

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: **University of Arkansas at Monticello**

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):

Link: <https://catalog.uamont.edu/content.php?catoid=3&navoid=141#academic-credit>

<https://www.uamont.edu/about/pdfs/UAMFederalComplianceReport10-14.pdf> (Appendix A)

ADHE's definition of a credit hour: <https://adhe.edu/File/APPENDIXH.pdf>

UAM Fall 2024 Class Schedule: https://pubdocs.uamont.cloud/uam_fall_schedule.pdf

UAM Spring 2025 Class Schedule: https://pubdocs.uamont.cloud/uam_spring_schedule.pdf

Provide the web address to relevant procedure(s):

Link: <https://catalog.uamont.edu/content.php?catoid=3&navoid=141#academic-credit>

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

Credit Hours

UAM's Credit Hour Policy was reviewed, revised, and approved in August 2014. The University's definition of a credit hour is adapted from the related federal statute and aligned with the Arkansas Division of Higher Education standards. The Credit Hour Policy formalizes existing procedures to provide consistency throughout the University and to document compliance with federal and accreditation expectations. The policy is annually distributed to deans and faculty to ensure a clear understanding of the definition of credit hour. UAM's Credit Hour Policy for distance education including online and hybrid courses is consistent with the standards for face-to-face course instruction. The 2024-2025 UAM Catalog is available at <https://catalog.uamont.edu/index.php?catoid=3>. Undergraduate course descriptions begin on page 147; graduate course descriptions begin on page 161. The University uses a five-digit course numbering system with the last digit indicating the number of credit hours assigned.

Course descriptions originate with faculty in the academic unit under which the course will be housed. Prior to publication, undergraduate course descriptions must be approved through the University's Curriculum and Standards Committee and the University Assembly prior to approval by the Chancellor. Graduate course descriptions must be approved by the Graduate Council and the Dean of Graduate Studies prior to approval by the Chancellor.

Class schedules are built by the Registrar's Office by "rolling" previous terms to the respective future term where academic unit heads oversee a three-draft circulation prior to the schedule's publication. Those leaders update the Registrar's Office with several details for each section including:

- Instructor
- Meeting Pattern (location, time, days)
- Modality
- Enrollment Capacity
- Special Topic course topics
- Public Comments

Any classes added after the deadline (April 1 for Summer and Fall schedules and November 1 for Spring schedules) are requested by the instructor or dean through an electronic form that requires justification, textbook adoption forms that are shared with the UAM bookstore, and the course syllabus. For the Registrar's Office to add the late addition, the request must be approved by the Vice Chancellor for Academic Affairs.

Close to the beginning of a class section's start date, if the enrollment does not meet required minimum numbers, the Academic Dean/ College of Technology Vice Chancellor may request the cancellation of the section after notifying any students enrolled.

UAM offers classes in a compressed two-week summer intersession, two five-week summer terms, and a ten-week summer term. Spring and Fall terms offer regular fifteen-week instruction, two eight-week terms, and a six-week term.

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://www.uamont.edu/life/pdfs/StudentHandbook-2024-2025.pdf>
<https://catalog.uamont.edu/index.php?catoid=3>

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

Link: <https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-525-1.pdf>
<https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-525-2.pdf>
<https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-275-1.pdf>
<https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-275-2.pdf>
<https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-545-1.pdf>
<https://www.uamont.edu/admissions/sss/UAM-ADA-Student-Grievance-Procedure.pdf>
<https://www.uamont.edu/academics/distance-education.html>
<https://www.uamont.edu/academics/pdfs/DistanceEdStudentHandbook2024.pdf>
<https://www.uamont.edu/academics/pdfs/concurrent-enrollment/Concurrent-Enrollment-Student-Handbook-2024-25.pdf>
[24-25 Student Athlete Handbook.pdf](https://www.uamont.edu/academics/pdfs/24-25_Student_Athlete_Handbook.pdf)

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://catalog.uamont.edu/content.php?catoid=3&navoid=141#transfer-policy>

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.

Along with several other academic units at UAM, the School of Education has several Memorandum of Understanding agreements with two-year institutions around the state, including UAM's campus-within-a-campus model at National Park College.

<https://www.uamont.edu/academics/transferAgreements.html>

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.

Transfer Policy in 2024-2025 Catalog:

<https://catalog.uamont.edu/content.php?catoid=3&navoid=141#transfer-policy>

Arkansas Course Transfer System

<https://app.powerbi.com/view?r=eyJrIjoiNmZlYWQ4NmItMmVjMi00YWQwLWI2ODEtMmE3MTVkNzA5YThkIiwidCI6ImNjNTc3MTQ3LWE1NTQtNDgzYS04Njg3LThlZmFINjk4ZmQ0NCJ9&pageName=ReportSection>

As a member of the University of Arkansas System, UAM has adapted its course numbering scheme to the system-wide implementation of Common Course Numbering (CCN). There is an index containing each sister institution's courses. Most courses with commonality share the same subject prefix and number to expedite course transfers within the system.

