



## Federal Compliance Filing by Institutions

Effective September 1, 2019–August 31, 2020

Institutions should answer the questions below. The [Federal Compliance Overview](#) provides information about the applicable HLC policies and provides an explanation of each requirement.

Note that some federal requirements are related to and accounted for in the Criteria for Accreditation or Assumed Practices. Those related Criteria and Assumed Practices have been identified for cross-referencing purposes. Cross-references are also provided to the Code of Federal Regulations. Because HLC may, in some cases, require more of its institutions than the federal regulations, it is important that institutions write to HLC's requirements to ensure their compliance not only with the federal regulations but with HLC's expectations. Lastly, although cross-references to the Code of Federal Regulations are provided here, an institution is always responsible to ensure that it is familiar with the full and current text of those regulations, as they may from time to time be updated.

### *Submission Instructions*

This form and any required appendices should be uploaded to the Assurance System no later than the institution's lock date, unless otherwise noted. Instructions for uploading the documents are provided in the Assurance System. The necessary supporting documentation should be directly responsive to specific documentation requested. While there is no minimum expectation with respect to length, the completed Federal Compliance worksheet, including all appendices, should not exceed 250 pages.

Institution name: **Sterling College, Sterling Kansas**

### **1. Assignment of Credits, Program Length and Tuition**

Provide web addresses to the following:

- Policy (or set of policies) and procedures for assignment of Credit Hour for all **types** of courses, disciplines, programs, credential levels, formats, regardless of modality.
- Course or program credit assignment procedures. (Note: The Federal Compliance reviewer will contact the institution's Accreditation Liaison Officer after the Federal Compliance materials are received to request a sample of course and program materials. The purpose of the representative

sample of materials is to enable the Federal Compliance reviewer to make a preliminary determination as to whether an institution adheres to its Credit Hour policy.)

Provide the web address to relevant policy/policies:

Link:

Undergraduate Credit hour Definition/Relevant Policy:

<https://www.sterling.edu/sites/default/files/2019-2020%2520Undergraduate%2520Academic%2520Catalog%2520%2528updated%2520July%25202019%252c%25202019%2529.pdf#page=53>

Graduate Credit hour Definition/Relevant Policy regarding semester/session:

<https://www.sterling.edu/sites/default/files/2019-2020%2520Graduate%2520Academic%2520Catalog%2520%2528Updated%25207.9.2019%2529.pdf#page=25>

Provide the web address to relevant procedure(s):

Link:

Undergraduate Credit hour Definition/Relevant Policy:

<https://www.sterling.edu/sites/default/files/2019-2020%2520Undergraduate%2520Academic%2520Catalog%2520%2528updated%2520July%25202019%252c%25202019%2529.pdf#page=53>

Graduate Credit hour Definition/Relevant Policy regarding semester/session:

<https://www.sterling.edu/sites/default/files/2019-2020%2520Graduate%2520Academic%2520Catalog%2520%2528Updated%25207.9.2019%2529.pdf#page=25>

Describe the process the institution utilizes to verify length of academic period and compliance with credit hour requirements through course scheduling.

The Academic Year

Sterling College uses a “4-1-4” calendar, with two approximately 15-week semesters separated by a three-week Interterm for traditional on-campus classes. During Interterm, students enroll in a single class to concentrate their efforts on one course. This allows a greater diversity of course topics and formats.

(Academic Catalog; Definition of semester: <https://www.sterling.edu/sites/default/files/2019-2020%2520Undergraduate%2520Academic%2520Catalog%2520%2528updated%2520July%25202019%252c%25202019%2529.pdf#page=14>)

Process:

1. The Calendar Committee meets to finalize the start date of classes in the upcoming academic year.
2. The Registrar then verifies the number of days that meets the 15-week semester term. The course schedule is built to meet the 50 minute meeting window required for classes that meet on MWF and

TR courses are set for 75 minutes. The credit hour policy is met by measuring the seat time or meeting time of each class over the 15 week period.

In the upcoming years the college is striving to build a three year academic calendar and measure contact days per term as another source of validation. The terms will have 75 contact days with 45 MWF and 30 TR.

3. The course schedule is produced, provided at the following link, and reviewed by faculty. It is also visible in the faculty and student portal (mySterling) under Course Search.

Spring 2020 Course Schedule: <https://www.sterling.edu/academics/course-finals-schedule>

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

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

## 2. Institutional Records of Student Complaints

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Provide the web address to the institution's complaint policy.

Link:

<https://www.sterling.edu/financial-aid/consumerism-at-a-glance>

<https://www.sterling.edu/sterling-college-complaint-process>

(See Consumer Information/Disclosures, Financial Assistance Information, #5 and #6.)

<https://www.sterling.edu/file-complaint>

Provide the web address to the institution's complaint procedure.

