

## Federal Compliance Filing by Institutions

### Effective September 1, 2023–August 31, 2024

#### [SURVEY - Federal Compliance DRAFT](#)

Please click survey link after review of Criterion 1 DRAFT

Institutions should answer the questions below and provide supporting documentation where applicable. The [Federal Compliance Overview](#) provides information about the applicable HLC policies and provides an explanation of each requirement. Please review the Overview in its entirety prior to completing this Filing.

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 filing, including Appendix A (if applicable), should not exceed 300 pages.

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 also 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 in compliance at all times with such regulations, as they may from time to time be updated.

#### *Submission Instructions*

##### **Comprehensive Evaluations**

Upload this form, any required attachments and, if applicable, Appendix A 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.

##### **Other HLC Processes**

Submit this form, any required attachments and, if applicable, Appendix A at the [HLC Document Submissions page](#). Select the appropriate submission option from the list provided to ensure the documents are sent to the correct HLC staff member.

Institution name:

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

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Provide web addresses to the following:

- Policy(ies) 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 (ALO) 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 ensures it is adhering to its credit hour policy.)

Provide the web address to relevant policy(ies):

Link: (Draft Definition of a Credit Hour AP is currently under development by Academic Standards/Morgan Phillips)

(Draft Academic Calendar AP is currently under development by the Provost Office)

\*9/26/23 Per Sandy need to have a BP or AP on tuition. Could not find one on the PCC website. Only BP/AP we have is on Tuition & Fee Waivers.

Provide the web address to relevant procedure(s):

Link:

Provide the web address to relevant procedure(s):

Program Development and Modification:

[Program Development and Modification](#)

Definition of a Credit Hour:

(Draft Definition of a Credit Hour AP is currently under development by Academic Standards/Morgan Phillips)

[Definition of a Credit Hour](#)

Calculation of Credit/Lecture/Lab Contact Hours:

[How to Calculate Credit/Lecture/Lab Contact Hours](#)

Course Types:

[Course Types](#)

Course Guidelines:

[Course Guidelines](#)

Glossary of PCC Curriculum Terms:

[Glossary of Terms](#)

List of Disciplines:

[Degrees & Certificates](#)

[Career Training Programs](#)

List of Programs

[Degrees & Certificates](#)

[Career Training Programs](#)

Policy on Credential Levels for Credit and Clock-Hour Workforce

[Curriculum Quality Improvement](#)

[Program Guidelines](#)

[Definition of a Credit Hour](#)

Board Policies, Academic Policies, and Standard Operating Procedures

[Curriculum Quality Improvement](#)

[Administrative Procedures](#)

[Board Policies](#)

Board Policies, Academic Policies, and Standard Operating Procedures to Determine Length of Period

[Curriculum Quality Improvement](#)

[Program Documents | Curriculum Quality Improvement](#)

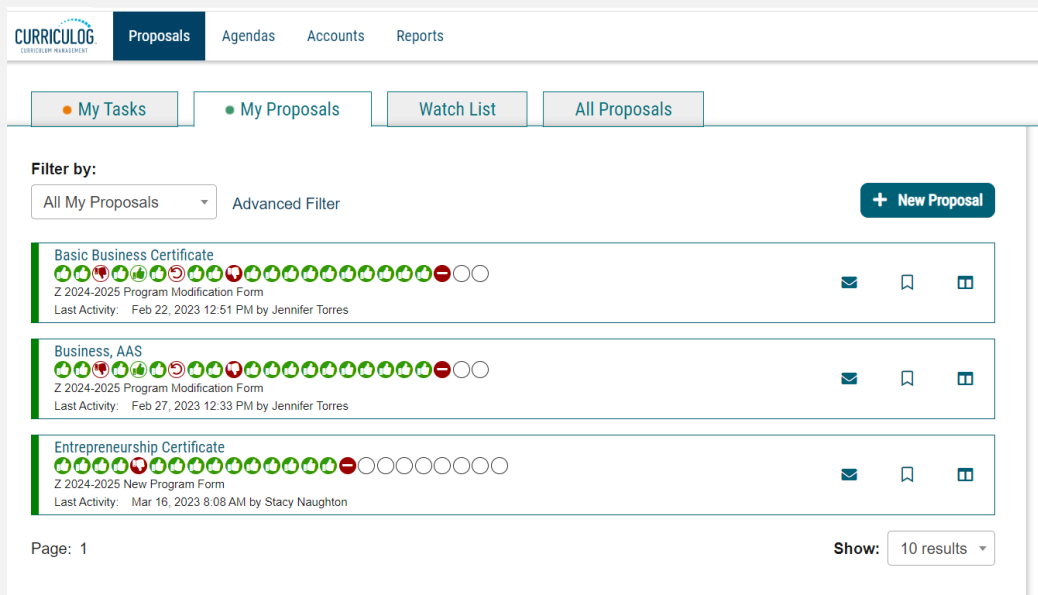
Describe the process the institution utilizes to verify length of academic period and compliance with credit hour requirements through course scheduling.

