

U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** Southern Association Of Colleges and Schools (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:** Compliance Report
3. **Current Scope of Recognition:** The accreditation and preaccreditation ("Candidate for Accreditation") of degree-granting institutions of higher education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, including the accreditation of educational programs offered via distance and correspondence education within these institutions. The accreditation status of these institutions and their recognition extends to the SACSCOC Board of Trustees and the Appeals Committee of the College Delegate Assembly on cases of initial candidacy or initial accreditation and for continued accreditation or candidacy.
4. **Requested Scope of Recognition:** The accreditation and preaccreditation ("Candidate for Accreditation") of degree-granting institutions of higher education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, including the accreditation of educational programs offered via distance and correspondence education within these institutions. The accreditation status of these institutions and their recognition extends to the SACSCOC Board of Trustees and the Appeals Committee of the College Delegate Assembly on cases of initial candidacy or initial accreditation and for continued accreditation or candidacy.
5. **Date of Advisory Committee Meeting:** 07/31/2019
6. **Staff Recommendation:** Renew the agency's recognition for three-years
7. **Issues or Problems:** None

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Southern Association of Colleges and Schools, Commission on Colleges (SACS or agency), is a regional institutional accreditor. SACS accredits or preaccredits ("Candidate for Accreditation") 794 degree-granting institutions of higher education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, including distance and correspondence education programs offered at those institutions.

Over 98% of the 794 institutions accredited by the Commission rely on the agency's continued recognition by the U.S. Department of Education for access to Title IV, HEA programs. The Department received no 3rd party written comments and no complaints for this compliance issue for agency.

Recognition History

SACS appeared on the initial list of nationally recognized accrediting agencies published by the U.S. Office of Education in 1952. The agency's recognition has been periodically reviewed and continued recognition has been granted after each review.

The agency's last review for continued recognition was in 2017, which resulted in the agency having to submit a compliance report regarding one outstanding issue. The agency's compliance report submission is the subject of this analysis.

PART II: SUMMARY OF FINDINGS

602.15 Administrative and fiscal responsibilities

(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

In response to the requested compliance report, the agency provided additional explanation and documentation for the collection of site evaluator's conflict of interest forms. Specifically, the agency provided copies of signed Reaffirmation off-site and on-site evaluator conflict of interest forms for multiple visits, which are maintained by the agency vice-president's and housed within the institutions file for two decennial review cycles (exhibits 1-24). The agency also noted that observers were not required to sign conflict of interest forms since observers did not participate in the discussion or the subsequent recommendations for the institution by the reviewers. Within Exhibit 8, Dr. Dietrich is listed as a participant in the off-site visit. However, the form does not reflect this evaluator's signature on the conflict of interest attestation in the capacity of an evaluator, observer, or a no show.

Further, the agency provided additional documentation for the collection of appeal panel member's conflict of interest forms. In particular, the agency provided the conflict of interest attestation for the agency; the accreditation activities, which includes the number of appeals for the agency; the packet of information sent to appeal panel members; and email correspondence of appeals panelists' conflict of interests (exhibits 25-29). However, conflict of interest forms with the appeal panelist's signatures have not been included as evidence.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency provided additional clarification for the deletion of the site evaluator's signature on the conflict of interest attestation within exhibit 8 of the original compliance report response. Specifically, the agency explains that the evaluator did not attend the off-site evaluation due to a medical emergency. Further, the agency provided documentation of the evaluators excused absence via the agency's data management system and email notification to the Chair of the site visit team (exhibit A). In addition, the agency provided additional explanation and documentation on the collection of conflict of interest forms from the appeals committee members. Specifically, the agency narrative, exhibits and supplemental documents uploaded by the analyst demonstrates clarification on the agency's prior use of email notifications as documentation for conflicts of interests identified by appeals committee members and oftentimes the board members (exhibits B-C and uploaded documents 1-4). Particularly, the agency practice as demonstrated for the appeal conducted during the recognition period, required the appeal committee members to identify their conflicts of interests via email (exhibits B-C). However, the agency has since changed its policy and now requires the appeal committee members to sign conflict of interest forms, as well as all identified by this criterion (uploaded documents 2-4). The agency also provided the new policy and implementation of this new policy with the submission of signed conflict of interest forms by appeals committee members for a recent appeal to the Analyst (uploaded documents 3-4).

PART III: THIRD PARTY COMMENTS

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