



CHAPTER 11

“The University of Wyoming is dedicated to fulfilling the requirements of the Higher Education Opportunity Act of 2008. To that end, we have established systems for review and implementation of current policies and procedures to ensure that we meet both the letter and spirit of the act.”

—Sara Axelson,
Vice President for Student Affairs

Compliance with Federal Regulations

The University of Wyoming qualifies for a variety of federal financial aid programs and grants programs, in part due to its affiliation with the Higher Learning Commission (HLC). The university is fully committed to complying with the requirements of the HLC and federal law. This chapter provides an overview of the practices, policies, and documentation of requirements for federal compliance, including those policies required by the Higher Education Opportunity Act of 2008 as described in the HLC document entitled Federal Compliance Program 2009-2010. Additional documentation for all of the requirements discussed in this chapter will be available to the team in the resource room.

CREDITS, PROGRAM LENGTH, AND TUITION

The University of Wyoming *General Bulletin* outlines the requirements established by the faculty for completion of baccalaureate and graduate degrees. Program-specific degree requirements are also published in the bulletin, along with more general requirements. In order to address educational goals, nearly all undergraduate programs and the majority of graduate programs have clearly established learning outcomes listed in the bulletin and on department Web sites.

The minimum credit hours required for awarding a baccalaureate degree is 120. The general basis for one credit is 15 contact hours of formal instruction, delivered on the average of one hour per week in a 15-week semester, a typical Carnegie unit. Focused undergraduates who pursue full-time study should be able to complete the baccalaureate degree in four years by taking an average of 15 to 16 credits per semester.

The number of semester credit hours required for the majors are consistent with good practices in higher education. Nearly all the programs in the Colleges of Business, Education, Engineering and Applied Science, Health Sciences, and Law are accredited by professional accrediting bodies. This accounts for more than half of the university's programs. Part of this accreditation considers the semester hours required for each program.

As specified in API, the university conducted an internal review of required credit hours by program, establishing a target ceiling of 128 credits in order to ensure more consistent standards across the university. Nearly all programs now comply with this limit. A few programs in the College of Education are exceptions, partly due to accreditation and certification constraints, and partly due to the college's requirements that secondary education majors complete a concurrent major in their content area. These programs warrant continued attention since maintaining appropriate accreditations is necessary.

As mentioned in previous chapters of the self-study, resident undergraduate tuition and fees at the University of Wyoming are the lowest of any U.S. public, doctoral institution. Likewise, resident graduate tuition and fees rank 145th out of 152 at such institutions.

Law, PharmD, and the MBA programs are the only programs for which differential tuition is charged. The tuition and fees for these programs rank low, falling below the 15th percentile for both residents and non-residents. At the Board of Trustees meeting in March 2005, the Board of Trustees approved a policy statement regarding the principles for the design and implementation of differential pricing mechanisms. In summary, differentials must consider the following: programmatic goals and objectives; base tuition and full cost of attendance; importance of access to education; significance of revenue generation and return of revenue to the program; and market position. Differentials should not be used at the undergraduate level and should be avoided as an enrollment management tool.

The university is currently instituting a multi-year approach to tuition increases to address specific institutional needs. This approach has the additional advantage of giving students a chance to plan for costs in the future.

STUDENT COMPLAINTS

The Student Handbook and Planner, available to all students, encourages students to first attempt resolution of concerns with the person or office involved in the following statement: "We recommend that if you have a problem, take it directly to the faculty member, department head, dean, or director/manager of the unit involved." Most minor complaints are readily resolved in this manner.

More formal and unresolved complaints from students and other stakeholders are directed to a variety of places depending on the nature of the complaints. Among the offices that handle such complaints are the president, academic affairs, student affairs, and administration, and when appropriate to the offices of academic deans, and other university officers. The recipient of a complaint either responds directly and copies pertinent university officers, or directs the complaint to the appropriate office for resolution and

the response. Documentation of substantive formal student complaints and the institutional response is recorded in a database in student affairs. A file of the aggregated student complaints, response, and resolution for the past three years is available in the resource room.

