CHAPTER ELEVEN

Federal Compliance
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As an organization that holds federal recognition as an approved accrediting agency, the Higher Learning Commission of the North Central Association of Colleges and Schools maintains a Federal Compliance Program. This section discusses Marshall University’s compliance with the expectations of this program.

Credits, Program Length, and Tuition

The Commission expects an affiliated institution to be able to equate its learning experiences with semester or quarter credit hours using practices common to institutions of higher education, to justify the lengths of its programs in comparison to similar programs found in accredited institutions of higher education, and to justify any program-specific tuition in terms of program costs, program length, and program objectives. Affiliated institutions notify the Commission of any significant changes in the relationships among credits, program length, and tuition. (Handbook of Accreditation, page 8.2-1)

1. All classes offered for credit are equated to semester credit hour equivalencies.

Fall and spring semesters are each 16 weeks long and include 15 weeks of instruction plus a week for final examinations. The number of class days per semester varies slightly because of variations in calendars across years. A credit is equivalent to 15 50-minute class periods across a semester. Students are expected to prepare two to three hours outside of class for each academic credit. Grades are assigned on a semester credit hour basis. Details of transcripted courses are provided in The Marshall Undergraduate and Marshall Graduate Catalogs, which include program requirements and course descriptions. The catalogs are available in print and online.

2. The West Virginia Higher Education Policy Commission directs higher education policies for the state’s colleges and universities.

In 2005, the West Virginia Legislature granted greater autonomy to West Virginia University and Marshall University. The Marshall University Board of Governors now has the authority to approve or disapprove all new degrees and majors. The
Board of Governors also has the responsibility to review existing degree programs at Marshall on a periodic basis and report these findings to the Higher Education Policy Commission.

3. **Marshall University does not have tuition rates that are program-specific.**

   Justification of differential tuition rates is not applicable. Some programs have program fees.

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

The Commission expects that its affiliated institutions comply if required with the Title IV requirements of the Higher Education Reauthorization Act as amended in 1998. Therefore, institutions will provide teams for review and consideration the most recent default rates (and any default reduction plans approved by the Department of Education) and any other documents concerning the institution’s program responsibilities under Title IV of the Act, including any results of financial or compliance audits and program reviews (Handbook of Accreditation, page 8.2-2).

1. **Marshall University will provide copies of all documents relevant to Title IV compliance to the Higher Learning Commission’s site review team.**

   The documents are available in the Financial Aid Office (Program Participation Agreement and Eligibility and Certification Renewal and Annual A-133 audit results).

2. **Marshall University’s official Ford Federal Direct Student Loan default rates for the past three years, as provided by the Department of Education, are as follows.**

   **Fiscal Year 2003**
   
   Number of borrowers entering repayment: 2,539
   
   Number of borrowers who entered repayment and defaulted: 138
   
   Official Cohort Default Rate: 5.4%
**Fiscal Year 2002**

Number of borrowers entering repayment: 2,537
Number of borrowers who entered repayment and defaulted: 150
Official Cohort Default Rate: 5.9%

**Fiscal Year 2001**

Number of borrowers entering repayment: 2,607
Number of borrowers who entered repayment and defaulted: 179
Official Cohort Default Rate: 6.8%

In addition to the Department of Education computed default rates, Marshall University also submits through FISAP the Cohort default rates for our Perkins Loan Program. Federal Perkins loan collections are the responsibility of the Associate Director of Student Financial Systems. The University employs 1.5 FTE internal staff and contracts with the Educational Computer Systems Inc. (ECSI) as a full service provider for Title IV campus-based student loans. The services provided by ECSI include coordinating data management, lock box and ACH payment methods, accounting, reporting, and compliance with federal regulations. The internal staff provides due diligence simultaneously with ECSI in the collection of the Perkins cohort. The five year average Perkins Cohort default rate is 9.6% as of June 30, 2005.

3. **Marshall University is in full compliance with Title IV-mandated requirements regarding disclosure of campus crime and University graduation rates.**

Marshall University is in compliance with the requirements of the United States Department of Education Campus Crime and Security Survey. This data may be viewed by the general public at two locations. The first location is the website for the [Department of Education](#) and the second location is the website for the [Marshall University Police Department](#). Annual updates to both sites are
coordinated through the Office of Public Safety. We also provide pamphlets containing the current data upon request.

Marshall University is in compliance with requirements regarding disclosure of University graduation rates for student athletes and other students. These data may be viewed by the general public on the University’s web site at www.marshall.edu/irp/srk. Written copies of the graduation rate information are provided to students and prospective students upon request. The annual update to the website is coordinated through the Office of Institutional Research and Planning.

Federal Compliance Visits to Off-Campus Locations

1. Marshall University has several off-campus locations as defined by the Higher Learning Commission.

An MBA program which is offered in Bangalore, India is pending NCA approval. A site visit was conducted in January 2006. The South Charleston campus and the Mid Ohio Valley Center are included in the accreditation review process.

Other off-campus sites are listed below and were reported in our 2004 Annual Institutional Update Report to the Higher Learning Commission.

- Teays Valley Regional Center
- 167th Air National Guard Base, Martinsburg, WV
- Raleigh County, Beckley
- Fairmont
- St. Mary’s Hospital
- SMC-Logan
- Hardy County, Moorefield
- WLSC (NUR), Warwood
- SMC-Williamson
• Bluefield
• Braxton County, Flatwoods
• Philippi
• Shawnee State University, Portsmouth OH

Advertising and Recruitment Materials
Whenever an organization makes reference to its affiliation with the Commission, it will include the Commission’s address and phone number (Handbook of Accreditation, pg 8.2-3).

1. Marshall University’s affiliation with the Commission is listed in print versions of the Undergraduate and Graduate Catalogs. Up-to-date listings will be in online versions of the Undergraduate Catalog and the Student Handbook and will be included in the Admissions Recruitment materials as they are produced and on the Admissions website.

2. Our own contact information is easily accessible through the Undergraduate and Graduate Catalogs, Admissions website, and the University website.

Professional Accreditation

1. Several of Marshall University’s academic programs hold separate professional accreditation.

A summary of these affiliations may be found in The Marshall Undergraduate and Graduate Catalogs and on the Marshall University website. The most recent reports from professional accrediting agencies are available in the applicable Deans’ offices. No accreditation body has taken adverse action against any of the University’s programs, and all of the professional accreditations are in good standing.
Requirements of Institutions Holding Dual Institutional Accreditation

1. Marshall University does not hold institutional affiliation with any CHEA recognized or federally recognized institutional accrediting bodies other than the North Central Association of Colleges and Universities.

Requirements of institutions holding dual institutional accreditation are not applicable.

Organizational Records of Student Complaints

1. Marshall University is in full compliance with the Commission’s expectations for maintaining institutional records of student complaints and their disposition.

University policy designates the Director of Equity Programs as responsible for administering and monitoring all equal opportunity/affirmative action policies and procedures. A database of grievances/complaints is maintained in the Office of Equity Programs and complaints are kept on file and are available to the site review team.

For academic matters the Associate Vice President for Academic Affairs collects and maintains records of formal, written student complaints that are received by the President, the Office of Academic Affairs, and the Faculty Senate. All other records of student complaints are handled thusly:

- Judicial Affairs: Dean of Students Office
- Residence Halls: Director of Residence Services