“Out of Sight, Out of Mind: Off-Campus Accreditation Issues”

Southern Association of Colleges and Schools
Commission on Colleges
Annual Meeting, December 8-11, 2018
Concurrent Session CS-43
Date/Time: 12/9/2018: Sunday: 3:15PM - 4:15PM
Location: R09, Level 2, ENMCC

Presented by:
Robert E. Bicknell, Ph.D.
Accreditation Consultant
Provost Emeritus
Howard Payne University
Brownwood, TX 76801
robertbicknell@harrisbb.com
(325)647-6546
LEARNING OUTCOMES

It is expected that session participants will develop heightened understanding of how and where to locate Commission on Colleges' requirements for off-campus and distance learning programs, and increased planning skills concerning the application of these requirements, whether in preparation for an Off-site Review Committee, an On-site Reaffirmation Committee, a Fifth Year Committee, or a Substantive Change Committee, as applied to the following nine potential issues.

INTRODUCTION

Many institutions operate, or plan to operate, off-campus programs. The Principles of Accreditation are clear that all Commission standards and policies apply to “all institutional programs and services, wherever located or however delivered. This includes programs offered through distance and correspondence education, off-campus sites, and branch campuses.” Careful attention is necessary to ensure that these requirements are monitored and documented for review by Off-site Review, On-site Reaffirmation, 5th Year, Substantive Change, and Special Committees. This presentation will examine the most frequently problematic off-campus and distance learning requirements.

As the number of institutions offering off-campus and distance learning programs has increased, so has the level of oversight of these programs been increased by the regional accrediting agencies, particularly through the initiation of federal encouragement to do so. Unfortunately, there are enough instances of abuses by some institutions that there is a stigma often attached to institutions that may be conducting off-campus or distance learning programs of the highest quality and integrity. Adherence to the standards and policies of the Commission on Colleges as expressed in the Principles of Accreditation and other Commission documents will help to insure that abuses will not occur. In addition, careful, constant attention must be paid to changing requirements that affect these programs.
RESOURCES

Three Key Statements


   SACSCOC accredits degree-granting higher education institutions and entities based on requirements in The Principles of Accreditation: Foundations for Quality Enhancement. These requirements apply to all institutional programs and services, wherever located or however delivered. This includes programs offered through distance and correspondence education, off-campus sites, and branch campuses. Consequently, when preparing documents for the Commission demonstrating compliance with the Principles of Accreditation, an institution must include these programs in its “Institutional Summary Form Prepared for Commission Reviews” and address these programs in its analysis and documentation of compliance.

   Page 187. APPENDIX C: Guidelines for
Branch Campus A branch campus is an instructional site located geographically apart and independent of the main campus of the institution. A location is independent of the main campus if the location is (1) permanent in nature; (2) offers courses in educational programs leading to a degree, diploma, certificate, or other recognized educational credential; (3) has its own faculty and administrative or supervisory organization; and (4) has its own budgetary and hiring authority.

Correspondence Education Correspondence education is a formal educational process under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. Interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student; courses are typically self-paced. (See SACSCOC policy Distance and Correspondence Education.)

Distance Education In conjunction with the federal definition, SACSCOC defines distance education as a formal educational process in which the majority of the instruction (interaction between students and instructors and among students) in a course occurs when students and instructors are not in the same place. Instruction may be synchronous or asynchronous. A distance education course may use the Internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVDs, and CDROMs, if used as part of the distance learning course or program. (See SACSCOC policy Distance and Correspondence Education.)

Off-Campus Instructional Site An off-campus instructional site is a teaching site located geographically apart from the main campus. A site at which an institution provides electronic delivery and where students go to access the support services needed is also considered an off-campus instructional site. The site is not independent of the institution’s main campus.


Commission Policies
Definition: A policy is a required course of action to be followed by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) or its member or candidate institutions. SACSCOC policies may also include procedures, which are likewise a required course of action to be followed by SACSCOC or its member or candidate institutions. The Principles of Accreditation require that an institution comply with the policies and procedures of SACSCOC. Policies are approved by vote of the SACSCOC Board of Trustees. At its discretion,
the Board may choose to forward a policy to the College Delegate Assembly for approval.

**Commission Guidelines**
Definition: A guideline is an advisory statement designed to assist institutions in fulfilling accreditation requirements. As such, guidelines describe recommended educational practices for documenting requirements of the Principles of Accreditation and are approved by the Executive Council of the SACSCOC Board of Trustees. The guidelines are examples of commonly accepted practices that constitute compliance with the standard. Depending on the nature and mission of the institution, however, other approaches may be more appropriate and also provide evidence of compliance.

