The MCCC Season Events Brochure outlines all campus and community events for the entire year. The College provides various brochures, flyers, and postcards for events and services held by Monroe County Community College. The College compiles a View Book, which is a signature marketing brochure for the entire College. The Foundation at MCCC creates an MCCC Annual Fund Brochure, Endowed Scholarship Brochure, and an E3 Campaign Brochure.

Credit schedules are printed three times a year: fall (March), winter (October), spring/summer (February). Noncredit schedules are printed in late July and in late December.

Per Board Policy, the MCCC Annual Report is printed in November of each year. The MCCC Annual Report is inserted in the Monroe Evening News and the Bedford Now, a circulation of about 30,000 subscribers. The Report is also mailed to about 8,000 others, including donors, potential donors, and friends of the College. All employees receive a copy as well. The report is posted on the MCCC website and is a featured link on the home page for about a month after it is printed.

The MCCC Catalog is updated and printed in April. Program sheets are printed in May. MCCC Career Focus is printed in the months of April and July. MCCC Season Events Brochures are printed in July. Various brochures are all printed throughout the year, as needed. The View Book is printed once every two years. Programs for special events, such as MCCC’s Honors Reception and Employee Recognition Dinner, are printed in April. The commencement program is printed in May. Concert programs are printed in the fall, winter, and spring. Various brochures, flyers, and postcards for events and services are printed throughout the year. MCCC publishes its affiliation with and accreditation through the Higher Learning Commission of the North Central Association of Colleges and Schools on its website and in its View Book, Catalog, program sheets, credit schedules, and annual reports. Printed materials are also available on the College’s website in pdf format.

The Admissions Office mails the following materials upon request:
- Semester schedules
- Catalog
- Lifelong Learning schedules
- General Application
- Annual Report
- View Book
- Career Focus

**Student Complaints**

The College provides opportunities for students to register concerns through either the informal or formal student-complaint processes.
Student Concerns - Informal Processes

The College supports a number of processes aimed at resolving student concerns at an informal level. The process used is determined by where the complaint is lodged. Students are encouraged whenever possible to handle their concerns directly with the department or division of the complaint. Complaints lodged to faculty members are handled informally with the students whenever possible. If a resolution is not reached, faculty members advise students to take the issue to the appropriate division office for further consideration. The division deans handle complaints lodged in their offices. Each dean works diligently to handle the complaints. Each division maintains its own system for documenting complaints.

Other College departments follow similar procedures for resolving and documenting complaints. When a complaint cannot be resolved with the division or department, the complaint is referred to the appropriate executive office. Student services and information concerns are referred to the Office of the Vice President of Student and Information Services. Academic concerns are referred to the Office of the Vice President of Instruction. Other complaints may be referred to the President’s Office.

Student Concerns - Formal Complaint Processes

The College provides opportunities for students to register formal complaints through the use of a written complaint. All formal written complaints are recorded in the Office of the Vice President of Student and Information Services and tracked through resolution. These complaint forms are maintained indefinitely by that office. The College has created a system to track written formal complaints that were filed with either the President’s Office, Office of the Vice President of Instruction, or the Office of the Vice President of Student and Information Services to ensure that they are logged appropriately as required by compliance with The Higher Learning Commission, a commission of the North Central Association of Colleges and Schools.

MCCC is continuing to develop ways of communicating this process to the College community.

Relatively few complaints move to a formal level. Only 23 formal written complaints have been logged since 1998. Review of the documents revealed no trends. Most are resolved informally.

Off-Campus Site Compliance

Monroe County Community College is a single campus institution. The Whitman Center in Temperance, Michigan, approximately 20 miles south of the College, is an HLC-approved off-campus site that offers, although not regularly, 50 percent or more of the courses leading to one or more of MCCC’s degree programs of study and enrolls approximately 1,000 students (unduplicated head count) in an academic year.
The Monroe County Community College’s Whitman Center is located at 7777 Lewis Avenue in Temperance, MI. The Whitman Center was established in order to serve the growing number of students in the southern portion of Monroe County, as well as the students of Northwest Ohio. The Whitman Center consists of 10, well-equipped classrooms, including an up-to-date, staffed computer lab. Of these classrooms, nine are equipped with erasable white boards. One classroom is set up solely for the use of computer classes. The Whitman Center has one classroom set aside as a laboratory classroom, which is utilized by the art and biology classes. Eight classrooms are equipped with digital overhead projectors. Carts with TVs, VCRs, and DVD players are available, as is a computer cart with projector. The building is handicap accessible with on-site handicap-accessible restrooms. A lounge and lobby are available for students.

