

U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** Association for Biblical Higher Education, The (1952 / 2017)
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Request for an Expansion of Scope of Recognition
3. **Current Scope of Recognition:** The accreditation and preaccreditation ("Candidate for Accreditation"), at the undergraduate level, of institutions of biblical higher education in the United States offering both campus-based and distance education instructional programs.
4. **Requested Scope of Recognition:** The accreditation and preaccreditation ("Candidate Status") of institutions of biblical higher education in the United States offering undergraduate certificates, associate degrees, baccalaureate degrees, graduate certificates, and master's degrees, including the accreditation of educational programs offered via distance education.
5. **Date of Advisory Committee Meeting:** 02/27/2020
6. **Staff Recommendation:** Recommend approval of the agency's request for an expansion of scope to include the accreditation of graduate certificates, and master's degrees.

Continue the agency's recognition as a nationally recognized accrediting agency at this time, and require the agency to come into compliance within 12 months with the criterion listed below, and submit a compliance report due 30 days thereafter that demonstrates the agency's compliance.

7. **Issues or Problems:** Additional information is requested for the following questions. These issues are summarized below and discussed in detail under the Staff Analysis section.
[602.15(a)(2)]--The agency does not meet the requirements of this section of the criteria. The agency must provide documentation demonstrating the training of all appeal panel members, a decision making body of the agency, on distance education pursuant to the criteria which requires competent and knowledgeable individuals, qualified by education and experience in their own right and trained by the agency on their responsibilities, as appropriate for their roles, regarding the agency's standards, policies, and procedures, to conduct its on-site evaluations, apply or establish its policies, and make its accrediting and preaccrediting decisions, including, if applicable to the agency's scope, their responsibilities regarding distance education and correspondence education.

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Commission on Accreditation (COA or agency) of the Association for Biblical Higher Education (ABHE) accredits Bible colleges and institutions offering undergraduate programs through both campus-based instruction and distance education.

The agency is an institutional accreditor and has 111 accredited and 12 preaccredited institutions located in the United States and territories, along with accrediting activities outside of its scope of recognition to institutions in Canada. The Secretary's recognition of the agency enables its accredited institutions to seek eligibility to participate in student financial assistance programs administered by the Department of Education under Title IV of the Higher Education Act of 1965, as amended. Since the agency's last review, the Department has received no complaints and no third-party comments.

Recognition History

The COA of the ABHE appeared on the first list of recognized accrediting agencies in 1952. The agency added distance education to its scope in December 2007. The agency has been periodically reviewed and continued recognition has been granted after each review.

The COA of the ABHE was last reviewed for renewal of recognition at the spring 2017 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). Both Department staff and the NACIQI recommended to the senior Department official to continue the agency's recognition for a period of five years. The agency is seeking to expand its scope of

recognition to include graduate certificates and master's degrees, which is the subject of this petition review.

In conjunction with the agency's expansion of scope petition, Department staff reviewed the agency's supporting documentation and observed two agency site visits in October and November of 2019 along with a virtual and on-site Commission meeting in June 2019 and February 2020.

PART II: SUMMARY OF FINDINGS

602.12 Accrediting Experience

(NOTE: Only recognized agencies seeking an expansion of scope need to respond.)

The following represent the current and requested scope of recognition for the agency:

Current Scope of Recognition: The accreditation and preaccreditation ("Candidate for Accreditation"), at the undergraduate level, of institutions of biblical higher education in the United States offering both campus-based and distance education instructional programs.

Requested Scope of Recognition: The accreditation and preaccreditation ("Candidate Status") of institutions of biblical higher education in the United States offering undergraduate certificates, associate degrees, baccalaureate degrees, graduate certificates, and master's degrees, including the accreditation of educational programs offered via distance education.

