



# Middle States Commission on Higher Education

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## Verification of Compliance with Accreditation-Relevant Federal Regulations Institutional Report Template

The Middle States Commission on Higher Education, as a federally recognized accreditor, is obligated to ensure that its candidate and member institutions comply with the accreditation-relevant federal regulations developed by the U.S. Department of Education in the Higher Education Opportunity Act of 2008. Further, the Commission is required to review candidate and member institutions' continued compliance with Title IV program responsibilities. Commission policy regarding federal compliance requirements for institutions was revised and enacted in January 2013, indicating that institutions must meet these federal regulations to be accredited by the Commission.

In response to this, it is assumed that the institution will provide documentation of policies and procedures that are (1) in writing, (2) approved and administered through applicable institutional processes, and (3) published and accessible to those affected.

In the event that one or more of these regulations do not apply to an institution, that institution shall indicate that fact in the compliance document. Otherwise, all accredited and candidate institutions must respond with regard to each of the areas.

These areas will be reviewed as part of the accreditation process, especially as they relate to the MSCHE Standards and applicable Requirements of Affiliation. Failure to comply with the areas of verification listed above will result in follow-up.

Reports must be filed in the Commission office according to the dates below:

<i>Self-Study Visit falls between. . .</i>	<i>Report on federal compliance is due no later than. . .</i>	<i>Reviewer's Report is due. . .</i>
September – January	July 1	August 15
February – March	December 1	January 15
April – May	January 15	March 1
<i>PRR review begins . . .</i>	<i>Report on federal compliance is due no later than. . .</i>	<i>Reviewer's Report is due. . .</i>
June 1	June 1	August 1

*Please note that as additional guidance is received from the U.S. Department of Education, these guidelines may be modified without prior notice.*

**Institution:** Borough of Manhattan Community College

**Report completed by:** Christopher Shults, Ph.D, Dean of Institutional Effectiveness & Strategic Planning/ALO

**Date:** 12/1/2017

## **1. Student Identity Verification in Distance and Correspondence Education**

*Institutions must provide the following information and evidence:*

	<b><u>Documents, Policies, and Procedures</u></b>
1. Policies and procedures used to ensure student identity verification in distance or correspondence education courses.	Students in online instruction offered by CUNY must log in through a system that uses IDs and passwords to invoke an authentication triangulated against name, date of birth, and social security number. (These are inaccessible but generate a unique access number; it is this access number that, invoked by the user ID/password combination, gives access to the system). This secure login is a student's only means of accessing the online course management system (CMS). All courses (not just online courses) use this same system of authentication for registration. Enrollments are imported directly into the CMS without any action on the part of students, faculty, and staff beyond the registration process. Additionally, every action within a course site is recorded by the extensive tracking features of the CMS, which monitor each user in terms of time and duration of any action as well as which part of the site is involved, even if there is no posting by the student. Such mechanical means of verifying student identity and activity in online courses are supplemented by high levels of interaction in small classes. Students introduce themselves in terms of prior knowledge about a course's subject and write posts at least weekly, including responses to one another. Many students also maintain blogs and/or wikis individually or in groups. Such interactivity creates a high degree of familiarity within each online course. And that is increasing as online courses move to program-wide implementations of increasingly sophisticated forms of self-presentation and interaction, including the growing use of cross-course portfolios, learning communities, and synchronous

	<p>conferencing (including voice and video). In other words, faculty teaching online courses make extensive use of performance-based assessment and active learning in online instruction. Through these activities, faculty are able to identify patterns in writing styles, levels of achievement, basic content knowledge, and typical types of interaction specific to each student. Such high exposure and high feedback instruction enables faculty to make professional judgments regarding any atypical assignments/assessments turned in that do not match noted student patterns established throughout the semester. Every online course syllabus contains a statement of expectations and preventative measures to ensure academic integrity. Assessments include but are not limited to papers, projects, group discussions, and/or online chats on a weekly basis. Faculty can check any written work, from discussion posts to submitted papers, with anti-plagiarism software such as Turnitin or SafeAssign.</p>
<p>2. Procedure(s) regarding the protection of privacy for students enrolled in distance and correspondence courses or programs.</p>	<p>Students in online instruction offered by CUNY must log in through a system that uses IDs and passwords to invoke an authentication triangulated against name, date of birth, and social security number. This secure login is a student's only means of accessing the online course management system (CMS).</p> <p>Student record privacy information is available on the Registrar's <a href="#">FERPA webpage</a>. Information regarding online courses is provided on the <a href="#">E-Learning webpage</a>.</p>
<p>3. Procedure(s) for notifying students about any projected additional charges associated with student identity verification. Provide URLs, catalogs, student handbooks, and other locations of any alternative institutional website documenting required disclosures.</p>	<p>Not applicable as there are no additional charges</p>

