Appendix G:

Federal Compliance Program

OSU-Okahoma City recognizes and adheres to all requirements set forth by the United States Department of Education and the Higher Learning Commission of the North Central Association. The university has also completed all of the necessary elements for the institutional self-study.

I.  Credits, Program Length, and Tuition

1. Relationship between Credits, Program Length, and Educational Goals – All associate degree programs (A.A.S. and A.S.) are comparable in length to similar degree programs from other institutions, which is anywhere between 63-69 credit hours. Students may either stop their education at the A.A.S. or A.S., or they may continue their education at any one of the four-year institutions in the Oklahoma City metropolitan area and carry most, if not all, of their credits with them in articulation agreements.

   The Bachelor of Technology in Emergency Responder Administration is 124 credit hours, which is comparable to other bachelor’s degrees. Because the program is designed as a feeder program for police, fire, and emergency medical A.S. and A.A.S. degrees on campus, students can complete the B.T. degree in two years or less when they matriculate their ‘associates’ degrees into the program.

2. Quarter/Semester Hours Earned for Programs Compared with Good Practice in Higher Education – OSU-Okahoma City operates on a traditional semester system. The institution has several options for students’ studies: 16-week fall and spring semesters, and an eight-week summer semester. Alternatives include eight-week sessions in fall and spring, fast-track fall and spring classes, intersession classes between semesters, and evening and online classes for added flexibility, all of which are in keeping with good practice in higher education.

3. Length of Major Programs Compared with Good Practice in Higher Education – Students who attend classes full-time at OSU-Okahoma City should be able to complete an associate of applied science or associate of science degree in two years. Students in the bachelor of technology program who have already earned their associate of applied science, associate of science, or other degree should be able to complete the bachelor of technology program in two years. These time frames are in keeping with good practice in higher education.

4. Program-Specific Tuition Compared with Good Practice in Higher Education – Tuition is charged by the credit hour for residential, non-residential, and international students, and fees are set. Tuition and fees are determined by Oklahoma State Regents for Higher Education, and they are listed in the print and online version of the Catalog. Both the print and online versions of the Catalog list courses with the days, times, locations, and full-time faculty (print only — online version includes all instructors). For the 2008-2009 academic year, the tuition rate for Oklahoma residents is $89.30 for lower division classes and $109.30 for upper division classes (Bachelor of Technology degree).
Almost half of the students entering OSU-Oklahoma City are required to take some type of developmental courses, most typically in mathematics. This means that—like most two-year campuses—developmental education is a major focus of both Academic Affairs and Student Services at OSU-Oklahoma City. Evidence of the importance of this function to the campus is the recent creation of a Developmental Studies department in the Arts & Sciences division.

Additional fees for developmental courses are necessary because developmental courses tend to be smaller and therefore less cost efficient than traditional general education classes. In addition, proper placement and advancement in these courses requires a continuing commitment of significant human resources from Student Services as well as the academic divisions. This cost factor is an especially acute consideration on a campus such as OSU-Oklahoma City which receives one of the lowest levels of FTE support from the state of Oklahoma and which does not receive any funds from a local ad valorem tax district.

Finally, these courses do not fulfill any degree requirements and do not immediately contribute to the achievement of students’ overall educational goals or their graduation from certificate or degree programs. For all these reasons, the OSU-Oklahoma City has made the decision to charge an additional $10.00 fee for developmental courses.

OSU-Oklahoma City is funded from two primary sources, state appropriations and tuition. The campus does not receive the benefit of ad valorem taxes. One reason tuition is higher for the Bachelor of Technology degree is that the Oklahoma State Regents for Higher Education made it clear the campus could not secure approval for a new program that would require additional funding from the state. In budget projections for the first five years of the program, the institution had to show exactly how the degree and all necessary equipment and personnel would be funded. Since tuition and fees make up 50% percent of the campus budget, there was little choice but to charge more for the upper-level courses. Upper-level courses carry higher fees at other institutions as well, so this practice at OSU-Oklahoma City is reasonable. Tuition structures for lower and upper division courses are fiscally responsible and competitive for the service area of the campus.

II. Student Complaints

Processes for formal student complaints are described in Student Rights and Responsibilities. According to Student Services records for 2006-2009, OSU-Oklahoma City has had 15 conduct student files opened with three of those student files including an academic/grade concern as well as a non-academic misconduct violation. These files are created when a student is in violation of a student code of conduct. In addition, the university has had 16 student issue/complaint files (from other students to instruction) from 2006-2008, and 20 to date in 2009. These records are housed in a secured, locked area in the vice president of Student Services office area. Student complaints concerning academic/grade issues are reported to the Office of Academic Affairs rather than the Campus Judicial coordinator. Those academic/grade appeal files are housed in the Office of Academic Affairs and are counted separately from the conduct files.