The agency is requesting an expansion of scope to include graduate certificates and master's degrees, which have been evaluated and accredited by the agency since 2005 with 77 institutions currently accredited at the graduate level. The agency provides justification for the expansion along with a summary of the standards and essential elements for evaluation; staff experience; and policies and procedures to support the requested expansion. The agency further identifies 6 standards and their essential elements related to graduate study requirements. In particular, standard 11 and 13 of its essential elements provide specific curriculum expectations for the requested level of education for the expansion of scope (exhibit 2). In addition to the narrative, the agency has provided a list of currently accredited graduate certificate and master's degree institutions, along with highlighted evaluation team report excerpts, and a summary of actions to support this request (exhibits 1, 3 and 4).

Analyst Remarks to Response:

The agency met the requirements of this criterion with its original narrative and documentation.

602.15 Administrative and fiscal responsibilities

The agency meets this requirement if the agency demonstrates that--

(a) The agency has--

(1) Adequate administrative staff and financial resources to carry out its accrediting responsibilities;

The agency provided position descriptions and curriculum vitae for the 4 full-time agency staff, including the Director, Associate Director, Accreditation Services Coordinator/COA Bookkeeper and the Accreditation Services Assistant (exhibits 6-9). In addition, the agency provided position descriptions and curriculum vitae for 3 staff that work adjunctly/part-time with the agency (exhibits 10-12); and acknowledges one Accreditation Services Assistant position is vacant at the agency and will be filled in September 2019.

Further, the agency provided the position descriptions and curriculum vitae for 4 of the 5 Association Board of Directors that work with the agency through the joint use of personnel agreement established by the Memorandum of Understanding between the two entities (exhibits 13 and 16). Specifically, the agency attests that the Association staff do not perform accreditation functions, have separate staff, budgets, and limited shared resources(exhibit 5); however, it is unclear, based upon the organizational chart, whether the Executive Vice President of the Association Board collaborates/works with the agency Director on accreditation matters, since the position description and curriculum vitae for the Executive Vice President of the Association Board has not been provided for analysis.

The agency also provided a weblink to the trainings provided for staff and an outlined agenda of the training provided to new staff and new evaluators (exhibit 18). However, the training documents for staff, not the weblink, must be provided for analysis and the new staff/evaluator training does not demonstrate the review of distance education, which is within the agencies scope of recognition.

Lastly, the agency provided agency budgets and audits for the past four years with current forecasts, which identifies a surplus; distribution of accreditation responsibilities and activities; fulfillment of deadlines; and a list of institutions served by staff (exhibits 14-15, 17, 19 and 21-23). The agency attests that the current staff and budget surplus are appropriate for the inclusion of graduate certificates and master's degrees within the agency's expansion of scope.

The Department nor the agency has received any complaints since their last review before the NACIQI, however, the agency did provide their Policy on Complaints against the Commission on Accreditation for analysis (exhibit 20).

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided an explanation and documentation to address the status of filling the vacant accreditation assistant position at the agency. Specifically, the agency explained the departure of the existing accreditation services coordinator, who was also responsible for bookkeeping for the agency, which resulted in the modification/reconfiguration of the existing accreditation services coordinator, bookkeeping and vacant positions. These modifications included the agency dissolving the vacant position duties; separating the accreditation services coordinator and bookkeeping functions; hiring the former coordinator to serve as consultant during these changes; revising the agency and the Association's shared services agreement; and moving the bookkeeping position to the Association without accreditation responsibilities. The agency provided the changed accreditation services coordinator and bookkeeping position descriptions; resume of the new accreditation services coordinator; the consultant agreement for this transition; FTE and budget allocations; the updated organizational chart as evidence (exhibits 242-248 and Analyst Upload). The revised shared services agreement with the agency and the Association depicting the aforementioned changes will be presented at the agency's February 2020 commission meeting. In addition, the agency attests that the Vice President of the Association does not work with the agency on any accreditation related activities. Further, the agency provided the position description and the biographical sketch of the Vice President of the Association, which outlines the Vice President's responsibilities as counsel to staff and assistant to the President of the Association with no references to accreditation or duties associated with the executive director of the agency (exhibit 249). Lastly, the agency provided documentation of the distance education training provided to agency staff, along with the signed attestations of agency staff acknowledging the completion of the training (exhibits 250 and 251).