## 2. Transfer of Credit Policies and Articulation Agreements

*Institutions must provide the following information and evidence:*

	<b><u>Documents, Policies, and Procedures</u></b>
<p>1. Policies and procedures for making decisions about the transfer of credits earned at other institutions (including all modes of delivery, if applicable). Include public disclosure (URL, catalog, or other public locations for information) of policy.</p>	<p>As a community college, BMCC accepts students transferring from other institutions and prepares students for transfer to four-year colleges and universities. Students wishing to transfer to BMCC must meet certain criteria that include current good academic standing and a GPA of 2.0 or higher. Students may transfer up to a total of 30 credits, which will be designated as “TR” on their official transcripts. Full disclosure of all applicable policies and procedures for students transferring into BMCC can be found on the Admissions Office’s <a href="#">Transfer Students webpage</a>.</p> <p>In addition to accepting transfer students, the College also participates in CUNY’s Reverse Transfer initiative. Designed to aid students who were close to or who had earned sufficient credits for an Associate Degree, but who are no longer enrolled at BMCC, the College reaches out to determine interest in obtaining the two-year credential. The process is facilitated by CUNY’s <a href="#">Reverse Transfer Implementation Manual</a>.</p> <p>Students seeking an Associate in Arts or Associate in Science Degree, the primary transfer degrees offered by BMCC, must follow the CUNY <a href="#">Pathways initiative</a>. This general education framework requires students to complete a 30 credit University-wide common core of courses, which includes both a Required Common Core (12 credits) and Flexible Common Core (18 credits). To ensure that students are made aware of these requirements, the Office of Academic Affairs maintains a comprehensive Pathways webpage that includes:</p>

	<ul style="list-style-type: none"> <li>• Rationale behind the initiative,</li> <li>• Pathways requirements, and</li> <li>• Subject matter categories that fall under the different cores as well as links to the specific courses that fulfill the requirements.</li> </ul> <p>Additionally, students can find information on their rights and responsibilities regarding Pathways on the <a href="#">CUNY Pathways webpage</a> addressing these issues. The comprehensive CUNY Policy on <a href="#">General Education Transfers</a> is made available to the public through the online Manual of General Policies. This policy provides the framework for all institutional procedures and Pathways webpage information.</p>
<p>2. URL and other publication locations, if applicable, of institutions with which the institution has established an articulation agreement.</p>	<p>Through the collaborative efforts of the College’s Office of Academic Affairs and the Academic Departments, BMCC continually seeks out appropriate comprehensive and programmatic articulation agreements for students. The college’s <a href="#">Academic Advisement and Transfer Center</a> (AATC) provides substantial guidance and resources for students that includes links to:</p> <ul style="list-style-type: none"> <li>• Academic advisement,</li> <li>• Academic program maps,</li> <li>• E-advisement,</li> <li>• Career information, and</li> <li>• Transfer information.</li> </ul> <p>The AATC also maintains a webpage with the <a href="#">active list of articulation agreements</a>, which currently includes more than 90.</p>