Students who wish to make complaints are encouraged to make their complaints in writing to the Office of Academic Affairs in order to get a clear view of the issues. Once the written complaint is received, the vice president for academic affairs invites the individual(s) for further discussion. The vice president for academic affairs investigates the complaint and writes a resolution in response to the complaint. After the complaint is addressed, documentation of the complaint is kept in a log and paperwork is filed and kept in a locked, secured area in the Office of Academic Affairs.
III. Transfer Policies

1. While OSU-Oklahoma City aims to serve many degree-seeking students, the institution also strives to assist many students that intend to transfer to four-year colleges. In an effort to support this endeavor, academic advisors use resources to ensure that the classes that students are taking at OSU-Oklahoma City transfer to receiving institutions. When academic advisors assist students through this process, they use the Oklahoma State Regents Course Equivalency Project (also known as the Transfer Matrix Guide) to determine if general education requirements will transfer and institutional transfer guides to determine if more specific subject area coursework will fulfill degree completion requirements at the institutions where students later attend.

OSU-Oklahoma City academic advisors also annually meet with advisors at area four-year colleges to discuss academic program changes and new academic programs. The purpose of these meetings is to make sure that academic advisors get the accurate and up-to-date information that is needed to help students facilitate the transfer process.

OSU-Oklahoma City also plans to launch more initiatives to serve transfer students in the future. The student services department will soon create a transfer web page that will shed light on the transfer process and display links to transfer guides. The institution will also aim to develop a virtual transfer student organization through a social networking medium. This organization will provide an avenue to connect with transfer students and continually communicate the dates and times that recruiters from four-year colleges will be on campus.

2. All transfer policies are discussed in the print and online versions of the OSU-Oklahoma City Catalog, p. 25 and 27.

3. To determine whether or not to accept credits earned at another institution, the Registrar’s Office and Records Department consult two resources: Transfer Credit Practices of Designated Educational Institutions: An Information Exchange (text in Resource Room) by American Association of Collegiate Registrars and Admissions Officers (2009) and CollegeSource. These two sources help personnel determine whether a college or university is accredited.

IV. Verification of Student Identity in Distance or Correspondence Education

- Online courses and programs have been described in the self-study, Criterion 3c.
- The Higher Learning Commission requires institutions to have processes in place to verify that the identity of students enrolled in distance education or correspondence courses are the same students completing the work in the courses. OSU-Oklahoma City has three steps in place to verify the identity of students in distance or correspondence education.

SIS (Student Information System) is the institution’s point of control for students’ admission to classes. Once students have been admitted to the school, have permission to enroll, and have a payment plan or have paid for their courses, they are enrolled through SIS in their courses.
Within 24 hours, their names appear in Desire2Learn, the campus course management system and online course platform. All courses on campus have Desire2Learn sites whether instructors choose to use them or not. Online and distance education courses are required to use them. If students drop a course or an instructor administratively withdraws them, they are automatically taken out of the Desire2Learn roster and are denied access to the course.

Once students are enrolled through SIS, they must set up their O-Key system. This account is controlled through the SIS system. The SIS system verifies who the students are by comparing their admissions information with information the students provide themselves. Students receive or set up a password and receive an email address that are associated with the campus and their online or distance education courses.

The third measure of verification is the O-Key system itself. It refreshes itself daily, and all users must change their passwords every 120 days.

These same procedures used for traditional students accessing online materials for a campus-based course are used for our open broadcast courses such as those offered via Cox cable. Every section, whether offered online, on campus, or through Cox cable, is verified through SIS and confirmed through O-Key.

OSU-Oklahoma City currently uses the Orange-Key system (O-Key) system. The Oklahoma State University A&M system also uses Campus Wide Identification numbers, email addresses, and online course logins to verify students’ identities. Discussions to increase security include creating unique identifiers for all students at the time of registration for courses. Another idea is to create unique identifiers for all students at the time of acceptance to the university. Students would receive their unique identification number by mail.
V. Title IV Information

1. Summary Remarks. Please see the tables below for a summary of the total number of students involved in the Title IV program who receive any type of federal aid, the total dollar amount disbursed, and other relevant data.