(2) Competent and knowledgeable individuals, qualified by education and experience in their own right and trained by the agency on their responsibilities, as appropriate for their roles, regarding the agency's standards, policies, and procedures, to conduct its on-site evaluations, apply or establish its policies, and make its accrediting and preaccrediting decisions, including, if applicable to the agency's scope, their responsibilities regarding distance education and correspondence education;

The agency, as mandated by the ABHE constitution and bylaws, is comprised of an 18-member Commission with eight administrators, seven academics, and three public members who are charged with both policy and decision-making authority for the agency (exhibits 24-26). The agency attests that nine commissioners hold doctoral degrees, eleven have graduate experience, and ten currently serve at institutions that grant graduate credentials to support the expansion of scope. In addition, the agency provided documentation and evidence of the policies; nomination and selection processes; classifications; appointments; education; experience; and responsibilities of current commissioners, including public members to demonstrate adherence to agency policies and the criteria (26-30).

The agency provided the policies and procedures excerpts for Appeal Panels, which are comprised of four persons selected from a qualified pool of 10-20 former commissioners, who are not current members of the commission or the agency Board; and are qualified personnel from accredited institutions with training on agency standards, policies, and procedures. The agency attests that Appeal Panels must consist of administrative, academic and public representatives not affiliated with an ABHE institution, which is evidenced in the agency excerpt of the Policy and Procedure for Reviews and Appeals and the Appeal Panel pool list for graduate institutions, which includes curriculum vitae of panelists (exhibits 33-34 and 36). The agency further attests that an appeal was conducted in June 2018, however, documentation of that appeal has not been provided for analysis; nor has the February 2018 appeal action referenced in the Appeal Panel training documents been provided as evidence. Lastly, the agency has provided excerpts from the agency policy and procedure manuals and agency handbooks; however, the full manuals and handbooks must be provided for staff to thoroughly review policies referenced and additional materials provided as evidence.

The agency provided the policy and procedure excerpts pertaining to the Policy on Composition of Evaluation Teams, which requires an evaluation team participating in the review of an institution offering graduate programs, to have two persons with doctoral degrees with three years of experience in a postsecondary institution that offers graduate study; an academic evaluator,

administrator; completed the agency evaluation team training on graduate programs; three additional evaluators (exhibit 37 and 40). The evaluation team also includes an agency staff member, which accompanies evaluation teams as an observer and procedural guider, not as an evaluator (exhibits 38-39). In addition, the agency provided a list of evaluators for the past three years, including their classification, education, experience, role; curriculum vitae, and evaluator database screenshots (exhibits 40-41). Department staff attended an on-site observation to an institution for review of their master's degree program for candidate status and observed the composition of the evaluation team and the procedural guidance offered by the agency staff member in attendance.

The agency attests that training for existing and new commissioners is conducted online, in which 14 of the 15 non-public members have completed the specific training for graduate evaluation. The agency provided the 2019 Commissioner training materials for new and existing members, which includes the agency conflict of interest and public representative certification forms, recusal instructions, regulatory requirements, and additional resources (exhibits 31 and 32). However, the agency training documents did not demonstrate or document the training of commissioners in the review of programs offered via distance education. Similarly, the agency provided the 2018 Appeal Panel training materials that must be completed to be certified to serve on an appeal, which includes the review of conflict of interest, appealable actions, grounds for appeal, resources, and the review of a February 2018 appeal (exhibit 35). However, the agency training documents did not demonstrate or document the training of Appeal Panelists in the review of programs offered via distance education.

