Federal Compliance Filing by Institutions
Effective September 1, 2020–August 31, 2021

Institutions should answer the questions below. The Federal Compliance Overview provides information about the applicable HLC policies and provides an explanation of each requirement. Please review the aforementioned Overview in its entirety prior to completing this Filing.

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 familiar with the full and current text as well as the significance of those regulations, and that it is in compliance at all times with such regulations, as they may from time to time be updated.

Submission Instructions
This form and, if applicable, Appendix A 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 filing, including Appendix A (if applicable), should not exceed 250 pages.

Institution name: Xavier University

1. Assignment of Credits, Program Length and Tuition

Provide web addresses to the following:

- Policy (or set of policies) and procedures for assignment of Credit Hour for all types of courses, disciplines, programs, credential levels, formats, regardless of modality.

- Course or program credit assignment procedures. (Note: The Federal Compliance reviewer will contact the institution’s Accreditation Liaison Officer after the Federal Compliance materials are
received to request a sample of course and program materials. The purpose of the representative
development 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/policies:

Link:

https://catalog.xavier.edu/content.php?catoid=33&navoid=1938 (Requirements for Programs)
https://catalog.xavier.edu/content.php?catoid=33&navoid=1902#credit-hours-semester

Provide the web address to relevant procedure(s):

Link:

2019-2020 Undergraduate Tuition and Fees
2019-2020 Graduate Tuition and Fees
https://www.xavier.edu/tuition-fees/policies

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

Procedures for Review and Verification of Credit Hour & Academic Term Length

Courses

At Xavier University, the number of credit hours awarded depends on the course workload, the
amount of formalized instruction, and the amount of student study/preparation time. A semester
course typically requires two units of student study/preparation time for every one unit of formalized
instruction.

The academic department submitting course proposals is responsible for ensuring that the course
contains sufficient minimum contact hours, including both direct instruction and independent student
work, as appropriate for course type and proposed credit hours. The college curriculum committee is
responsible for reviewing the sample syllabi submitted as part of the course proposal for new
courses, including an audit of contact hours to ensure compliance with the university credit hour
policy.

Section Offerings of Courses

The academic department is responsible for the initial development of the schedule of section
offerings each term and ensuring that the duration and frequency of each section meets the minimum
requirements for direct instruction as appropriate based on course type and credit hours earned. The
Dean’s Office of each college is responsible for the preliminary review of the schedule of classes
each term. Part of their review is an audit to ensure each section meets contact hour minimums. The
Office of the Registrar conducts an audit of the scheduled contact hours prior to publishing the
schedule of classes each term. Sections offered in an accelerated format must contain the same total
hours (contact hours, study/preparation time, content, and requirements) as the same course offered
in a standard full-term semester.
Length of Standard Academic Terms

The University Calendar Committee is responsible for planning the university’s academic calendar. They take into account relevant academic and logistical concerns, including the inclusion of sufficient class days to meet contact hour minimums of direct instruction for standard full-term meeting patterns.

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


2. Institutional Records of Student Complaints

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

Link:
https://www.xavier.edu/dean-of-students/student-complaint-procedure

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

Link:
https://catalog.xavier.edu/content.php?catoid=33&navoid=1902#grade-grievance-procedure

https://www.xavier.edu/titleix

https://www.xavier.edu/disability-services/grievance

https://www.xavier.edu/policy/hcap/index

Posted in the online course site:

Xavier University strives to provide the highest quality educational experience for all of its students. However, if a conflict does arise, students are encouraged to reach out to the appropriate personnel to discuss concerns, grievances and complaints. Issues related to academic courses should be raised first with the instructor, then the instructor’s department chair and finally the instructor’s dean, if necessary. Issues related to sex discrimination should be filed with the Title IX Office.