**Commission Good Practices**
Definition: Good practices are commonly-accepted practices within the higher education community which enhance institutional quality. Good practices may be formulated by outside agencies and organizations and endorsed by the Executive Council of the SACSCOC Board of Trustees or the Board itself. Good practice documents are available on the SACSCOC website (www.sacscoc.org). SACSCOC

**Commission Position Statements**
Definition: A position statement examines an issue facing the SACSCOC membership, describes appropriate approaches, and states the SACSCOC stance on the issue. It is endorsed by the Executive Council of the SACSCOC Board of Trustees or the SACSCOC Board of Trustees.

**Commission on Colleges Documents**
All of the following references are to the Southern Association of Colleges and Schools Commission on Colleges Website: www.sacscoc.org. With the December 2017 approval of the revision to the Principles of Accreditation, most forms and documents have been updated during 2018. Pay careful attention to the “Recent Changes to the Web Site” section of the SACSCOC website to be sure you are aware of ongoing revisions to Commission documents.


Agreements Involving Joint and Dual Academic Awards (July 2018)

Credit Hours (August 2018)

Distance and Correspondence Education (August 2018)-
Documentation Template for Approved Substantive Change Committee
Branch Campus
Distance Education/Electronic Expansion
Fifth Year Off-campus Site
Off-campus Site (Not a Branch Campus)
Program Expansion at a New Off-campus Site

Dual Enrollment (June 2018)

Faculty Roster Form (April 2018)

General Instructions for Completing the Faculty Roster Form (May 2018)

Guidelines for Addressing Distance and Correspondence Education
(December 2011)

Institutional Summary Form Prepared for Commission Reviews (January
2018)

Reaffirmation of Accreditation and Subsequent Reports (January 2018)

Reports Submitted for SACSCOC Review (January 2012)

Substantive Change for SACSCOC Accredited Institutions (May 2018)

Templates for the Compliance Certification (Sept. 2009 – under revision)
Out of sight, out of mind [OC]


This guide provides assistance for peer reviewers when preparing to serve as evaluators of distance and correspondence education and also off-campus instructional sites and branch campuses, especially as part of the reaffirmation process. It should be used in conjunction with the Principles of Accreditation, the Resource Manual, and the Handbook for Peer Evaluators as well as the Commission policy Reaffirmation of Accreditation and Subsequent Reports.
The underlying rationale for these reviews is that the Principles of Accreditation applies to all institutional programs and services, wherever located or however delivered. This includes programs offered through distance and correspondence education, off-campus sites, and branch campuses. The institution must have incorporated an assessment of its compliance with appropriate standards for these circumstances. Furthermore, federal mandates require that on-site reaffirmation committees explicitly review distance and correspondence educational programs as well as all branch campuses. The committee must also visit a representative sample of other off-campus instructional sites where 50 percent or more of the coursework for a program is offered.

Generally, issues of compliance with the Principles of Accreditation as related to off-campus sites and distance/correspondence education will appear in a committee’s deliberations and in its report of findings within the standard of the Principles where there is an issue. If the issue is specific to location or mode of delivery, the narrative and the wording of the finding should make that clear. For example, the institution may have provided sufficient and acceptable information concerning distance education as it relates to physical resources, academic and student support services, library and learning resources, and the like, but totally omitted any reference about student access to fulltime faculty or what role the faculty played at the locations or via the delivery mode. In that case, the review committee might find the institution in noncompliance with Standard 6.1 (Full-time faculty) and/or Standard 6.2.b (Program faculty), specifically citing that the issue is related to the location and/or modality of instruction, with details in the narrative of the report. However, if the nature of the issue is a general lack of attention in the institution’s materials to distance or correspondence education, or to off-campus sites or branch campuses, there is a separate standard specific to that concern: Standard 14.3, which reads as follows:

The institution applies all appropriate standards and policies to its distance learning programs, branch campuses, and off-campus instructional sites.

(Comprehensive institutional reviews)

When citing this standard of the Principles as in noncompliance (off-site committees) or in writing a recommendation on this standard (on-site committees), the review committee is essentially saying that the presentation was largely devoid of material that allowed a review of distance or correspondence education, and/or off-campus sites to include branch campuses. Such a finding or recommendation would then entail a rather substantial institutional response directed specifically Resource Manual for The Principles of Accreditation: Foundations for Quality Enhancement 187 at the mode of delivery or location of delivery, and covering a broad array of standards from the Principles. However, the standards in the rest of the Principles where information was omitted could be found in compliance if the submitted materials support compliance for the locations and modes of delivery not covered by the finding in Standard 14.3.