Finally, the agency provides concurrent training for new and veteran site evaluators, which includes evaluator roles and responsibilities; preparation instructions; standards review; qualifications for graduate evaluation; and review areas in graduate programs. The veteran evaluator training agenda also includes training on distance education; however, the new evaluators training agenda does not (exhibit 42). Also, the agency narrative states "where an institution offers distance education, one or more of the evaluators, must have completed the ABHE training for distance education" which indicates site visitor training on distance education is not completed by all site evaluators prior to an on-site evaluation as indicated in the ABHE evaluator manual.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided documentation of the classifications and distance education training provided to the commissioners, appeals panel members, and on-site evaluators as evidence, along with a sample of signed attestations of the aforementioned groups acknowledging the completion of the training (exhibits 250, 262-265 and 267). However, the documentation provided in the petition for appeal panelist records and distance education training verifications (exhibit 264) demonstrates that the public member participating on the appeal panel, which is a decision making body of the agency, did not complete distance education training prior to taking part in the appeal and further states the training is not applicable for the panelist. In addition, the agency provided clarification on the requirements of distance education training for on-site evaluators. Specifically, the agency evaluation manual requires all evaluators to participate in training on distance education, yet the website referenced different language. The agency has since provided the screen shot documentation of the updated agency website reflecting the distance education training module requirement for evaluation teams consistent with the agency evaluation manual (exhibit 264). The agency also provided the complete Commission on Accreditation Manual, Self-Study Guide, Evaluation Team Handbook, and Commissioner Handbook for analysis (exhibits 258-261). Lastly, the agency provided additional clarification on the appeal referenced in the original narrative. In particular, the agency clarified that the appeal referenced in the agency training documents and the appeal mentioned in the original narrative are the same; and the references in the training documentation refer to the original Commission decision in February 2018 which initiated the institutions Appeal of this decision, that took place in June of 2018. The agency provided the full cycle of review of the appeal as evidence (exhibits 252-257).

(3) Academic and administrative personnel on its evaluation, policy, and decision-making bodies, if the agency accredits institutions;

The agency bylaws states that the elected commissioners be qualified administrators and academics (exhibit 43). Similarly, agency policy defines the role of administrator as significant post-secondary engagement in program or institution administration; and the role of academic as significant post-secondary engagement in teaching and/or research (exhibit 44). The current commission consists of eight administrators and seven academics (exhibit 30). As discussed in 602.15(a)2, the Appeal Panel composition, pursuant to agency Policy, also requires the Appeal panel to include an academic and administrator for graduate Appeals (exhibits 33 and 36). Lastly, the agency policy on the composition of evaluation teams for institutions offering graduate programs requires an administrator; an academic evaluator with a doctoral degree; at least one other evaluator with a doctoral degree; three years of experience in a postsecondary institution that offers graduate study; and completion of the agency evaluation team training on graduate programs (37, 40-41, and 45).

Analyst Remarks to Response:

The agency met the requirements of this criterion with its original narrative and documentation.

(4) Educators and practitioners on its evaluation, policy, and decision-making bodies, if the agency accredits programs or single-purpose institutions that prepare students for a specific profession;

This criterion is not applicable to the agency, which is specialized institutional accreditor.

Analyst Remarks to Response:

This criterion is not applicable to the agency.

(5) Representatives of the public on all decision-making bodies; and

The agency Policy on Public Representatives states the need and requirement of representation from the public at the meetings of an accrediting agency's decision makers, which includes Commissioners and Appeal Panelists (exhibit 46-47). The agency provides the same definition of a public member as the criteria and contains 3 public members on the Commission and one public member on Appeal Panels (exhibits 30 found in 602.15(a)2; 34, 36 and 50). The agency has also provided signed public member certification forms for the Commissioners and an Appeal Panelist as well as meeting minutes noting the inclusion of the public members at a 2017 Commission meeting (exhibits 48-49 and 50A).

Analyst Remarks to Response:

The agency met the requirements of this criterion with its original narrative and documentation.

(6) Clear and effective controls against conflicts of interest, or the appearance of conflicts of interest, by the agency's--

(i) Board members;

(ii) Commissioners;

(iii) Evaluation team members;

(iv) Consultants;

(v) Administrative staff; and

(vi) Other agency representatives; and

The agency Policy on Conflict of Interest defines conflicts and includes procedures and definitions for recusals of Commissioners from meetings, which is reflected in meeting minutes, due to such conflicts (exhibits 51 and 59). Specifically, the agency defines a recusal as a declaration acknowledged by the Commissioner who

Recuses themselves before discussion begins; leaves the discussion, and avoids participation in any discussion related to the institution or the decision that the Commission makes relative to the institution under consideration. The agency has also provided signed conflict of interests forms for Commissioners, Association Board members, staff, and adjunct consultants attesting to the agency's Conflict of Interest policy (exhibit 56).