Link:

<https://www.sterling.edu/financial-aid/consumerism-at-a-glance>

<https://www.sterling.edu/sterling-college-complaint-process>

(See Consumer Information/Disclosures, Financial Assistance Information, #5 and #6.)

<https://www.sterling.edu/file-complaint>

For more information see Federal Requirement 34 CFR §§602.16(a)(1)(ix) and 668.43(b).

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

## 3. Publication of Transfer Policies

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Provide the web address to the institution's transfer policies.

Link: <https://www.sterling.edu/admissions/transfer-students>

Provide the web address where the public can access a list of institutions with which the institution has established articulation agreements. Note that you do not need to provide the full articulation agreements themselves, only the list of agreements that you make public. This list should include the name and location of the agreement partner, the extent to which the institution accepts credit for courses offered by the partner or offers courses for which credits are accepted by the partner, and any credit limitations.

Link:

Public Access to the List of Articulation Agreement (with name/location)

<https://www.sterling.edu/admissions/GAA>

Information regarding the extent to which the institution accepts credit for courses offered by the partner or offers courses for which credits are accepted by the partner, and any credit limitations.

<https://www.sterling.edu/admissions/transfer-students>

Provide the web address where current and prospective student can ascertain the institution's transfer requirements in addition to what will and will not transfer.

Link: <https://www.sterling.edu/admissions/credit-transfer>

For more information see Federal Requirements 34 CFR §§668.5, 668.8, 668.43(a)(11) and 668.43(a)(12).

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

#### 4. Practices for Verification of Student Identity

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

Yes

No (If no, please move on to Title IV Program Responsibilities)

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

As students apply for admission to Sterling College and the financial process has begun, students are given an ID and password which they can use to access mySterling, a secure, web-based portal. Through mySterling, students have access to the online course management system (Canvas), residence information, and financial aid and student accounts. To receive their mySterling password, students submit an application for admission via the Jenzabar Recruitment Management (JRM) portal. If the student applies via a paper application, the Admissions department enters the application into JRM. The data in JRM integrates automatically into Jenzabar CX (our Student Information System) generating a User ID, Username, and random initial password for mySterling. New students are

filtered from the database and emailed credentials and instructions. Student are not charged any additional costs for their secure logins to the mySterling portal.

When IDs are created, email addresses are concurrently created, which creates the login authentication for Canvas (our new Learning Management System, launched fall 2019). Realizing that as an institution we'd like to heighten our levels of verification, the College is working on a process that requires a copy of a notarized, picture ID for all students.

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

Via the verification process above, students are given an ID and password which they can use to access the web-based portal. This assists in protecting their academic and financial records.

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

Yes

No

If yes, how are the additional costs disclosed to students prior to enrollment in a distance or correspondence course?

n/a

Provide the web address where the public can access information regarding the additional costs.

Link:

n/a

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

*Related HLC Requirement: Core Component 2.A.*

## 5. Title IV Program Responsibilities

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*Institutions that do not receive Title IV funding should skip this section and go to item 6, Publication of Student Outcome Data.*

This requirement has several components the institution must address. The institution staff compiling this information should work with the financial aid office and the chief financial officer or comptroller. For more information see Federal Requirement 34 CFR §602.16(a)(1)(x).

### General Program Responsibilities

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

Recertified 1/25/2018

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

Date: 9/2014

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

Yes

No

Provide the most recent Title IV program review, or other inspection or audit report since the last comprehensive evaluation by HLC, as **Appendix A**.

d. List any limitation, suspension or termination actions imposed on the institution by the U.S. Department of Education (hereafter referred to as "the Department") since the last comprehensive evaluation by HLC and the reason for such actions. (Use N/A for not applicable.)

n/a

e. List any fines, letters of credit or heightened cash monitoring imposed on the institution by the Department since the last comprehensive evaluation by HLC and the reason for such actions. (Use N/A for not applicable.)

Sterling College was placed on Heightened Cash Monitoring 1 (HCM1) resulting from the A-133 Audit for year ending 2016. Sterling College was removed from HCM1 after the A-133 Audit for the year ending 2017.

Sterling College is not on the most recent monitoring list dated September 1, 2019.

f. What response and corrective actions have the institution taken in regard to these Department actions? (Use N/A for not applicable.)

Sterling College followed the HCM1 guidelines.

Corrective actions taken:

1. Implementation of Capital Campaign
2. Evaluation of large expenditures and revenues
3. Refinanced the bond

g. What are the consequences of these actions by the Department for the institution's short- and long-term financial health? (Use N/A for not applicable.)

Being on one year of HCM1 monitoring, minimal financial consequences were experienced. However, this brought attention to how the College handles the budget expenditures and revenues for the future.

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

1. 2018-2019:

No findings.