CCN Index: [Common Course Number Index - Official 11.25.2024.xlsx](#)

UAM's new student information system, Workday, has functionality that the Registrar's Office plans to leverage in the future to articulate and display preliminary transfer work for prospective students. At this time, we are prepared to articulate transfer work only for current (matriculated) students but hope to expand this to all who have applied to the institution in AY 2026-2027.

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?

The University of Arkansas at Monticello uses the Blackboard Learning Management System for online courses. UAM employs several methods to verify the identity of students enrolled in online courses, ensuring both security and academic integrity. These methods include:

1. Multi-Factor Authentication (MFA)

UAM uses **Multi-Factor Authentication (MFA)** to verify the identity of students accessing online courses and other university resources. MFA requires students to provide two forms of identification:

- **Something they know:** A personal password.

- **Something they have:** A personal device, such as a smartphone, to receive a verification code or push notification.

MFA helps ensure that only the enrolled student can access their course materials and participate in online assessments.

2. Respondus Monitor for Online Exams

For some online exams, UAM uses **Respondus Monitor**, a proctoring tool that verifies student identity and monitors exam integrity. This is done through:

- **Facial Recognition:** Students are required to take a photo or video of themselves at the beginning of the exam to confirm their identity. Respondus Monitor uses facial recognition technology to match the student's appearance with their recorded profile.
- **Government-Issued ID:** In some cases, students may be asked to show a government-issued ID (e.g., driver's license or passport) to further verify their identity before starting the exam.

3. Secure Login Credentials and Password Management

UAM also ensures secure access to online courses through robust login systems. Students must use their university-issued credentials (username and password) to access course platforms, and they are encouraged to change their passwords periodically to maintain security.

Additionally, students have the ability to manage their account security by changing passwords and unlocking accounts independently, allowing them to control their own access and identity verification.

4. Student Consent and Transparency

Before taking video-monitored online exams or assessments, students are informed about the identity verification process and must provide consent. This ensures that students are fully aware of the security measures and agree to the process as part of their participation in online courses.

5. Secure Online Course Platforms

UAM uses secure online learning platforms (e.g., Blackboard) that integrate secure login and authentication measures to ensure that only enrolled students can access course materials. These platforms are compliant with data privacy regulations, such as FERPA, ensuring that student information is protected.

6. Course Registration and Authentication

During the course registration process, most students are enrolled through a UAM faculty or professional advisor. Otherwise, students register through a secure system that requires proper authentication of their identity.

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

UAM's efforts to protect student privacy include the secure login and pass code. Respondus Monitor also ensures student privacy by verifying student identity—the student shows the exam proctor his/her ID card.

UAM is dedicated to safeguarding student privacy through a range of robust security measures. One of the key tools is **Multi-Factor Authentication (MFA)**, as described above. MFA helps secure UAM resources, including email and online portals, by prompting a second form of authentication, such as a mobile app notification, text message, or phone call.

In addition to MFA, students have full control over their account security. They can independently change their passwords and unlock their accounts, empowering them to maintain privacy and control over their personal information.

Secure Online Exam Proctoring with Respondus Monitor

UAM also prioritizes privacy in online learning environments. To maintain the integrity of online exams, we use **Respondus Monitor**, a secure proctoring tool that ensures the fairness of assessments while protecting student privacy. Respondus Monitor is designed with privacy-conscious features to minimize data collection and ensure student information is handled securely:

1. **Minimal Data Collection:** Respondus Monitor only collects the essential information needed to verify a student's identity and ensure exam integrity. No personally identifiable information is collected beyond what is required for exam authentication.
2. **Facial Recognition and ID Verification:** To confirm the student's identity, Respondus Monitor uses facial recognition technology. Students may be asked to show a government-issued ID (such as a driver's license) at the beginning of the exam. This process ensures that only the registered student is taking the exam.
3. **Recording and Monitoring:** During the exam, Respondus Monitor records the student's video and audio to monitor the exam environment. These recordings are only reviewed if suspicious behavior is detected, and they are securely stored and then deleted after a set period to minimize retention of personal data.
4. **No Live Proctoring:** Unlike traditional live proctoring services, Respondus Monitor does not involve a live person observing the student. Instead, the system automatically flags suspicious behavior based on predefined rules. This approach helps maintain student privacy while still ensuring exam security.
5. **Data Security:** All data collected by Respondus Monitor is encrypted and stored securely, in compliance with data protection regulations such as the Family Educational Rights and Privacy Act (FERPA). This ensures that student information is protected from unauthorized access or breaches.