The agency provides reiterations of the policy within excerpts of the Policy on Assignment of Primary and Secondary Readers; the Commissioner Handbook; the Policy on Composition of Evaluation Teams; and the Evaluation Team Handbook, to ensure Commissioners, Appeal Panelists and evaluation teams are informed of the agency requirements (exhibits 52-55). In addition, the agency has provided excerpts from Commissioners, Appeal Panel, and new member training documents, which also houses the conflict of interest policy as evidence (exhibits 31-32 and 35). Lastly, the agency has provided signed Conflict of Interest forms of the recent agency Appeal Panelists and evaluation site team members for the past three years to document their awareness and agreement of the policy (exhibits 57-58).

Department staff attended a Virtual Commission meeting and witnessed the execution of the recusal procedures within the Conflict of Interest policy for the agency as Commissioners were removed from the discussions due to conflicts and notified by agency staff to return to the call once the discussion had concluded by the remaining Commissioners.

Analyst Remarks to Response:

The agency met the requirements of this criterion with its original narrative and documentation.

602.16 Accreditation and preaccreditation standards

The agency meets this requirement if -

(1) The agency's accreditation standards effectively address the quality of the institution or program in the

following areas:

(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.

The agency attests that a comprehensive review of agency student achievement standards to assess the validity of rigor and reliability of the standards is conducted by an elected Delegate Assembly of the Association and its Commission on Accreditation every 10 years, which is mandated by agency policies on Review of Standards; Changes to Standards; Academic Quality; and the Spirit of Accreditation (exhibits 60-64). However, a complete agency manual, including all agency standards, has not been provided for the assessment of the standards in their entirety. The agency evaluates and makes accreditation decisions based upon the following: institutions compliance with the eleven agency standards and their essential elements, which provide specific guidance with regard to expectations for a self-study, including an assessment plan that details success of student achievement pursuant to the institutional mission and agency standards; evaluation team review of institutional documents, including the self-study, evaluator worksheets and team reports on the review of agency standards, essential elements, and federal regulatory requirements; and the final decision making of the Commission on the aforementioned review of documents (exhibits 69-72).

The agency further attests that three standards focus on student achievement as it relates to mission, which are standard 1 and its essential elements 1 and 4 requiring institutional mission, goals, and objectives be related to biblical higher education and the mission statement; standard 2 which emphasizes student learning, institutional effectiveness, and planning of the institution; and standard 11, academic programs. It should be noted that essential element 1 of 11d requires institutional objectives and outcomes be extended to distance education programs and the content and rigor of courses be offered in alternative academic patterns consistent with offerings of the institution (exhibit 66). In addition, standard 11, which includes 7 additional essential elements specific for graduate level programs, has been unchanged by the Delegate Assembly upon completion its most recent decimal review (exhibits 65-68). Also, the self-study guides provide institutions with assessment tools for capturing student achievement success for evaluation of the abovementioned standards. The evaluator worksheets provide questions specific to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibits 69-72).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of student achievement standards for graduate certificate and master's degree programs (exhibits 73-86). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the complete Commission on accreditation manual and the full cycles of review for three institutions to demonstrate the assessment and review of their student achievement standards for graduate certificate and master's degree programs (exhibit 258). In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates. Department staff attended two separate site visits and observed the on-site evaluation team's review and documentation of the institution's adherence to agency standards for student achievement and assessment.