2. 2017-2018:

Finding - R2T4 Calculation errors: During the audit, R2T4 files for seven students who withdrew from Sterling during the time period of the audit were reviewed, identifying three incorrect returns due to the College inadvertently using Thanksgiving break days in the calculation(s). A review of the entire population of 22 withdrawal students identified two additional incorrect returns.

The College concurs with the auditor's finding and circumstances behind it. The office reviewed the guidelines regarding R2T4 calculations and the internal process for setting up calendars in FAA Access. The duties of the financial aid staff have been evaluated and process changes were implemented.

The Department of Education found the new adjustments satisfactory and noted that all corrections were made immediately. The finding is considered closed.

3. 2016-2017:

No findings.

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

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

Provide action letters issued by the Department that explain its rationale for any actions described in D, E and H (if applicable) and provide any reports issued by the institution, if available, demonstrating improvement as **Appendix B**.

For more information see Federal Requirement 34 CFR §668.16.

## Financial Responsibility Requirements

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

1. Year ending 2018 – 2.2 ratio – passed composite score
2. Year ending 2017 – 2.2 ratio – passed composite score – HCM1 removal
3. Year ending 2016 – 1.1 ratio – In the zone –HCM1

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

Yes

No

**Note:** HLC also annually analyzes each institution's financial ratios to determine whether there might be financial concerns. The peer review team checks with the institution and the HLC staff to determine whether HLC or the Department has previously raised concerns about the institution's finances based on these ratios.

c. What actions has the institution taken or does it plan to take in response to any concerns raised by HLC or the Department? Please insert narrative below. (Use N/A for not applicable.)

n/a

Provide any action letters issued by the Department that explain its rationale for any actions it may have taken (if applicable) and evidence of institutional improvement as **Appendix C**.

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

*Related HLC Requirements: Core Components 5.A, 2.B; Assumed Practice D.*

## Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures

Title IV responsibilities include the legal obligation to disclose information to students and to the public about campus crime, athletic participation and financial aid.

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

Campus Crime Information: Jason Briar (VP for Student Life)

Athletic Participation and Financial Aid: Mitzi Suhler (Director of Financial Aid), Justin Morris (Athletic Director), Michelle Hall (CFO)

b. Has the institution been the subject of any federal investigation related to any of the required disclosures for Title IV responsibilities?



Yes

No

If yes, does the institution have any findings from the Department regarding these disclosures?

Yes

No

If yes, explain any findings related to any of the required disclosures for Title IV and corrective action plans the institution may have to remedy the findings.

c. Provide the web address where this information is made available to the public.

Link:

Consumerism page link with links to all disclosure requirements:

<https://www.sterling.edu/financial-aid/consumerism-at-a-glance>

EADA (Equity in Athletics Data Analysis): <https://ope.ed.gov/athletics/#/>

Clery Act: <https://www.sterling.edu/student-life/safety-security>

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

### Student Right to Know/Equity in Athletics

Title IV responsibilities require that institutions provide to students and the public graduation/completion rates for the student body by gender, ethnicity, receipt of Pell grants and other data as well as information about the process for withdrawing as a student, cost of attendance, policies on refund and return of Title IV financial aid, current academic programs and faculty, names of applicable accrediting agencies, description of facilities for disabled students, and the institution's policy on enrollment in study abroad. In addition, certain institutions need to disclose their transfer-out rate. Also, institutions with athletic programs are required to disclose athletic participation rates and financial support data.

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

Kendra Grizzle (Registrar), Michelle Hall (CFO), Mitzi Suhler (Director of Financial Aid)

b. Has the institution been the subject of any federal investigation related to any of the required disclosures for Student Right to Know/Equity in Athletics?

Yes

No

If yes, does the institution have any findings from the Department regarding these disclosures?

- Yes  
 No

If yes, explain any findings related to any of the required disclosures for Student Right to Know/Equity in Athletics and corrective action plans the institution may have to remedy the findings.

c. Provide the web address where this information is made available to the public.

Link:

Equity in Athletics (EADA) <https://ope.ed.gov/athletics/#/institution/details>  
Cost of Attendance Link: <https://www.sterling.edu/financial-aid/cost>  
Grad/Athletics PDF Link: <https://www.sterling.edu/sites/default/files/Grad%20Rates.pdf>  
Withdrawal Policy Link: <https://www.sterling.edu/admissions/withdrawal-policy>  
Withdrawal Policy for Title IV Funds: <https://www.sterling.edu/return-title-iv-hea-funds-policy>  
Retention Rates: <https://www.sterling.edu/financial-aid/consumerism-at-a-glance>  
Additional Detailed like to Graduation Rates/Transfer Out rates through IPEDS:  
<https://nces.ed.gov/collegenavigator/?q=Sterling+College&s=all&id=155937#enrolmt>  
Students with Disabilities: <https://www.sterling.edu/student-success/disability-services>  
Enrollment/Study Abroad/Best Semester:  
Link for Initial Interest: <https://www.sterling.edu/sites/default/files/2019-2020%2520Undergraduate%2520Academic%2520Catalog%2520%2528updated%2520July%25202019%25202019%2529.pdf#page=33>)  
Link for study aboard/Best Semester program options:  
<https://www.sterling.edu/sites/default/files/2019-2020%2520Undergraduate%2520Academic%2520Catalog%2520%2528updated%2520July%25202019%25202019%2529.pdf#page=73>)  
Link to Undergraduate Programs/Faculty: <https://www.sterling.edu/academics/majors>  
Link to Online Programs: <https://online.sterling.edu/programs/>  
Link to Graduate Programs: <https://www.sterling.edu/academics/graduate-programs>