Applicable Standards of the Principles
The following standards of the *Principles of Accreditation* make clear reference to either distance/ correspondence education or to off-campus instructional sites. For these standards, the institutional narratives obviously must address location or mode of delivery, as applicable:

**Standard 10.6** An institution that offers distance or correspondence education: (a) ensures that the student who registers in a distance or correspondence education course or program is the same student who participates in and completes the course or program and receives the credit. (b) has a written procedure for protecting the privacy of students enrolled in distance and correspondence education courses or programs. (c) ensures that students are notified in writing at the time of registration or enrollment of any projected additional student charges associated with verification of student identity. (*Distance and correspondence education*)

**Standard 10.7** The institution publishes and implements policies for determining the amount and level of credit awarded for its courses, regardless of format or mode of delivery. These policies require oversight by persons academically qualified to make the necessary judgments. In educational programs not based on credit hours (e.g., direct assessment programs), the institution has a sound means for determining credit equivalencies. (*Policies for awarding credit*)

**Standard 13.7** The institution ensures adequate physical facilities and resources, both on and off campus, that appropriately serve the needs of the institution’s educational programs, support services, and other mission-related activities. (*Physical resources*)

**Standard 14.1** The institution (a) accurately represents its accreditation status and publishes the name, address, and telephone number of SACSCOC in accordance with SACSCOC requirements and federal policy and (b) ensures all its branch campuses include the name of that institution and make it clear that their accreditation is dependent on the continued accreditation of the parent campus. (*Publication of accreditation status*)

**Standard 14.3** The institution applies all appropriate standards and policies to its distance learning programs, branch campuses, and off-campus instructional sites. (*Comprehensive institutional reviews*)

As noted above, the *Principles of Accreditation* applies to all institutional programs and services, wherever located or however delivered. The SACSCOC policy *Reaffirmation of Accreditation and Subsequent Reports* provides details on how this review will take place. Note that determination the importance and the sufficiency of coverage of extended sites and of distance and correspondence education in an institution’s compliance materials is a matter of professional judgment by the review committee except where explicitly required by policy or by the *Principles*. The following guidelines may help institutions and reviewers make these judgments by using the SACSCOC policy on *Reaffirmation of Accreditation and Subsequent Reports* to determine where best to incorporate location and delivery mode in standards of the *Principles*. That policy should be consulted regarding specifics of planning and carrying out on-site reviews of off-campus instructional sites and branch campuses.
Mission If the institution offers predominantly distance and correspondence education programs as its primary mode of delivery, this should be reflected in the institutional mission. Likewise, if expansive use of extended sites is the primary means of program delivery, that should be reflected in the institutional mission. Otherwise, the mission should not be inconsistent with the nature of such locations and modes of delivery. See Core Requirement 2.1 (Institutional mission).

Degree-granting authority If the institution has physical sites in states or nations outside of the main campus, these should have appropriate governmental operating authority and/or degree-granting authority, if required. Similarly, if the institution has distance/correspondence education students enrolled from other states, it should provide evidence of state authorization, if required. If such authorization is not required, evidence should support that it is not needed. See Core Requirement 3.1.a (Degree-granting authority).

Multi-level governance If branch campuses have their own boards, the relationship of these boards to the governing board of the institution should be clearly explained. See Standard 4.3 (Multilevel governance). Faculty Oversight of faculty teaching at extended sites and in programs offered predominantly via distance or correspondence education should be explained [see Standard 6.3 (Faculty appointment and evaluation)]. If students can earn 50 percent or more of the credits for a program at an extended site or via distance/correspondence education, there should be explanation of the responsibility for program coordination [see Standard 6.2.c (Program coordination)]. It would also be appropriate to explain the role of faculty development activities in preparing faculty to offer and teach courses using different modes of delivery [see Standard 6.5 (Faculty development)]. Faculty teaching at all sites and via all modes of delivery should be included in faculty rosters provided for Standard 6.2.a (Faculty qualifications). Faculty at branch campuses should be included in discussion of other parts of Section 6 (Faculty).

Institutional planning If the institution has broad goals and outcomes regarding growth and development of off-campus sites and distance education, these should be pointed out in the discussion of Core Requirement 7.1 (Institutional Planning). Similarly, it should be clear whether extended sites and/or distance education students are part of the QEP (Standard 7.2) and if not, why not.

Student achievement An institution is not required to report separate student achievement data by location of instruction or by mode of instruction. However, it should be clear from narratives how these sites and modes are incorporated into broader institutional statistics and into outcomes assessment measures. Institutions with multiple sites or with a broad array of distance learning programs may find it helpful to consider location or mode of delivery as a key variable in developing ways to use assessment results for program improvement. See Core Requirement 8.1 (Student achievement), as well as all of the student outcomes sub-standards in Standard 8.2 (Student outcomes: general education). It should be noted that an institution does have an obligation to establish comparability of instruction across locations and modes.
Educational policies, procedures, and practices If branch campuses have academic policies or practices that vary from campus to campus, this should be explained in Standard 10.1 (Academic policies). Narratives in Standard 10.2 (Public information) should make clear how key public information is conveyed to students across sites and across modes of delivery.

Cooperative academic arrangements Off-campus programs and distance/correspondence education are areas where contractual or cooperative agreements often occur. The nature of these agreements should be clear, as should that the institution has the capacity to ensure the quality and integrity of programs offered via such arrangements. See Standard 10.9 (Cooperative academic agreements).