The agency attests that the curricula expectations for institutions are found in standard 11, academic programs, of the excerpt from the agency manual. Specifically, standard 11a, essential elements 1, 2, and 6, requires institutions to evidence programs exhibit rigor, analytical research, and communication skills at the level of education offered; student outcomes and achievement of outcomes; and course progression to the degree and level of education offered by the institution. In addition, standard 11d requires institutions to evidence that courses and programs offered in alternative academic patterns are consistent with other offerings of the institution (exhibit 87). The agency provides guidance to institutions for evaluating this standard in the self-study guide; the Policy on Alternative Academic Patterns; the Policy on Competency-Based Education and Direct Assessment; and the Regulatory Requirements Evaluation Form. (exhibits 75 and 88-90). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review and classroom observations during on-site evaluations, and reporting to the Commission (exhibit 91).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review

of curriculum standards for graduate certificate and master's degree programs (exhibits 91-102). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their curricula standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that the faculty expectations for institutions are found in standard 9, faculty. Specifically, standard 9a, essential elements 2, 4, 5, 7 and 9 requires faculty to possess a terminal or appropriate professional doctoral degree from an accredited institution with expertise in teaching for graduate program offerings; evidence of such credentials through transcripts, vitae, and publications; evaluation of instructional effectiveness; and faculty professional development. In addition, standard 9b, essential element 5 requires faculty involvement in academic decision-making of the institution (exhibit 103), which is discussed in detail within the agency guidance provided to institutions for evaluating this standard in the self-study guide and the regulatory requirements form (exhibits 75 and 104). Further, the evaluator worksheets are then utilized to assess the institutional responses, which includes document review and classroom observations during on-site evaluations, and reporting to the Commission (exhibit 105).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of faculty standards for graduate certificate and master's degree programs (exhibits 106-116). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their faculty standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; confidential evaluator worksheet; and the Commission's decision letter (exhibits 268-309). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that the expectations of facilities, equipment and supplies for institutions are found in standards 6, 10 and 11. Specifically, standards 6c and d, physical and technological resources essential elements 1-5 and 1-2 requires institutions to possess adequate facilities, equipment and supplies for achieving educational goals; personnel to maintain and meet the needs of the facilities; services to ensure health, safety and disability access to the facilities; appropriate technology support and resources to maintain technological and educational effectiveness (exhibit 117).

Additionally, agency standard 10, library and learning resources, essential element 3 requires institutions to sustain sufficient funding for learning resources, staff, facilities and technology for all methods of instruction. Similarly, standard 11d requires adequate staffing, facilities and technology to support all delivery modes (exhibit 117). The agency also provides institutions guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 118). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibits 119-121).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of standards for facilities, equipment and supplies at graduate certificate and master's degree programs (exhibits 122-132). It should be noted that the agency's facilities, equipment and supplies standards are also applicable to all other programs accredited by the agency. However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance

determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their facilities, equipment and supplies standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that the expectations for the fiscal and administrative capacity of the institutions are found in standards 5, administration and 6b financial resources. Specifically, standard 5 essential elements 1-5 requires institutions to have a board appointed chief executive officer leading the institution toward accomplishing its stated mission; appropriate organizational structure with specified roles; appropriately skilled administrative leaders through education and experience; and continuous assessment and development of these administrators (exhibit 133). In addition, standard 6b, essential elements 1-3, 6 and 8 requires institutions to evidence financial stability; budgeting processes for effective oversight; sufficient financial reserves; and institutional planning to inform budgets. The agency notes that standard 5 was revised by the Delegate Assembly in 2018 and institutions are afforded two years to come into compliance with the new standard requirements (exhibit 137). The agency also provides institutional guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 134). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibits 135-136).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of standards for fiscal and administrative capacity at graduate certificate and master's degree programs (exhibits 138-148). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their fiscal and administrative capacity standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that the student support services expectations for the institutions are found in standards 7, 8, and 11. Specifically, standard 7c and 7d, student financial services and retention, essential elements 3 and 1 requires institutions to provide students with financial counseling services, assistance and obligations; and resources for retention and at risk students (exhibit 149).