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

*Related HLC Requirement: Assumed Practice A.6.*

### **Satisfactory Academic Progress Policy**

The institution is required to have a Satisfactory Academic Progress policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program and may receive assistance under Title IV, HEA programs.

a. Is such a policy readily available to students?

Yes

No

b. Does it satisfy federal requirements?

Yes

No

c. Does the institution have any findings from the Department regarding this policy?

Yes

No

If yes, explain any findings related to any of the required disclosures for Satisfactory Academic Progress and corrective actions that may have been required by the Department related to these findings.

d. Provide the web address where this information is made available to the public.

<https://www.sterling.edu/sites/default/files/2019-2020%2520Undergraduate%2520Academic%2520Catalog%2520%2528updated%2520July%252029%252c%25202019%2529.pdf#page=37>

For more information see Federal Requirement 34 CFR §668.34.

*Related HLC Requirements: Criterion 3.A; Assumed Practice A.5.*

## 6. Publication of Student Outcome Data

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

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

Yes

No

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

Link(s):

Consumerism page:

<https://www.sterling.edu/financial-aid/consumerism-at-a-glance>

Grad/Athletics Rates Link:

<https://www.sterling.edu/sites/default/files/Grad%20Rates.pdf>

IPEDS Program Graduation Information: Outcome measures (IPEDS):

<https://nces.ed.gov/collegenavigator/?q=Sterling+College&s=all&id=155937#outcome>

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

*Related HLC Requirement: Assumed Practice A.6.*

## 7. Standing With State and Other Accrediting Agencies

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

**Kansas Board of Regents:** Sterling College is recognized by the [State of Kansas](#) as being authorized to offer educational programs beyond the secondary level leading to certificates and degrees. As such, Sterling College is eligible and approved to participate in State of Kansas student financial assistance programs allowing its students to receive need-based student aid from the State.

**NC-SARA:** Sterling College offers distance education courses through Sterling College Online to students throughout the United States and has been a participant in the National Council for State Authorization Reciprocity Agreements (NC-SARA) since February 4, 2015. The official participating institution list can be viewed at <https://nc-sara.org/directory>.

**Specialized Accreditation:** Sterling College maintains specialized accreditation for its Education licensure programs through the Kansas State Department of Education (KSDE) and The Kansas State Board of Education (KSBOE), and will undergo its next accreditation visit on April 27-28, 2020.

Additionally, Sterling College maintains accreditation for its Athletic Training program through the Commission on Accreditation of Athletic Training Education (CAATE). On February 8, 2019, Sterling College was notified that our program was in non-compliance with the *Standards for Accreditation of Professional Athletic Training Programs* and was placed on probation. The change in status was due to the program's 3-year aggregate first-time BOC exam pass rate, which was below the minimum of 70%. As required, Sterling College completed an analytic progress report, as well as an action plan (prior to April 1, 2019). Sterling College expects to receive an updated status in February 2020 that reflects our move from "probationary" to "good standing" status in regard to the BOC exam pass rate.

**Regional/Institutional Accreditation:** Sterling College maintains accreditation through the Higher Learning Commission. A Year 4 Assurance visit was conducted in April 2016 and resulted in action by the IAC to continue the accredited status, paired with three Interim Reports, which were successfully submitted and approved.

Provide the web address where students and the public can find information about the institution's standing with state agencies and accrediting bodies.

Link:

<https://www.sterling.edu/about/accreditation>

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

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

## List of Appendices

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Please read each section of this document carefully for instructions on the information and material to be included in these appendices.

### Title IV Program Responsibilities

- Appendix A..... General program responsibilities: Most recent program review or other inspection or audit reports since last comprehensive evaluation.
- Appendix B..... General program responsibilities: Action letters issued by the Department that explain its rationale for any Department actions any reports issued by the institution, if available, demonstrating improvement.
- Appendix C ..... Financial responsibility requirements: Action letters issued by the Department that explain its rationale for any actions it may have taken (if applicable) and evidence of institutional improvement.