



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Evaluation and Inspection Services

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Belle S. Wheelan, Ph.D.
President
Southern Association of Colleges and Schools
Commission on Colleges
1866 Southern Lane
Decatur, GA 30033

Dear Dr. Wheelan:

This final management information report presents the results of our review of the Southern Association of Colleges and Schools – Commission on Colleges’ (SACS) standards for program length and SACS’s response to those results.

The objectives of our inspection were to determine: (1) what guidance SACS provides to institutions regarding program length and credit hours, (2) what guidance SACS provides to peer reviewers to assess program length and credit hours when evaluating institutions, and (3) what documentation SACS maintains to demonstrate how it evaluates institutions’ program length and credit hours. Although SACS has a clearly defined minimum standard for program length in terms of credit hours, it has not defined what constitutes a credit hour. Without defining a minimum standard for credit hours, SACS cannot ensure that its standard is being consistently applied.

BACKGROUND

Accrediting agencies are private educational associations that develop evaluation criteria and conduct peer evaluations of institutions of higher education to ensure that the education provided by those institutions meets acceptable levels of quality. The U.S. Department of Education (Department) does not determine the quality of education funded by Federal education dollars; however, the Secretary recognizes accrediting agencies as reliable authorities for the quality of education. In order for an accrediting agency to be recognized by the Department, it must submit an application for recognition. Under 34 C.F.R. § 602.16(a) (2008) an accrediting agency is required to demonstrate that it has standards for accreditation that are “sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits.” The agency meets this requirement if its accreditation standards effectively address the quality of the institution or program in ten areas, including (ii) curricula and (viii) measures of program length and the objectives of the degrees or credentials offered.

In 2008, there were 7 regional accrediting agencies that accredited 2,897 institutions of higher education. These institutions received \$74.8 billion in Title IV funding.¹ The Southern Association of Colleges and Schools – Commission on Colleges accredits institutions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia. Institutions accredited by SACS received over \$19 billion of the \$74.8 billion in Title IV funding in 2008.

Section 496(a)(5)(H) of the Higher Education Act, as amended, requires accrediting agencies to establish accreditation standards that assess the institution's measures of program length. In 2003, the Office of Inspector General (OIG) issued a management information report entitled *Southern Association of Colleges and Schools, Commission on Colleges' Accreditation Standards for Student Achievement and Program Length* (ED-OIG/A09-C0018). That report found that SACS's standards on program length require institutions to specify the number of credit hours in an educational program and provide guidance on program content. The report also stated that SACS did not define what constitutes a credit hour. In its comments on the report, SACS disagreed with the OIG's conclusion that the agency's standards covering student achievement and program length have inherent limitations. SACS did not provide specific comments addressing the OIG suggestions for its standards and management controls.

In 2002, SACS revised its standards for accreditation and developed its *Principles of Accreditation* which it began implementing in 2004. SACS also revised its review process beginning with leadership orientations during which institutions are provided with SACS's *Principles of Accreditation* and given the opportunity to meet their SACS contact person. Institutions are required to submit a Quality Enhancement Plan (QEP) and a Compliance Certification instead of the previously required self-study.

In the Compliance Certification, institutions provide justification for compliance with each of SACS's *Principles of Accreditation*. The institution's QEP focuses on student learning with an emphasis on outcomes and methods of assessment. Once a Compliance Certification is sent to SACS, an off-site committee reviews the certification.

The off-site committee compiles a report that is sent to the institution's president, who has the option of sending back a report focusing on the off-site committee's comments. The off-site committee's report and institution's focused report are sent to an onsite committee that looks at the QEP, any non-compliance issues, and all standards identified as criteria of the Secretary of the Department of Education.

The onsite committee is charged with evaluating the QEP and making final determinations of compliance with the *Principles of Accreditation's* core requirements, comprehensive standards, and federal requirements. The onsite committee compiles a report based on their review that is sent to the SACS Executive Council for its approval and then to the full Board of Trustees for final action on accreditation.

¹ Title IV funding is federal student financial aid provided through the Federal Stafford Loan, the PLUS Loan, the Federal Perkins Loan, the Federal Pell Grant, the Academic Competitiveness Grant, the National Science & Mathematics Access to Retain Talent Grant, the Federal Supplemental Educational Opportunity Grant, and Federal Work Study programs.