<table>
<thead>
<tr>
<th></th>
<th>Fall 2008</th>
<th>Fall 2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Aid Applicants</td>
<td>2927</td>
<td>3052</td>
</tr>
<tr>
<td>% of Total Fall Enrollment</td>
<td>50%</td>
<td>55%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Fall 2008</th>
<th>Fall 2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students receiving Financial Aid</td>
<td>3184</td>
<td>3051</td>
</tr>
<tr>
<td>Loans %</td>
<td>48%</td>
<td>48%</td>
</tr>
<tr>
<td>Work study %</td>
<td>1%</td>
<td>1%</td>
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<tr>
<td>Scholarships/Grants %</td>
<td>55%</td>
<td>53%</td>
</tr>
<tr>
<td>Academic/Merit based Scholarships %</td>
<td>11%</td>
<td>13%</td>
</tr>
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</table>

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
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<tbody>
<tr>
<td>Tuition</td>
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<tr>
<td>Fee Waivers</td>
<td></td>
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<tr>
<td>TDR</td>
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<td></td>
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<tr>
<td>Fall 2008 TDR Calculations</td>
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<td>$334,597</td>
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<tr>
<td>Fall 2007 TDR Calculations</td>
<td>$3,496,094</td>
<td>$331,610</td>
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<tr>
<th></th>
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<tbody>
<tr>
<td>Number Entering (NE)</td>
<td>509</td>
<td>520</td>
</tr>
<tr>
<td>Number Returning (NR)</td>
<td>225</td>
<td>183</td>
</tr>
<tr>
<td>NR/NE as percentage</td>
<td>44%</td>
<td>35%</td>
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</table>

2. Financial Aid Default Rates and Corrective Plan - OSU-Oklahoma City complies with the Title IV requirements of the Higher Education Authorization Act. The processes by which students apply for financial aid are made available online and in the catalog [Applying for Aid Catalog]. Students who enroll and request financial aid are evaluated individually for their qualifications. Every student must meet the minimum requirements for enrollment in six credit-hours and must be enrolled in an eligible degree program.

The most recent default rates for the campus follow. Fiscal Year 2008 data is unavailable because the cohorts of student data run two years behind the current fiscal year.
## Cohort Default Rate History List

<table>
<thead>
<tr>
<th>Select</th>
<th>Fiscal Year</th>
<th>Rate Type</th>
<th>Program Type</th>
<th>Numerator</th>
<th>Denominator</th>
<th>Rate</th>
<th>Process Date</th>
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<tr>
<td></td>
<td>2007</td>
<td>OFFICIAL</td>
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<td>117</td>
<td>1287</td>
<td>9</td>
<td>8/1/2009</td>
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<td></td>
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<td>1289</td>
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<td>1683</td>
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<td>1597</td>
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<td>1/6/2007</td>
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<td></td>
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<td>FFEL</td>
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<td>1177</td>
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<td>1/7/2006</td>
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<td>1/8/2005</td>
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<td>714</td>
<td>6.7</td>
<td>7/31/2004</td>
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<td>692</td>
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<td>1/10/2004</td>
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<td>52</td>
<td>524</td>
<td>9.9</td>
<td>8/2/2003</td>
</tr>
<tr>
<td></td>
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<td>FFEL</td>
<td>52</td>
<td>525</td>
<td>9.9</td>
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<td>578</td>
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<td>FFEL</td>
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<td>590</td>
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<td>43</td>
<td>548</td>
<td>7.8</td>
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<td>FFEL</td>
<td>71</td>
<td>594</td>
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<td>8/28/1999</td>
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<tr>
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<td>602</td>
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<td>FFEL</td>
<td>73</td>
<td>547</td>
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<td>3/28/1998</td>
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<td>497</td>
<td>14.2</td>
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<td>337</td>
<td>11.8</td>
<td>11/2/1996</td>
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<td>341</td>
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<td>6/6/1996</td>
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<td>369</td>
<td>16.8</td>
<td>1/14/1996</td>
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<tr>
<td></td>
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<td>FFEL</td>
<td>60</td>
<td>381</td>
<td>15.7</td>
<td>6/18/1995</td>
</tr>
</tbody>
</table>
OSU-Oklahoma City complies with requirements for default aversion policies and procedures.

Our current policies concerning default aversion are:

- Loan counseling must be completed each year by students seeking to borrow funds. At most schools, entrance loan counseling is completed once over the course of a student’s borrowing; however, OSU-Oklahoma City’s policy is that students must complete this counseling session each year. This requirement helps in that it is a constant reminder to students of what the requirements for repayment would be. It is a way of educating and reeducating students, and financial aid officials believe it works well.

- Exit counseling must be completed by any loan borrowers who drop below six credits, withdraw, or do not return from one year to the next. This counseling is designed to inform borrowers of what to expect since they are no longer enrolled.

