Higher Learning Commission

Form

Federal Compliance Filing by Institutions

Effective September 1, 2024–August 31, 2025

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 requirements may, in some cases, exceed the requirements of 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 all such regulations, as they may be updated from time to time.

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 hlcommission.org/upload. Select the appropriate submission option from the list provided to ensure the documents are sent to the correct HLC staff member.

Institution name: **Eastern Iowa Community Colleges**

1. Assignment of Credits, Program Length and Tuition

Provide web addresses to the following:

- Policy (or 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 (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 (or policies):

Iowa Code 281, Chapter 21.2(12)

https://www.legis.iowa.gov/docs/iac/rule/08-29-2018.281.21.2.pdf

EICC Board Policy: 637

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6555&returnto=2119

Provide the web address to relevant procedure(s):

Administrative Procedure C4: Assignment of Credit Hour

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6560

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

Eastern Iowa Community Colleges' (EICC) Board Policy 637 and Administrative Procedure C4 establish clear standards for the definition and assignment of credit hours to ensure that the institution meets federal, state, and accreditation requirements. EICC's credit-bearing courses, regardless of delivery method, are scheduled and conducted aligned with the federal definition of a credit hour and Iowa Code 281, Chapter 21.2(12). In cases where federal and state definitions differ, EICC complies with the most restrictive definition.

The Higher Learning Commission (HLC) requires that institutions translate learning experiences with commonly accepted practices in higher education, ensuring that credit hours align with program length and tuition costs. EICC notifies HLC of any significant changes in these relationships, and all credit hour assignments conform to accepted academic practices. For

institutions participating in Title IV federal financial aid, policies for determining credit hours must also comply with federal definitions.

At EICC, a credit hour generally includes one hour of classroom instruction and two hours of out-of-class work each week for approximately 16 weeks, or an equivalent amount of work distributed over a different timeframe. This definition also applies to laboratory work, internships, clinical practice, and other academic activities leading to the award of credit hours.

In accordance with Iowa Code 281, Chapter 21.2(12), EICC's policies define methods for equating alternative instruction to credit hours, ensuring that students achieve the same outcomes as they would in conventional courses. The minimum requirements for one semester hour of credit include 800 minutes (16 contact hours) of classroom instruction, 1,600 minutes (32 contact hours) of laboratory work, 2,400 minutes (48 contact hours) of clinical practice, and 3,200 minutes (64 contact hours) of work experience.

EICC employs the Course Development Model (CDM) to standardize curriculum across all delivery methods, including accelerated courses, hybrid courses, synchronous and asynchronous distance education, and self-paced instruction. The CDM outlines course descriptions, student learning outcomes, and instructional topics, ensuring consistency regardless of format.

Credit hours are assigned during the course development process, with the Divisional Dean, Department Coordinator, faculty, and Dean of Curriculum and Concurrent Enrollment collaborating to ensure compliance with state and federal regulations. Discipline faculty review credit hour assignments for appropriateness during program reviews, course updates, and accreditation visits.

EICC's robust review process, which includes input from advisory boards and compliance with the Liaison. Advisory Committee on Transfer Students (LACTs) agreement and Iowa transfer major frameworks, ensures that all courses, regardless of instructional method, maintain the same high standards for credit hour assignment and student outcomes.

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.

Link:

EICC Board Policy 578: Address Complaints

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6554&returnto=2119

EICC Board Policy 522: Sexual Misconduct Policy

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6554&returnto=2119

EICC Board Policy 520: Behavior and Discipline – Orderly Conduct

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6554&returnto=2119

Academic Dishonesty

https://catalog.eicc.edu/content.php?catoid=41&navoid=2233

Non-Discrimination, Anti-Harassment

https://catalog.eicc.edu/content.php?catoid=41&navoid=2228

Sexual Misconduct Policy (Title IX)

https://catalog.eicc.edu/content.php?catoid=41&navoid=2229

Student Conduct Violations

https://catalog.eicc.edu/content.php?catoid=41&navoid=2232

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

Link:

Student Handbook 2024-2025 Student Complaint Procedure

https://catalog.eicc.edu/content.php?catoid=41&navoid=2227

Complaint Form and Information:

https://cm.maxient.com/reporting.php?EasternIowaCC

Administrative Procedure: B8 Student Rights and Responsibilities

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6559

Administrative Procedure: B9 Non-Discrimination/Anti-Harassment

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6559

Administrative Procedure: B10 Sex Discrimination/Sexual Harassment (Title IX)

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6559

Administrative Procedure: C21 Final Course Grade Appeal Process

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6560

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:

EICC Board Policy 612: College Transfer Program

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6555&returnto=2119

College Catalog: Academic Information: Transfer Credit

https://catalog.eicc.edu/content.php?catoid=30&navoid=1912

Administrative Procedure C5: College Transfer Program

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6560&returnto=2119

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(s) 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:

EICC Webpage: Transfer Path

www.eicc.edu/transfer

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:

EICC Website: Transfer Path. Focus on transferring to other colleges

www.eicc.edu/transfer

EICC Website: Transfer Prior College Work

https://eicc.edu/admission-aid/applying-enrolling/cpl/transfer-prior-college-work.aspx

EICC Website: Campus Resources Registration and Records: Request an EICC Transcript Evaluation Highlights Process to transfer credits into EICC.

https://eicc.edu/services-support/campus-resources/registration-records/

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

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

Per the college's administrative procedure B27 on Student Identity Verification:

EICC verifies that a student who registers for a credit-bearing online or distance education course or program is the same student that participates and completes the course for academic credit. All methods of identity verification used by EICC are designed to protect student privacy.

The college uses unique usernames, secure passwords, and a multi-factor authentication (MFA) process for student identity verification beginning with the admissions process. Students create their own passwords and are responsible for maintaining the confidentiality of their password in accordance with the college Technology Usage Policy. Students use their unique username, password, and MFA combination to access EICC Connect, the college intranet, as well as the EICC LMS, college email, student planning, and registration modules, and all academic records.

Students receive a handout or email containing instructions for first accessing their student account upon admission to the college. From there, they are guided through the steps for establishing a secure password, implementing MFA and accessing the LMS and other electronic resources.

The EICC selected Learning Management System (LMS) is Canvas. All EICC courses, regardless of the mode of delivery, are provisioned with a Canvas course shell. Instructors must use the EICC LMS. The EICC Department of eLearning and Instructional Technology provides technical and pedagogical support for Canvas use.

Students and instructors are required to use the secure EICC login combination of a username, secure password, and MFA to access Canvas. This serves as verification of the identity of the student completing online coursework.

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

Per the College's Procedure:

Confidentiality of Student Records

EICC includes statements about the confidentiality of student records in the student handbook, shared with all enrolled students. The protection of identification data is explicitly included in the Confidentiality of Student Records section, a portion of which is excerpted here:

- The College collects and maintains records on each student to facilitate their instruction, guidance, and educational progress. The records contain information about students and their education and may include, but are not limited to, the following types of information: identification data, attendance data, record of achievement, educational and vocational plans, honors and activities, discipline data, objective advisor or teacher ratings and observations, and external agency reports.

Are there any additional costs (e.g., fees associated with test proctoring) charged directly to the student because of this method?

☐

☒ **No**

EICC students incur no additional charges associated with identity verification. However, any additional charges related to any specific course, such as eTextbook charges or special fees, are noted on the section schedule page, which the student accesses before registration.

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

N/A

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

Link:

N/A

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

Provide the web address to the institution's policy(ies) governing student privacy and the privacy and security of student data, including student records.

Link:

Student Handbook: Confidentiality of Student Records

https://catalog.eicc.edu/content.php?catoid=41&navoid=2209

Administrative Procedure B 7 - FERPA/Confidentiality of Student Records

https://catalog.eicc.edu/preview_program.php?catoid=39&poid=6559

Consumer Information- Privacy Policy:

https://eicc.edu/about/consumer-information/privacy.aspx

Consumer Information – FERPA
https://eicc.edu/about/consumer-information/ferpa.aspx

Administrative Procedure D7: Information Systems Procedures: Passwords

Program: Section D7 - Information Systems Procedures

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

Link:

Confidentiality of Student Records

https://catalog.eicc.edu/content.php?catoid=32&navoid=1969

Privacy Policy

https://eicc.edu/about/consumer-information/privacy.aspx

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:

Eastern Iowa Community Colleges (EICC) ensures that all employees and third-party contractors acting on its behalf receive timely training and adhere to institutional policies related to confidentiality, FERPA, and privacy. New employees must complete mandatory FERPA training before gaining access to student records, ensuring that they understand the importance of safeguarding sensitive information from the outset. All employees must participate in annual FERPA training to stay current with any changes in legislation or institutional policies. These trainings reinforce the college's commitment to protecting student records and maintaining compliance with federal and state regulations.

EICC integrates updates related to confidentiality and privacy into broader trainings including adjunct faculty orientation, frontline staff training, and other professional development sessions. Through these efforts, EICC creates a culture of accountability and vigilance in handling confidential information, aligning its practices with the privacy expectations outlined in its Website Privacy Policy, Consumer Information page, and the Student Handbook.

