

UNIVERSITY OF MAINE SYSTEM

A SUMMARY OF PROCESS CONSIDERATIONS AND FRAMEWORK FOR PURSUING UNIFIED ACCREDITATION

Chancellor Dannel P. Malloy

In consultation with and including contributions from

UMS Presidents • UMS Chief Academic Officers
James B. Thelen • Ryan Low • Chip Gavin
Beatrice Fevry • Robert Placido • Kay Kimball
Rosa Redonnett • Greg Fahy • Jeff St. John
Kathy Yardley • Kim-Marie Jenkins
Dominic Barraclough • Sara Mlynarchek

November 2019

INTRODUCTION

At the July 2019 meeting, University of Maine System Board Chair James Erwin stated that it was the Board's sense that, in order for UMS to move forward with and attain the strategic goals established in the December 2018 *Declaration of Strategic Priorities to Address Critical State Needs*,¹ UMS needs to be able to deliver significantly more collaborative, market-relevant cross-campus programming. In recent years, however, there have been significant challenges to developing, delivering, and managing such programs at the scope, scale, and pace the Board determines to be necessary to meet Maine's higher education attainment needs, some of which stem from the fact that each UMS university is accredited separately from other universities in the System.

Recognizing these challenges, Chair Erwin asked UMS Chancellor Dannel Malloy to review UMS's accreditation status and provide recommendations for what accreditation structure would be most likely to permit UMS to achieve its strategic goals and best serve the higher education needs of its students and the State of Maine.

In his September 2019 report to the Board, detailing historical consideration of a System-wide accreditation back more than three decades, Chancellor Malloy recommended that UMS universities begin a process to unify their accreditations to a statewide accreditation within the University of Maine System based on a series of Guiding Principles that were developed by the Chancellor, the UMS Presidents, and Senior System Staff and reviewed by staff at UMS's regional accreditor, the New England Commission of Higher Education (NECHE).² Accepting that report on September 16, the Board directed the Chancellor to:

- Visit UMS campuses to gather input from key academic leaders and staff to determine how to successfully implement unified accreditation according to the Guiding Principles developed with UMS Presidents;
- Continue discussions with staff at NECHE and the U.S. Department of Education as necessary to ensure UMS planning and actions incorporate relevant input from those entities; and
- Develop, with input from System Presidents and campuses, "a process, plan, and timeline to seek unified accreditation from NECHE that could successfully transition UMS to a statewide accreditation model," to be presented at the November 17-18, 2019 Board meeting.

¹ "Declaration of Strategic Priorities to Address Critical State Needs," December 2018 (UMS Board of Trustees Office).

² See [Guiding Principles](#), Appendix A.

SUMMARY OF UNIFIED ACCREDITATION ENGAGEMENT TO DATE

Since the Board's September 2019 meeting, and by the time of this report's publication, the Chancellor and System leadership staff have visited all seven UMS universities twice except for a single visit to Machias, conducting 33 total meetings over that six-week span. Of these, the Chancellor has led "town hall"-styled open forum discussions and answered questions about his unified accreditation recommendation at all seven universities, met with six of the seven UMS faculty assemblies or senates (Machias is scheduled for November 20, two days following the Board's November 17-18 meeting at Farmington), as well as all seven Boards of Visitors and additional select faculty at all seven universities.

Throughout that time, UMS hosted an online survey about unified accreditation, inviting questions and comments about both the benefits of and concerns about unified accreditation from the perspective of survey responders. As of November 6, 67 responses, with more than 325 individual comments, have been logged and reviewed. Nearly half of responses came from faculty (46 percent), with staff equally responsive. Half of all respondents stated that they have either written for or participated in an accreditation review previously. Respondents identified themselves as associated with a particular UMS university as follows:

- UM Fort Kent (40 percent of respondents)
- USM (17 percent)
- UM Farmington (14 percent)
- UM (8 percent)
- UM Augusta (8 percent)
- UM Machias (6 percent)
- UM Presque Isle (3 percent)

As the online survey remains open through November 8, individual comments provided in response to the online survey remain under review and will be organized and presented thematically for the Board at its meeting on November 18, 2019. As a general matter, the overall nature of individual comments provided in the online survey are thematically similar to those offered by the Board faculty representatives (which are referenced further below and included here as Appendix B).

On October 9, at a joint meeting of all UMS Presidents and Chief Academic Officers with the Chancellor and senior System staff, along with additional academic leaders from the University of Maine, the University of Maine at Augusta, and the University of Maine at Farmington, the Chancellor invited NECHE President Barbara Brittingham to discuss NECHE's perspective on the expected near- and longer-term interaction UMS will have with NECHE should the Board of Trustees direct UMS leaders to pursue a transition to unified accreditation. Additional discussion about the issues addressed in this report occurred with UMS Presidents on November 4.

In advance of the Board’s Academic and Student Affairs Committee meeting on October 28, Board of Trustees Faculty Representatives informally surveyed their faculty colleagues around the System and compiled a list of written comments, concerns, and questions about unified accreditation. Faculty representatives submitted the two-page document for the ASA’s public agenda. The Chancellor and System staff developed a written “FAQ” document that responded to the faculty’s questions and concerns and other general issues about unified accreditation, reviewed the answers with NECHE President Barbara Brittingham for alignment with NECHE staff expectations, and posted both [the faculty concerns and FAQ online](#) on October 29 (see Appendix B, which is available as well through the hyperlink embedded here).