Pima Community College (PCC) follows informed guidance of academic (faculty) oversight of curriculum and compliance with PCC's Board of Trustees policies to provide a rigorous program review of all degrees and certificates using an iterative continuous improvement process on a four-year cycle. Faculty review course learning outcomes for each course/section every semester funneling into annual program reviews for all academic programs across the institution every year. These processes are governed by policy, regulation, and embedded processes; through our embedded processes, these are reviewed by both faculty oversight through academic disciplines and our faculty senate and through administrative procedures governing regulatory and administrative compliance. All programs undergo a community needs assessment, feasibility, and viability assessment every three years (failing programs are placed into a teach-out process - continuing programs are aggressively reviewed for changes and improvements based on community driven and data driven needs). PCC currently uses multiple processes for assessing co-curricular learning alongside relevant General Education Learning Outcomes (GELOs), the PCC Mission, and the Strategic Plan, and makes use of assessment data to

help determine funding areas of need. Acknowledging the need to centralize co-curricular assessment practices, a working group has formed.

Course Learning Outcomes (CLOs) are detailed on course syllabi which are managed and reviewed through a central repository each semester. Faculty use standardized syllabi templates with course learning outcomes, course requirements, course credit hours, contact hours, course delivery modalities, and college policies and procedures to ensure compliance with length of academic period, credit hour requirements, course learning outcomes, modality of delivery, and alternative locations of instructional delivery.

Embedded Processes are a critical component of PCC's academic and administrative compliance processes and procedures. Curriculog documents the academic and administrative workflow for curriculum review and approval as it relates to as many as six different academic and administrative silos from academic departments, curriculum, financial aid, AZtransfer, HLC, articulation, etc. awaiting approval.



Proof of Compliance with Credit Hour Requirements through Course Scheduling

[Curriculum Quality Improvement](#)  
[Course Types](#)

Master Schedule

[Calendars](#)

Continuous Improvement

[Program of Study Process Improvement](#)

Transfer of Students and Student Credits (**Currently Being Revised**)

## [Board Policy BP 3.21 Transfer Students and Credits](#)

Transfer and Prior Learning Credit (**Currently Being Revised**)

### [Administrative Procedure AP 3.21.01 Transfer and Prior Learning Credit](#)

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

*Related HLC Requirements: Assignment of Credits, Program Length and Tuition (FDCR.A.10.020), Criteria for Accreditation Core Component 3.A. (CRRT.B.10.010), and Assumed Practice B.1. (CRRT.B.10.020)*

## **2. Institutional Mechanisms for Handling Student Complaints**

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[This policy is currently being updated - See 2023 AP updates]

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

### [Complaint Processes](#)

Student Bill of Rights:

#### [Student Handbook](#)

Student Code of Conduct:

#### [Academic Standards](#)

Sexual Misconduct, Harassment and Discrimination (Title IX):

#### [Title IX & Sexual Harassment](#)

Academic Grievance:

#### [Complaint Processes](#)

Student Appeal Process (non-academic)

#### [Complaint Processes](#)

Reasonable Accommodations for Students with Disabilities

#### [Administrative Procedure AP 3.46.06 Complaint Procedure for Students with Disabilities](#)

#### [Title IX & Sexual Harassment](#)

Additional Resources:

#### [Board Policy BP 3.31 Student Conduct and Ethics](#)

#### [Administrative Procedure AP 3.31.01 Student Complaints](#)

#### [Complaint Processes](#)

[Public Incident Report](#)

[Student Complain Form: Ethics Point](#)

[ADR Complaint Procedures](#)

[Administrative Procedure AP 3.46-06 Complaint Procedure for Students with Disabilities](#)

