

SACS COC

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS
COMMISSION ON COLLEGES

November 13, 2014

Dr. Carol L. Folt
Chancellor
The University of North Carolina at Chapel Hill
103 South Building
Campus Box 9100
Chapel Hill, NC 27599-9100

Dear Dr. Folt:

The Southern Association of Colleges and Schools Commission on Colleges' policy, "Standing Rules: SACSCOC Board of Trustees, Executive Council, and the College Delegate Assembly," (available at www.sacscoc.org) stipulates that the Commission give appropriate consideration to significant accreditation-related unsolicited information revealed about an institution between periods of scheduled review. This policy provides that an institution be afforded the opportunity to respond to concerns raised by the review of the unsolicited information.

I am writing to you today because the recently released report you sent to SACSCOC entitled, "Investigation of Irregular Classes in the Department of African and Afro-American Studies at the University of North Carolina at Chapel Hill" (Cadwalader Report) regarding academic irregularity and degree integrity issues, has raised questions about the University of North Carolina at Chapel Hill's ongoing compliance with the *Principles of Accreditation* (copy enclosed). Many of the assertions made by the investigative report were based on interviews with the two university employees responsible for instigating and perpetuating the "academic irregularities."

At the time of the Committee visit on April 2-4, 2013, the University appeared to confine the root of the problems to "the unethical actions by two people that required the University to go through this process...", a phrase used by the previous chancellor. The Committee was unable to interview the two primary coordinators due to legal actions pending against them; however, the Cadwalader Report makes it clear that there was a network of individuals within the academic and athletic community that knew of and referred students to the "paper classes." The administration's failure, prior to the review of the SACSCOC Special Committee, to examine the full impact of these "academic irregularities" beyond the professional activities of two people; evidence that some University faculty and staff were aware of the fraud and played a part in directing students toward the classes; and additional evidence in the report supporting the fact that students "received one or more semesters of deficient instruction and were awarded high grades that often had little relationship to the quality of their work" (page 3, Cadwalader) cause SACSCOC to raise questions about the University's compliance with the following standards:

SACS COC

Dr. Carol L. Folt
November 13, 2014
Page Two

1. institutional integrity
2. program content
3. organizational structure
4. personnel appointment
5. control of intercollegiate athletics
6. admissions policies
7. academic policies
8. academic support services
9. faculty evaluation
10. academic freedom
11. faculty role in governance
12. student records
13. qualified staff
14. policy compliance
15. publication of policies
16. recruitment materials
17. title IV program responsibilities
18. credit hour

In light of these circumstances, and in accordance with the Commission's policy and procedures, I am requesting that the institution prepare a report that explains and documents the extent of its compliance with the following standards of the *Principles of Accreditation*. In addition to addressing specific requests delineated by SACSCOC for each standard, the institution should also feel free to provide information it deems appropriate and customized to the issues of academic integrity.

Principle of Integrity: 1.1

This standard expects an institution to operate with integrity in all matters.

Since the time of the Commission's Special Committee review April 2-4, 2013, the institution has undergone a more extensive and thorough collection and review of documents, leading the Commission to conclude that UNC-Chapel Hill was not diligent in providing information to the Committee during its review. A number of findings in the investigative report support this conclusion. In addition, it appears that the institution may have had information that was not shared during the course of the Commission's Special Committee review. In at least two instances, people who were interviewed by the Special Committee appear to have had some prior concerns and/or knowledge of abnormal activity occurring in the Department of African and Afro-American Studies (AFAM) [AFAM now named African, African American, and Diaspora Studies] that was not revealed or discussed with the Special Committee. The investigative report clearly refutes the institution's claims that the academic fraud was relegated to the unethical actions of two people.

SACS COC

Dr. Carol L. Folt
November 13, 2014
Page Three

Core Requirement

- **2.7.2 (Program Content)**

This standard expects an institution to offer degree programs that embody a coherent course of study that is compatible with its stated mission and is based upon fields of study appropriate to higher education. Further, coherence should be a critical component of an educational program and should demonstrate an appropriate sequencing of courses, not a mere bundling of credits, so that student learning is progressively more advanced in terms of assignments and scholarship required and demonstrates progressive advancement in a field of study that allows students to integrate knowledge and grow in critical skills.

The institution is requested to provide information regarding current degree program content in the Department of African, African American and Diaspora Studies, and any other educational programs with significant exposure that may have been caused by the nearly 20 years of proven academic irregularities.

Comprehensive Standards

- **3.2.7 (Organizational Structure)**

This standard expects an institution to have a clearly defined and published organizational structure that delineates responsibility for the administration of policies. Further, the organizational structure should provide the necessary foundation for internal and external understanding of the institution's operations.

The institution is requested to provide its organizational structure chart with clearly depicted reporting lines of authority. Provide discrete organizational structures for each department in the College of Arts & Sciences, and each unit within the Athletics Department, with clearly depicted reporting lines of authority.

