Substantive Change Application Distance Education – 50% of Students or Courses

Directions: Complete each section, keeping narratives concise and direct. Should you have any questions, please contact substantivechange@accic.org and we will be happy to assist you.

Email completed application to substantivechange@accic.org.

Institution	Las Positas College				
name:					
Address:	3000 Campus Hill Drive, Livermore, CA 94551				
ALO name:	Nan Ho	Phone:	925.424.1103	Email: nho@laspositascollege.edu	

Select the type of Distance Education approval:

∑ 50 percent or more of all the institution's students enrolled in at least one course offered through distance education

∑ 50 percent or more of all the institution's courses available to be offered in the distance education modality

<u>493</u> Total number of courses in catalog | <u>254</u> Total number of courses, not sections, available to be offered in distance education modality

It is the institution's responsibility to demonstrate the effect of a substantive change on the quality, integrity, capacity, and effectiveness of the total institution. The substantive change process requires evidence of institutional planning, resource commitment to the proposed change, and evidence that following the change, the institution continues to meet the Eligibility Requirements, Accreditation Standards and Commission policies. References to the Accreditation Standards are intended to help provide the institution with a framework for its response, and along with the required documentation, align with federal regulations for accreditation standards¹. Your thorough responses to the questions below and submission of required documentation will assist ACCJC in making its determination.

Describe how the distance education modality is consistent with the mission of the institution	n
(Standard 1.1).	

¹ 34 CFR § 602.16(a)

<u>Mission Statement</u>: Las Positas College provides an inclusive, learning-centered, equity-focused environment that offers educational opportunities and support for completion of students' transfer, degree, and career-technical goals while promoting lifelong learning.

Distance education at LPC is consistent with the college mission, and the <u>Glossary of Selected Terms</u> that accompanies the mission statement provides proof.

- 1. Inclusive: All students, no matter their age, race, gender, socio-economic background, disability status, etc., are eligible to enroll in distance education courses.
- 2. Learning-Centered: The college offers <u>multiple modes of delivery</u> within distance education that fit students' preferences: asynchronous online, synchronous online, a combination of synchronous and asynchronous online, hybrid, and HyFlex courses.
- 3. Educational opportunities: The college includes distance education in its list of educational opportunities, along with library research, internships, field trips, etc.
- 4. Support: The college offers its academic, technical, and student support services online for distance education students.
- 5. Degree and career-technical: LPC offers distance education courses in all General Education areas and in many degree, transfer, and Career Technical Educational programs.

Describe how distance education will be integrated into the institution's regular review of relevant and meaningfully disaggregated data to evaluate its progress and inform plans for improvement and innovation (*Standard 1.3*).

Distance education data is disaggregated by success and retention rates and compared against corresponding rates of face-to-face classes. Success and retention rates are disaggregated further by distance education mode and compared against each other. Each semester's rates are reviewed and discussed by the Distance Education Committee, which, if necessary, will suggest ways to improve those rates.

Furthermore, as part of the college's annual academic program review process, each program reviews the disaggregated data supplied by the office of Research, Planning and Institutional Effectiveness. This data is available online as <u>discipline data packets</u> that give programs the ability to analyze and respond to disaggregated course success rates by program and by course for the last running five years. The data is then analyzed by distance education and non-distance education results.

Additional evidence:

- Distance Education Committee meeting minutes February 24, 2023
- <u>Distance Education Committee meeting minutes September 23, 2022</u>
- Discipline data packet: History

Describe how the distance education modality meets students and curricular needs and promotes equitable student learning and achievement (Standard 2.6).

Distance education at LPC meets students' and curricular needs by responding to student preferences and offering a variety of modes from which they can choose. According to the LPC Student
Experiences Survey results in Spring 2022, the majority of respondents who used services such as Admissions & Records, the Bookstore, the Financial Aid office, Counseling, the Library, etc., prefer that services be offered both in person and online. Furthermore, more students preferred that the

services be offered online only than in person only. In that same survey, 30% of students indicated that they preferred to take all of their classes online in Fall 2022, compared to 16% who preferred to take all of their classes in person. The rest (54%) preferred a combination of online and in-person classes. As a result, all student services are now offered online and in person, and the college offers courses in a variety of distance education modes: asynchronous online, synchronous online, a combination of synchronous and asynchronous online, hybrid, and HyFlex (the latter was introduced in Spring 2022).