### **3. Title IV Program Responsibilities**

*Institutions must provide the following information and evidence:*

	<b><u>Documents, Policies, and Procedures</u></b>
1. Student loan default rates for the most recent three years. If applicable, submit reports on compliance from the U.S. Department of Education in regard to the cohort default rate, including any default reduction plans.	<p>The College has consistently maintained student loan default rates that are substantially below both the one and three-year limits. For the three most recent fiscal years (FY), the rates are as follows:</p> <ul style="list-style-type: none"> <li>• FY2014 – 14.9%</li> <li>• FY2013 – 10.8%</li> <li>• FY2012 – 12.8%</li> </ul> <p>This information is available through the Department of Education’s Federal Student Aid School <a href="#">Default Rates database</a>.</p>
2. Three most recent years of composite ratios (private and proprietary institutions only).	N/A
3. Date of most recent Title IV program review.	<p>The last Department of Education Financial Aid Program Review occurred from August 18-20 of 2008. The College received a final determination on January 27, 2010 (<a href="#">Appendix 1</a>).</p> <p>As of the last program review, the College has received annual audits with no findings. The most recent reports, FY 2012-2014, are provided in <a href="#">Appendix 2</a>.</p>
4. Relevant correspondence from the U.S. Department of Education, such as program reviews and any actions to limit, suspend, or terminate the institution’s eligibility to participate in Title IV, including institutional responses, if applicable.	<p>BMCC continues to maintain its eligibility to participate in the Federal Student Financial Aid Program. The most recent Program Participation Agreement with the updated Eligibility and Certification Approval Report was in February, 2015 (<a href="#">Appendix 3</a>).</p>

#### **4. Institutional Records of Student Complaints**

*Institutions must provide the following information and evidence:*

	<b><u>Documents, Policies, and Procedures</u></b>
<p>1. Policy and methods used in handling and tracking student grievances and complaints. Include public disclosure(s) of the policy /policies for student grievances and complaints (URLs, catalog, handbook, or other public location of this information).</p>	<p>BMCC ensures that students are made aware of the grievance and complaint process regarding faculty through publication of the policy and procedures in the <a href="#">Student Handbook</a>. Guided by the CUNY Board of Trustees Resolution on Student Complaints Procedures in 2007, available on the Academic Affairs website under <a href="#">Rules and Regulations</a>, the procedures detail the following:</p> <ul style="list-style-type: none"> <li>• Assistance provided in determining the procedures to follow,</li> <li>• Steps involved in lodging a formal complaint,</li> <li>• A description of the roles and responsibilities of the fact-finder, and</li> <li>• Instructions on how to file an appeal.</li> </ul> <p>The Fact Finder is the most important individual at the College in regard to student complaints and is responsible for ensuring compliance with the outlined procedures, assisting the student, reaching out to the faculty and appropriate administrators, and providing a final report. After the final report is submitted, the procedures detail the appeals process as well as final disciplinary options, if appropriate.</p> <p>Sometimes students file complaints against other students. Students can file these complaints via email, Public Safety report, or coming to Student Affairs. When students lodge these complaints via email, they are requested to come in to discuss the complaint with a staff member in Student Affairs. When students do come to the Office of Student Affairs, they are asked to fill out a complaint form to initiate the review (<a href="#">Appendix 4</a>). When they file a report with the Office of Public Safety, they first complete an incident report (<a href="#">Appendix 5</a>) and then either the Office of</p>

	<p>Student Affairs. If an incident falls under a possible Title IX complaint, it is referred to the Office of Compliance and Diversity for investigation.</p> <p>Should a student have a complaint against another student, The CUNY Board of Trustees has provided guidance under Article 15.4 – <a href="#">Student Disciplinary Procedures</a>. After a formal complaint has been made, the Office of Student Affairs works with the student to attempt to resolve the complaint informally. Should a formal complaint process be deemed necessary, the Office of Student Affairs, is responsible for conducting an investigation to determine if charges should be filled, informing the student about the allegations, explaining his/her rights, and reviewing the evidence. The possible steps to be taken are to:</p> <ul style="list-style-type: none"> <li>• Dismiss the matter,</li> <li>• Refer the matter to mediation, or</li> <li>• Execute formal disciplinary charges.</li> </ul> <p>The Student Handbook provides a comprehensive explanation regarding the mediation, notice of charges and hearing, committee structure, and additional information surrounding student discipline for a complaint.</p>
<p>2. Procedures for making modifications and improvements to the institution as a result of information obtained in handling student complaints.</p>	<p>The Office of Student Affairs and the Office of Academic Affairs regularly review student complaints and recommend or make changes to institutional procedures or services as appropriate.</p>



