Federal Compliance Materials
The University of Toledo adheres to the federal compliance program of the Higher Learning Commission of the North Central Association of College and Schools.

I. Credits, program length and tuition

1. The University of Toledo operates on a semester system, assigning credit hours for courses offered during its 15-week fall and spring semesters and its 12-week summer term.

The constitution of the Faculty Senate establishes the review of courses and programs which are forwarded to the Provost’s Office for approval. The course credit hours are established as part of the course creation process within the department. One semester credit hour equates to 50 minutes of instruction for a 15-week regular term for a total of 750 minutes of faculty-led instructional activities that is supported by 1,500 minutes of out-of-class learning activities. The policy was formulated during the university’s conversion to semesters in 1997 and aligns with current federal and state of Ohio definitions and requirements.1

Other instructional formats, such as laboratory, studio, field experiences, and practicums, are established by the chancellor under section 3333.04 of the Ohio Revised Code. The various curriculum committees of the Faculty Senate for undergraduate programs and courses, along with the curriculum committees of the Graduate Council for graduate courses and programs, ensures that courses meet the credit and contract hour requirements. The Provost’s Office, in collaboration with the University Registrar and other key stakeholders, ensures that credit hours are awarded as directed by state and federal directives.

Credit-bearing coursework, offered at both the undergraduate and graduate level, is offered during each of the three terms comprising the academic year. Credit-bearing coursework for the professional programs adheres to the requirements established by the external accrediting body and state directives. The length and requirements of academic programs at the University are consistent with peer institutions and where applicable, meet the standards of external accrediting bodies.

The University has established a minimum of 124 semester hours for a bachelor’s degree. The state of Ohio is moving towards a common semester calendar effective fall 2012 and has established a new minimum of 120 semester hours for a baccalaureate degree program. The state of Ohio through the chancellor and the Ohio Board of Regents establishes the minimum semester credit hours for each level of degree. For fall 2012, master’s programs have a minimum of 30 credit hours. Doctoral degrees have a minimum of 90 credit hours of graduate course work for students entering without a master’s degree and 60 credit hours for students entering with a prior master’s degree.

Effective fall 2012, a baccalaureate program will include 36 hours of general education courses distributed across the humanities, social sciences, natural sciences, mathematics, and English composition. The general education curriculum is designed to provide a common body of knowledge that expands the breadth of a student’s knowledge while preparing the student for a discipline. The state of Ohio through its Transfer Module guarantees the transfer of general education coursework among its public postsecondary institutions.

The awarding of credit hours along and degrees meets the Commission’s requirement “within the range of good practice currently in higher education in the United States.”

The program requirements at each degree level are available to students, faculty, and the public on each of the colleges’ website along with being maintained in the undergraduate and graduate catalogs.2
The 2010-2011 catalog includes the most current course requirement information.\textsuperscript{3}

Tuition and fees are established annually, conform to requirements set by the Ohio Board of Regents and the governor of the state of Ohio, and are approved by the University board of trustees. Tuition and fees vary based on student-specific residency status, on program level, and on the need of some courses to charge fees to cover expenses such as laboratory materials, disposable items and special equipment. Information on tuition and fees are available on the university website, through the Finance Handbook, and on many program-specific websites.\textsuperscript{4}

II. Institutional records of student complaints

The University of Toledo complies with the Higher Learning Commission’s expectations for maintaining student complaint and disposition records. The institution takes student complaints very seriously and processes student complaints in a timely manner.

Students at the University have a variety of avenues to provide their input and complaints to faculty and staff members at the program, department, chair, college, and institutional levels. Complaints that arise are generally first addressed informally through discussions between the student and instructor. Processes for submission of student complaints are available on each of the college’s websites and in University policies.

The different avenues are:

**Office of Vice President for the Student Experience**

The office handles complaints involving the Student Code of Conduct.

**Office of Student Customer Service**

The Office of Student Customer Service, an administrative unit of the Division of Student Affairs, is an “impartial and confidential information and referral source that educates undergraduate students regarding options for problem resolution.” The office supports the university mission by serving students in a holistic and humanistic manner, emphasizing core values of compassion, professionalism and respect. The director is a member of the International Ombudsman Association and adheres to its code of ethics and standards of practice. Student complaint data collected weekly include method of student contact — phone, email, office visits — demographic information, and the nature and disposition of complaint. The office annually publishes a summary of complaints that serves as an educational tool for the University community and that identifies trends that require administrative attention. No identifying information regarding individual complaints is contained in the reports. The logs for years 2009-2010 and 2010-2011 are available for inspection.