What's more, students are also asked to rank the above five modes in terms of their preference. In the <u>Fall 2023 Distance Education Student Survey</u>, distance education students ranked asynchronous online as their top preference, outdistancing the others. It's no surprise that the college offers far more asynchronous online courses than courses in the other four modes because of the flexibility offered. When asked why they chose to enroll in a distance education class, 80% of students, in the fall 2023 survey, chose flexibility as the main reason.

Equitable student learning is promoted not just by meeting students' modality preferences, but also by the variety of learning activities and communication techniques that are present in distance education classes. These are meant to engage students in a variety of ways in order to meet diverse learning styles. They include using audio and video, discussions, and group work for instruction, along with web conferencing, chat, and email for communication. Faculty learn to deliver these methods while participating in the college's <u>Online Learning Development Program (OCDP)</u> and <u>HyFlex Training program</u>. Additionally, within the OCDP, and among the training topics offered by LPC's Teaching and Learning Center (TLC), are <u>workshops on web accessibility</u> so content within courses is ADA-compliant and, thus, accessible to students with disabilities.

As mentioned previously, achievement is measured by <u>success and retention rates at the macro level</u> and within individual programs. Students themselves are asked about the effectiveness of distance education. In the LPC Student Experiences Survey, 59% of students rated hybrid courses either very effective or extremely effective, followed by asynchronous online (58%), combination synchronous and asynchronous (53%), and synchronous (47%). In the Fall 2023 Distance Education Student Survey, when asked to rate their level of satisfaction with different components of online learning, 73% were mostly satisfied or very satisfied with the distance education program as a whole, 77% were mostly satisfied or very satisfied with the overall course quality, and 78% were mostly satisfied or very satisfied with overall course satisfaction. When asked if they would take another distance education course from LPC, 88% percent indicated that they would. Students also indicated (60%) that they learned about the same in their distance education classes than they would have in similar on-campus classes. Interestingly, 29% said they learned more in their distance education classes.

Describe how the institution designs and delivers equitable and effective services and programs (e.g., counseling, advising, tutoring, library, etc.) that support students in the distance education modality (Standard 2.7).

LPC offers in-person and online support services and programs to all students. These services and programs include Admissions & Records, Counseling, Disabled Student Programs and Services, Financial Aid, Library, Tutoring, and Veterans Services. Online delivery methods include the college website, the CLASS-Web student portal, the Canvas learning management system, and various other online platforms.

Some examples:

- The LPC Counseling Office has robust counseling services available to all students, including virtual drop-in and appointments available through <u>Cranium Café</u>, phone appointments, and email. Cranium Café is a real-time, online student contact platform in which all counseling related services are available. Available counseling services include career exploration, the development of Student Education Plans using <u>Degree Works</u> (an online degree audit and planning tool), transcript evaluations, and transfer counseling.
- Two tutoring links are embedded in the course navigation menu of every class in Canvas (all LPC classes have Canvas sites). One allows students to schedule an online tutoring appointment with a student tutor. It also allows students to access the Reading and Writing Center where they can drop off a paper to be reviewed by an instructor or just ask a question. Students can also access online tutoring via the Tutorial Center web site. The other link in Canvas sends students to the online tutoring service NetTutor.
- Aside from going directly to the <u>Library web site</u>, students can click a Library Resources link
 that is embedded in every Canvas class. The web site offers access to research resources, in
 addition to giving students the opportunity to chat live with a librarian or make an
 appointment for research help on Zoom. The Library Resources link takes students to a
 resources page customized for the class they are currently accessing.
- The <u>Computer Center</u> offers technical support to students at a distance. Students can receive drop-in help via Zoom, submit an online support ticket, or call the center. When the Computer Center is not open, students can access 24x7 chat assistance from Canvas by accessing the Help icon in the Canvas global navigation menu.

The above is complemented by various other services for distance education, including: a Student Support Hub (recently changed to Support & Belonging Platform) in Canvas that connects students to all services, an Academic & Career Pathways site in Canvas that aims to increase student success in college, a Quest for Online Success readiness tutorial in Canvas that aims to increase success in distance education classes, virtual online learning orientations, and Smart Shops that offer faculty-led virtual workshops on academic, transfer, and career topics.