[Title IX & Sexual Harassment](#)

[Public Incident Report](#)

[Complaint Processes](#)

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

Link:

[Complaint Processes](#)

[This policy is currently being updated - See 2023 AP updates - including Provost Flowchart request detailing flow of complaints between ODR (Office of Dispute Resolution) and Simplicity systems in use across the college]

Link:

[Office of Dispute Resolution](#)

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

*Related HLC Requirements: Institutional Records of Student Complaints (FDCR.A.10.030), Criteria for Accreditation Core Component 2.A (CRRT.B.10.010) and Assumed Practices A.3, A.4. (CRRT.B.10.020)*

### 3. Publication of Transfer Policies

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

Link: [College Catalog | Pima Community College](#)

[Transferring from Pima](#)

[Transfer Degrees & Partners](#)

Provide the web address where the public can access a list of all institutions with which the institution has established articulation agreements. Note that there is not a need to provide the full articulation agreements themselves, only the list of agreements that the institution makes 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: [Pima Transfer Partnerships](#)

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: [Transfer Degrees & Partners](#)

[Board Policy BP 3.21 Transfer Students and Credits](#)

[Administrative Procedure AP 3.21.01 Transfer and Prior Learning Credit](#)

[Transfer Tools | Pima Community College](#)

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

*Related HLC Requirements: Publication of Transfer Policies (FDCR.A.10.040), Criteria for Accreditation Core Component 2.A (CRRT.B.10.010) and Assumed Practice A.5.D. (CRRT.B.10.020)*

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

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

Yes

No (If no, please move on to the next section.)

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

The College follows BP 3xx.xx (Currently being revised) and AP 3xxx (Currently being revised) Verification of Student Identity (Update Policy Title upon policy adoption). Pima Community College students must provide a copy of a government approved or acceptable form of identification, social security number, and date of birth when applying for admission to the College during the admission process. Further the college collaborates with key partners such as K-12 education systems for dual-enrollment for identity verification. These processes are further supplemented and supported by data verification and identity validation systems through our IT department tools through partnerships with Experian to further supplement identity verification and identity fraud prevention procedures. International students' identification is further validated through our International Division and US State Department visa protocols.

During this admission process - Pima continues to revise embedded processes and procedures to enhance student identity fraud processes and procedures resulting in student applications which result in further manual review. This is a critical embedded process contributing to financial integrity of the institution and protecting student information.

Upon completion of the application and registration process, students are protected through a secure privacy login and password with additional two factor authentication (with additional authentication, validation, and fraud monitoring processes - FERPA, Single Sign-On, D2L Recognition – [\(Family Educational Rights and Privacy Act \(FERPA\)\)](#)). The college assigns a student identification number which becomes a permanent part of the student identification record. This is an additional safety feature of the college records and identification process. AP 3.10.03 (Currently being revised)

### [Administrative Procedure AP 3.10.03 Student Identity Verification in Distance Learning](#)

All online, traditional, and mixed modality students may access additional services through a secure online portal, MyPima. Students taking exams in online classes are required to take proctored exams which validate student identity through confirmation processes which match the student taking the exam with a current approved form of government issued identification and the student identification on-file with the college. This ensures student identity of students engaging with the college is validated. Proctoring of Tests - [Additional Testing Services](#)

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

The college policies and embedded procedures support FERPA privacy and security practices, protecting student confidential information. This privacy practice includes student identification numbers and critical student personal information. College employees receive FERPA training and practices, and embedded procedures are proactively designed to protect confidential student information. The college also complies with the Gramm-Leach-Bliley Act.

### [Administrative Procedure AP 9.01.03 Security of the Information Technology Infrastructure](#)

### [Administrative Procedure AP 9.01.02 Data Trusteeship](#)

Internal IT SOP: [Operational Standards Written Information Security Program](#)

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?

### [Additional Fees](#)

### [Pima Community College Testing Site](#)

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

Link: [Additional Testing Services](#)

For more information see Federal Regulations 34 CFR §§602.17(g) and 602.17(h).

*Related HLC Requirement: Institutional Practices for Verification of Student Identity and Protection of Student Privacy (FCDR.A.10.050), Criteria for Accreditation Core Component 2.A. (CRRT.B.10.010)*

## 5. Protection of Student Privacy

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Provide the web address to the institution's policies governing student privacy and the privacy and security of student data, including student records.

