



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: **Barton County Community 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://docs.bartonccc.edu/procedures/2540-credithourallocation.pdf>

Provide the web address to relevant procedure(s):

Link: <https://docs.bartonccc.edu/procedures/2540-credithourallocation.pdf>

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

Barton verifies the length of academic periods and compliance with credit hour requirements through a defined process inclusive of the following steps:

Step 1: Academic Calendar

Building the Academic Calendar is the foundation for course scheduling. The Academic Calendar Committee coordinates building the Academic Calendar and considers start/end days, holidays and breaks, day counts, coordination with the community and partners as well as state and federal requirements. Various college teams and departments review the calendar until agreement on a final version.

Step 2: Course Scheduling

Course scheduling begins once the Academic Calendar and semester schedules are set. Course schedulers follow defined parameters to meet federal, state, and accreditation requirements regarding assignment of credit hours to courses.

Credit is the basic unit of collegiate level instruction that an institution assigns to a course or course equivalent learning. Each course has a determined number of instructional hours and coursework to meet the course outcomes and competencies regardless of the delivery modality. All courses regardless of delivery method meet the same student learning outcomes and have comparable student assessments as the equivalent standard course.

Course schedulers assign credit hours according to the following time-based standards:

- Barton defines a regular college semester as 15 weeks of instruction and one week allocated for final exams. [Note: Summer semester may be shorter in length.]
- Lecture courses must meet for a minimum of 750 minutes per credit hour (50-minute hour for 15 weeks), plus time allocated for a final exam.
- Laboratory courses, including those in vocational-technical programs, must meet for a minimum of 1,125 minutes per credit hour (1.5 x 750 minutes). Laboratory courses are ones in which students predominantly are involved in experimentation or application learning activities.
- Internship, practicum and on-the-job training courses must meet for a minimum of 45 hours (60-minute hour) per credit hour.
- Physical education activity courses must meet for a minimum of 1,500 minutes per credit hour.

- Clinical courses and apprenticeship courses will meet the minimum required by the respective professional accrediting or regulatory agency, but may not be less than the minimum required for laboratory courses as defined above.

Those scheduling courses use a matrix for each type of course (e.g. lecture/sync, laboratory/studio, lecture hybrid, lab/studio hybrid, internship/independent study, voice lessons/voice lab/applied lessons).

Matrix Examples:

Lecture/Sync class (Does not include finals week)					
Credit hours	Total contact (hours)	Total contact (minutes)	15 - week	8 - week	4 - week (Typically summer only)
1 credit hour	12.5	750	1 day per week at 55 minutes	2 days per week at 55 minutes	4 days per week for 55 minutes
2 credit hour	25	1500	2 days per week at 55 minutes	3 days per week at 65 minutes	4 days per week at 95 minutes
3 credit hour	37.5	2250	3 days per week at 55 minutes OR 2 days per week at 80 minutes	4 days per week at 75 minutes OR 5 days per week at 60 minutes	4 days per week at 145 minutes
4 credit hour	50	3000	4 days per week at 55 minutes OR 3 days per week at 70 minutes	Would not schedule except as hybrid	Would not schedule except as hybrid
5 credit hour	62.5	3750	5 days per week at 50 minutes OR 4 days per week at 65 minutes	Would not schedule except as hybrid	Would not schedule except as hybrid
6 credit hour	75	4500	5 days per week at 60 minutes OR 4 days per week at 75 minutes	Would not schedule except as hybrid	Would not schedule except as hybrid

Laboratory / Studio					
Credit hours	Total contact (hours)	Total contact (minutes)	15 - week	8 - week	4 - week
1 credit hour	18.75	1125	1 day a week at 75 minutes OR 2 days per week at 40 minutes OR "By Arrangement"	1 day per week at 145 minutes (evening class) OR 2 days per week at 75 minutes OR "By Arrangement"	4 days per week at 70 minutes
2 credit hour	37.5	2250	1 day a week at 150 minutes OR 2 days per week at 75 minutes OR "By Arrangement"	2 day per week at 145 minutes OR 3 days per week at 95 minutes OR "By Arrangement"	4 days per week at 145 minutes
3 credit hour	56.25	3375	1 day per week at 225 minutes (evening class) OR 2 days per week at 150 minutes OR 3 days per week at 75 minutes OR "By Arrangement"	3 days per week at 145 minutes OR 4 days per week at 110 minutes OR "By Arrangement"	Would not schedule except as hybrid

Step 3: Review of Draft Course Schedule

Integral areas (e.g. academics, financial aid) review a draft of the course schedule to ensure compliance with institutional, state, federal, and accreditation requirements. Once reviewed, the draft passes to Barton’s Registrar and the Director of Online and LMS Management for input in Barton’s student information system, Banner.

Step 4: Second Review and Final Posting of the Course Schedule

Once courses are in Banner, those individuals scheduling courses check the Scheduling Matrix (i.e. an output document pulled from Banner). Faculty, schedulers, and supervisors review this document and provide corrections, if necessary. Supervisors and schedulers review any changes to ensure “seat-time” meets requirements. The Registrar makes requested adjustments as needed. The Registrar’s Office is responsible for final compliance oversight.