- With the aid of the Oklahoma Guarantee Student Loan Program, monthly notices are mailed to borrowers who are delinquent on student loan payments. Letters are sent encouraging students to avoid default and to contact their loan servicer. OSU-Oklahoma City began this process approximately three years ago.

The goal of OSU-Oklahoma City is to have the default rate remain below six percent for a number of years, but this has been challenging because the cohort of students who receive financial aid has fluctuated for years. Due to recent changes in the way the cohort is calculated, the campus will experience a larger rate than normal. The U.S. Department of Education has modified some of the regulations to accommodate larger cohorts due to these changes.

The Financial Aid director is responsible for implementing new default management policies. Reports concerning default rates and other related information may be viewed in the Office of Financial Aid because these reports contain sensitive, confidential student data.

3. Recent USDE program audits, fines, or corrective actions – None.

4. Financial Audit Review (A-133) and Repercussions for the Institution – There have been two issues since the last site visit.

4-A.  A-133 Year Ended June 30, 2009 (No document available)

There are no findings for FY 2008 because the audit report has not been received.

4-B.  A-133 Year Ended June 30, 2008

There are no findings.

4-C.  A-133 Year Ended June 30, 2007

Finding 2007-01
FEDERAL PROGRAM:

OSU-Oklahoma City (OSU-OKC) Federal Family Education Loans - 84.032

FINDING:

Auditors noted that all students selected for file testing were improperly disbursed FFEL loans more than three days from the date that the institution received the funds.

CRITERIA:

In accordance with 34 CFR 668.167(b)(2), an institution that receives FFEL cash through electronic funds transfer (EFT) must disburse the funds within three days.

CONDITION:

OSU-Oklahoma City was unaware of the necessary steps required by the institution’s disbursement program to ensure timely disbursement of Federal funds to students.

RECOMMENDATION:

Auditors recommended that OSU-OKC set forth policies and procedures for verifying that disbursement requirements are met. In addition, auditors recommend that OSU-Oklahoma City delay requesting/certifying loans until they are ready to be credited to the students’ accounts. Additionally, auditors recommend that OSU-Oklahoma City personnel undergo a more intensive training program. OSU-Oklahoma City can then develop an internal control system to meet these requirements for each Federal program.

UNIVERSITY RESPONSE:

The Financial Aid Office of OSU-Oklahoma City has been operating under the assumption that when they received a loan roster and placed the loan into the SCT system (OSU-Oklahoma City student data program) without running the SCT Disbursement Program, they were in compliance with the three-day disbursements rule for FFEL Programs. However, as noted in the audit this process was not assigning a date and creating a credit to the students’ accounts within the three days of receipt of the loan disbursement roster. Therefore, the process has been changed, and the SCT disbursement program runs every night, creating the credit in the students’ bursar accounts when the students become eligible for the disbursement. It is important to note that 34 CFR 668.167 authorizes an institution to delay disbursement up to an additional 10 days if the institution believes a student will become eligible within the 10-day window. After disbursement, any credit will then be refunded to the student within 14 business days of the credit.

This process has been implemented for the fall 2007 semester and will be used for all future loan disbursements. As part of internal control, this process will be monitored by the OSU-Oklahoma City bursar and the OSU-Oklahoma City director of Financial Aid to ensure all transactions occur within the required timelines. The university stands ready to provide assistance to personnel in the Bursar and Financial Aid offices at the OSU-Oklahoma City campus as requested to help ensure they are kept abreast of changes in both the federal and institution’s policies, procedures, and regulations.
CURRENT STATUS:

Implementation of the new process was completed in the fall 2007 semester, and no additional concerns remain on this issue. No further correction action is needed.

4-D. **A-133 Year Ending June 30, 2006**

There are no findings.

4-E. **A-133 Year Ending June 30, 2005**

There are no findings.

4-F. **A-133 Year ended June 30, 2004**

There was one finding for FY 2004

**Item 2004-1**

**FEDERAL PROGRAM:**

Student Financial Aid, Federal Supplemental Educational Opportunity Grant – CFDA 84.077, Oklahoma State University-Oklahoma City Campus involving misappropriation of a federal grant.

**FINDING:**

During fiscal year 2004, the director of Financial Aid at the University’s Oklahoma City campus inappropriately approved and awarded to herself a Federal Supplemental Educational Opportunity Grant in the amount of $1,500.

**CRITERIA:**

Section 510(a)(6) of OMB Circular A-133 requires the reporting of an audit finding when there is known fraud affecting that Federal award.