**College of Graduate Studies**

The Office of the College of Graduate Studies (COGS) serves as the impartial and confidential resource for concerns and complaints from graduate students. Complaints are addressed usually within 24 hours of receipt, and the process includes a response back to the student to acknowledge the complaint and then, following review, to communicate the final resolution to the student, faculty member, department, and college as appropriate. Graduate student handbooks contain procedures for how students can voice complaints and how these are handled; and the handbooks are available online for students on Main Campus and Health Science Campus. Many student issues are resolved at the department and college level and do not have to addressed by the COGS Dean’s Office.
The common areas of complaints for the last three years include submission process problems, late registration, missed deadlines, and delayed stipends because of incomplete documents. Forty-five complaints were recorded in 2009 and about 20 in each of 2010 and 2011. The numbers are not fully reflective of COGS involvement since it routinely investigates and resolves many issues. The office is the first place that students turn to when trying to navigate the system or finding information not obtainable at the department level.

In cases of grade appeal and grievances, graduate students follow appeal procedures established by their respective colleges and described in college handbooks, after which students may appeal to the College of Graduate Studies and finally to the Graduate Council’s Academic Standing Faculty Committee. Two policies related to grade appeals and grievances — policy 3364-77-01 and policy 3364-77-02 — are in final stages of implementation. There has been one grievance or grade appeal each year for the last three years.

**Office of Student Conduct**

The Office of Student Conduct, part of the Division of Student Affairs, administers the Code of Student Conduct that covers all undergraduate and graduate students at the University. For undergraduate students, the office offers conflict and dispute management and resolution, facilitates student grievance processes, and is available for students and parents concerning expectations for student conduct, responsibilities, and rights, and University of Toledo policies and procedures.  

**Office of Institutional Diversity**

The Office of Institutional Diversity conducts investigations of complaints of discrimination on the basis of race, color, religion, sex, national origin, age, disability, veteran status, marital status, sexual orientation, or gender identity.

**Other avenues for complaints**

Student complaints that come to the attention of the president are logged and then directed to the appropriate university official for investigation and resolution. The President’s Office records the name of the complainant, issue, and administrative official to whom it was sent for resolution. Complaints directed to the President’s Office must be resolved within 24 hours if possible. The resolution of the complaint is recorded by the President Office.

The University maintains an ethics and compliance hotline that allows faculty, staff and students to anonymously report apparent ethics and compliance violations with federal, state, or local laws or regulations, University policies, errors or irregularities in financial accounting practices and policies. In September 2011, the University rededicated itself to the goal of providing a high-quality student experience with a new three-year strategic plan that commits significant resources to provide students with user-friendly support services to help them prepare for, enter, progress through, and graduate from the University.

An important component of the plan is development of a proactive complaints/issues resolution process that calls on university academic colleges, departments or divisions to acknowledge and resolve student complaints quickly and fairly. University units are required to acknowledge receipt of student complaints with 24 hours and resolve issues within three days of receipt of the complaint.

**III. Transfer of credits**

Information on transfer policies for undergraduate and graduate students is found on the perspective student undergraduate and graduate admissions websites.
Undergraduate transfer policies are found also on the Provost’s website at: http://www.utoledo.edu/catalog/catalog_statement.html

The university’s undergraduate transfer policy follows the state of Ohio’s Transfer and Articulation Policy for Institutional Transfer. The Ohio Board of Regents in 1990, following a directive of the 119th Ohio General Assembly, developed the Ohio Articulation and Transfer Policy to facilitate students’ ability to transfer credits from one Ohio public college or university to another in order to avoid duplication of course requirements. A subsequent policy review and recommendations produced by the Articulation and Transfer Advisory Council in 2004, together with mandates from the 125th Ohio General Assembly in the form of Amended Substitute House Bill 95, have prompted improvements of the original policy.

The policy established the transfer module, which is a subset or entire set of a college or university’s general education curriculum in associate of arts, associate in science, and baccalaureate degree programs. Transfer module course(s) or the full module completed at one college or university will automatically meet the requirements of individual transfer module course(s) or the full Transfer Module at another college or university once the student is admitted. Students may be required, however, to meet additional general education requirements at the institution to which they transfer. The Ohio Transfer Module only applies to undergraduate coursework, taken at one of Ohio’s public postsecondary institutions.

For example, a student who completes the Transfer Module at institution S (sending institution) and then transfers to institution R (receiving institution) is said to have completed the Transfer Module portion of institution R’s general education program. Institution R, however, may have general education courses that go beyond its Transfer Module. State policy initially required that all courses in the Transfer Module be completed to receive its benefit in transfer. However, subsequent policy revisions have extended this benefit to the completion of individual Transfer Module courses on a course-by-course basis.

All graduate credits requested for transfer must carry a grade of B or higher. Credit for an S grade may be transferred only if the grading institution verifies, in writing, that the S translates into a grade of B or higher. Credit applied towards the master’s degree and education specialist degree must have been earned within the period of six years immediately preceding the time the degree is awarded; credit applied for the doctoral degree must have been earned within seven years immediately preceding the time the degree is awarded (combined M.D./Ph.D. program limit is ten years). Credits earned at another university as part of a completed degree are not transferable. Transfer policies and forms for graduate students are included in the graduate handbooks, which are available on the College of Graduate Studies website.