Additionally, standard 8, student services, requires institutional commitment to the development of students in various areas consistent with biblical higher education; organization and distribution of diverse student services to all modes of educational instruction; and a system for assessing student satisfaction and concerns. Further, standard 11c, academic patterns and procedures, requires academic advisement for students; and record keeping that is secure, accurate and consistent with state and federal regulations (exhibit 149). The agency also provides institutional guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 150). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibits 151-152).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of student support services standards for graduate certificate and master's degree programs (exhibits 153-163). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the

assessment and review of their student support services standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that the expectations for recruiting and other practices of the institutions are found in the Conditions of Eligibility; Policy on Ethical Practices; Policy on Institutional Advertising, Student Recruitment and Representation of Accredited status; and standards 3, 7, and 11 (exhibits 164-166). Specifically, the agency's Conditions of Eligibility-condition 7 requires institutions to make available to students a catalog, which includes the mission, courses, program requirements, faculty, degrees and fees. In addition, standard 3, institutional integrity, essential element 1, which contains the previously mentioned policies, requires institution publications, websites, advertising and statements to accurately describe credit policies, articulation agreements and program requirements. Further, standard 7a, recruitment, and 7b admissions, requires the institution to have recruitment strategies for targeting students consistent with the institutional mission; accurate recruitment and admission information made available to students; evaluation procedures, published policies and applicant identification systems for admissions. Lastly, standard 11c, essential elements 2, 3 and 5 require academic calendars and credit offerings to meet state and federal requirements; and provide a fair, transparent and consistent system of grading (exhibit 164).

The agency also provides institutional guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 167). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibits 168-170).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of standards for recruiting and other practices at graduate certificate and master's degree programs (exhibits 171-181). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their recruiting and other practices standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that program length expectations for the institutions are found in the Conditions of Eligibility and standards 1, 3 and 11 (exhibit 182). Particularly, the agency's Conditions of Eligibility-condition 7 requires institutions to make available to students a catalog, which includes the mission, courses, program requirements, faculty, degrees and fees. In addition, standard 1, mission, goals, and objectives, essential element 5 requires institutions to publicize objectives for educational programs in conjunction with the institutional mission. Further, standard 3, institutional integrity, essential element 1, requires institution publications, websites, advertising and statements to accurately describe credit policies, articulation agreements and program requirements (exhibit 182).

Specific to graduate certificate and master's degree levels of education, standard 11a, essential elements 14 and 20 specifies the minimum credit hour threshold required for the master's credential, which is 30 semester credit hours or the equivalent. Requirements for graduate certificate consists of 24 or more semester credit hours or the equivalent in a single discipline or subject area to be considered a program by the agency; along with expectations for practical or applied learning experiences in ministry or professional programs. Lastly, standard 11c, essential elements 2, 3 and 5 require academic calendars and credit offerings to meet state and federal requirements; and provide a fair, transparent and consistent system for grading (exhibits 182-184).

The agency Policy on Competency-Based Education and Direct Assessment also provides guidance and expectations for program length and quality of academic engagement for those utilizing this method of deliver within their institution (exhibit 185). The agency also provides institutional guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 186). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibits 187-189).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review

of program length standards for graduate certificate and master's degree programs (exhibits 190-200). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their program length standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

The agency attests that the expectations of institutions for student complaints are found in standards 3 and 8. Specifically, standard 3, institutional integrity, essential element 2 requires institution handbooks to describe, govern and maintain appropriate policies, processes and procedures for grievances related to institutional associations. Further, standard 8, student services, essential element 8 requires institutions to have published procedures for and records addressing formal complaints and grievances (exhibit 201). The agency also provides institutional guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 203). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations and complaint review with findings reported to the Commission (exhibits 204-205 and 207).

In addition to institutional requirements, the agency Policy on Complaints Against an Institutions, provides procedures for persons to file formal complaints with the agency against an institution (exhibit 202). The agency attests complaints received by the agency are reviewed annually at Commission meetings to determine patterns and/or non-compliance of an institution to agency standards, which are reflected in Commission meeting minutes (exhibit 206).