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 should include 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

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

Link(s):

The college provides Consumer Information at the following link:

https://eicc.edu/about/consumer-information/

This includes:

Academic Awards:

https://eicc.edu/pdf/2023-report-academic-awards-fy23.pdf

Financial Aid Demographics:

https://eicc.edu/pdf/2024-report-student-profile-fa-demographics-fy24.pdf

Equity in Athletics:

https://eicc.edu/pdf/report-eicc-ada-survey-2023.pdf

Fall to Fall Retention:

https://eicc.edu/pdf/2024-report-fall2022-fall2023.pdf

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Fall to Spring Retention:

https://eicc.edu/pdf/2024-report-fall-2023-spring-2024.pdf

Satisfactory Academic Progress:

https://eicc.edu/pdf/2024-report-outcomes-%20satisfactory-progress-fy24.pdf

Perkins:

https://iowastudentoutcomes.com/perkins

Iowa Board of Regents Community College Transfer Report
https://www.iowaregents.edu/reports/community-college-transfer-report-outcomes

Iowa Community Colleges Outcomes Dashboard
https://iowastudentoutcomes.com/college_program_outcomes_new

IPEDS Graduation Rate

https://eicc.edu/pdf/2024-report-ipeds-graduation-persistence-2020cohort.pdf

Student Body Profile:

https://eicc.edu/pdf/2024-report-02-student-profile-eicc-fy24.pdf

Program Licensure Pass Rates:

- Nursing https://eicc.edu/classes-programs/pathway/health/nursing/
- Radiologic Technology https://eicc.edu/classes-programs/pathway/health/radiologic-technology/ (Pass rates are on the Program Effectiveness repot linked to from the program page - Program Effectivness Data RAD RT MR 2021 (eicc.edu)
- Veterinary Technology https://eicc.edu/classes-programs/pathway/agriculture/veterinary-technician/
- EMS/Paramedic https://eicc.edu/classes-programs/pathway/health/emergency-medical/
- Health Information Management - https://eicc.edu/classes-programs/pathway/health/information-management/

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.

Iowa Department of Education. Community College Accreditation | Department of Education (iowa.gov)

Eastern Iowa Community Colleges participates in the State Authorization Reciprocity Agreements. EICC has been approved by the state of Iowa to participate in the National Council of State Authorization Reciprocity Agreement (NC-SARA). NC-SARA is a voluntary, regional approach to state oversight of postsecondary distance education. Iowa became a SARA state in 2015. Eastern Iowa Community Colleges became a SARA institution in June 2016.

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.

Eastern Iowa had a comprehensive state evaluation in October 2019 with full continued accreditation.

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).

- **Automotive Technology** – Automotive Service Excellence (ASE)
- **Cancer Information Management** – National Cancer Registrars Association (NCRA)

- **Dental Assisting** – The Commission on Dental Accreditation (CODA)
- **Diesel Technology** – Automotive Service Excellence (ASE)
- **Health Information Management** – Commission on Accreditation for Health Informatics and Information Management Education (CAHIIM): (Associated with AHIMA)
- **Heating, Ventilation & Air Conditioning** – HVAC Excellence
- **Paramedic** – Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions (CoAEMSP): (Associated with CEEHEP)
- **Radiologic Technology** – Joint Review Committee on Education in Radiologic Education (JRCERT)
- **Registered Nurse Program and Licensed Practical Nursing** – Iowa Board of Nursing (IBON)
- **Surgical Technology** – Accreditation Review Council on Education in Surgical Technology and Surgical Assisting (ARC/STSA): (Associated with CAAHEP)
- **Veterinary Technician** – AVMA Committee on Veterinary Technician Education and Activities (CVTEA)

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.

EICC has no pending actions.

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:

EICC Website Accreditation https://eicc.edu/about/accreditation.aspx

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

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.

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.

Eastern Iowa Community Colleges (EICC) ensures timely training and adherence to procedures through a comprehensive framework for onboarding, a mandatory training course, continuous professional development, and rigorous oversight of all employees and third-party contractors involved in recruitment, admissions, marketing, and financial aid.

EICC's Code of Conduct, as outlined in Administrative Procedure B 22, establishes ethical recruitment practices, emphasizing responsible, respectful, and transparent interactions with prospective and current students. Upon hiring, all relevant staff undergo training that covers the policy's provisions, federal compliance, and the Higher Learning Commission's assumed practices. Regular professional development opportunities, including sessions with the Iowa College Access Network and Federal Student Aid, keep employees informed of best practices and updates in the field. The college ensures that third-party contractors adhere to the same standards, with qualified EICC personnel overseeing their activities to ensure compliance.

Additionally, the policy mandates ongoing training and certification acknowledgments, holding all staff accountable through internal oversight mechanisms, disciplinary actions, and adherence to ethical guidelines from national organizations like NACAC.

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

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; and provide information 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.