



Federal Compliance Filing by Institutions

Effective September 1, 2022–August 31, 2023

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, any required attachments 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 300 pages.

Institution name: **Central Lakes College**

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 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/policies:

Link: <https://www.minnstate.edu/board/procedure/336p1.html>

Provide the web address to relevant procedure(s):

Link: <https://www.minnstate.edu/board/procedure/336p1.html>

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

Central Lakes College (CLC) complies with the policies and procedures prescribed by the Board of Trustees of the Minnesota State (MnState) system. CLC maintains an academic program inventory under the purview of the Vice President of Academic and Student Affairs, and through the processes for academic review established by the Academic Affairs and Standards Council (AASC) of CLC.

To verify the length of academic period and compliance with credit hour requirements, CLC adheres to its [Course Scheduling Guidelines](#), which is publicly available on its website, and provides faculty and administrators clear parameters when constructing course schedules. As faculty and administrators construct course schedules, they use these Guidelines to determine mode of delivery, credit and contact hour requirements for lecture and lab courses, as well as to review the scheduling matrix to help determine standard times for courses. The Guidelines also include directions to create course notes to inform students of section-specific information such as special course fees or course materials.

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

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

Links:

<http://www.clcmn.edu/college-policies/3-8-student-complaints-and-grievances-policy-2/>

<https://www.minnstate.edu/board/policy/308.html>

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

Link: <http://www.clcmn.edu/complaint/>

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

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

Link:

- Undergraduate Course and Credit Transfer and Minnesota Transfer Curriculum—Minn State Policy <https://www.minnstate.edu/board/policy/321.html>
- Transfer of Undergraduate Courses, Credit, Associate Degrees and Minnesota State Transfer Curriculum—Minn State Procedure <https://www.minnstate.edu/board/procedure/321p1.html>
- Minnesota State Transfer Curriculum Instructions—Minnesota State Procedure <https://www.minnstate.edu/board/procedure/321p1g1.html>
- Transfer Pathways <https://www.minnstate.edu/board/procedure/321p1g3.html>

Provide the web address where the public can access a list of all 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.mntransfer.org/transfer/tools/t_artagreements.php?numResults=25&archive=false&from_inst=57&from_prog=&to_inst=&Search=Search

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: <http://www.clcmn.edu/transfer-information/>

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?

CLC verifies the identify of students enrolled in online classes with a secure log in. Online students log into D2L, the Minnesota State learning management system, with their StarID and StarID password. Students create their StarID and password when enrolling into the college. They register for a class (in e-services) and log into D2L using the same StarID and password. When creating a StarID or resetting a password, to verify a student's identity, the system uses a student's record in ISRS, which is the Minnesota State student data platform.

In addition to secure log in, faculty members use a variety of student authentication strategies throughout the semester, which include: use of proctored exams, on-going engagement strategies including quizzes and discussion board posts, student advising sessions, virtual office hours, and plagiarism awareness training and monitoring. Faculty engagement with each student provides a level of recognition and understanding of student capabilities throughout the course, leading to red flags if students perform far better (or worse) than expected.

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

The Minnesota State system, which includes CLC, moved to using a "meta-ID" (StarID) for everyone to provide a single identity to be used across the system for all students. Whether it be grades, email, student portal, or signing up for courses, everything uses a single login that the student has for life. This provides a consistent way to contact and support our students. The StarID is a user name that is used across Minnesota State to access information technology systems and services. Using any part of a student name, college, university, Tech ID, or D2L user name is not possible because these identifiers may be duplicated across institutions and because of increased privacy requirements and laws such as FERPA. The StarID is never duplicated and never re-assigned. This means that once issued, students use the same StarID every time they visit a participating institution over the lifetime of their relationship with Minnesota State.

Benefits of StarID:

- Non-name based identifiers will not have to change if a name changes.
- Non-name based identifiers avoid privacy issues (e.g. FERPA, HIPAA).
- Non-name based identifiers do not have name collision problems.
- A consistent format prevents the need for "filler" characters that may result in an undesirable identifier.
- A consistent eight-character length facilitates ease of integration with legacy systems. Legacy systems can generally accommodate an eight-character identifier, but seldom one that is longer than eight characters.
- An eight-character identifier is easier to remember than one that is longer.
- A consistent, randomly generated, eight-character credential will never need to change and can therefore be assigned to one person for the duration of the person's affiliation with Minnesota State.

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 the CLC website, the cost of web-based courses and hybrid courses is disclosed to students and the public. Additionally, if a specific course has additional fees, such as proctoring or other costs, students and the public can view this information on the eServices page, when looking at the current course schedule. Each section, under the Tuition and Fees heading, includes the exact cost of tuition and additional fees associated with that particular course, whether it is online, hybrid, or traditional in-person.

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

Links:

<http://www.clcmn.edu/business-office-2/tuition-and-fees/>

<http://www.clcmn.edu/testingcenter/>

<http://www.clcmn.edu/financial-aid/>

<https://eservices.minnstate.edu/registration/search/basic.html?campusid=301>

Example Course:

<https://eservices.minnstate.edu/registration/search/detail.html?campusid=301&courseid=00001&ytr=20235&rcid=0301&localrcid=0301&partnered=false&parent=search>

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

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

5. Protection of Student Privacy

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

Links:

* HLC's Board of Trustees will consider [proposed revisions to this policy](#) on second reading at their June 2022 meeting. If adopted, the revised policy will be effective immediately.