IV. Verification of student identity

To verify the identity of students who enroll in distance-learning courses, the University uses a process featuring secure logins and passwords, an approach suggested in the Higher Education Commission’s guide for its Federal Compliance Program. This ensures that students who participate in courses or programs provided through distance or correspondence courses are the same students who participate in and complete the course or program and receive credit.

The University’s Blackboard system is integrated with the Student Data System (banner). Student identities are therefore guarded and verified as part of a log-on procedure. Distance-learning students use their student identification number and a password that are kept confidential and that are used to submit work online. Students may change their password at any time and are required to change it at regular intervals.
In some cases tests for distance-learning courses are proctored.

Where the security of an exam cannot be assured using technological or pedagogical approaches, Learning Ventures arranges for on-campus proctoring in the university testing center or with Learning Ventures staff, or off-campus proctoring using a certified proctor. In these cases, a proctor agreement form is completed, signed by the selected proctor and returned to the University to complete the registration process.

Proctors are sent the exams/assignments for grading and administers exams to the students. Proctors are required to verify student identity before exams are delivered to students.

Proctors must be selected from the following list:

- College test center proctor.
- Personnel or human resource director at place of employment.
- A certified librarian.
- Administrator at a local school or college.
- School superintendent, principal, counselor, administrator, or faculty member who is not their (the students’) co-worker.
- Faculty member or administrator at an accredited college or university.
- Corporate education director.
- Commissioned officer whose rank is higher than their (the students’) own, or education officer of the base (for military only).
- Proctors cannot be related to the student in any way or be a friend of the student.

In accord with the Higher Education Opportunity Act, the University continues to consider and evaluate ways to improve and strengthen its student verification process.

V. Institutional compliance with the Higher Education Reauthorization Act (Title IV)

The University of Toledo participates in Federal Title IV programs to benefit eligible students. The U.S. Department of Education conducted a review and found the University met the requirement of “institutional eligibility, administrative capability, and financial responsibility.”

The Program Participation Agreement was extended through June 30, 2012. The University also met the requirements with respect to unsubstantiated funds. More detail about compliance can be found in the Program Participation Agreement (PPA), the Eligibility and Certification of Approval Report (ECAR) and the U.S Department of Education Monitoring Report of July 4, 2011.11,12

Financial audits and responsibility requirements

Audits conducted in 2008-2009, 2009-2010, and 2010-2011 by the state of Ohio determined that the University complied with both federal and state reporting standards. The auditors’ examination included applications, transcripts, class schedules and statements of accounts. The director of financial aid of the Ohio Board of Regents commended the University financial aid staff “for such excellent record keeping and reporting.”13

The annual audited financial statements with A133 for University of Toledo from 2007 to 2011 are available as are the financial statements for both institutions for the period from 2004 to 2006.14

The University’s 2010-2011 audit indicated that “based on our audits and the reports of the other auditors, the basic financial statements . . . present fairly, in all material respects, the respective financial position of University of Toledo and its discretely presented component units as of June 30,
2011 and 2010 and the respective changes in financial position and cash flows for the years then ended, in conformity with accounting principles generally accepted in the United States.”

As required by the Ohio Board of Regents, the University is audited by an outside auditing firm. The state selected Plante Moran in 2010 to conduct audits consistent with government auditing standards issued by the Comptroller General and the Office of Management and Budget Circular A-133 Audits of States, Local Governments and Non-Profit Organizations.

The 2010-2011 audit concluded that the “University of Toledo complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2011.”

**Student loan default rates**

The student loan default rate as of July 30, 2011, is six percent for 2009, a rate consistent with the university’s historical average and comparable to and better than the national average of 8.8 percent provided by the U.S. Department of Education.16

![National Student Loan Default Rates](http://www2.ed.gov/offices/OSFAP/defaultmanagement.defaultrates.html)

As of Oct. 18, 2011, the University has successfully closed out the 2010-2011 Direct Loan Program year.17 This is an indication of a very well managed system that successfully complies with the requirement of the U.S. Department of Education. It also indicates that internal processes are very good, and that staff are very knowledgeable and capable of managing the system.

**Disclosure of campus crime statistics, athletic participation, and financial aid and related disclosures**

In keeping with the Jeanne Clery Disclosure of Campus Security Policy and the Campus Crime Statistics Act of 1998, the University of Toledo Police Department publishes crime statistics every year on its website. Prospective students and others may examine the University of Toledo annual security report published in 2011, which contains statistics on campus, non-campus, and public property crime from 2010, 2009, and 2008.18

As a condition of receiving federal student aid, the Equity in Athletics Disclosure Act requires all institutions with intercollegiate athletic programs to file the Equity in Athletics report annually and
to make the report available to students, prospective students, and the public. The reports are on file and may be obtained by any student, prospective student, or member of the public from the Athletics Department. These reports are available to the site review team in the Resource Room. The University is committed to conduct and promote its athletics programs free from gender bias.