- **3.2.9 (Personnel Appointment)**

This standard expects an institution to publish policies regarding the appointment, employment, and evaluation of all personnel.

The institution is requested to provide policies and evidence of implementation of those policies pertaining to the appointment, employment and evaluation of all personnel. Specifically, address the application of those policies to administrative staff at a parallel level to the administrative assistant in the former AMFAM department. Show how the policies are effective in evaluating the capability of individuals at that level, and how the institution ensures that an appropriate oversight and review occur.

SACS COC

Dr. Carol L. Folt
November 13, 2014
Page Four

- **3.2.11 (Control of Intercollegiate Athletics)**

This standard expects an institution's chief executive officer to have ultimate responsibility for, and exercise appropriate administrative and fiscal control over the institution's intercollegiate athletic programs, including the academic standards for athletes.

The institution is requested to provide information demonstrating how the Chancellor of UNC at Chapel Hill has responsibility for and exercises appropriate administrative and fiscal control over the institution's intercollegiate athletic programs. The administrative control includes accountability for the application of academic standards for athletes.

- **3.4.3 (Admissions Policies)**

This standard expects an institution to publish admissions policies that are consistent with its mission. Further, admission policies are designed to ensure that students who are admitted to the institution or to a specific program can benefit from the institution's programs. Implicit in the policies is that the institution consistently applies the policies to all applicants, transfers; exceptions are limited in number and based on specific criteria for waiving admission requirements.

The institution is requested to provide its admissions policies with particular emphasis given to "special admits." Provide the composition and role of the 'Committee on Special Talents,' along with the reporting line for this committee. In addition, the institution should provide information on how many students who enrolled in the aberrant courses were admitted through this process. Specify the number of students that are currently enrolled through the "special admits" process. Disaggregate student athletes and non-student athletes and the programs/majors in which they are enrolled.

- **3.4.5 (Academic Policies)**

This standard expects an institution to develop and publish academic policies that adhere to principles of good educational practice. In addition, it is the obligation of the institution to disseminate these policies to students, faculty, and other interested parties through publications that accurately represent the programs and services of the institution.

The institution is requested to provide policies pertaining to independent study classes, grading, syllabi review, and external departmental program reviews. Show the effects of the Independent Study Task force Committee recommendations and subsequent adoption of procedures by the institution in terms of the impact on offering independent study courses and the number of courses students may count toward graduation. Address the approval process for (1) offering the independent study course and student enrollment in the course, (2) current grading practice, (3) current grading oversight, and (4) changes in the process since the SACSCOC Special Committee visit in April 2013.



Dr. Carol L. Folt
November 13, 2014
Page Five

- **3.4.9 (Academic Support Services)**

This standard expects an institution to provide appropriate academic support services. Further, the services are designed to strengthen academic programs and ensure the success of students and faculty in meeting the goals of the educational programs.

The institution is requested to provide an overview of academic support services for all undergraduate education. Give particular attention to the Athletics Department and Academic Support Program for Student-Athletes (ASPSA), and the undergraduate academic advising program. Demonstrate the effectiveness and integrity of the student athlete support services process and provide evidence of institutional accountability. Provide an update on the strategic initiatives developed by ASPSA in 2013 and assess the effectiveness of these policies related to the hiring, training, and oversight of academic tutors for student-athletes. Report on the effectiveness of the move of the ASPSA from the College of Arts and Sciences to the office of the Executive Vice Chancellor and Provost.

- **3.7.2 (Faculty Evaluation)**

This standard expects an institution to regularly evaluate the effectiveness of each faculty member in accord with published criteria, regardless of contractual or tenured status. Since the members of the faculty direct the learning enterprise of an academic institution and are responsible for assuring the quality of the academic program, it is imperative that an effective system of faculty evaluation be in place.

The institution is requested to describe the policies, procedures and practice for all faculty evaluation activity. Provide samples of Chair evaluations from across the institution and also provide reliable samples from the African, African American, and Diaspora Studies program. Provide evidence that the system of faculty evaluation is effective for ensuring the quality of the academic program.

- **3.7.4 (Academic Freedom)**

This standard expects an institution to ensure adequate procedures for safeguarding and protecting academic freedom.

The institution is requested to define and provide current policies and practices related to academic freedom. Demonstrate how the application of the policy plays a role with regard to responsibility for academic integrity. Identify the elements in the institution's definition of academic freedom that excuses faculty from accountability for academic integrity and creates barriers for faculty and staff reporting academic irregularities.

- **3.7.5 (Faculty Role in Governance)**

This standard expects an institution to publish policies on the responsibility and authority of faculty in academic and governance matters.