Academic governance If an institution has extended sites and/or distance/correspondence education programs, Standard 10.4 (Academic governance) should clarify the responsibilities of the faculty for the content, quality, and effectiveness of curricula, including those offered at off-campus sites and via distance or correspondence education.

Library and learning/information resources Institutional narratives and documents should be explicit as to how students at off-campus sites and those enrolled in distance or correspondence education programs have access to adequate and appropriate library or related collections and services. All three parts of Section 11 (Library and Learning/Information Resources) will generally have supporting narrative related explicitly to location or mode of delivery.

Academic and student support services It is common to see explicit reference to off-campus sites and to distance education in narratives relating to academic and student support services. The standard does not require identical services regardless of location or mode of delivery, but it should be clear as to the nature of services across locations and modes, and that the services match the needs of students by location and mode. See Core Requirement 12.1 (Student support services).

Student written complaints Students at off-campus locations or taking courses via distance or correspondence education have rights to file written complaints with the institution. Narratives should make clear how this information is accessed for these students. See Standard 12.4 (Student complaints).

Financial documents A characteristic of a branch campus is a degree of budgetary independence from the main campus. Institutions with branch campuses will need to discuss this, including budget approval processes, as part of its narrative in Standard 12.2 (Financial documents).

Physical resources There should be explicit reference to the adequacy and appropriateness of the physical facilities and resources at off-campus instructional sites and branch campuses within Standard 13.7 (Physical resources). For branch campuses,
the coverage under this standard will be very similar to what is provided for the main campus; use of a subheading for each branch campus might be considered. For smaller off-campus sites, the facilities should be discussed, whether or not under the direct control of the institution. Institutions offering distance education programs generally include a brief discussion of the learning management system and the IT backbone available to host the service.

**Institutional environment** Institutions are responsible for the institutional environment at off-campus instructional sites and at branch campuses, whether or not the sites are under the direct control of the institution. Contracts, emails, surveys, and other documents might be relevant for inclusion under Standard 13.8 (*Institutional environment*).

---

**Commission on Colleges Visiting Committee Expectations** ("Off-campus Site Purpose and Process" instructions given to On-site Reaffirmation Committees). This document is not found on the SACSCOC web site and has not yet been updated in its references to the numbered standards of the *Principles of Accreditation*. Thanks to Dr. Crystal Baird, Commission on Colleges Vice President, for providing the document.

---

**Visiting Off-Campus Sites**

**Purpose of Visiting Off-Campus Site**
Federal regulations require visits to off-campus sites as part of the reaffirmation of accreditation. The purpose of the visit is to determine if the institution has adequate personnel, facilities, and resources to operate all off-campus sites. The visit assures that the student learning outcomes are comparable to those on the main campus, and resources supporting student success and the educational programs are adequate.

**Process:**
You will tour the facilities, talk with faculty and staff, and review the support activities relative to the educational programs offered at the off-campus site. During your visit, if you find comparability to programs (or similar programs) on the main campus, and adequacy of /access to appropriate support services and physical resources you will report as such to the full committee and your visit will be noted in the Reaffirmation Report (Appendix B). If you determine that there is non-compliance in any standard, you will report as such to the full committee, and draft the appropriate narrative and recommendation for consideration and review by the full committee. Any area found non-compliant will be noted in the body of the Reaffirmation Report and the appropriate recommendation written.

Directions:
Consider the questions below as a guide to the areas applicable to the off-campus site. First, record the name and address (number, street, city, state, zip code) of the off-campus site. Write a few short paragraphs describing and summarizing your findings, which will be Appendix B of the Reaffirmation Report. You do not need to write to specific standards but do include the concepts in these standards in your narrative. See last page of this document.

Questions and standards to consider in conducting your visit and writing your findings; additional questions may be appropriate depending on the off-campus site.

1. Does the institution have adequate personnel, facilities, and resources to operate the off-campus site?
2. Has the off-campus site developed expected student learning outcomes for each of its educational programs? Is the expected student learning outcomes at the off-campus site comparable with those offered on the main campus?
3. What kind support activities relative to the educational programs offered at the off-campus site are available to students? Are the resources supporting student success and the educational programs adequate?
4. Is the number of full-time faculty adequate to ensure the quality and integrity of the academic programs offered at the off-campus site? (Core Requirement 2.8)
5. Does the institution and/or the off-campus site provide student and faculty access and user privileges to adequate library collections and services and to other learning/information resources consistent with the degrees offered? (Core Requirement 2.9)
6. Does the off-campus site provide student support programs, services, and activities that promote student learning and enhance the development of students? (Core Requirement 2.10)
7. Are the physical facilities adequate to support the scope of the programs and services offered at the off-campus site? (Core Requirement 2.11.2)
8. Does the off-campus site have qualified administrative and academic officers with the experience, competence, and capacity to provide the programs and services offered? (Comprehensive Standard 3.2.8)
9. Are there expected student learning outcomes for all educational programs, administrative support services, academic and student support services, research...
within its mission, and community/public service within its mission at the off-campus site? Have these outcomes been assessed on the extent to which they are achieved at the off-campus site? Is there evidence of improvement based on analysis of assessment results at the off-campus site? (Comprehensive Standard 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.1.4, and 3.3.1.5)