REVIEW RESULTS

The objectives of our inspection were to determine: (1) what guidance SACS provides to institutions regarding program length and credit hours, (2) what guidance SACS provides to peer reviewers to assess program length and credit hours when evaluating institutions, and (3) what documentation SACS maintains to demonstrate how it evaluates institutions' program length and credit hours. We found that:

- SACS provides guidance to institutions regarding program length and credit hours, however, it does not provide guidance on the minimum requirements for the assignment of credit hours,
- SACS provides guidance to reviewers regarding the assessment of program length, but does not provide reviewers guidance regarding the assessment of credit hours, and
- SACS maintains documentation to demonstrate that it evaluates institutions' program length and credit hours.

Although SACS has a clearly defined minimum standard for program length in terms of credit hours, it has not defined what constitutes a credit hour. Without defining a minimum standard for credit hours, SACS cannot ensure that its standard is being consistently applied.

Guidance to Institutions Regarding Program Length and Credit Hours

SACS provides institutions with guidance regarding program length in Core Requirement 2.7.1 (Program Length) of its *Principles of Accreditation*. The requirement clearly defines minimum semester credit hour requirements for associate, baccalaureate, and graduate degrees as follows:

The institution offers one or more degree programs based on at least 60 semester credit hours or the equivalent at the associate level; at least 120 semester credit hours or the equivalent at the baccalaureate level; or at least 30 semester credit hours or the equivalent at the post-baccalaureate, graduate, or professional level. If an institution uses a unit other than semester credit hours, it provides an explanation for the equivalency. The institution also provides a justification for all degrees that include fewer than the required number of semester credit hours or its equivalent unit.

SACS provides further guidance on this requirement in its *Resource Manual for the Principles of Accreditation* (Resource Manual) by suggesting questions for institutions and reviewers to consider specific to Core Requirement 2.7.1, including how the institution identifies the minimum number of credit hours required for degrees; what policies and procedures the institution has related to new programs; and if an institution uses a unit other than a semester hour, what is the equivalency of that unit to a semester hour and how was that equivalency determined. The Resource Manual also provides general descriptions of documentation that could be used to support compliance with this requirement, such as a course catalog, internal and external program reviews, and a description of any unit that is the equivalent of a semester hour and how it determines program length.

SACS does not provide institutions with guidance on what constitutes a credit hour, but does provide general guidance on the awarding of credits in Comprehensive Standard 3.4.6 (Practices for Awarding Credit) of its *Principles of Accreditation*. The standard states:

The institution employs sound and acceptable practices for determining the amount and level of credit awarded for courses, regardless of format or mode of delivery.

Further guidance on this standard is provided to institutions and reviewers in SACS's Resource Manual. The Resource Manual provides three questions for institutions and reviewers to consider with regard to Comprehensive Standard 3.4.6, specifically 1) how the institution ensures the equivalency of credits awarded for alternative format courses, 2) what policies the institution has to determine the level and amount awarded, and 3) how the institution uses standards or professional organizations or practices of peer institutions in developing its credit awarding policies. The Resource Manual also provides general descriptions of documentation that could be used to support compliance with this standard including a course catalog identifying the credits assigned to courses and modes of instruction and any policies, guidelines, or written procedures for establishing and evaluating the award of credit. SACS does not provide institutions with specific criteria on what would constitute sound and acceptable practices for determining the amount and academic level of credit for courses. The Resource Manual does not contain further guidance on determining equivalency of courses offered in alternative formats.

Guidance to Reviewers Regarding the Assessment of Program Length and Credit Hours

SACS does provide reviewers guidance regarding program length in its Core Requirement 2.7.1, but as stated above, does not provide guidance on what constitutes a credit hour. The minimum numbers of credit hours required for each degree is explicit in the wording of the requirement as shown above. Reviewers are also provided with the Resource Manual containing the considerations and information on documentation examples specific to the requirement used by institutions.

SACS's Comprehensive Standard 3.4.6 addresses the awarding of credit hours stating that the "institution employs sound and acceptable practices for determining the amount and level of credit awarded for courses. . . ." SACS provides reviewers with the additional information in the Resource Manual but does not provide reviewers guidance on what constitutes a "sound and acceptable practice" for assigning credit hours. Our file review showed that review teams did examine the practices of awarding credit relying on professional judgment to determine what was sound and acceptable. A letter from SACS denying one institution's request to add a new program shows that SACS can identify what constitutes an unacceptable practice for awarding credit, but SACS does not provide institutions and reviewers with a minimum requirement related to the assignment of a credit hour.

SACS provides reviewers with its *Handbook for Review Committees* (Handbook) which includes guidance on general review team procedures. The Handbook emphasizes the reviewer's use of professional judgment to determine an institution's compliance, based on the reviewer's experiences, expertise, and familiarity with studies of best practices in higher education. However, the Handbook does not contain specific criteria for reviewers to use when evaluating institutions' compliance with the *Principles of Accreditation*.