**CONDITION:**

The director of Financial Aid for the university’s Oklahoma City campus knowingly and intentionally defrauded the university by inappropriately awarding herself a Federal Supplemental Educational Grant in the amount of $1,500. This individual disregarded campus policies and procedures that are followed in a normal application process. This individual did not obtain any type of approval for the grant, and the amount awarded exceeded the maximum allowable Federal Supplemental Educational Opportunity Grant for the campus by $1,000 for an individual semester. The transaction in question was discovered by an employee of the Bursar’s Office during a routine review of student financial aid disbursements. The irregularity was communicated to the vice president of finance and operations for the Oklahoma City campus who immediately initiated a formal investigation. During the initial investigation, this individual used her position and knowledge regarding federal grant requirements to further conceal and perpetrate the fraud, and only upon further investigation from the university did the individual admit to the fraud. The individual was suspended from her duties during the investigation process and ultimately terminated upon completion of the investigation process and ultimately upon completion of the investigation. All funds in question were repaid by the individual back to the university.
We selected a sample of individuals (employees and students) that were awarded a Federal Supplemental Educational Opportunity Grant during fiscal year 2004 and tested these individuals to ensure that the campus made appropriate eligibility determinations as defined by OMB Circular A-133 in awarding these grants. Further, we reviewed all employees of the Student Financial Aid Department on the Oklahoma City campus who receive financial aid to test whether these individuals meet the requirements of OMB Circular A-133 for student financial aid. The results of our tests indicated that the Financial Aid Department of the Oklahoma City campus is substantially in compliance with the requirements of OMB Circular A-133 regarding eligibility determinations. Further, we noted that the employees receiving financial aid appear to meet the requirements as set forth in OMB Circular A-133. Based on our testing it appears that this was an isolated incident arising due to one individual’s abuse of position and knowledge of the student financial aid process.

**QUESTIONED COSTS:**

$1,500

**RECOMMENDATION:**

We recommend that the university implement a set of policies and procedures which require any employee requesting financial aid or a federal grant to have the application completed by a separate employee within the financial aid department, and that such applications be reviewed and approved by a member of university management independent of the financial aid department prior to any funds being disbursed.

**UNIVERSITY’S RESPONSE:**

The university concurs with the auditor’s recommendation.

4-G. [A-133 Year Ending June 30, 2003]

There were no findings.

4-H. [A-133 Year Ending June 30, 2002]

There were no findings.

4-I. [A-133 Year Ending June 30, 2001]

There were no findings.


- 2007 Primary Reserve Ratio = .430
- 2007 Net Operating Revenue Ratio = .037
- 2007 Return on Net Assets Ratio Calculation = .046
- 2007 Viability Ratio Calculation = 9.043
- **2007 Total Composite Financial Indicator Score = 5.6**
- 2008 Primary Reserve Ratio = .474
- 2008 Net Operating Revenue Ratio = .132
- 2008 Return on Net Assets Ratio Calculation = .182
- 2008 Viability Ratio Calculation = 12.255
- **2008 Total Composite Financial Indicator Score = 7.6**
The institution has good financial health.

6. Campus Crime Statistics - Reported crime statistics include those which occur within the jurisdictional boundaries of campus. They include Oklahoma City Police jurisdiction on city streets or public property immediately adjacent to the campus, and may include Oklahoma County property.

Crime statistics required for reporting by the U.S. Department of Education are compiled from incident reports in the Office of Safety and Security at OSU-Oklahoma City. Also, a list of crimes is obtained from Oklahoma City Police for property adjacent to the campus, up to the sidewalk. Statistics are due to the U.S. Department of Education every October for the previous year and must be available to anyone on campus who request them, including visitors. The statistics are available in printed form in the Parking & Traffic Regulations, Student Rights and Responsibilities, and on the campus website (Crime Information at OSU-Oklahoma City). Cards are displayed in the Cyber Café, OSU-Oklahoma City, and The Learning Center.

7. Limitation, Suspension, and Termination actions by USDE, reasons and outcome – None.


9. Other Items from Academic Policy –

a. Satisfactory Academic Progress: Students receiving any type of federal and/or state financial assistance at OSU-Oklahoma City must:

   i. Successfully complete at least 75% of all credit hours attempted for each academic semester; and

   ii. Maintain a minimum cumulative grade point average of 2.0 on a 4.00 scale; and

   iii. Complete an eligible academic program within the maximum credit hours attempted of one and one-half times the number of credit hours required for the program (Satisfactory Academic Progress Policy).