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of standards for student complaints at graduate certificate and master's degree programs (exhibits 208-218). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their student complaints standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

(a)(1)(x) Record of compliance with the institution's program responsibilities under Title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency; and

The agency attests that the expectations of institutions for Title IV responsibilities are found in standard 7 and the Policy on Institutional Compliance with Title IV. Specifically, standard 7c, student financial services, requires the institution to provide evidence that financial aid practices meet the regulatory and reporting requirements. In addition, agency Policy outlines the review of Title IV regulations, and institutional recourse for non-compliance with Title IV requirements, including notifications to the Department of institutions failing to meet Title IV responsibilities (exhibits 219 and 220). The agency also provides institutional guidance for evaluating these standards in the self-study guide and the regulatory requirements form (exhibits 75 and 221). The evaluator worksheets are then utilized to assess the institutional responses, which includes document review during on-site evaluations, and reporting to the Commission (exhibit 222).

Lastly, the agency acknowledges its current experience with the review and regulatory requirements for Title IV responsibilities through the accreditation of undergraduate and graduate level institutions. Though, graduate studies are not currently included in the agency's scope of recognition, the agency attests and provides excerpts of the assessment of Title IV graduate study in conjunction with alternate gatekeepers; and provides documentation to demonstrate the agency and its evaluators familiarity with

Title IV responsibilities across the institution. Further, the agency attests that the proposed expansion of scope will not alter their processes used for review of institutional compliance with Title IV.

The agency provided excerpts from self-studies and highlighted evaluator worksheets as evidence of the assessment and review of standards for Title IV responsibilities at graduate certificate and master's degree programs (exhibits 223-233). However, the agency has not provided the full cycle of review (complete self-studies; complete evaluator worksheets; complete evaluation team reports; decision letters; and other related accreditation evaluation documents) for specific institutions or the accreditation status of the institution being reviewed for Department staff to make a compliance determination. Specifically, the excerpts contain redacted information, incomplete dates, and no identifiers to distinguish whether the evidence is from the review of the same institution, which is problematic and hinders Department staff's analysis and compliance determination.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided the full cycles of review for three institutions to demonstrate the assessment and review of their Title IV responsibilities standards for graduate certificate and master's degree programs. In particular, the agency provided each institution's self-study; evaluation team report, which included the review of distance education; the institution's response to the evaluation team report; and the Commission's decision letter (exhibits 268-308). The evidence provided by the agency demonstrates the agency's experience in handling the review of institutions that offer master's degrees and graduate certificates.

602.22 Substantive change.

The agency meets this requirement if--

(1) The agency requires the institution to obtain the agency's approval of the substantive change before the agency includes the change in the scope of accreditation or preaccreditation it previously granted to the institution; and

The agency's Substantial Change policy identifies changes in mission, scope, control, geographic location, or modality of educational delivery as substantive changes requiring Commission approval prior to implementation and inclusion of the change in the institutions accreditation profile for the agency (exhibit 234). The agency provided the forms available for institutions to submit a formal request for substantive change; the process of review for requests by the Committee on Progress and Substantive Change for accredited institutions and the Committee on Applicant and Candidate Status for candidate/preaccredited institutions; and a list of highlighted substantive change actions taken by the Commission for institutions that offer master's degrees and/or graduate certificates for the past three (exhibit 236). In addition, the agency provided meeting minutes on substantive change proposals and sample letters provided to the institutions denoting Commission action on the request to demonstrate the processes in place to adhere to the criteria (exhibits 239-240).

The agency also provided two separate substantive change proposals requesting to offer master's degrees at their institutions (exhibits 237 and 238) as examples to demonstrate the review of substantive changes at the graduate level. However, the agency Progress and Substantive Change Committee reviews of these requests have not been provided for analysis; nor have the coinciding Commission decision letters for these examples demonstrating the full review process.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided additional documentation of the full cycles of review for the two substantive change examples provided in the original submission to demonstrate adherence to agency policy. Specifically, the agency provided the Progress and Substantive Change Committee meeting minutes, outlining the review of the substantive changes; and the Commission decision letters approving the changes for the new level master's programs at two separate institutions (exhibits 311-315). The evidence provided by the agency demonstrates the agency's experience in handling substantive changes for institutions that offer master's degrees and graduate certificates.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third - party comments regarding this agency.