Publication of retention, graduation rates

The Office of Institutional Research\textsuperscript{19} maintains an up-to-date website listing information that must be made available to any enrolled or prospective student based on Consumer Information sections 668.41 and 668.45. These data include rate of retention, completion, and graduation rate information, and other requirements. There are a total of 43 different reports.

Satisfactory academic progress and class attendance

Recipients of federal financial aid must meet the academic standards defined in the university’s policy on satisfactory academic progress as a condition of continued eligibility.\textsuperscript{20}


The University’s policy on class attendance was established by the Faculty Senate of the University in 2002. This policy, available on the University’s policy website, is clearly articulated in the academic and college catalogs\textsuperscript{21}, and supports basic protections and reasonable accommodations for students who miss class with excused absences.

Students are expected to attend every class meeting of courses in which they are registered. Only in specific, unavoidable situations does the University excuse absences from class: (1) personal emergencies, including, but not limited to, illness of the student or of a dependent of the student, or death in the family; (2) religious observances that prevent the student from attending class; (3) participation in university-sponsored activities, approved by the appropriate university authority, such as intercollegiate athletic competitions, activities approved by academic units, including artistic performances, ROTC functions, academic field trips, and special events connected with coursework; (4) government-required activities, such as military assignments, jury duty, or court appearances; and (5) any other absence that the professor approves. It is the responsibility of each instructor to decide what weight (if any) shall be placed on missed classes in the computation of final course grades.

Contractual relationships

The University does not have any contracts to provide content with third-party entities not accredited by a federally recognized accrediting agency.

Consortial relationships

The University has five consortial arrangements that have been reported in the Higher Learning Commission’s annual institutional data update (AIDU) and approved by the Higher Learning Commission. These programs are bachelor of science in nursing consortium, the doctor of nursing practice degree program, the literacy specialist endorsement program, the Northwest Ohio Consortium for Public Health degree program, and the RN-to-BSN degree completion program.

VII. University advertising and recruitment materials
The University of Toledo historically has not publicized its full accreditation status with the Higher Learning Commission of the North Central Association of Colleges and Schools. As a result of the self-study, the University plans to do so properly, including website address and telephone number.

**VIII. Professional accreditations**

The University of Toledo does not hold dual institutional accreditation, but does have many programs that are accredited by external professional accreditation bodies. There have been no adverse actions by professional accrediting agencies since the last Higher Learning Commission reviews in 2001 of Medical College of Ohio and in 2002 of the University of Toledo.

**IX. Public notification of comprehensive evaluation visit and third-party comment**

The University has made presentations, held campuswide forums, and sought feedback from University and community members throughout the entire self-study process. This included subcommittees of the board of trustees.

A comprehensive communication plan has been developed to announce the Commission’s site visit to a number of important internal and external university constituencies and prepare the university and regional community. The University plans to solicit third-party comment by placing advertisements in a number of publications and other media.

**End notes:**

1. utoledo.edu/offices/provost/cte/pdf/Dir2010-016.pdf
2. utoledo.edu/catalog/2010Catalog/Index.html
3. utoledo.edu/catalog/pdf/COURSE DESCRIPTIONS 2010-11.pdf
4. utoledo.edu/offices/treasurer/tuition_rates.html
5. utoledo.edu/policies/main_campus/student_life/pdfs/3364-30-04%20Student%20code%20of%20conduct.pdf
6. utoledo.edu/policies/administration/compliance/pdfs/3364-15-05.pdf
7. utoledo.edu/studentaffairs/pdfs/Student%20Experience%20UT%20Strategic%20Plan.pdf
8. utoledo.edu/admission/transfer/index.html
9. utoledo.edu/graduate/currentstudents/additionalresources/transfercredit.html
10. utoledo.edu/graduate/currentstudents/additionalresources/transfercredit.html
11. utoledo.edu/accreditation/pdf/Program_Participation_Agreement_PPA.pdf
12. utoledo.edu/accreditation/pdf/Eligibility_and_Certification_Approval_Report09ECAR.pdf
13. utoledo.edu/accreditation/pdf/State_Audit_2008_09.pdf
15. utoledo.edu/offices/controller/accounting_reporting/pdfs/UTCombinedFinalFY11.pdf
16. utoledo.edu/accreditation/pdf/Default_Rate_History_List.pdf
17. utoledo.edu/accreditation/pdf/Federal_Direct_Loan_Program_101811.pdf