**5. Required Information for Students and the Public**

*Institutions must provide the following information and evidence:*

	<b><u>Documents, Policies, and Procedures</u></b>
<p>1. URLs, catalogs and student handbooks, and other public locations of any alternative institutional website documenting required disclosures as required by Student Right to Know, as well as policies on SAP, withdrawal, leave of absence, and attendance.</p>	<p>To ensure that students have access to all information pertinent to their successful educational journey at BMCC, the College maintains a Student Hub page located on the main information bar of the <a href="#">college homepage</a>. The <a href="#">hub</a> is separated into categories with links to important information for students including:</p> <ul style="list-style-type: none"> <li>• Academic Programs and Support Services</li> <li>• Registration and Financial Services,</li> <li>• Student Engagement and Leadership, and</li> <li>• Student Resources and Information.</li> </ul> <p>Under the publications header, students can access an updated, electronic version of the <a href="#">Student Handbook</a>. This document is comprehensive including calendars, a listing of services, special programs, policies, and other information. Students can find information on grading policies, complaint and disciplinary procedures, student right to know, and more within the Handbook.</p> <p>A very important link available on the Student Hub page is the <a href="#">Student Consumer Information</a>, which is found under the policies header. Information provided on this page includes:</p> <ul style="list-style-type: none"> <li>• Program and service information,</li> <li>• Student Outcomes,</li> <li>• Financial Aid information,</li> <li>• Academic Policies,</li> <li>• Campus Policies and Compliance,</li> <li>• Campus Safety and Security, and</li> <li>• Campus Health.</li> </ul> <p>The Office of Academic Affairs also maintains a comprehensive webpage dedicated to providing information to students, families, and the public regarding <a href="#">academic rules and regulations</a>. Information regarding attendance policies, grading policies, disciplinary procedures, and relevant CUNY policies and procedures are made</p>

	<p>available on this site. The <a href="#">Registrar's Office</a> also maintains a comprehensive webpage including relevant policies and procedures.</p>
<p>2. Methods used to collect and review information on student outcomes and licensure pass rates.</p>	<p>As an institution within the CUNY system, all student outcomes data is collected centrally and stored within the University's database known as CUNYFirst. While the system provides data directly for Federal and State reporting, all institutions have access to information on their students, review the information, and utilize it for reporting. BMCC provides comprehensive analysis and public reporting on student outcomes through the Office of Institutional Effectiveness and Analytics (<a href="#">IEA</a>)</p> <p>BMCC maintains three academic programs that require graduates to pass a licensure exam. These include:</p> <ul style="list-style-type: none"> <li>• Nursing,</li> <li>• Respiratory Therapy, and</li> <li>• Paramedic.</li> </ul> <p>Each of these programs receives reporting from their licensing boards regarding pass rates. The information is then shared with the Office of Institutional Effectiveness and Analytics and provided in the College's final Performance Management Process (PMP) report to CUNY. Information regarding the NCLEX-RN pass rates is also provided on the IEA website.</p>
<p>3. Documents and URLs for advertising and recruitment materials that are available to current and prospective students that show the accreditation status with the Commission and any other U.S. Department of Education approved agencies.</p>	<p>BMCC's accreditation status with the Commission and specialized accreditation bodies is described on the IEA website and on relevant academic department websites.</p>