Effectiveness of online services and programs is typically measured through satisfaction surveys. For instance, in the Fall 2021 Distance Education Student Survey, 62% of students had heard of online Counseling services and were either satisfied or very satisfied with them. That figure was 58% each for Admissions & Records and the campus bookstore. In 2022-23, 78% of students who used online tutoring services through the Tutorial Center indicated that they were pleased with the overall effectiveness of their experience. Students using NetTutor came in at a 68% rate. For that same academic year, 77% indicated that they felt either mostly prepared or very prepared to successfully complete an online course after completing the Quest for Online Success tutorial, and 90% indicated that they were either mostly prepared or very prepared to successfully complete an online course after completing an online learning orientation. On the Fall 2023 Distance Education Student Survey, 61% were either satisfied or very satisfied with the Library's online resources (10% marked not applicable), 46% were either satisfied or very satisfied with the college's technical support desk (20% marked not applicable), and 42% were either satisfied or very satisfied with the Student Support Hub in Canvas (26% marked not applicable).

Other evidence:

- Screenshot of tutoring and library links in Canvas
- Screenshot of customized library resources page in Canvas

- Screenshot of Student Support Hub and icon
- Screenshot of Help icon in the Canvas global navigation menu
- Screenshot of Academic & Career Pathways site
- Screenshot of Quest for Online Success site
- 2022-23 LPC Annual Distance Education Report

Describe how the institution ensures that "regular and substantive interaction" occurs between students and instructors (Policy on Distance Education and Correspondence Education).

LPC ensures regular and substantive interaction (RSI) between students and instructors in a variety of ways. First, RSI is in the <u>Faculty Association contract</u>. The section titled Minimum Standards for Distance Education Instruction includes subsection 19E.1, which states that "any portion of a course taught in online Asynchronous format shall meet the following guidelines:" Of the nine guidelines listed, (h) states: "Opportunities for RSI from student to student and instructor to student(s) are provided." The contractually negotiated <u>Evaluation: Observation of Instruction Form – Online Class</u> states that "An interactive tour of the class shall take place with evaluator and evaluee prior to evaluator viewing the class, including discussion and viewing of feedback for purposes of assessing regular and substantive contact standards." After viewing the class, the evaluator completes the form, which includes a Yes or No response to the statement: "The course design included ample opportunities for required regular effective contact between instructor-student." The evaluator, incidentally, is a peer faculty member who has undergone <u>specialized training</u> in how to conduct distance education evaluations.

New distance education instructors also undergo a course review by a member of the <u>Distance Education Committee</u>, which has, as part of its charge, "To review distance education courses and provide feedback to instructors on how to align their courses to quality course design standards, in addition to legal and accreditation requirements." This review includes a <u>checklist of 20 items</u> that need to be present in courses, including number 18: "Regular opportunities for meaningful student-student and student-instructor interaction, such as in Discussion Boards, are required." Additionally, instructors who wish to submit their courses for review by the college's faculty Peer Online Course Review team will have their courses compared to the <u>California Virtual Campus-Online Education Initiative's Course Design Rubric</u> to determine alignment with the rubric. Section B of the rubric is titled Interaction/Instructor Contact, and subsection B2 establishes criteria for regular effective contact.

In <u>Module 4 of the OCDP</u>, faculty learn about, and are <u>assessed on</u>, Required Human Interaction, with a focus on <u>Regular and Substantive Interaction</u>. Within the lesson, they review the <u>LPC Distance Education Interaction Guidelines</u>, which were approved by the Academic Senate in 2012, with revisions approved in 2021 and 2022. Outside of the OCDP, faculty can learn about RSI by participating in a <u>TLC workshop</u>. In the <u>Spring 2023 Online Learning Faculty Survey</u>, faculty were asked to rate the methods of communication they used most when interacting with students, and the top five methods were feedback on assignments, email, announcements, feedback with grading rubrics, and class discussion board.

Other ways the college ensures RSI:

• When proposing a course for distance education through the Curriculum process, faculty must indicate on the <u>proposal form</u> how they will achieve instructor-student interaction.

- Faculty are encouraged to use the <u>Model Course Syllabus</u>, a template that includes the relevant information students need to succeed in distance education courses. The template has a section titled Instructor Communications that tells students how to contact the instructor via email, phone, Zoom, and Pronto (a third-party communications tool), as well as on campus. Among other things, the template tells students how long to expect an answer to an inquiry, feedback on an assignment, and grade on an assignment.
- Prior to the beginning of each semester, faculty receive an <u>email</u> that includes information about RSI, along with a <u>checklist</u> that has an item on RSI and a link to examples. A <u>second, and</u> <u>separate, email</u> is sent to hybrid instructors in order to underscore that they need RSI in the online portion of their courses. A <u>reminder email</u> with <u>another RSI checklist</u> is sent in the middle of the semester to all faculty.