   A complete degree audit is conducted at the end of each semester on every student receiving financial aid. The audit evaluated three elements of students’ academic progress: completion rate of all courses attempted during each semester, the maximum time frame for program completion, and the cumulative grade point average.

b. Attendance: All faculty are required to state their attendance policies in syllabi distributed to students. The OSU-Oklahoma City syllabus guide allows for instructor preference in how this policy is determined. Attendance records are requested by both Student Support Services and Veterans Services periodically during the semester. At the end of the semester, instructors are required to enter the last date of attendance, never attended, or attended for every student who earned an F in a class, which makes keeping good attendance records important.

c. Contractual Relationships: OSU-Oklahoma City does not have contracts with non-accredited third-party providers of 25-50% of the academic content of any degree or certificate programs.
VI. **Public Disclosure**

1. **Institutional Policies for Maintaining Accuracy and Completeness of Information for Students — OSU-Oklahoma City** follows and established timeline and set of policies and procedures for maintaining accuracy and completeness of information for students. Documents such as the [Catalog](#), [Student Rights & Responsibilities](#), [Student Calendar](#), and the [Course Schedule](#) are printed each year, and the [Course Schedule](#) is printed for each academic semester.

   Each of these documents is reviewed by the originating unit for accuracy and completeness. The unit checks sections relevant to its operations before the document either goes to the Vice Presidents’ Council for approval or to Communications and Marketing for formatting and printing. For example, Financial Aid and Scholarships reviews all information pertinent to financial aid. Similar processes apply to all of the other documents.

2. **Institutional Policies Related to Producing Advertising and Recruitment Materials — [www.osuokc.edu/communications](http://www.osuokc.edu/communications)**

   **Media Relations**
   
   Only the president and the senior director of Marketing and Communications at OSU-Oklahoma City, or those authorized by the above, are designated to dispense press releases, contact the media or answer media inquiries. Also, should media representatives make an unscheduled stop on campus, the Office of Marketing & Communications should be contacted immediately.

   Occasionally, the media may contact the Office of Marketing & Communications for a representative to participate in an interview regarding a particular area of expertise. In most of these situations, a representative from the Office of Marketing & Communications will also attend the interview to provide support as needed and will provide any preliminary information in preparation for the interview.

   **Image and Publications**
   
   It is important to remember that often the first impression prospective students, community leaders and alumni receive is through OSU-Oklahoma City publications. Whether it is a class schedule, calendar, fax, e-mail, advertisement, or the university web site, it is vital one clear and concise message is sent.

   Any item that is produced with the OSU-Oklahoma City official name and / or logo must be approved by the Office of Marketing & Communications. This includes but is not limited to: press releases, mass mailings, brochures, newsletters, promotional items, apparel, web sites, and advertisements.

3. **Explain institutional policies related to oversight of third party contractors who conduct advertising or marketing:**

   In 2008 a bid was let for a professional service agency or organization specializing in media buying and marketing analysis for the placement and production of advertising (radio, cable, television, display/classified and outdoor, and other forms) for fiscal year beginning July 1, 2008, through June 30, 2009, with options to renew annually for three additional one-year periods.
Media agencies are evaluated on the following parameters:

- Stated rate of media commission;
- Consulting fee rate scale for non-commissionable media (hourly rate or bulk rate), including special event and community outreach assistance;
- Access to primary rating services such as Nielsen TV Local Market Reports, Arbitron Radio Local Market Reports or Arbitron Radio County By County Coverage Study;
- Client consultation ability;
- Target audience analysis;
- Media planning experience;
- Negotiating and added value opportunities;
- Record keeping (gantt charts of annual media planning, paperwork to stations, budget recaps, etc.);
- Trafficking of creative materials;
- Spot invoice audits, which match spot time, dates, costs and commercial numbers with original buy schedule;
- Post-buy analysis/estimate;
- Reach/frequency estimate;
- Willingness to place print advertisements in any national or local newspaper and special interest publications (print advertising tear sheets will be required before payment);

The successful bidder was PEAK Media, an Oklahoma City media placement agency. PEAK Media works in conjunction with and under the direction of the OSU-OKC Marketing & Communications senior director.

The contract requires the following of PEAK Media:

- The agency must use industry-standard, media management and evaluation software and methods for rating services and other pertinent information about broadcast media.
- They must also have strategic partnerships with creative service agencies or individuals to facilitate those resources if needed.
- The agency must be located in the Oklahoma City metroplex and specialize in the Oklahoma City metropolitan media market. Media placed outside of the Oklahoma City metroplex may or may not be purchased by the contracted media buyer.
- OSU-OKC will not be limited in placing advertisements outside of this agreement with the marketing agency or organization;
- Agency must be willing to accommodate all advertising deadlines; and
- Each party has the right to cancel service within 30 days (written notice).
The advantage of having a third party contractor placing advertising is the ability to pay reduced rates based on strategic buying of media based on volume and timeliness of placement.