TRANSFER POLICIES

Chapter 5 of the self-study provides an overview of the programs supported by the university to facilitate efficient transfer from postsecondary institutions. Specific policies published in the *General Bulletin* and on the university Web site are described in this section.

The University of Wyoming accepts transfer courses for credit from regionally accredited institutions that are college-level, non-technical in nature. Remedial courses, as well as technical courses, are generally not transferable. There are two exceptions. Technical courses may be accepted for transfer into two degree programs: the Bachelor of Science in Industrial Technology offered at the University of Wyoming Casper College Center and the Bachelor of Applied Science in Organizational Management. This policy is published on the transfer credit page on the Office of the Registrar Web site.

The university established a general education articulation agreement with the seven Wyoming community colleges in 2001. Under this agreement, students who earn an associate's degree at a Wyoming community college and complete three additional mathematics credits transfer to the University of Wyoming having fulfilled the university's lower division general education requirements. The university recently reached a similar agreement with Pikes Peak Community College in Colorado.

The University of Wyoming follows American Association of Collegiate Registrars and Admissions Officers (AACRAO) guidelines for acceptance of credit and degrees from international institutions. AACRAO publications and the AACRAO Edge Web site are used to determine the degree equivalencies, credit hours, grading scale, and acceptance. It is left to academic departments to determine degree applicability for international credit, including study abroad. Staff in the Office of the Registrar work closely with faculty and specialists in international programs, international students and scholars, and the academic departments in order to determine appropriate transfer of credits and degrees.

VERIFICATION OF STUDENT IDENTITY IN DISTANCE OR CORRESPONDENCE EDUCATION

The University of Wyoming Outreach School delivers approximately 30 undergraduate and graduate degree and certificate programs at a distance. A list of these programs can be found on the Outreach School's Web site. Several delivery systems are employed, and include correspondence, audio conferencing, video conferencing (referred to as the Outreach Video Network, or OVN), and Web-based delivery methods. With Web-based delivery, the university offers completely online courses and programs, Web-assisted components of correspondence, audio, and video conferencing courses, and a hybrid course approach in which part of the course is solely online and the remainder involves other modalities.

The Outreach School provides for a system of secure personal log-in and password access, provided by the eCollege course management system, for Web-based courses. Online testing services, also facilitated through the eCollege course management system, require the secure personal log-in and password access. In cases where site-based testing is required, proctors obtain picture ID verification of all students. The Outreach School also maintains a testing policy manual and provides it to proctors to promote and maintain the integrity of testing processes.

The Outreach School will continue to explore the possibilities of using non-intrusive forms of identity verification (i.e., avoiding the use of Web cameras, retinal scans, or thumbprint scans). Possibilities include the Kryterion system, which verifies identity through keystroke pattern analysis, and Axicom, which verifies identity through questions about personal data. In regards to testing integrity, the Outreach School will be pilot testing eCollege's ExamGuard system in spring 2010 with selected School of Nursing courses. This system provides for lockdown browser capability, so that students at testing sites or at a distance will be unable to seek help from other sources via the Internet during testing or to copy and distribute tests afterwards.

TITLE IV PROGRAM AND RELATED RESPONSIBILITIES

The university participates in all Title IV student financial aid programs except the Federal Direct Loan Program. Supplemental materials including the Eligibility and Certification Approval Report, the Program Participation Agreement, letter of approval from the U.S. Department of Education, and information on student awards are available in the resource room.

General program responsibilities and financial responsibility requirements (1 & 2)

The U.S. Department of Education (ED) reviews the single audit report of the University of Wyoming each fiscal year. The audit report is prepared by an independent professional audit firm in accordance with the Office of Management and Budget Circular A-133. Upon completion of its review, ED issues a letter advising the university of the final audit determination concerning the portions of the audit report that relate to the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended (Title IV, HEA programs).

ED reviews corrective action plans designed by university management to address audit findings and significant deficiencies or material weaknesses in the internal control system over major programs such as Title IV financial aid. ED reminds the university that it must take the necessary actions to correct all of the deficiencies noted in the audit report, even if the final determination letter does not address each of the auditor's findings. As required by Sections .315(b) and .320(c) of OMB Circular A-133, the university prepares and submits a Summary Schedule of Prior Audit Findings in each year's single audit report package. The external auditors comment on all actions taken to correct each finding. It

is through this process that the auditors may identify repeat findings from a prior year. The University of Wyoming administration takes repeat findings very seriously, as ED may initiate adverse administrative action if the university fails to satisfactorily resolve any findings.