Describe how the institution authenticates students in distance education courses (*Policy on Distance Education and Correspondence Education*).

LPC authenticates students in distance education courses mainly through the secure Canvas login process. District Information Technology Services (ITS) assigns each student a randomly generated user identification number that is used to log into Canvas. That number is used in lieu of students' Social Security numbers. Students enter their passwords, which are encrypted by Canvas. This process is detailed in Chabot-Las Positas Community College District's Administrative Procedure 4105 Distance and Correspondence Education. Additionally, students are identified by the default email addresses in Canvas that are given to them by the district. Each email address is uniquely formatted based on students' names.

To promote honesty, responsibility, and academic integrity in distance education, LPC uses Proctorio, an online test proctoring service. One option available to instructors within Proctorio is to validate identity by directing students to hold up their college-issued ID card or their driver's license in front of the webcam so a snapshot can be taken and later accessed by the instructor. LPC also uses Turnitin, an anti-plagiarism service (with a built-in artificial intelligence detector) within Canvas.

In recent years, reports have surfaced statewide of financial aid fraud schemes in which a "student" registers for an online class, logs in, then drops the class after financial aid funds have been disbursed. Instructors are trained in the OCDP to note students' <u>last day of attendance</u> and to adhere to the college's <u>Instructor's Withdrawal Option: Distance Education</u> policy. Prior to the beginning of each semester, the Instructional Technology Coordinators sends <u>an email to all instructors</u> that includes a reminder of the last day of attendance, the withdrawal policy, and a directive to report "anything suspicious with any of your students—regarding participation, submitting or not submitting assignments" to the Financial Aid Office. Emails about the issue also come from the <u>Vice President of Academic Services</u> and the <u>Director of Financial Aid</u>. Students tagged as potentially fraudulent receive <u>emails from Admissions & Records</u>.

Other evidence:

- Canvas Privacy Statement
- Financial Aid section in catalog

Describe how the institution employs qualified faculty, staff, administrators, and other personnel to support and sustain the distance education modality (*Standard 3.1*).

During the Spring 2024 semester, Las Positas College employs 122 full-time faculty members and over 200 part-time faculty members. All faculty, whether full-time or part-time, meet at least the <u>minimum requirements established by the Board of Governors for California Community Colleges</u>. To teach a distance education course, the academic deans require that faculty either complete the <u>OCDP</u> or <u>apply for an exemption</u> based on equivalent training elsewhere. <u>Subsection 19I.1.a. of the faculty contract</u> states that training is required for faculty who want to teach a HyFlex course.

All distance education course delivery training is conducted by a full-time Instructional Technology Coordinator, who also administers the Canvas system. The coordinator has a master's degree in Instructional Technology, 25 years of experience at LPC and has served on multiple statewide committees and task forces. He is supported by a full-time Instructional Technology Specialist, who has six years of experience at LPC and 13 overall providing online support to faculty. The specialist is also responsible for training and supporting faculty to make their online instructional materials accessible to students with disabilities. The college Webmaster (nine years at LPC) provides specific programming, as needed, to Canvas.

Student technical support is provided by the college's <u>Computer Center staff</u>, which helps students with problems logging into Canvas, submitting assignments, etc. That staff consists of 2.5 full-time equivalent employees, and between the three, they have a combined 64 years of experience at LPC. Through District ITS, the Chief Technology Officer (CTO) oversees the procurement of online tools used by faculty and students and helps resolve any issues that cannot be resolved at LPC and its sister college, Chabot. The CTO also manages the district's <u>Senior Programmer Analyst III</u> who is responsible for the transmission of data from the district's enterprise computing system, Ellucian Banner, to Canvas, and the Manager, IT Las Positas College, who oversees the technical infrastructure, including networking, at LPC. The CTO has worked for the district for six years, while the analyst and manager have done so for 30 and 23 years, respectively.

Other evidence:

- Office of Vice President of Academic Services organizational chart
- District ITS organizational chart

Describe the institution's fiscal resources to support and sustain the distance education modality (Standard 3.4).

Provide a budget showing evidence the institution has the capacity to maintain distance education.