1. Institutional Policies Related to Commission Status, etc.

OSU-Oklahoma City publishes its accreditation status both on its website and in the Catalog (Oklahoma State University-Oklahoma City section, pg 5). The Higher Learning Commission’s address and phone number are listed in both places. This is an update new to the 2009 edition of both media. Accreditation status has not previously been published in the campus course schedule, but it will appear in the spring and summer 2010 issue for the first time.

VII. Relationship with Other Accrediting Agencies and with State Regulatory Boards

OSU-Oklahoma City has several degree programs and one area on campus that are accredited separately from the Higher Learning Commission:

- Child Development Center – National Association for the Education of Young Children (NAEYC)
- Collegiate Officers Program – Council on Law Enforcement Education and Training (CLEET)
- Early Care Education Program – National Association for the Education of Young Children (NAEYC)
- Interpreter Training Program – Commission on Collegiate Interpreter Education\(^1\)
- Nurse Science Program – National League for Nursing Accrediting Commission (NLNAC)
- Approved by the Oklahoma Board of Nursing
- Veterinary Technology Program – American Veterinary Medical Association – Committee on Veterinary Technician Education and Activities (AVMA-CVTEA).

\(^1\)Accreditation pending

No adverse actions have been taken against any OSU-Oklahoma program by external accrediting agencies. OSU-Oklahoma City does not hold dual accreditation.
VIII. Public Notification of an Evaluation Visit and Third Party Comment

The solicitation of Third Party Comment required by the Higher Education Act and the Higher Learning Commission concerning institutions’ qualifications for accreditation is welcomed by OSU-Oklahoma City. Campus personnel view this comment period as an opportunity to receive additional valuable feedback on campus programs and services in order to improve the quality of all OSU-Oklahoma City has to offer its constituents.

The following table outlines the Third Party Comment plan of action for the campus, and it lists constituencies solicited for third part comments as required by the Higher Learning Commission.

<table>
<thead>
<tr>
<th>Task/Action</th>
<th>Implementation Date</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meet with Senior Director of Marketing &amp; Communica</td>
<td>August 2009</td>
<td>Steering Committee Co-Chair</td>
</tr>
<tr>
<td>Develop draft plan to include determining public constituencies</td>
<td>August 2009</td>
<td>Steering Committee Co-Chair/ Senior Director of Marketing &amp; Communications</td>
</tr>
<tr>
<td>Submit Plan of Action to Steering Committee</td>
<td>September 16, 2009</td>
<td>Steering Committee Co-Chair</td>
</tr>
<tr>
<td>Develop press releases/ads, etc.</td>
<td>September 2009</td>
<td>Senior Director of Marketing &amp; Communications</td>
</tr>
<tr>
<td>Disseminate ads/press releases/information to public constituencies</td>
<td>October 2009</td>
<td>Senior Director of Marketing &amp; Communications</td>
</tr>
<tr>
<td>Submit copies of notices to Higher Learning Commission</td>
<td>December 2009</td>
<td>President/Steering Committee Co-Chair</td>
</tr>
<tr>
<td>Higher Learning Commission receives comments</td>
<td>November 2009 through mid-February 2010</td>
<td>Higher Learning Commission</td>
</tr>
<tr>
<td>Higher Learning Commission forwards comments to OSU-Oklahoma City</td>
<td>2 weeks prior to visit</td>
<td>Higher Learning Commission</td>
</tr>
<tr>
<td>Consultant Evaluation Team reviews comments and President</td>
<td>February 22-24, 2010</td>
<td>Consultant Evaluation Team</td>
</tr>
<tr>
<td>Incorporate comments into planning processes for action</td>
<td>Late February 2010</td>
<td>President</td>
</tr>
</tbody>
</table>
The following list represents constituents who either had access to Third Party Comment public notices or were sent letters requesting their participation in this process.

Public Constituencies

Various Publics (to include prospective students):

- Web Site: [http://www.osuokc.edu](http://www.osuokc.edu)
- Social Networking Sites:
  - Electronic Message Boards
  - E-mail
  - Facebook
  - Twitter
  - YouTube

Current Students:

- Post message in the Online College Classroom to reach online students
- Distribute notice at Student Government Association Meeting
- Distribute notice to all student club presidents and faculty sponsors
- Post on campus bulletin boards
- Post on campus flat screen televisions
- Post on campus computer message screens
- Student Club Officers

Former Students:

- Post message on the Alumni Association website

Business Community:

- CEO/superintendents, etc. partnership and cooperative agreement sites
- County Assessor
- Hispanic Chamber of Commerce
- Kirkpatrick Family Fund
- Kirkpatrick Foundation, Inc.
- Letter to our business/industry partners such as OG&E and Chesapeake Energy Corporation
- Nichols Hills Chamber of Commerce
- OSU-Oklahoma City Campaign Launch Committee
- Greater Oklahoma City Chamber of Commerce
- OSU-Oklahoma City Academic Program Advisory Committee
- OSU-Oklahoma City President’s Advisory Board
- Northwest Chamber of Commerce
Colleges and Universities:

- Letters to Presidents:
  - Oklahoma City Community College
  - Oklahoma City Downtown College
  - Oklahoma Council of Two-Year College Presidents Association
  - Oklahoma City University
  - Oklahoma State University System Institutions
  - Langston University
  - Oklahoma Panhandle State University
  - Northeastern Oklahoma A&M College
  - OSU-Okmulgee
  - Connors State College
  - OSU Center for Health Sciences / College of Osteopathic Medicine
  - Redlands Community College
  - Rose State College
  - University of Central Oklahoma

- Chancellor, Oklahoma State Regents for Higher Education

- Community at Large (Taxpayers):
  - Local Newspapers: *Daily Oklahoma, Journal Record, Black Chronicle, El National*
  - Employers of graduates
  - Practicum and clinical site supervisors for program students
  - External accrediting agencies

OSU-Oklahoma City Faculty and Staff:

- Campus e-mail notice via ALLOSUOKC group

High Schools:

- Area Home School Associations
- Bethany Public Schools superintendent
- Deer Creek Public Schools superintendent
- Edmond Public Schools superintendent
- Oklahoma City Public Schools superintendent
- Oklahoma City Public Schools – high school principals
- Other top feeder high schools: Mustang, Western Heights, Northwest Classen, Yukon
- Putnam City Public Schools superintendent
- Putnam City Public Schools – high schools principals
- Western Heights Public Schools superintendent
Public Officials:

- State Government: Governor, State of Oklahoma; Superintendent of Public Instruction
- Oklahoma State Senate and House of Representatives members (local), President Pro Tempore of the Senate, and the Speaker of the House of Representatives
- Congressional delegates for district
- Fire and Police Chiefs: Bethany, Edmond, Nichols Hills, Norman, Oklahoma City, Yukon
- Oklahoma County Sheriff
- Mayors: Nichols Hills, Oklahoma City
- Oklahoma Highway Patrol
- Office of the District Attorney
- Department of Human Services
- Oklahoma City Council Members
- Oklahoma City County Commissioners

Methods of Information Dissemination

- Newspaper ads, articles, and press releases
- Web Site
- Letters sent via U.S. Postal Services
- Campus bulletin boards
- Distribution at meetings on campus and in public
Sample Third Party Comment Letter

Date

Dear:

As part of our accreditation process, Oklahoma State University-Oklahoma City will undergo a comprehensive evaluation visit by a team representing The Higher Learning Commission, a commission of the North Central Association. For the past two years, OSU-Oklahoma City has been engaged in a process of self-study, addressing the Commission’s requirements and criteria for accreditation. The evaluation team will visit OSU-Oklahoma City Feb. 22-24, 2010, to gather evidence that the self-study is thorough and accurate. The team will recommend to The Higher Learning Commission a continuing status for the university. Following a review process, The Higher Learning Commission itself will take the final action.

To help us meet this goal, you are invited to submit comments regarding OSU-Oklahoma City by writing:

Public Comment on Oklahoma State University-Oklahoma City
Commission on Institutions of Higher Education
North Central Association of Colleges and Schools
30 North LaSalle Street, Suite 2400
Chicago, IL 60602

All comments must address substantive matters related to the quality of the institution or its academic programs. Written, signed comments must be received by Jan. 20, 2010, and should include the name, address and telephone number of the person providing the comments. Comments will not be treated as confidential.

Enclosed with this letter is a flyer you can share with your staff. Thank you for your cooperation in the accreditation process.

Sincerely,
SAMPLE PUBLIC NOTICE

Oklahoma State University – Oklahoma City is seeking comments from the public about the university in preparation for its periodic evaluation by its regional accrediting agency. OSU-Oklahoma City will undergo a comprehensive evaluation visit Feb. 22-24, 2010, by a team representing The Higher Learning Commission, a commission of the North Central Association. OSU-Oklahoma City has been accredited by The Higher Learning Commission since 1975. The team will review the institution’s ongoing ability to meet The Higher Learning Commission’s criteria for accreditation.

The public is invited to submit comments regarding OSU-Oklahoma City by writing:

Public Comment on Oklahoma State University-Oklahoma City

Commission on Institutions of Higher Education

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All comments must be received by January 20, 2010.