The Whitman Center remains a popular location. The enrollment numbers at the Whitman Center remain strong. The fall 2008 unduplicated headcount was 995 students enrolled. Students were enrolled in 6,205 credit hours. There were 93 classes to choose from, with an average of 21 students per class. During the winter 2008 semester, the unduplicated headcount was 943 students enrolled at the Whitman Center, with 485 being students solely at this site. Students were enrolled in a total of 5,661 credit hours. There were 83 classes offered with an average of 22 students per class. For both semesters, students averaged six credits hours at the Whitman Center.

A large number of classes that meet General Education Requirements are offered at the Whitman Center, as are a limited number of specialized classes. During the winter 2008 semester, 10 classes meeting the College’s general education requirements were offered at the Center with multiple sections. These classes included Astronomy, English Composition, Biology, Environmental Science, Introduction to Computer Information Systems, Beginning Algebra, College Algebra, Trigonometry and Analytical Geometry, and Introduction to Political Science. Day, evening, and Saturday classes are offered at the Whitman Center.

Security personnel are available at the Whitman Center to provide a secure learning environment for students. Many services available at the Monroe County Community College Main Campus are also available at the Whitman Center; however, as an off-campus site the Whitman Center does not provide a full range of instruction or administrative and support services.

The Whitman Center provides the following:

- College applications available and accepted
- Scholarship applications and financial aid packets available
- COMPASS testing
- Academic advising and counseling available year-round
- Career assessment testing and results
- Financial aid (by appointment)
- Disability services (by appointment)
- Registration services
- Tuition and other payments accepted
- Forms available (certificate/degree applications, drop/add, pass/fail, etc.)
- Regularly scheduled visits from University of Toledo advisor (by appointment)
- Informational college visits and transfer fair (fall and winter semesters)
- Academic credit courses (fall, winter, spring, and summer semesters)
- Lifelong Learning courses
- Bookstore at the start of each semester (temporary)
- General bookstore services through the Whitman Center office, year-round
- Test proctoring
- Staffed computer lab
- Job posting board maintained through Workforce Development
- Educational displays
- Educational “Lunch and Learn” programs

The Whitman center follows the policies and procedures set by the Monroe County Community College Board of Trustees.

**Human Resources**

Monroe County Community College commits itself to creating an environment of working and learning in which all individuals are treated fairly and equally. The College supports an environment that will encourage, nurture, and reward career and educational goals. As such, the College endorses all applicable state and federal legislation, which involve prohibiting all forms of discrimination including sexual harassment in employment or education. It is, therefore, the policy of the College that no employee or qualified person participating in a College-sponsored program, service, or activity shall be discriminated against because of race, color, religion, national origin or ancestry, age, height, weight, sex, marital status, veteran status, or disability.

In preparation for the self-study, the Human Resources Office conducted a review of employee and student discrimination complaints. The HR Director reported that on average one discrimination complaint is filed annually at the institutional level. Three formal discrimination complaints have been filed against the College since the last HLC accreditation visit in 1999; one sex, one race, and one disability discrimination claim. Of these, two were filed through the Equal Employment Opportunity Commission (one scheduled for mediation in August 2009 and the other dismissed in May 2007) and one filed through the U.S. Department of Education, Office for Civil Rights, which was settled through mutual agreement between both parties.

The College adheres to the rights of faculty and staff regarding the Family Medical Leave Act. The Office of Human Resources administers the FMLA leave and provides clarification of the policies and procedures that the College and its employees must follow to comply with the law. Similarly, the College affirms to
protect the rights of its employees, students, and the public as they relate to the Americans with Disabilities Act. MCCC has an Accessibility and Accommodations for Disabilities standing committee. Its purpose is to review state and federal laws and regulations pertaining to the accessibility and accommodations for people with disabilities and to make appropriate recommendations as needed. These cover the areas of facilities, employment, and services for students, staff, and the community. The committee is also responsible for the development and review of procedures related to accommodation requests and complaints. Serving as the Compliance Officer, the Director of Human Resources closely examines specific situations that create an overlap between the FMLA and the ADA.

**Professional Accreditation**

The following Monroe County Community College programs have earned specialized accreditation:

- **Nursing**
  
  National League for Nursing Accrediting Commission (NLNAC)
  350 Hudson Street
  New York City, New York
  1-800-669-9656, extension 153

- **Respiratory Therapy**
  
  Committee on Accreditation for Respiratory Care (COARC)
  1701 W. Euless Boulevard, Suite 300
  Euless, Texas 76040-6823
  1-817-283-2835

The College withdrew from the American Culinary Federation Foundation Accrediting Commission’s accreditation program, effective January 1, 2006 because it was unable to support a full-time program coordinator. Currently, the program is staffed with one full-time faculty and one culinary technician and managed by the dean of the business division.