If an issue cannot be resolved by Xavier University’s internal processes, students in online courses in SARA states (Links to an external site.) may choose to file a complaint with the Ohio Department of Higher Education (Links to an external site.). Students in states not participating in SARA may appeal to their state of residence. Click here (Links to an external site.) to find the contact information for each state agency that would handle the complaint.
3. Publication of Transfer Policies

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

Link:

https://www.xavier.edu/registrar/transfer-work-policies-and-practices

https://catalog.xavier.edu/content.php?catoid=33&navoid=1902#Courses_at_Other_Institutions

https://www.xavier.edu/adult-and-professional/transfer-credits/index#Transfer_Credit_Policies

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:

https://www.xavier.edu/registrar/registration-information/index#Consortium

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.xavier.edu/registrar/transfer-work-policies-and-practices

https://tes.collegesource.com/publicview/TES_publicview01.aspx?rid=32a4c0f0-8dbb-4e35-ab15-681b09279fb0&aid=23fc213f-b427-4922-8b39-0b4fecca85b7

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

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

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

There are a number of methods that are used at Xavier to help verify the identity of a student who is participating in an online course.

1. Xavier University’s Learning Management system (Canvas) requires a user id and password in order to access.
2. The LMS site includes a statement regarding academic honesty and is limited to those who have been given a student log-in code.
3. Student logins in Canvas are created as a result of an interface with our Banner Student Information System.
4. Students only have access to the course for which they are currently registered. Each course has a default begin date and a default end date that coincide with the course dates provided in Banner by the Registrar’s Office.
5. A user account will be locked if more than 10 unsuccessful attempts in a row are made to log into the LMS. The user must call the in order to reactivate a suspended account. Locked accounts can be unlocked by answering 3 security questions or calling the Xavier Help Desk (513-745-4357).
6. In order to change a password for an account that has not been suspended, the user must either know the current password or be able to answer three security questions that the user answered when his or her Xavier account was created.
7. Faculty members are given strategies within the Introduction to Online Course Design (IOCD) training, required when faculty develop their first online course, as well as ongoing support after IOCD, for preventing academic dishonesty within their online courses. These strategies include setting time limits on exams, randomizing test questions and/or text responses, delaying student access to results, increasing complexity of assignments, monitoring students taking exams using web cameras, and using proctored testing centers. IOCD participants are also given language on University policies related to plagiarism and copyright to include in their course syllabi and their Start Here page.
8. Faculty are given the option of requiring test proctoring for individual exams. Xavier has contracts with ProctorU and Respondus Monitor to facilitate this process.

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

Students’ protected information is located primarily in the Banner student information system, but also exists in several auxiliary systems. The security of all information systems is overseen and ensured by our Information Technologies division. Access to the information is restricted to the specific user accounts of those with a need to know in order to accomplish their job duties. Educational records and information that is classified as non-directory information under FERPA are not publicly released without the consent of the student. Students have the option to also restrict the public release of their information classified as directory information.
Are there any additional costs (e.g., fees associated with test proctoring) charged directly to the student because of this method?

- [x] Yes  
- [ ] No

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

When faculty choose to require proctoring for online exams, this is disclosed on the syllabus. There is also a notification within the schedule of classes for sections that have additional costs.

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

Link:

https://www.xavier.edu/registrar/registration-information/index#Course_Fees_Additional_Costs

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

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

### 5. Publication of Student Outcome Data

If an institution uses student outcome data in any marketing or recruitment content, the institution must make that data easily accessible to the public through its 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. The data 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.

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

- [x] Yes  
- [ ] No

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

Link(s):

https://www.xavier.edu/student-outcomes/index

https://www.xavier.edu/consumer/student-outcomes

https://www.xavier.edu/institutional-research/reports-and-documents/interactive-university-factbook/index

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

*Related HLC Requirement: Assumed Practice A.6.*
6. Standing With State and Other Accrediting Agencies

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

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.

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

Link:

https://online.xavier.edu/state-authorization/
https://www.xavier.edu/consumer/information/institutional-profiles
https://www.xavier.edu/consumer/information/accreditation-approval-and-licensure-of-institution-and-programs
https://nces.ed.gov/collegenavigator/?q=xavier&s=all&id=206622#accred
https://catalog.xavier.edu/content.php?catoid=33&navoid=1948

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


Additional Documents

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 (including limitation, suspension or termination actions by the Department; letter of credit requirements, fines or heightened cash monitoring imposed by the Department; or other negative findings on the basis of any OMB Circular A-133 [Single Audit] submitted by the institution) and any reports issued by the institution, if applicable, demonstrating the institution’s improvement efforts in response to such communications.
Appendix A – Not applicable