10. Are appropriate academic support services provided at the off-campus site? What academic support services are available to students enrolled at the off-campus site? (Comprehensive Standard 3.4.9)

11. Do students enrolled at the off-campus site have access to and training in the use of technology? What forms of technology are available at the off-campus site? (Comprehensive Standard 3.4.12)

12. Is the effectiveness of all faculty members who teach at the off-campus site evaluated in accord with published criteria, regardless of contractual or tenured status? (Comprehensive Standard 3.7.2)

13. Are the facilities at the off-campus site appropriate to support educational programs and services? (Comprehensive Standard 3.8.1)

14. Do students at the off-campus site have access to regular and timely instruction in the use of the library and other learning/information resources? (Comprehensive Standard 3.8.2)

15. Are there a sufficient number of qualified library staff to serve the students enrolled at the off-campus site? (Comprehensive Standard 3.8.3)

16. Is there appropriate control over all its physical resources at the off-campus site? (Comprehensive Standard 3.11.1)

17. Are reasonable steps taken to provide a healthy, safe and secure environment for all members of the campus community at the off-campus site? (Comprehensive Standard 3.11.2)

18. Do the physical facilities at the off-campus site appropriately serve the needs of the educational programs, support services, and other mission related activities? (Comprehensive Standard 3.11.3)

19. Does the institution make available to students at the off-campus site current academic calendars, grading policies, and refund policies? (Federal Requirement 4.3)

20. Is the program length appropriate for each of the educational programs offered at the off-campus site? (Federal Requirement 4.4)

21. Are there adequate procedures for addressing written student complaints at the off-campus site? What evidence is there that the institution follows its procedures to resolve student complaints at the off-campus site? (Federal Requirement 4.5)

**Report:**

A summary narrative is needed for each off-campus site in Appendix B of the Reaffirmation Report. Summarize, in a few short paragraphs, your findings to the questions above and others you may have explored; below is a suggested outline

1. Personnel – brief description of faculty, staff, and administrators at the off-campus site
2. Physical Facilities – brief description of facilities that support educational programs and services offered at the off-campus site and scope of safety/health measures taken at the off-campus site
3. Library resources – brief description of library services and personnel that support educational programs offered at off-campus site
4. Technology – brief description of technology resources, services, and personnel that support educational programs offered at off-campus site
5. Financial – annual operating budget (adequacy of budget) for the off-campus site
6. Access to student support programs, services, and activities that promote student learning and enhance the development of students at the off-campus site
7. Institutional effectiveness – brief description of IE efforts at the off-campus site

RUG #1: “Nobody’ll ever look at these sites”. When can an institution expect its off-campus and distance learning programs to be reviewed?

1. The Commission reaffirms the accreditation of an institution as a totality. This accreditation extends beyond the parent campus to include all centers, branches, campuses, or other sites at which postsecondary degree or non-degree work is offered as well as all work offered through distance learning and correspondence education. The institution must include the review of all its operations in its Compliance Certification and the
Commission will review them during the institution’s reaffirmation. *(Reaffirmation of Accreditation and Subsequent Reports - Policy)*

2. **Required Committee Visits**

The following four types of substantive changes require on-site committee reviews within six months after implementation:

1. The initiation of an additional off-campus site/location at which a student can earn at least 50 percent of the credit toward an educational program, if any of the following applies: (a) the institution has a total of three or fewer additional locations, or (b) the institution has not demonstrated, to the satisfaction of SACSCOC, that it has a proven record of effective educational oversight of additional locations, or (c) the institution has been placed on sanction by SACSCOC or is subject to some limitation on its accreditation, or (d) the institution has been accredited by SACSCOC for less than ten years.

SACSCOC will conduct visits to the first three off-campus locations initiated by an institution that offer 50 percent or more of the credit for at least one program.

When an institution initiates its fourth off-campus site/location where 50 percent or more of a program’s credits are offered, SACSCOC may, at its discretion, choose not to conduct visits to any of these additional sites at the times of their initiation if the institution has previously demonstrated a record of effective oversight of its off-campus educational locations and has not been placed on sanction. However, SACSCOC will require visits to a representative sample of sites at the fifth-year interval between scheduled reaffirmations if (1) the additional sites have been initiated since the last scheduled reaffirmation and (2) the sites have not been visited.

At any time, SACSCOC may choose to authorize visits to new sites developed between the fifth-year review and the next scheduled reaffirmation of accreditation.