Link: [Administrative Procedure AP 9.01.03 Security of the Information Technology Infrastructure Acceptable Use of Information Technology Resources](#)

Provide the web address to the institution's disclosures about how any personal data collected, including personally identifiable information (PII), may be used.

Link: [Administrative Procedure AP 9.01.02 Data Trusteeship Privacy Policy | Pima Community College Security of Data Mobile App Privacy Policy](#)

Provide a brief narrative below describing how the institution ensures timely training and adherence to the policies referenced in this section by its employees and any third-party contractors acting on its behalf:

The college requires annual training on FERPA and data confidentiality training for all employees; this training is also part of the onboarding process for all new college employees. This training is also embedded in training throughout all levels of employment at the college including non-traditional student workers who may engage with the college through other roles such as student ambassadors and receive awards in the form of stipend, awards, or grants.

This is further included in documentation and contractual agreements with third-party agency parties that engage with the college both directly and indirectly. Software and services agreements are continuously being reviewed and updated as they become available and reach renewal dates - with privacy terms and agreements increasingly becoming standardized throughout the higher education industry. The college relies primarily on compliance audits during these contracting phases such as for the college to perform due diligence and validation on third-party vendor and contractor compliance acting on behalf of the college.

[Privacy Policy D2L](#)  
[D2L's Privacy Center](#)

While this is an embedded practice at the college AP 9.01.03 provides general guidance for this standard at the college; this policy is currently under review.

For more information see Federal Regulations 34 CFR §602.17(h).

**Related HLC Requirements:** *Institutional Practices for Verification of Student Identity and Protection of Student Privacy (FDCR.A.10.050), Recruiting, Admissions and Related Enrollment Practices (FDCR.A.20.020), Assumed Practice A.2. (CRRT.B.10.020)*

## 6. Publication of Student Outcome Data

The institution must disclose student outcome data in a manner that is easily accessible to the public. The institution's website includes a webpage containing (or linking to) data related to student achievement that addresses the broad variety of its student populations and programs, including at the undergraduate and graduate levels, as applicable. The information must include retention, completion, required state licensure exam pass data (if applicable), and data about the institution's students after transfer or graduation (such as continuing education, job placement and earnings). The institution must also disclose which student populations are excluded from the data. If an institution uses student job placement data in any marketing or recruitment content, it must also publicly disclose these data on its website along with information necessary to substantiate the truthfulness of its marketing and recruitment materials. All student achievement information must be presented in plain language, with any technical terms defined and the institution's methodology for compiling data included.

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

Yes <https://www.pima.edu/about-pima/reports-data/federal-reporting/docs/2021-ipeds-completions.pdf>

[Consumer Information](#)

No (If no, please move on to the next section.)

If yes, provide a link to the webpage(s) that contains the student outcome data.

Link(s):

[2021 IPEDS Completions](#)

[Consumer Information](#)

Additional Resources:

[Reports & Data](#)

[Federal Reporting](#)

[Retention and Completion](#)

[Program Effectiveness Nursing \(ADN\) AAS](#)

[Program Outcomes Early Childhood Studies AAS](#)

Licensure exam pass data posted under the programs, here are few examples:

[Program Effectiveness Aviation Technology AAS](#)

[Program Effectiveness Nursing \(ADN\) AAS](#)

[Emergency Medical Technology](#)

Student Outcome Data is Consistently Published under each Program of Study:

[2021 IPEDS Completions](#)

[Consumer Information](#)

For more information see Federal Regulations 34 CFR §§602.16(a)(1)(i) and 668.14(b)(10).

Related HLC Requirements: Public Information (FDCR.A.10.070), Review of Student Outcome Data (FDCR.A.10.080), Assumed Practice A.6. (CRRT.B.10.020)

## 7. Standing With State and Other Accreditors

List the governing or coordinating bodies in states (e.g., Illinois Board of Higher Education; Arizona State Board for Private Postsecondary Education) in which the institution has a presence.

