



## Federal Compliance Filing by Institutions

Effective September 1, 2019–August 31, 2020

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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: **Delta College**

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

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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: <https://www.delta.edu/transparency/credit-hours.html>

Provide the web address to relevant procedure(s):

Link: <https://www.delta.edu/transparency/credit-hours.html>

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

The Curriculum Council reviews program and course change, creation, and elimination proposals. This Council is multi-layered, has college-wide representation and meets every other week during the Fall and Winter semesters as needed. Review of these curriculum actions as a part of the process assures correct credit hours for certificates and degrees. The Registrar and Financial Aid Offices then assure that the courses and programs meet federal standards.

In addition as part of scheduling development the Associate Deans have access to a schedule development tool to check compliance.

Annually, a data file is prepared of the entire annual schedule and sent to the State of Michigan through the Center for Educational Performance and Information (CEPI). Each record must meet the minimum 800 hour threshold per credit hour, before it can be counted for funding from the State. It includes credits, meeting times and days met in order to do the proper calculations. If there are any discrepancies, CEPI works with the institution to verify or correct the data. If the data does not meet standards, it cannot be used for State funding.

Additionally, as a part of the annual audit, a random sample of the schedule file is selected and used to verify credit hour compliance by the external auditors.

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.delta.edu/transparency/complaint-procedure.html>

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

Link: <http://www.delta.edu/report-incident.html>

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: <http://catalog.delta.edu/content.php?catoid=7&navoid=966>

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: General link: <https://www.delta.edu/academics/transfer/>  
<https://www.delta.edu/academics/transfer/reverse-transfer.html>  
<https://www.delta.edu/academics/transfer/transfer-agreements.html>  
<https://www.delta.edu/academics/transfer/transfer-in.html>

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.delta.edu/academics/transfer/course-transfer-tools.html>

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?

Delta College uses the Desire2Learn (D2L) course management system for not only its online courses, but all courses. Each course offered at Delta has a D2L site set up for them each semester. Courses not offered as online use the site for various class activities and announcements.

On the D2L login page are the following instructions: "All Delta College students are required to update their Delta College Electronic Account password every 122 days. Notifications of the password expiration are sent to your Delta College email account. We recommend that you check your Delta College email often as messages from the College and instructors will be sent there. If you are unable to log into your eLearning course site, try updating your password at [signup.delta.edu](http://signup.delta.edu). You will need to know your student ID, date of birth, and social security number in order to update your account." This login and account information is required for access to many student services, including grades.

Delta College operates a Testing Center that administers placement, face-to-face class, online class and business skill tests. Each student coming into the Testing Center to take any form of test must present a valid picture id, before testing can begin. As a secondary step, for the face-to-face class and online class tests, students must also appear on the class roster before a test will be issued.

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

Only the student has access to their individual password. The Office of Information Technology (OIT) cannot recover or resend passwords. A student would need to create a new password in order to access the individual records if the current password is forgotten. Previous passwords cannot be used, helping to assure that a student's information is not compromised.

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?

On Delta's webpage, when a student clicks on the cost button for any program it takes them to the cost page which shows the \$33.00 per contact hour fee charged for courses offered online.

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

Link: <https://www.delta.edu/admissions-aid/cost-financial-aid/tuition-costs-fees.html>

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.)?

The initial approval date was January 12, 1965. This was then recertified on January 15, 2015 and will be recertified again this year (2020).

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

Date: January 15, 2015

- 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.)

N/A

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

N/A

- 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.)

N/A

- 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. 2019/None

2. 2018/None

3. 2017/None

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. 2019/None
2. 2018/None
3. 2017/None

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?

Annual Security Report – Department of Public Safety

Athletic Participation and Costs – Athletics Department

Graduation Rates – Institutional Research Office

General Financial Aid – Financial Aid Office

- 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: <https://www.delta.edu/transparency/>

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?

Graduation Rates with Associated Breakouts – Institutional Research Office

Athletic Costs and Participation – Athletics Department

- 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: <https://delta.prestosports.com/athletics/EADA?preview=true>

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.delta.edu/admissions-aid/cost-financial-aid/financial-aid.html>

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

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): <https://www.delta.edu/transparency/student-right-to-know.html>

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.

None of Delta College's programs with specialized accreditation are on any type of warning or sanction. A list of Delta's accredited programs can be accessed via the link below.