Key tools that support and sustain distance education are provided at no cost to LPC and other California Community Colleges by the State Chancellor's Office. This includes Zoom, EBSCO Library Database Services, and the Pope Tech Instructor Accessibility guide. The state's California Virtual Campus (CVC) grant pays for the systemwide licenses to Canvas and its video management tool, Canvas Studio. Still, licenses to other online instructional tools must be purchased. Last year, District ITS spent \$59,263 for LPC to use the web accessibility tool Ally, NetTutor, Pronto, and Proctorio through the Systemwide Technology Access Collaborative (STAC) and Systemwide Technology Access Resource Tools for Education (STARTE) program. STAC-STARTE was created at the state level "to simplify access and procurement of online education tools to deliver virtual instructional and student support services" and "to leverage greater economies of scale that lead to expanded cost savings by

centrally coordinating procurements of online education tools." ITS purchased Turnitin and Watermark (used for online student surveys), outside of the STAC-STARTE program.

Funding for the CTO and Senior Programmer Analyst III positions come from the district's budget, while funding for the Instructional Technology Coordinator, Instructional Technology Specialist, Webmaster, Computer Center staff, and Manager, IT Las Positas College positions come from LPC's general fund. The college Technology Department's budget covers the hardware and main software in the Teaching and Learning Center, while the TLC's <u>Instructional Technology operational budget</u> pays for office supplies, conferences and specialized software licenses.

Describe the institution's physical resources including, if applicable, equipment and supplies, to support and sustain the distance education modality (Standard 3.8).

LPC's main resources that support and sustain distance education, Canvas and Ellucian Banner, are both hosted off-site and in the cloud. Therefore, no physical resources are needed for the learning management and student information systems. Supplemental distance education tools, such as Ally, NetTutor, Pronto, Proctorio, Turnitin, and Watermark, are integrated into Canvas and are supported by each vendor. Faculty and staff also have access to Microsoft products via Office 365, which is cloud-based.

Full-time faculty have office computers with which to work on their distance education classes, and there are multiple areas on campus with computers that are designated for adjunct faculty use. All employees have access to the college's Teaching and Learning Center, an 1,879-square-foot facility with 14 workstations and wireless Internet access, allowing them to use the computers there or bring their own laptops from which to work on their courses. The TLC is also used to train faculty to design and develop distance education courses.

Describe the institution's technology resources to support and sustain the distance education modality (*Standard 3.9*).

The LPC Technology Department and District ITS collaboratively support the management, maintenance, and operation of the college's technological infrastructure and equipment. The Technology Department provides support for the equipment in the TLC, as well as for the equipment in all offices, classrooms, computer labs, and other meeting spaces on campus. Since many faculty teach distance education classes along with on-campus classes—and many students take a mixture of distance education and on-campus classes—both groups utilize that equipment for distance education purposes. LPC installs and replaces technology hardware resources such as computers, servers, and audio/visual equipment in accordance with its <u>Life Cycle Plan</u>. District ITS maintains a robust <u>Disaster Recovery Plan</u> to protect and safeguard all college and district critical systems, applications, servers, technology infrastructure, and resources.

The Technology Department and District ITS work together to ensure that the networking infrastructure is in place that allows faculty and students to access Canvas, the LPC web site, and the Internet in general from on campus. This includes the college's wireless network that allows open access to the Internet inside and outside of campus buildings. Students can even access Wi-Fi from certain parking lots on campus.

Other technology resources for distance education include:

- Laptops that are loaned to students and staff
- The Online Learning web site that includes information and support for students
- A <u>distributed antenna system (DAS)</u> for cellular phone service inside buildings

Other evidence:

- Las Positas College Technology Plan 2021-2026
- Chabot-Las Positas Community College District Technology Plan 2021-2026
- CLPCCD Information Technology Planning-Measure A Bond 2017-2026

Describe how the institution's decision-making structures support innovation and equitable student outcomes in the distance education modality (*Standard 4.3*).

Several shared governance bodies and upper-level executives are involved in decisions regarding distance education. These include the Distance Education (DE) Committee, which is a subcommittee of the Academic Senate that discusses all issues related to the modality at LPC, and the District Technology Coordinating Committee (TCC), which, among other things, discusses common distance education issues that affect LPC, Chabot College, and/or District ITS. Distance Education is also discussed at the LPC Technology Committee meetings. The membership of each of the three committees consists of faculty, administrators, Classified staff, and students. The link among all three is the Instructional Technology Coordinator who co-chairs the DE Committee, serves on the TCC as a voting member, and serves on the Technology Committee as an ex-officio member. The coordinator also reports on distance education issues to the Academic Senate and to his supervisor, the Vice President of Academic Services.