At the time of reaffirmation, SACSCOC will conduct a thorough review of a representative sample of additional locations/sites where a student can obtain 50 percent or more of course work toward an educational program. The extent of the review will depend, in part, on whether there has been a recent review of the site(s). *(Substantive Change for Accredited Institutions of the Commission on Colleges – Policy Statement (May 2018 Revision))*

3. The Fifth-Year Interim Report consists of several parts: (1) Signature Attesting to Integrity; (2) Institutional Summary Form; (3) Fifth-Year Compliance Certification, an abbreviated compliance report that addresses 17 standards of the Principles of Accreditation; (4) Fifth-Year Follow Up Report (as requested by the Board of Trustees), an additional report on standard(s) identified during an institution’s previous monitoring that require an update for ensuring continued compliance (not applicable to all institutions); (5) a QEP Impact Report; and (6) Review of off-campus instructional sites initiated since last reaffirmation but not reviewed by a committee. An institution is requested to undergo a COC committee review of previously unvisited off-campus instructional sites that were initiated since the institution’s last reaffirmation and where students can obtain 50% or more of coursework toward the completion of an educational program. The areas of evaluation as applicable to the off-campus instructional site(s) include: (1) faculty qualifications and access, (2) qualifications of administrative and academic officials leading activities and programs at the site(s), (3) student services, (4) library/learning resource accessibility and sufficiency, (5) physical facilities supporting the programs, and (6) student learning outcomes compared to similar programs offered on the main campus. The institution should use the Commission form "Documentation Prepared by the Institution for the Review Committee"

**RUG #2:** “My full-time faculty is already overloaded, we’ll never go to [fill in blank].” What provision needs to be made for student access to full-time faculty at an off-campus location or in a distance learning program?

1. The number of **full-time faculty** members is adequate to support the mission of the institution and to **ensure the quality and integrity of its academic programs.** (Principles of Accreditation: CR 6.1 Faculty).

2. The faculty assumes responsibility for and exercises **oversight of distance and correspondence education**, ensuring both the rigor of programs and the quality of instruction. (Distance Education - Policy Statement)

3. Provide a narrative with supporting evidence that the **number of full-time faculty members is adequate** to support the program, and describe the impact of the new initiative on faculty workload (Substantive Change Prospectus).

4. **Column One.** List **each location** where students can complete 50% or more of a certificate or degree program. Only the city and state is necessary.

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location of Instruction</td>
<td>Number &amp; Percent of Student Undergraduate Credit Hours Taught by Full-time Faculty for each Major or Program content area</td>
<td>Number &amp; Percent of Student Undergraduate Credit Hours Taught by Part-time or Adjuncts or Graduate Teaching Assistants for each Major or Program content area</td>
<td>Number &amp; Percent of Student Undergraduate Credit Hours Taught by Part-time Faculty or Adjuncts or Graduate Teaching Assistants in General Education Courses</td>
<td>Number &amp; Percent of Student Graduate Credit Hours Taught by Full-time Faculty in each Degree Program</td>
<td>Number &amp; Percent of Student Graduate Credit Hours Taught by Part-time Faculty or Adjuncts in each Degree Program.</td>
<td></td>
</tr>
</tbody>
</table>

(Core Requirement 2.8 – Faculty Template – not yet revised on the Commission’s web site)

5. The purpose of the **visit to the off-campus site(s)** is to determine whether or not the institution has adequate personnel, facilities, and resources to operate the off-campus site(s). The evaluation committee, therefore, will interview relevant faculty and staff at the site(s) with particular attention to student access to full-time faculty, student achievement, review facilities, and review appropriateness of other support activities such as library/learning resources and student services vis-à-vis the programs offered at the site(s), and any other pertinent compliance issues emerging from the Off-Site Committee report. (Reaffirmation of Accreditation and Subsequent Reports - Policy Statement)
**RUG #3:** “The high schools where we have dual-enrollment sites have plenty of good teachers – let them teach all our courses.” How does the “full-time faculty” requirement apply to dual-enrollment off-campus sites and distance learning?

1. SACSCOC defines an “instructor of record” as the faculty member qualified to teach the course. This person has overall responsibility for the development and implementation of the syllabus and for issuing grades. The faculty member will provide direct instruction for the course.

The institution ensures appropriate faculty qualifications for those who provide instruction for dual enrollment courses; these faculty members possess the same academic credentials and/or documented professional experience required by the institution of all of its faculty. Graduate teaching assistants, if they are the instructor of record and providing direct instruction, should meet the same academic and/or professional criteria. In all cases, the institution bears responsibility for documenting and justifying the qualifications of its dual enrollment instructors, and they are included on the Faculty Roster when appropriate for review by a SACSCOC committee. (Please refer to the Resource Manual, Standard 6.2.b, for a broader discussion of faculty qualifications.)