6. **Student Consent and Transparency:** Students are fully informed about the use of Respondus Monitor before their exam. They must provide consent before proceeding with the exam, ensuring that they understand the monitoring process and have control over their participation.

By integrating secure login protocols, minimal data collection, encrypted storage, and clear consent procedures, UAM ensures that both student privacy and academic integrity are upheld in all aspects of online education.

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?

Respondus Monitor has an additional cost of \$15.00 for twelve months for students who are enrolled in a course that utilizes this tool. To inform students of the cost associated with Respondus Monitor, the institution places a note about the cost on the class schedule, and it is discussed on the distance education website.

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

Link: <https://www.uamont.edu/academics/distance-education.html>

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:

<https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-545-1.pdf>

<https://www.uamont.edu/Fin-Admin/pdfs/op/OperatingPro-545-2.pdf>

<https://www.uasys.edu/wp-content/uploads/sites/16/2016/04/UASP-515.1-Student-Education-Records-and-FERPA.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://catalog.uamont.edu/content.php?catoid=3&navoid=141#releasing-restricting-student-education-records>

<https://www.uamont.edu/life/pdfs/StudentHandbook-2024-2025.pdf>

<https://www.uamont.edu/privacy.html>

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:

Information Technology provides live Zoom training each month to ensure new employees receive information related to student data privacy in a timely manner.

Current employees complete FERPA and Data Security & Privacy training on an annual basis via Workday. The FERPA Compliance Officer also sends a campus notice to employees each semester. To remain updated on FERPA best practices, the FERPA Compliance Officer attended two sessions hosted by the American Association of Collegiate Registrars and Admissions Officers (AACRAO) last year. The Registrar's Office team also has access to AACRAO's latest FERPA Quick Guide. Academic advisors also receive information related to FERPA through academic advising training and the Academic Advising Organization page.

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

No (If no, please move on to the next section.)

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

Link(s): <https://www.uamont.edu/life/student-resources/students-right-to-know.html>

Also, webpages for each school provide more detailed information on the job placement and earnings of their graduates.

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.

Arkansas Department of Education
Arkansas Division of Higher Education
Arkansas Higher Education Coordinating Board

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.

None.

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).

[National Association of Schools of Music](#)

[National League for Nursing Commission for Nursing Education Accreditation](#)

[Society of American Foresters](#)

[Council on Social Work Education](#)

[Arkansas State Board of Nursing](#)

[Commission on Accreditation of Allied Health Education](#)

[Arkansas Department on Human Services](#)

[Arkansas Department of Health](#)

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.

None.

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.uamont.edu/about/accreditation.html>

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.

The University of Arkansas System has developed Board Policy 335.1 University Code of Ethical Conduct which applies to all UA System employees. The University of Arkansas at Monticello also abides by the ethical principles and Code of Conduct established by the National Association of Student Financial Aid Administrators and agrees to refrain from high-pressure recruitment tactics as documented by the DoD MOU uploaded.

Upon hire, UAM financial aid staff and admissions staff receive one-on-one training from a senior staff member within their office. The training entails how to appropriately interact with students and the steps required to move a student through the recruitment, admission, and financial aid processes. To facilitate the best experience for a student, UAM hired an onboarding and retention specialist to review all processes with which a student must engage.

UAM faculty advisors are provided training during Professional Development Week (program in Appendix) and periodically during the academic year. All faculty and professional advising staff are granted membership to the UAM Academic Advising Organization in Blackboard. (The Table of Contents for the Organization page is in the Appendix). Professional advising staff also complete training appropriate to their roles, participate in professional meetings or conferences, and receive direct mentorship from the Assistant Vice Chancellor for Student Success.

UAM annually releases training to faculty and staff through Workday. The following trainings are packaged as UAM’s Compliance courses and are assigned according to an employee’s job profile.

1. Building Supportive Communities: Clery Act and Title IX
2. Child Abuse: Mandatory Reporting
3. Duty to Prevent Violence (managers only)
4. FERPA: Family Educational Rights and Privacy Act
5. Discrimination & Harassment (UAM)
6. Accommodating People with Disabilities
7. Active Shooter: Run, Hide, Fight
8. Data Security & Privacy

As a result of this review, UAM plans to add a training titled, “General Ethics in the Workplace” to the list above and require it of all employees who engage in direct communications with prospective and current students.

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.