Documentation SACS Maintains to Demonstrate How it Evaluates Institutions' Program Length and Credit Hours

SACS maintains documentation showing a transparent review of program length and the process for assigning credit hours. Specifically, SACS maintains the compliance certification, the QEP, the review team report, and any subsequent correspondence to address recommendations from the review team for institutions applying for initial accreditation or reaffirmation of accreditation. In the compliance certification, institutions provide a narrative explaining their compliance with each of the items in SACS's *Principles of Accreditation*, including Core Requirement 2.7.1 and Comprehensive Standard 3.4.6, along with references to additional documentation to support their narrative.

The committee reports show evidence of review of the institution's compliance with SACS's *Principles of Accreditation* by both the off-site and onsite committees. The committee reviews are transparent as a result of SACS's standards and review process, with both the compliance certification and committee report organized by SACS's *Principles of Accreditation*. The committee reports show clear documentation of the review team's evaluation of Core Requirement 2.7.1 and Comprehensive Standard 3.4.6. In some cases, the committee reports showed an extensive review by the committee, referencing a variety of documentation provided by the institution, describing the committee's independent searches for information, providing additional suggestions for improvement, and explaining the onsite committee's follow-up on issues raised by the off-site committee. In other cases, committee reports simply stated that the institution had met the standard or requirement with a brief explanation of the institution's compliance. Although the depth of the review teams' evaluations varied in committee reports, SACS does maintain documentation to demonstrate that the review committees evaluated institutions' program length and process for assigning credit hours.

OIG Conclusion

SACS has a clearly defined minimum standard for program length in terms of credit hours, but does not define what constitutes a credit hour. Title IV funding for students is based on the number of credit hours a student takes. SACS does not have a minimum standard related to the definition of a credit hour and does not provide criteria for reviewers to use to evaluate sound and acceptable practices for assigning credit hours. SACS relies on the professional judgment of its reviewers. Our file review showed that reviewers did exercise their professional judgment to determine what was sound and acceptable, but that the level of documentation of that review varied. Without defining a minimum standard for credit hours, SACS cannot ensure that Comprehensive Standard 3.4.6 is being consistently applied which could result in inflated credit hours, the improper designation of full-time student status, and the over-awarding of Title IV funds.

SACS COMMENTS

On September 29, 2009, we provided SACS with a copy of our draft management information report for comment. We received SACS's comments to the report on October 21, 2009. SACS

did not take issue with any of the results presented in the draft report. SACS did identify two sentences in the background section that required clarification and those sentences have been modified. SACS also provided its perspective on the definition of a credit hour stating that there are a number of traditional practices in the awarding of credit, as well as the more recent proliferation of distance learning programs, that affect what the academy would normally define as a credit hour and its minimum requirements. SACS acknowledged that there is an expectation that accrediting bodies adopt and apply a definition of what constitutes a credit hour so that it can be applied across the board to all learning experiences, including distance learning. SACS stated that the traditionally accepted definitions of semester credit hours and quarter credit hours based almost exclusively on seat time can no longer be applied to half of the credits now being awarded by its higher education institutions. SACS's response, in its entirety, is attached.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objectives of our inspection were to determine:

- (1) What guidance SACS provides to institutions regarding program length and credit hours,
- (2) What guidance SACS provides to peer reviewers to assess program length and credit hours when evaluating institutions, and
- (3) What documentation SACS maintains to demonstrate how it evaluates institutions' program length and credit hours.

We notified SACS of our inspection on June 19, 2009, and began our fieldwork on August 3, 2009. We conducted an exit conference on September 21, 2009.

We reviewed applicable laws and regulations related to the accreditation of institutions. We also reviewed guidance that SACS provided to its institutions and to its peer reviewers including its *Principles of Accreditation*, *Resource Manual for the Principles of Accreditation*, *Handbook for the Reaffirmation of Accreditation* and *Handbook for Review Committees*. We interviewed relevant officials at SACS.

We reviewed SACS's files for a judgmental sample of institutions that SACS has accredited. We selected two public, two private, and two proprietary schools based on the highest amount of Title IV funding received for each type of institution in 2008. We selected the University of Texas at Austin and University of Florida as the public institutions; Nova Southeastern University and Liberty University as the private institutions; and Keiser University and South University as the proprietary institutions. American Intercontinental University (AIU) was listed as the proprietary school accredited by SACS that received the most Title IV funds in 2008 but we did not review AIU's file since they were no longer accredited by SACS at the time of our review.