An institution offering dual enrollment courses or programs ensures that a sufficient number of full-time faculty members teach and/or provide appropriate oversight for the courses/programs. Materials submitted for review by SACSCOC explain the nature of faculty oversight that ensures the quality and integrity of the courses offered. The institution has clear criteria for the evaluation of faculty teaching dual enrollment courses and demonstrates the use of these criteria. (*Dual Enrollment – Policy Statement*)

**RUG #4:** “The adequacy and appropriateness of the physical facilities back home are fine – we don’t need to worry about off-campus.” How do the “physical facilities” requirements apply to off-campus sites?

1. The institution ensures adequate physical facilities and resources, both on and off campus, that appropriately serve the needs of the institution’s educational programs, support services, and other mission-related activities. ([Principles of Accreditation: CS 13.7 Physical Resources](#)).

2. The institution takes reasonable steps to provide a healthy, safe, and secure environment for all members of the campus community. ([Principles of Accreditation: CS 13.8 Institutional environment](#)).


4. How does the institution evaluate the appropriateness and sufficiency of physical resources at off-campus instructional sites, whether or not such sites are under the direct control of the institution? ([Resource Manual for the Principles of Accreditation, p. 137](#)).

**RUG #5** “The ‘boss’ said to do it.” How should off-campus locations be approved?

1. The Content of the Substantive Change Prospectus: Background Information. Provide a clear statement of the nature and purpose of the change in the context of the institution’s
mission and goals; evidence of the legal authority for the change (if authorization is required by the governing board or the state); and whether the proposed degree program or similar program is offered on the main campus or at other approved off-campus sites. (Substantive Change Prospectus)

2. The Content of the Substantive Change Prospectus: Assessment of Need and Program Planning/Approval. Briefly discuss the rationale for the change, including an assessment of need, evidence of the inclusion of the change in the institution’s on-going planning and evaluation processes, and documentation that faculty and other groups were involved in the review and approval of the new site or program. (Appendix B: Substantive Change Prospectus)

RUG #6: “This is a snap; we only meet one night a week for five weeks” Do compressed time-frame courses meet the federal standard for awarding academic credit?

1. Federal Definition of the Credit Hour. For purposes of the application of this policy and in accord with federal regulations, a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates
   1. Not less than one hour of classroom or direct faculty instruction and a minimum of two hours out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time, or
   2. At least an equivalent amount of work as required outlined in item 1 above for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours. (Credit Hours – Policy Statement)

2. For a program offered in compressed time frames, describe the methodology for determining that levels of knowledge and competencies comparable to those required in traditional formats have been achieved. (Appendix B: Substantive Change Prospectus.)

3. As part of the response, include a description of how the institution is monitoring the quality of the program(s) at the sites to be visited. Summarize current procedures for the assessment of learning outcomes and achievement, and how results are being or will be used to improve the programs offered at the sites to be visited. Include examples of related existing programs if the new site(s) follows existing practices at the main campus. (Documentation for the Substantive Change Committee – Template)

RUG #7: “What library; isn’t a Google search all anyone needs to know?” What level of learning resources support should be provided to off-campus students and faculty?

1. The institution provides adequate and appropriate library and learning/information resources, services, and support for its mission. (Library and learning/information resources) ... (Principles of Accreditation: CR11.1 Library and Learning/Information Resources and Services.)

2. Relevant Questions for Consideration:
   What access to collections and services is provided for off-campus sites and distance learning courses? (Resource Manual for the Principles of Accreditation, p.113)
3. The institution provides (a) student and faculty access and user privileges to its library services and (b) access to regular and timely instruction in the use of the library and other learning/information resources. (The institution ensures that users have access to regular and timely instruction in the use of the library and other learning/information resources. *Principles of Accreditation:* CS 11.3 Library and learning/information access).

4. Describe specifically how students enrolled in a new program and/or enrolled in a program at an off-campus location and/or enrolled in a distance education program access these discipline-specific learning resources.
   - Describe how students and faculty members will access information electronically.
   - Describe how faculty and students are instructed in the use of online resources as well as on-site library resources.
   - Describe resources to support students in access to and use of learning resources. *(Substantive Change Prospectus)*

5. Students have access to and can effectively use appropriate library resources. Access is provided to laboratories, facilities, and equipment appropriate to the courses or programs. *(Distance and Correspondence Education - Policy Statement)*

**RUG #8:** “IE? We don't do that here, that's back home on the main campus.”

Does Institutional Effectiveness need to include off-campus locations and distance learning?