<http://www.clcmn.edu/college-policies/3-2-1-student-data-integrity-ferpa-and-mgdpa-policy-and-procedures-2/>

<http://www.clcmn.edu/college-policies/1c-5-employee-data-integrity-policy-2/>

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

Links:

<http://www.clcmn.edu/college-policies/3-2-1-student-data-integrity-ferpa-and-mgdpa-policy-and-procedures-2/>

<http://www.clcmn.edu/college-policies/1c-5-employee-data-integrity-policy-2/>

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:

CLC ensures timely training and adherence to employees and third-party contractors in multiple ways:

1. All CLC employees must complete required compliance training entitled "Public Jobs Private Data training for Minnesota State" via the Minnesota State Learning Management System (LMS). This LMS tracks each employee's progress, and the CLC Human Resources department follows up with employees to ensure timely completion of this training.
2. All third-party contractors who provide services to the college must complete Minnesota State contracts/agreements/memoranda of understanding that include requirements for compliance with Minnesota State data privacy. In a standard contract for services, the third-party agrees to the following:

The requirements of Minnesota Statutes § 13.05, subd. 11 apply to this contract. The Contractor and Minnesota State must comply with the Minnesota Government Data Practices Act, Minnesota Statutes Chapter 13, as it applies to all data provided by Minnesota State in accordance with this contract, and as it applies to all data, created, collected, received, stored, used, maintained, or disseminated by the Contractor in accordance with this contract. The civil remedies of Minnesota Statutes §13.08 apply to the release of the data referred to in this clause by either the Contractor or Minnesota State.

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

Related HLC Requirements: Recruiting, Admissions and Related Institutional Practices (CRRT.C.10.010), Practices for Verification of Student Identity (FDCR.A.10.050), 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,

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

No

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

Link(s):

<http://www.clcmn.edu/student-success/>

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 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.

The following programs have received specialized accreditation for program-specific accrediting agencies:

Central Lakes College embraces specialized program accreditation, as evidenced by CLC's Academic Master Plan, Strategic Direction 1.1. The college holds specialized accreditation, certification, or recognition for the following programs:

- Automotive Technology – Automotive Service Excellence (ASE) Accreditation through 6/1/2027
- Dental Assisting – Commission on Dental Accreditation (CODA), since 1967, was last accredited in January 2020. The next visit is in 2026.
- Diesel and Heavy Equipment Technician – Associated Equipment Distributors (AED), accredited since 2014, accredited in 2019, subsequent evaluation in 2024.

- Medical Assistant – Commission on Accreditation of Allied Health Education Programs (CAAHEP), accredited since 2011, reaffirmed in 2016, continuing accreditation in 2021, and subsequent evaluation in 2028.
- Nursing Associate degree – the Minnesota Board of Nursing approves the Nursing program; the CLC associate degree in Nursing is accredited by the National League for Nursing Commission for Nursing Education Accreditation (NLN CNEA). The most recent accreditation was affirmed in June 2019. The next evaluation is in 2025.
- Practical Nursing – the program is approved by the Minnesota Board of Nursing. The CLC Practical Nursing diploma program was accredited by the National League for Nursing Commission for Nursing Education Accreditation (NLN CNEA) in June 2019. The subsequent evaluation is in 2025.

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:

HLC:

<http://www.clcmn.edu/hlc-accreditation/>

CNEA:

<http://www.clcmn.edu/nursing-rn-a-s-degree-2/>

<http://www.clcmn.edu/nursing-a-s-mobility/>

<https://cnea.nln.org/accredited-programs#MINNESOTA>

ASE:

<http://www.clcmn.edu/automotive-technology-a-a-s-degree/>

<https://aseeducationfoundation.org/find-a-program>

CODA:

<http://www.clcmn.edu/dental-assisting-a-a-s-degree-2/>

<https://coda.ada.org/en/find-a-program/search-dental-programs#q=Brainerd&t=us&sort=%40codastatecitysort%20ascending>

AED:

<http://www.clcmn.edu/diesel-equipment-technician-a-a-s-degree-2/>

<https://aedfoundation.org/wp-content/uploads/2021/03/AED-Accredited-Recognized-School-List-2-10-2021.pdf>

CAAHEP:

<http://www.clcmn.edu/medical-assistant-diploma-2/>

<https://www.caahep.org/students/find-an-accredited-program>

NACEP:

<https://www.nacep.org/docs/accreditation/Website/NACEP%20Accredited%20Programs%20Updated%202021-22%20v3.pdf>

<http://www.clcmn.edu/college-in-the-schools-cis/college-in-the-schools-students/>

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

Related HLC Requirements: HLC Policy FDCR.A.10.090, Core Component 2.B; Assumed Practices A.7, C.4.

8. Recruiting, Admissions and Related Institutional Practices

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

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.

Recruitment

CLC Recruitment, Marketing, and Financial Aid staff adhere to the core values of Ethical Practice in College Admission set forth by The National Association for College Admissions Counseling. These core values align with CLC's values, which is to represent CLC in an honest and transparent manner while providing guidance and accurate information to prospective students and families in the transition to postsecondary education. Under no circumstances will any CLC staff use high-pressure tactics to get a student to enroll or matriculate, or register a student in the next term without that student's affirmative consent to such registration.

CLC's Recruitment, Marketing, and Financial Aid staff adhere to the same policies and codes of conduct as all Minnesota State and CLC employees; this is completed via the Minnesota State learning management system, which includes training about Code of Conduct, FERPA, private data practices, respectful workplace, sexual harassment, as well as workplace safety. New staff continue to receive mentoring throughout their first year of employment related to FERPA and fair practices in regards to prospect communications. The Director of Admissions and Recruitment and seasoned Recruitment staff will provide mentoring on these communications which are including, but not limited to, direct conversations, (group and individual), phone, web and email communications.

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

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

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 Single Audit or its equivalent submitted by the institution) and

any reports issued by the institution, if applicable, demonstrating the institution's improvement efforts in response to such communications.