The above groups—along with the VP of Academic Services, the district's Chief Technology Officer, the district's Vice Chancellor of Educational Services and Student Success, and the Manager, IT Las Positas College—were all part of the discussion to standardize technology and develop local training for HyFlex instruction. HyFlex not only brought a new and innovative mode of distance education learning to LPC, but it also supports equitable student outcomes by allowing students an additional way to achieve their academic goals.

Other examples of decision-making structures supporting innovation and equitable student outcomes include:

- The district Chancellor and college presidents agreed to allow both LPC and Chabot to join the CVC-Online Education Initiative's February 2025 cohort that will integrate key district technology systems into the statewide <u>CVC Exchange</u>. When this work is finished, LPC and Chabot will become Teaching Colleges in the exchange, giving their students more opportunities to complete their degrees faster.
- Faculty on LPC's <u>Guided Pathways Steering Committee</u>, which includes the college President, decided to <u>work with an outside designer</u> to create an <u>Academic & Career Pathways site</u> in Canvas for students that brings clear pathway and milestone information, campus resources and supports to where the students are spending the most time, in Canvas. The site is available to all students, faculty, and staff. Representatives from those three groups collaborated in the design and content for a new <u>Support & Belonging Platform</u> that recently replaced the Student Support Hub in Canvas. The new platform builds upon the old hub,

- providing an interactive and extensive organization of information, resources, and opportunities based on student needs and interests.
- In early 2024, a cross-campus team worked to implement graphical global announcements to post in Canvas for all students to read. These announcements give students just-in-time information they need to succeed at LPC, including information on financial aid, student education plans, Smart Shop workshops, and important events and dates. The decision to incorporate the Academic & Career Pathways site, the Support & Belonging platform, and global announcements into was made by the DE Committee. All three innovations support equitable student outcomes by bringing the information to Canvas, from remote to oncampus learners, daytime or evening. The intention is to take the luck out of students who happen to visit campus or who have a classmate or employee share information about resources, supports, opportunities, or events.
- Over the years, the DE Committee and TCC have done considerable work on the topic of making course content accessible to students with disabilities. The DE Committee, for example, approved the college's <u>DE Accessibility Guidelines</u>, <u>sponsors Flex Day workshops</u>, includes accessibility on its <u>course review checklist</u>, and offers <u>voluntary course checks in Canvas</u>. The TCC helped get <u>Board Policy 3725 Information and Communications Technology Accessibility & Acceptable Use</u> passed and crafted the accompanying <u>Administrative Procedures 3725</u> for that policy. It also recently recommended to the Chancellor that a new <u>Digital Accessibility Advisory Group</u> be established to accomplish several tasks, including regular compliance review of information and course materials online and vetting textbook publisher content prior to its placement into Canvas.

Other evidence:

- Distance Education Committee minutes 2-25-22
- Technology Coordinating Committee minutes 2-11-22
- Distance Education Committee minutes 12-15-23
- Distance Education Committee minutes 1-26-24

Required Documentation

Provide a hyperlink or include documentation for each item below. Be sure to provide a clear, descriptive name for each document.

- Documentation of the institution's advertising and recruitment policies, demonstrating alignment with the *Policy on Institutional Advertising and Student Recruitment*.
 - Most of the policy elements under section A. Advertising, Publications, Promotional Literature can be found in the <u>LPC Catalog</u>. The rest can be found on the <u>LPC web site</u>. For Locations or Publications where Other Policies may be Found, see our <u>California Licensure Examination</u>

 <u>Reporting page</u>. For criteria on scholarships, see our <u>Scholarships</u> page on the Financial Aid site.
- Policies/processes for student complaints, demonstrating how the institution communicates process to students and handles complaints with due process.

Student Grievance Process

- Documentation of institution's implementation of the required components of the Title IV Program (if applicable), including:
 - Findings from any audits and program/other review activities by the U.S. Department of Education (ED)
 - Evidence of timely corrective action taken in response to any Title IV audits or program reviews

Not applicable.

See <u>Policy on Institutional Compliance with Title IV</u>

Supporting Evidence

Please provide any evidence that supports the narrative above as separate files. Please link evidence where appropriate in the narrative. Do not embed evidence files into the application.