## 6. Standing with State and Other Accrediting Agencies

*Institutions must provide the following information and evidence:*

	<u>Documents, Policies, and Procedures</u>
<p>1. Documentation of the relationships with any specialized, programmatic, or institutional accrediting agencies recognized by the U.S. Department of Education and all governing or coordinating bodies in the state(s) and countries in which the institution has a presence.</p> <p>If, in the last five years, the institution has had a review resulting in non-compliance, include the report from the state or other accreditor as well as the institutional response.</p>	<p>BMCC has maintained its <a href="#">accreditation</a> with the Middle States Commission on Higher Education since 1964. In 2014, the College submitted a <a href="#">monitoring report</a> to the Commission based on concerns raised about Standards 2, 3, and 14 during the 2013 Periodic Review Report. The Report was accepted by the Commission in March of 2015.</p> <p>In addition to institutional accreditation, the College maintains programmatic accreditation for four of its academic programs. These include:</p> <ul style="list-style-type: none"> <li>• <a href="#">Nursing</a>,</li> <li>• Health Information Technology,</li> <li>• Paramedic, and</li> <li>• Respiratory Therapy.</li> </ul> <p>The Health Information Technology, Paramedic, and Respiratory Technician programs are all housed within the <a href="#">Allied Health Sciences Department</a>. None of these programs has engaged in a review over the last five years that has resulted in non-compliance.</p>
<p>2. URLs, catalogs, student handbooks, and other locations of any alternative institutional website documenting required disclosures.</p>	<p>In addition to providing the accreditation status of the institution and programs on the <a href="#">About BMCC</a> webpage, the institutional accreditation with Middle States is documented within the <a href="#">strategic plan</a> and each of the program pages document their accreditation status.</p> <ul style="list-style-type: none"> <li>• <a href="#">Nursing</a>,</li> <li>• <a href="#">Health Information Technology</a>,</li> <li>• <a href="#">Paramedic</a>, and</li> <li>• <a href="#">Respiratory Therapy</a>.</li> </ul>

## **7. Contractual Relationships**

*Institutions must provide the following information and evidence:*

	<b><u>Documents, Policies, and Procedures</u></b>
1. List of contractual arrangements for education services, including name of third-party and applicable programs and the date the arrangement was approved by the Commission.	N/A
2. URLs, catalogs, student handbooks, and other locations of any alternative institutional website documenting required disclosures.	N/A

## 8. Assignment of Credit Hour

*Institutions must provide the follow information and evidence:*

	<u>Documents, Policies, and Procedures</u>
<p>1. Policy and procedures for credit hour assignment covering for all types of courses (including studio, internships, laboratory, practica, etc.), disciplines, programs, degree levels, formats, and modalities of instruction (including hybrid and online). Include each policy that documents the assignment of credit hours specific to the types noted above. The following should be clearly indicated:</p> <ul style="list-style-type: none"> <li>○ Academic period (e.g., 15 weeks plus one week exam over two semesters);</li> <li>○ Recommended instructional time (e.g., three 50-minute sessions or two 75-minute sessions per week);</li> <li>○ Recommended out-of-class time requirements (e.g., twice in-class time).</li> </ul>	<p>BMCC, as a recognized higher education provider in the State of New York, is bound by the New York Department of Education’s rules and regulations regarding assignment of credit hours. Referred to as semester hours and in compliance with Federal guidelines, the statute, as listed in <a href="#">Chapter II</a> of the Protocol for Opening a College in New York State, indicates in 50.1.o that:</p> <p><i>Semester hour means a credit, point, or other unit granted for the satisfactory completion of a course which requires at least 15 hours (of 50 minutes each) of instruction and at least 30 hours of supplementary assignments, except as otherwise provided pursuant to section 52.2(c)(4) of this Subchapter. This basic measure shall be adjusted proportionately to translate the value of other academic calendars and formats of study in relation to the credit granted for study during the two semesters that comprise an academic year.</i></p>
<p>2. URLs, catalogs, student handbooks, and other locations of any alternative institutional website documenting required disclosures.</p>	N/A
<p>3. Evidence that the institution’s credit hour policies and procedures applied consistently across the full range of institutional offerings. If the institution is required to obtain approval from the relevant State Department of Education, compliance with this requirement should be documented.</p>	<p>CUNYFirst, which is the University’s Student Information System, provides the platform for course scheduling at the College. Using the criteria of term length and credit hours, class schedules are populated within the system to ensure that the semester hour regulations are upheld.</p>
<p>4. Processes used by the institution to review periodically the application of its policies and procedures for credit hour assignment.</p>	<p>Not applicable as CUNY sets credit hour assignment in accordance with New York State guidelines.</p>