We requested a listing of all institutions with a final action for a substantive change from January 1, 2008 through June 1, 2009, as specified in 34 C.F.R. 22(a)(2)(iii) through (vi) and a listing of all institutions that were newly accredited by SACS from January 1, 2008, through June 1, 2009. We reviewed the files for two institutions from each listing. For substantive change we selected two institutions that were adding baccalaureate programs, Polk State College

(formerly Polk Community College) and Young Harris College, based on the types of programs being added. For newly accredited schools we selected Georgia Gwinnett College and Louisiana Delta Community College based on the level and type of programs being offered. We also reviewed the substantive change request from Mid-Continent University based on a recommendation from SACS.

Our inspection was performed in accordance with the *2005 President's Council on Integrity and Efficiency Quality Standards for Inspections* appropriate to the scope of the inspection described above.

ADMINISTRATIVE MATTERS

In accordance with the Inspector General Act of 1978, as amended, the Office of Inspector General is required to report to Congress twice a year on the audits that remain unresolved after six months from the date of issuance.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

We appreciate the cooperation given us during this review. If you or your staff have any questions, please contact W. Christian Vierling, Director, Evaluation and Inspection Services at 202-245-6964.

Respectfully,

/s/

Wanda A. Scott
Assistant Inspector General
Evaluation, Inspection, and Management Services

Electronic cc: Daniel T. Madzellan, Delegated the Authority to Perform the Functions and Duties of the Assistant Secretary for Postsecondary Education



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October 21, 2009

Mr. W. Christian Vierling
Director
Evaluation and Inspection Services
Office of Inspector General
555 12th Street, S.W., Room 8153
Washington, D.C. 20024

Dear Mr. Vierling:

Thank you for the opportunity to comment on the draft management information report provided to my office on September 29, 2009. We have read it carefully and find that it is a comprehensive assessment of our practices. Although it is not necessary for us to comment on the findings of the report since it does not contain recommendations for corrective action, we would like to make a few points for your consideration.

First, upon further scrutiny, we found two sentences requiring factual corrections and would appreciate your making them for the record. On page 2, last paragraph, the last sentence should read as follows: "The off-site committee's report and institution's focused report are sent to an onsite committee that looks at the QEP, any non-compliance issues, and all standards identified as criteria of the Secretary of the Department of Education." You may recall that we have asterisked 14 standards that are directly related to those of the DOE; those are reviewed during the off-site and the on-site evaluations.

The second correction is on page 3, first paragraph, the last sentence. A revised sentence should read as follows: "The on-site committee compiles a report based on their review that is sent to the Executive Council for approval and then to the full Board of Trustees for final action on accreditation." Without adding the underlined phrase, it appears that the 13-member Council makes final decisions on the accreditation status of institutions.

Second, I would like to reiterate what we discussed about the definition of a credit hour. There are a number of traditional practices in the awarding of credit, as well as the more recent proliferation of distance learning programs, that affect what the academy would normally define as a credit hour and its minimum requirements. For years the assignment of

credit hours for experiential learning, advanced placement, and professional certificates has rested solely with the institution awarding the credit. Given the variety of experiences that would allow for such credit, it has been, and will continue to be, impossible to define for all institutions what constitutes a credit hour as applied to those credit assignments. As part of its standards for accreditation, our membership has expected institutions to define and publish their policies for evaluating and awarding such credit.

In addition, the traditional practice of accepting credit for transfer goes against a generic definition of what constitutes a credit hour. It is the responsibility of the accepting institution to determine the equivalency of credit awarded for courses taken at another institution—an institution that might not use the same unit of credit as the institution accepting the credit.

And then there is distance learning whereby, like the practices described above, seat time cannot be measured. Yet, with this explosion of renewed traditional practices and new learning methods, there is an expectation that accrediting bodies adopt and apply a definition of what constitutes a credit hour so that it can be applied across the board to all learning experiences.

It is the practice of SACS Commission on Colleges to hold institutions accountable for the academic quality of **any and all** course work or credit recorded on an institution's transcript. It does this by engaging evaluators from peer institutions and training them to make professional judgments using as a framework the expectation that an institution makes these decisions consistent with its mission and ensuring that the course work and learning outcomes are at the collegiate level and that all degree programs offered by the institution are comparable. The traditionally accepted definitions of semester credit hours and quarter credit hours based almost exclusively on seat time can no longer be applied to half of the credits now being awarded by our higher education institutions.

Thank you for this opportunity to comment and we look forward to receiving your final report.

Sincerely,

/s/

Belle S. Wheelan, Ph.D.
President

BSW/CAL:rb