### Program Accreditation/Certification

Automotive Technology - National Institute for Automotive Service Excellence (ASE)  
Automotive Mechanic Certificate - National Institute for Automotive Service Excellence (ASE)  
Aviation Technology- US DOT Federal Aviation Administration  
Dental Hygiene - Commission on Dental Accreditation  
Dental Assisting Certificate - Commission on Dental Accreditation  
Dental Laboratory Technology - Commission on Dental Accreditation  
Early Childhood Studies - National Association for the Education of Young Children  
Elementary Education - Arizona State Board of Education  
Secondary Certification - Arizona State Board of Education  
Special Education Certificate - Arizona State Board of Education  
Special Education for Certified Teachers Certificate - Arizona State Board of Education  
Medical Laboratory Technology - National Accrediting Agency for Clinical Laboratory Sciences  
Nursing AAS - Arizona State Board of Nursing  
Paralegal AAS - American Bar Association  
EMT Certificate - Arizona Department of Health Services: Emergency Medical Services and Trauma System  
EMT Paramedic AAS - Commission on Accreditation of Allied Health Education Programs  
Fire and Emergency Services Higher Education (FESHE) AAS - US Fire Administration  
Radiologic Technology AAS - Joint Review Committee on Education in Radiologic Technology  
Surgical Technology AAS - Commission on Accreditation of Allied Health Education Programs  
Therapeutic Massage Certificate - Arizona State Board of Massage Therapy  
Veterinary Technician AAS - American Veterinary Medical Association

Note whether there are any pending or final state actions that affect the institution's legal status or authority to grant degrees or offer programs.

N/A

List any relationships the institution has with any other recognized accreditor (e.g., Accreditation Commission for Education in Nursing; Council for the Accreditation of Educator Preparation; Distance Education Accrediting Commission).

EMT Paramedic AAS-Commission on Accreditation of Allied Health Education Programs

Nursing AAS-Accreditation Commission for Education in Nursing

Respiratory Care AAS-Commission on Accreditation for Respiratory Care (CoARC)

Surgical Technology AAS-Commission on Accreditation of Allied Health Education Programs

Surgical Technology AAS-Accreditation Review Council on Education in Surgical Technology and Surgical Assisting

Note whether there are any pending or final actions by any other recognized accreditor to withdraw status or impose a sanction, Show-Cause Order or adverse action.

N/A

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

Link: [Program Accreditation/Certification](#)

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

*Related HLC Requirements: Standing With State and Other Accreditors (FDCR.A.10.090), Criteria for Accreditation Core Component 2.B; Assumed Practices A.7, C.4.; Obligations of Membership #8 and #9 (INST.B.30.020)*

## 8. Recruiting, Admissions and Related Institutional Practices

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Upload as part of this filing the institution's (i) training materials and (ii) code of conduct (or its equivalent) for its recruiters, admissions counselors, marketing or advertising staff, financial aid advisors, and any other personnel engaged in direct communications with prospective and current students, as required by HLC policy.

Link: [Administrative Procedure AP 3.10.04 Student Recruitment](#) (Draft-Currently being revised to include all of these new components)

HR Training Video for All Employees Link: [Ambassador Training](#)

Provide a brief narrative below describing how the institution ensures timely training and adherence to its procedures by employees and any third-party contractors acting on its behalf in this area.

The college adheres to Administrative Procedure 3.10.04 supporting ethical recruiting policies, practices, and procedures and also requires that all employees complete a required annual training course that includes a refresher on FERPA, recruitment, and admissions policies developed by the Human Resources Office. The most recent training was sent out to all employees on September 13, 2023. HR monitors the completion rate to ensure that all college employees complete the mandatory training.

For more information see Federal Regulations 34 CFR §§668.14 and 668.82

*Related HLC Requirements: Fraud and Abuse (FDCR.A.20.010), Recruiting, Admissions and Related Enrollment Practices (FDCR.A.20.020), Criteria for Accreditation Core Components 2.A and 2.B (CRRT.B.10.010), Assumed Practice A.2. (CRRT.B.10.020)*

## **Additional Documents**

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Please attach the following documents as applicable:

Appendix A      With respect to an institution’s ongoing responsibilities under federal regulations, provide any action letters issued by the U.S. Department of Education that articulate a rationale for any negative actions and any reports issued by the institution, if applicable, demonstrating the institution’s improvement efforts in response to such communications. Negative actions include, but are not limited to limitation, suspension, or termination actions by the Department; letter of credit requirements, fines, heightened cash monitoring, or reimbursement payment methods imposed by the Department; or other negative findings on the basis of any Single Audit (or its equivalent) submitted by the institution.

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