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.delta.edu/about-us/accreditations.html>

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.



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UNITED STATES DEPARTMENT OF EDUCATION

FEDERAL STUDENT AID  
SCHOOL ELIGIBILITY SERVICE GROUP  
SCHOOL PARTICIPATION TEAM  
CHICAGO - DENVER TEAM

Dr. Jean Goodnow  
President  
Delta College  
1961 Delta Road  
University Center, MI 48710-0001

02/11/2015

OPE ID 00225100

Dear Dr. Goodnow:

The Chicago - Denver School Participation Team is pleased to inform you that, based upon the information included in your Application for Approval to Participate in Federal Student Financial Aid Programs, the Secretary of Education (Secretary) has determined that Delta College (Institution) satisfies the definition of an eligible institution under the Higher Education Act of 1965, as amended (HEA). Delta College will be listed in the next edition of the Directory of Postsecondary Institutions published by the U.S. Department of Education (Department).

**OPE ID NUMBER**

The OPE ID Number 00225100 is a unique identifier for the Institution. The OPE ID Number will also be the Institution's identification number for the Title IV, HEA programs. Please use the OPE ID Number in all communications with the Department.

**ELIGIBILITY AND CERTIFICATION APPROVAL REPORT**

Please print a copy of the **Eligibility and Certification Approval Report (ECAR)** Together, the **Program Participation Agreement (PPA)** that has been signed on behalf of the Secretary and the ECAR constitute the Chicago - Denver School Participation Team's determination that the Institution has qualified to participate in programs under the Higher Education Act of 1965, as amended (HEA) and the Federal student financial assistance programs (Title IV, HEA programs).

The Institution must retain the ECAR and the PPA together.

The ECAR contains the most critical of the data elements that form the basis of the Institution's approval, and also a list of the highest level of offering, any nondegree or short term training programs, and any additional locations that provide 50 percent or more of an educational program that have been approved for the Title IV, HEA programs. The Institution may not award, distribute or disburse any Title IV, HEA program funds for any educational or training program that is beyond

the scope of the approval contained in the ECAR, nor for any additional location providing 50 percent or more of an educational program that has not been approved and is not listed on the ECAR.

- In order to comply with the requirements of 34 CFR 668.8(1), some vocational or nondegree programs may have been approved for fewer credit hours than requested in the Institution's application.
- Vocational and nondegree programs that do not meet the requirements of 34 CFR Parts 600 and 668 have not been approved and are marked in the ECAR as not approved.
- The listing of Vocational Programs in the ECAR contains those nondegree programs that the Chicago - Denver School Participation Team has determined are eligible programs for participation in the Title IV, HEA programs.
- The ECAR contains a list of HEA programs other than Title IV, HEA programs, for which the Institution is eligible to apply. This list does not mean that the Institution will automatically be eligible to participate in or receive funds under any HEA competitive grant program. Information concerning applications for, and the individual requirements of, the competitive grant program can be obtained from:

Deputy Assistant Secretary Office of Higher Education Programs U.S. Department of Education 400 Maryland Avenue, S.W. Washington, DC 20202-5140
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## PROGRAM PARTICIPATION AGREEMENT

The PPA contains the agreement between the Institution and the Secretary concerning the Institution's participation in the Federal student financial assistance programs (Title IV, HEA programs).

## CERTIFICATION FOR TITLE IV, HEA PROGRAMS

As explained in the PPA, Title IV, HEA programs administered by participating educational institutions are subject to applicable laws, regulations, and guidelines. Listed below are the appropriate telephone numbers for further information on the HEA programs:

- Federal Pell Grant Program (800) 474-7268
- Federal Family Education Loan Program (202) 377-4008
- Federal Direct Student Loan Program (800) 848-0978

If the Institution wishes to begin participating in the Direct Loan Program or to request a change in its funding method, contact COD School Relations at the Federal Direct Student Loan Program number above or send an email to [codsupport@acs-inc.com](mailto:codsupport@acs-inc.com)

- Federal Campus-Based Programs (877) 801-7168  
The Federal Campus-Based Programs are (a) the Federal Supplemental Educational Opportunity Grant Program, (b) the Federal Work-Study Program, and (c) the Federal Perkins Loan Program. To obtain funding under any or all of these programs, the Institution must file the Fiscal Operations Report and Application to Participate (FISAP) annually. FISAP packages are typically available at the end of July each year and the due date for electronic submission of this data is generally a postmark or

transmission date of October 1. Please keep in mind that the October 1 submission is to obtain funding for the Award Year that begins the following July 1.