SACS COC

Dr. Carol L. Folt
November 13, 2014
Page Six

The institution is requested to provide its policies relating to faculty member's role in governance and how these policies delineate the responsibilities and authority of its faculty in academic matters. Within the framework of CS 3.7.5, what is the Faculty Athletics Committee's (FAC) authority in maintaining and protecting academic integrity? Detail the qualifications of those faculty members who are on the FAC and discuss the selection/appointment process. In addition, provide the name of the office with oversight responsibility for this Committee. Provide details on its authority in disseminating the "charge and/or goals" given to the FAC participants and how it determines the effectiveness of the Committee in meeting the "charge/goals" of the committee.

- **3.9.2 (Student Records)**

This standard expects an institution to protect the security, confidentiality, and integrity of student records and to maintain security measures to protect and back up data.

The institution is requested to provide information and policies on the retention of student records. Address the length of time specified in the policy for retention of academic records, and indicate any institutional or system policies that would create a barrier for the institution to have continuous access to the records in order to ensure their integrity. Provide an update on the effectiveness of newly-automated grade change process and the interactive student records dashboard that included enrollment data for independent study courses and grade distributions by course, and the process for monitoring the enrollment patterns of student athletes. Provide evidence of regular audits designed to verify the validity and integrity of student records in the future.

- **3.9.3 (Qualified Staff)**

This standard expects an institution to provide a sufficient number of qualified staff—with appropriate education or experience in the student affairs area—to accomplish the mission of the institution.

The institution is requested to provide the educational background, experience, professional development and internal/external training of its student services staff. Additionally, identify training in academic policy provided to academic advisors/counselors involved in undergraduate advising and disaggregate distinguishing units (e.g. undeclared majors, ASPSA).

- **3.13.1 (Policy Compliance)**

This standard expects an institution to comply with the policies of the Commission on Colleges.

The institution is requested to demonstrate its compliance with the following two Commission policies: (1) "Credit Hour" and (2) "Advertising, Student Recruitment, and Representation of Accredited Status."

SACS COC

Dr. Carol L. Folt
November 13, 2014
Page Seven

"Credit Hour." Specifically, address institutional practice as it relates to the policy. (Cross reference to FR 4.9).

"Advertising, Student Recruitment, and Representation of Accredited Status." Specifically address the issue in the SACSCOC policy regarding accurate depiction of publications and misrepresenting abilities required to complete an intended program. (Cross reference to FR 4.6).

Federal Requirements

- **4.3 (Publication of Policies)**

This standard expects an institution to make available to student and the public current academic calendars, grading policies, and refund policies.

The institution is requested to provide information regarding its policy for grading. Address safeguards for consistent application across the University, indicate the office(s) that ensure consistency, and how the office carries out its responsibility for consistent application.

- **4.6 (Recruitment Materials)**

This standard expects an institution to maintain recruitment materials and presentations that accurately represent the institution's practices and policies.

The institution is requested to provide all formal and informal, current and past materials that are used by the Athletic Department to recruit student athletes. The information should include, although not be limited to information regarding graduation and future employment, academic and student support services available while enrolled, academic program advising and assistance, and any proposed or sample curriculum.

- **4.7 (Title IV Program Responsibilities)**

This standard expects an institution to be in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended.

The institution is requested to provide information regarding its Title IV responsibilities, its policy on Satisfactory Academic Progress, and evidence of how it ensures that valid coursework is being used to assess federal Satisfactory Academic Progress standards. In addition, submit to the Commission any communication from the U.S. Department of Education related to continued compliance with Title IV provisions.

SACS COC

Dr. Carol L. Folt
November 13, 2014
Page Eight

- **4.9 (Credit Hour)**

This standard expects an institution to have policies and procedures for determining the credit hours awarded for courses and programs that conform to commonly accepted practices in higher education and to Commission policy. Because credits are used as a measure of student engagement and as a basis for awarding financial aid, an institution is obligated to ensure that credit hours awarded for courses and programs conform to commonly accepted practices in higher education.

The institution is requested to provide its policies and procedures for determining the credit hours awarded for courses and programs. How does the institution ensure adherence to its policy?

Please submit to my office **three** copies of the institution's response to this letter by no later than **January 7, 2015**. The institution's report to SACSCOC should also include copies of all responses to other external investigative reports.

In accord with Commission policy on the receipt of unsolicited information, the institution's response will be reviewed, and if Commission staff determines that the information is of factual substance and is accreditation related, the information and documentation, along with the institution's response will be forwarded to the SACSCOC Board of Trustees for formal review. Or, it is possible that the President of the SACSCOC could authorize a Special Committee to review the institution.

If you have any questions, please feel free to contact me at 404.679.4501, ext. 4529.

Sincerely,



Cheryl D. Cardell, Ph.D
Vice President

CDC/BSW:ch

Enclosures

cc: ✓ Dr. Belle S. Wheelan
Ms. Carol Luthman