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: https://docs.bartonccc.edu/procedures/2615-problem_resolution.pdf

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

Link: <https://bartonccc.edu/financialaid/studentconsumerinfo/procedures>

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: <https://www.bartonccc.edu/student-services/transfer-credits>

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.bartonccc.edu/student-services/transfer-credits>

Provide the web address where current and prospective student can ascertain the institution's transfer requirements in addition to what will and will not transfer.

Link: <https://www.bartonccc.edu/student-services/transfer-credits>

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?

Upon admission, Barton assigns each student is assigned a unique email address as well as a unique login to their Barton Portal account. The Barton Portal is where students access sensitive information such as financial aid, billing, enrollment, grades, transcript, and online course access.

In addition, for some online courses Barton uses a statewide proctoring provider (Examity) to authenticate the student's identity during exams.

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

Students access their personal information (e.g. financial, grades, courses) through their unique login information. Additionally, Barton recently implemented multi-factor authentication, which students must use to access their student portal account. To reset a password, students may set up security questions with answers, which the student must supply if resetting their password.

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?

Barton covers the cost of proctoring for students except when the student does not show up to a scheduled exam. If the student does not show up for a scheduled exam, Barton charges the student upon their next test login. Additionally, if the student does not login to test within 2 months after missing a scheduled exam, Barton applies the testing charge to the student's account.

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

Link: <https://online.bartonccc.edu/student-services/proctoring>

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.

Link: <https://www.bartonccc.edu/enrollment/ferpa>

<https://docs.bartonccc.edu/policies/1605-studentprivacyrights.pdf>

<https://docs.bartonccc.edu/procedures/2605-ferpa.pdf>

https://docs.bartonccc.edu/procedures/2175-GLBA_Required_Information_Security.pdf

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

Link: <https://www.bartonccc.edu/enrollment/ferpa>

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:

Barton employs multiple methods to ensure timely training and adherence to the protection of student information.

- Barton's Registrar provides FERPA training in new Faculty Orientation.
- Annually, Financial Aid Office staff members must meet with the Director of Financial Aid to review and sign Confidentiality Agreements. The Confidentiality Agreements include employee responsibilities for protecting student information, a definition and examples of confidential information, and examples of breaches of sensitive information.
- All Barton employees undergo cybersecurity training annually.
- Barton has a procedure for identifying breaches of Personally Identifiable Information and reporting the breach to the U.S. Department of Education. As part of the mitigation of a breach, Barton requires the employee responsible for the breach to receive additional training on the handling of secure information.
- Per Barton policy 2175, Barton's Chief Information Security Officer (CISO) coordinates the procurement and selection of third party service providers who are able capable of maintaining appropriate safeguards for protected student information. The CISO also works with the Vice President of Administration to develop and incorporate contractual protections applicable to third party service providers.

* 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.

- Except in the case of a missed proctored exam, Barton does not charge students any additional charges associated with the verification of student identity. Barton notifies students of this charge at this website: <https://online.bartonccc.edu/student-services/proctoring>

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): <https://www.bartonccc.edu/financialaid/studentconsumerinfo>

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 accretor (e.g. Accreditation Commission for Education in Nursing; Council for the Accreditation of Educator Preparation) or institutional accretor (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.

Barton is in good standing with all specialized accreditation. This includes the Dietary Manager, Emergency Medical Services, Medical Laboratory Technician, and Nursing programs, all of which undergo programmatic accreditation.

Barton Programs with Specialized Accreditation

- Dietary Manager
 - [Association of Nutrition and Food Service Professionals \(ANFP\)](#)
 - Next accreditation visit: 11/2026
- Emergency Medical Services
 - [Commission on Accreditation of Allied Health Education Programs \(CAAHEP\)](#)
 - Next accreditation visit: Fall 2022
- Medical Laboratory Technician
 - [National Accrediting Agency for Clinical Laboratory Sciences \(NAACLS\)](#)
 - Next accreditation visit: 2028
- Practical Nursing
 - [Kansas State Board of Nursing](#)
 - Recent accreditation visit: Completed visit in February 2022
- Registered Nursing (ADN)
 - [Kansas State Board of Nursing](#)
 - Recent accreditation visit: Completed visit in February 2022
 - [Accreditation Commission for Education in Nursing \(ACEN\)](#)
 - Recent accreditation visit: Completed visit in February 2022

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: <https://www.bartonccc.edu/accreditation>

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.

Annually, financial aid staff members meet with the Director of Financial Aid to review the financial aid Code of Conduct. Each staff members signs and dates a form with the Code of Conduct information. The training takes place with the annual “Touch Base” meeting with the Director of Financial Aid.

Recently, Barton expanded this training and now includes admissions (which includes recruiters), enrollment services, and communications (marketing) staff members. This training takes places at the beginning of the school year.

Barton has no third-party contractors acting on our behalf for recruiting, admissions, enrollment, or financial aid processing.

Additionally, employees making purchases on behalf of the College must sign a “Conflict of Interest” form attesting there is no conflict of interest with any third party or vendor. This is part of the annual audit process.

<https://docs.bartonccc.edu/policies/1165-conflictinterest.pdf>

<https://www.bartonccc.edu/financialaid/othersources#ALTloans>

<https://www.bartonccc.edu/financialaid/office/conduct>

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.