If the Institution does not already participate in the Title IV, HEA programs, the Institution must complete Fundamentals of Title IV Administration (Precertification) Training no later than 12 months after the Institution executed the PPA. Completion of this training must be not earlier than one year before beginning to participate in any Title IV, HEA program for which the Institution has not previously participated. If you wish to register for Fundamentals of Title IV Administration (Precertification) Training, please register at <http://www.register123.com/event/profile/web/index.cfm?PKwebID=0x112117625&varPage=info>. For information concerning the training, contact the Chicago - Denver Team at the telephone number listed later in this letter.

Participating educational institutions will be reviewed at least once every six years to determine whether the institutions remain administratively capable and financially responsible to administer Title IV programs and funds.

## **REPORTING AND REAPPLICATION REQUIREMENTS**

The Institution must report promptly to the Department certain changes and actions that affect the Institution's participation approval, as specified in 34 CFR 600 and 668, including, but not limited to:

- Change of name and/or address;
- New contract or significant modification of existing contract with a third party servicer;
- Change in exercise of a person's substantial control over the Institution, e.g., a change in the chief executive officer or members of the board of trustees or board of directors.
- Change in the way the Institution measures educational program length;
- Change in the level of course offerings;
- Additions and/or closures of non-main campus locations that offer at least 50% of an educational program;
- Change of accrediting agency;
- Change of the State agency that confers legal authority on the Institution to offer programs of postsecondary education; or
- Change in ownership *whether or not* that ownership change results in a change in control of the Institution.

If the Institution fails to report any such changes within ten days after the change occurs, the ability of the Institution to administer the Title IV student financial assistance programs properly will be called into question. As a consequence, we will consider whether it is necessary to monitor the Institution's receipt of Federal funds more closely. Failure to report changes within the time frame required may also result in an adverse action being taken against the Institution in accordance with 34 CFR 668, Subpart G.

### **Automatic Termination of Approval**

This Approval for Institutional Participation automatically terminates on the happening of any of the following events:

- December 31, 2020
- The date the Institution loses the legal authority to offer programs of postsecondary education in the State in which it is located;

- The date the Institution loses accreditation from its designated primary accrediting agency;
- The date the Institution ceases to offer all approved postsecondary instruction;
- The date the Institution merges with another institution;
- The date the Institution undergoes a change in ownership resulting in a change of control;
- The date the Institution files for bankruptcy; or
- The date the Institution otherwise ceases to meet the definition of an eligible institution of higher education.

Please send all information or documentation required by this letter to:

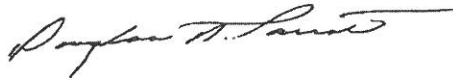
United States Department of Education  
Federal Student Aid, Schools Channel  
Attention: Chicago - Denver School  
Participation Team  
230 S. Dearborn St.  
Room 3733  
Chicago, IL 60604-1505

One of the institutional eligibility requirements is that the institution must admit as regular students only persons who have a high school diploma; have the recognized equivalent of a high school diploma; or are beyond the age of compulsory school attendance in the State in which the institution is physically located (see 34 CFR 600.4, 5 or 6). This means if the student is not yet beyond the age of compulsory school attendance in the State in which the institution is physically located, the institution can only enroll the individual as a regular student if he or she has a high school diploma or its equivalent.

One of the student eligibility requirements is that an eligible student is one who is not enrolled in either an elementary or secondary school (see 34 CFR 668.32). This means that an institution cannot accept as a regular student at this school, an individual who is also enrolled at the same time in elementary or high school.

The telephone number for the Chicago - Denver Team is (312) 730-1511. The fax number is (312) 730-1520.

Sincerely,



Douglas Parrott  
Area Case Director  
School Participation Team, NW  
Chicago Team

cc: Mr. David R. Urbaniak, Director of Financial Aid  
North Central Assoc of Colleges and Schools, the Higher Learning Commission  
Guarantee Agency  
Workforce Development Agency

## **Appendix B**

Delta College – No Applicable Actions

## **Appendix C**

Delta College – No Applicable Actions