1. The institution engages in ongoing, comprehensive, and integrated research-based planning and evaluation processes that (a) focus on institutional quality and effectiveness and (b) incorporate a systematic review of institutional goals and outcomes consistent with its mission. *(Institutional Planning)* *(Principles of Accreditation: CR 7.1 Institutional Planning)*

2. The purpose of the visit to the off-campus site(s) is to determine whether or not the institution has adequate personnel, facilities, and resources to operate the off-campus site(s). The evaluation committee, therefore, will interview relevant faculty and staff at the site(s) with particular attention to student access to full-time faculty, review facilities, and review appropriateness of other support activities such as library/learning resources and student services vis-à-vis the programs offered at the site(s), and any other pertinent compliance issues emerging from the Off-Site Committee report. The visitors will insure that the institution has demonstrated sufficiently the comparability of student learning outcomes with those for the same or similar programs on the main campus. The institution would have included and addressed its instructional sites and campuses in its Compliance Certification. The Compliance Certification would have been reviewed by the Off-Site Committee before these site visits. *(Reaffirmation of Accreditation and Subsequent Reports – Policy Statement)*

3. An institution is requested to undergo a COC committee visit to previously unvisited off-campus site(s) that were initiated since the institution's last reaffirmation and where students can obtain 50% or more of coursework toward the completion of an educational program. The areas of evaluation as applicable to the off-campus site(s) include: (1) faculty qualifications and access, (2) qualifications of administrative and academic officials leading activities and programs at the site(s), (3) Student services, (4) library/learning resource accessibility and sufficiency, (5) physical facilities supporting the programs, and (6) student learning outcomes compared to similar programs offered on the main campus. *(An Overview: the Fifth-Year Interim Report Review Process)*
4. Briefly discuss the rationale for the change, including an assessment of need, evidence of inclusion of the change in the institution’s ongoing planning and evaluation processes, and documentation that faculty and other groups were involved in the review and approval of the new site or program. (Substantive Change Prospectus)

5. Describe how the institution assesses overall institutional effectiveness as well as the means used to monitor and ensure the quality of the degree program(s), off-campus site(s), or other changes. Summarize procedures for systematic evaluation of instructional results, including the process for monitoring and evaluating programs at the new site, as well as using the results of evaluation to improve institutional programs, services, and operations. For compressed time frames describe the methodology for determining that levels of knowledge and competencies comparable to those required in traditional formats have been achieved. (Substantive Change Prospectus)

6. Long-range planning, budgeting, and policy development processes reflect the facilities, staffing, equipment and other resources essential to the viability and effectiveness of the distance education program. (Distance Education - Policy Statement)

7. Both the assessment of student achievement and evaluation of the overall program take on added importance as new techniques evolve. For example, in asynchronous programs the element of seat time is essentially removed from the equation. For these reasons, the institution conducts sustained, evidence-based and participatory inquiry as to whether distance learning programs are achieving objectives. (Best Practices for Electronically Offered Degree and Certificate Programs)

RUG #9: “Lets offer a bunch more courses at (location) – nobody cares how much we offer.” How are the requirements of “substantive change” applicable to off-campus sites?

1. Substantive change is a significant modification or expansion in the nature and scope of an accredited institution. The types of substantive change and the procedures for addressing them appropriately may be found in Substantive Change for SACSCOC Institutions.
   - Some changes, such as offering courses on-line that amount to less than 25% of the coursework needed to complete a degree, certificate or diploma, do not need to be reported to the Commission.
   - Others, such as offering (for the first time) 25% to 49% of the coursework required for a program on-line, simply require that the Commission be notified in advance of the implementation of the change. The letter of notification should include the name of the actual change, implementation date, street address if it involves a new site, and the credential being offered.
   - Larger scale changes, such as adding significantly different programs to the academic curriculum or offering a majority of the coursework needed to complete a degree, certificate or diploma on-line, may require written notification as well as advance approval of a prospectus; see the Substantive Change policy for details on due dates and on the content of the prospectus.
   - Institutions seeking to offer coursework at a more advanced level than that for which they are currently approved must submit an application for level change. See the Substantive Change policy for due dates. (What is a substantive change and how should it be handled? SACSCOC web site: Substantive Change)
2. The institution has a policy and procedure to ensure that all substantive changes are reported in accordance with SACSCOC policy. *(Principles of Accreditation: CS 14.2 Substantive Change)*

3. If an institution fails to report a substantive change that requires prior approval or prior notification, the committee will take the following actions:
   a) If discovered during the off-site review. The Off-Site Review Committee will mark Standard 14.2 out of compliance. The institution will be able to address the omission in its Focused Report and before the on-site review.
   b) If discovered during the on-site review. The On-Site Reaffirmation Committee will mark Standard 14.2 out of compliance and write a recommendation. The institution will address the recommendation in its response to the Commission. *(Reaffirmation of Accreditation and Subsequent reports – Policy Statement)*

---

**Don’t Let This Be YOU!!**

---

**For Additional Information, Contact:**

Robert E. Bicknell, Ph.D.
Accreditation Consultant
Provost Emeritus
Howard Payne University
Brownwood, TX 76801
robertbicknell@harrisbb.com
(325)647-6546