ED has raised no specific concerns about unresolved findings and no adverse administrative action has ever been initiated. However, audits of fiscal years 2008 and 2009 both contain repeat findings. The university has undertaken an examination of the corrective action plans that were designed to correct the findings and these plans will be revised in order to achieve resolution of the repeat findings. The university's internal auditor will monitor all corrective action plan implementations throughout the year and provide quarterly updates to the university's Board of Trustees Fiscal and Legal Affairs Committee.

ED has not raised any concerns regarding the university's financial ratios. The university continues to have a strong and stable financial position even in the face of a global recession and budget reductions. Net assets have increased each year beginning with fiscal year 2003. This increase shows that the university continues to build upon its strong financial foundation. This financial health reflects the prudent utilization of financial resources, including careful cost controls, sensible management of its endowments and investments, and conservative utilization of debt.

Finally, during the past five years, the university had no ED program review or audits that required corrections or fines. The university has not been involved in any limitation, suspension, or termination (LST) of eligibility for federal Title IV programs.

Student loan default rate (3)

The most recent cohort default rate for the Federal Family Education Loan Program for fiscal year 2007 was issued in September 2009. The most recent three years' default rates are as follows:

- FY 2007 2.5%
- FY 2008 2.7%
- FY 2009 3.2%

No corrective plan is required for the university as the default rates are well below the thresholds for corrective action. The official notification letter from ED, dated September 2009, is provided in the resource room.

Campus crime information and related disclosure of consumer information (4)

Campus safety is highlighted on the university's Web site very prominently. Consumer information requested by Title IV is published annually in electronic and paper format, distributed widely to the student body and employees, and made available to prospective students and employees. The university has no findings with regard to consumer disclosures.

Satisfactory academic progress and attendance policies (5)

The university has established satisfactory academic progress (SAP) policies necessary for continued consideration for participation in student financial aid programs administered by the university's Office of Student Financial Aid (OSFA) in accordance with federal regulations. Calculation of SAP is determined by cumulative grade point average (2.0 minimum for undergraduates and professional students, 3.0 minimum for graduate students); completion of 67 percent of all credit hours attempted; and completion of the enrolled program in no more than 150 percent of the average length of the program enrolled. Detailed description of SAP is provided in the resource room.

The university does not require faculty to take classroom attendance. However, to meet the Title IV attendance measure, the OSFA contacts the faculty members teaching students receiving Title IV aid who are listed as receiving failing grades. Faculty are asked to report the student's last date of attendance using the best available evidence. Attendance records, assessment result data, and writing assignment responses by the student are all utilized, for example.

Contractual relationships (6)

The University of Wyoming does not have any relationships as defined by this requirement.

INSTITUTIONAL DISCLOSURES AND ADVERTISING AND RECRUITMENT MATERIALS

The university bulletin and recruitment materials identify the university as Accredited by the Higher Learning Commission, a member of the North Central Association. Over the past year, the Commission's mark of affiliation has been incorporated into the University of Wyoming Web site, materials for prospective students, and other appropriate promotional materials.

RELATIONSHIP WITH OTHER ACCREDITING AGENCIES AND STATE REGULATORY BOARDS

The university holds no accreditations with institutional accrediting agencies other than the Higher Learning Commission. A list of all programs holding disciplinary or professional accreditation, the schedule for reaccreditation, and the accrediting body are provided in the resource room.

PUBLIC NOTIFICATION OF AN EVALUATION VISIT AND THIRD PARTY COMMENT

A broad range of university constituencies were informed of the comprehensive visit for reaccreditation by the Higher Learning Commission. The constituencies were identified by the President's Executive Council, and included state policymakers, the Board of

Trustees, students, parents, alumni, college deans and advisory boards, the University of Wyoming Foundation Board, and others. Newspapers with state and regional circulation were employed to communicate with the various boards and constituent groups, as well as with the public at large.