Representatives from the UMS faculty union – the Associated Faculties of the Universities of Maine, known as AFUM – posed questions about the impact, relative to unified accreditation, of newly-negotiated contract language that permits faculty to work in cooperating departments between UMS universities who each offer their own degree programs. UMS leaders consulted with NECHE regarding these matters and transparently introduced the AFUM leaders to NECHE staff to ask further questions, though it should be clearly understood that NECHE’s accreditation assessments are not bound or governed by the AFUM contract.

Nearly two dozen people across UMS – Presidents, Chief Academic Officers, other university academic leaders, and System staff – were consulted about or provided content for developing this report. An outline of issues to be addressed in the report was circulated to this group in early October, to which comments were invited. In parallel to the direct university community engagement meetings led by the Chancellor and described above, numerous meetings, discussions, and emails occurred to finalize the topics covered and content provided in this report. These same UMS leaders, as well as NECHE staff, provided comment to the final draft of this report before its publication.

UNIFIED ACCREDITATION PROCESS CONSIDERATIONS

NECHE

In answer to the Board's September 2019 charge to develop "a process, plan, and timeline to seek unified accreditation from NECHE that could successfully transition UMS to a statewide accreditation model," UMS proposes to prepare for and manage a transition to a System-wide unified accreditation by following essentially the same process as its universities do in maintaining their own separate NECHE institutional accreditations now.

It is thus helpful to first review how UMS universities currently manage their accreditations.

How UMS Universities Manage the Current NECHE Accreditation Review Process

UMS universities have each developed processes and relatively standardized practices for independently fulfilling their accreditation requirements and for completing the required reports and self-study documents. In some cases, for significant periods of time, large portions of one or more faculty or staff member's time are dedicated to writing or responding to NECHE correspondence and preparing for site team visits or Commission appearances. The number of faculty and staff shouldering these responsibilities vary widely by UMS university, ranging from 10 to 110 and consuming literally thousands of hours of time. While the University of Maine and USM each have a Vice Provost position whose duties include, among other things, managing the respective university's accreditation reviews and continuous improvement attendant in the accreditation process generally, in all other cases work on accreditation matters is additive to the involved faculty or staff member's regular duties, sometimes resulting in non-accreditation-related work being delayed or set aside.

Typically, though actual staffing varies by university, the responsibility for completing the work of preparing accreditation reports and correspondence falls to a designated Accreditation Liaison Officer – who can but need not be the institution's Chief Academic Officer – and Chief Business Officer at each university, and they work together with other faculty and staff as necessary, including notably institutional research staff who provide data for outcomes analysis and assessment. The work leading up to preparing the documents and database for a ten-year review can start as early as two-and-a-half years in advance of the NECHE team's visit, and preparing for five-year reports generally begins nine months to one year ahead of time. The estimated salaries associated with the identified time burden range from \$10,000 for a five-year review to 182,500 for a ten-year review, depending on the university at issue.

With all this said, accreditation should not be understood or viewed as a burden. Quite to the contrary, it is nearly universally agreed in the academy that there is great value in accreditation through the self-study process and interaction with NECHE to regularly assess and continually improve institutional quality and outcomes. Through these accreditation processes, the accredited institution reflects on what it is doing well, where it wants to improve, and how it

will prioritize improvement efforts. The multi-year comprehensive evaluation process, done well, brings together a university community to look beyond the institution's individual parts and consider instead how, and how well, the institution *as a whole* meets widely accepted academic and institutional quality standards in higher education,³ with additional constructive outside peer perspectives offered by the visiting team as well.

NECHE staff have committed to helping ensure that the value of accreditation remains at least as strong for the whole of UMS under a unified accreditation.

Appendix C provides examples of how the University of Maine and University of Maine at Machias prepared for and managed their nearly complete ten-year comprehensive review, how the University of Southern Maine is organizing to prepare for its Spring 2021 ten-year comprehensive review, how the University of Maine at Augusta prepared for and managed its nearly complete five-year review, and how the University of Maine at Fort Kent and the University of Maine at Presque Isle individually and together prepared for and managed their recent combined focused site visit and appearance before the Commission, as well as their five-year reviews, respectively.

The second half of Appendix D summarizes NECHE's review policies and procedures associated with the five- and ten-year institutional accreditation reviews.

Summary of the Proposed and Expected Process for a Unified Accreditation Transition

In written correspondence to former UMS Chancellor James Page in early 2019, which was cited in Chancellor Malloy's September 2019 Unified Accreditation Recommendation Report, NECHE summarized the process UMS would follow to initiate a transition from six separate NECHE institutional accreditations to one unified System-level institutional accreditation covering all seven UMS universities.⁴ In sum, should the Board authorize and direct UMS to transition to a unified accreditation, UMS would submit a substantive change⁵ application to NECHE sometime in Spring 2020, demonstrating that it meets NECHE's Standards as a whole and requesting that its separate university accreditations be unified into a System-wide accreditation.

³ It was this very idea of reviewing the quality of and extent to which the University of Maine System met its state-wide mission *as a whole* that first inspired the 1985 Visiting Committee recommendations and February 1986 UMS Board vote to seek a System-wide accreditation. See Malloy, D. and J. Thelen, [University of Maine System Unified Accreditation Recommendation](#), discussion at pp. 3-4 (UMS Board Office, September 2019).

⁴ See David Quigley letters to James H. Page, Ph.D., [March 13, 2019](#) and [May 10, 2019](#), respectively (UMS Chancellor's Office).

⁵ U.S. Department of Education regulations require that regional institutional accreditors, such as NECHE, require the institutions they accredit to submit an application for review in advance of any substantive change to the institution's educational mission or programs. Relevant here, federal regulations provide that NECHE must require UMS to submit to its substantive change process if there is to be any change in the established mission or objectives of the institution or to its legal status, form of control, or ownership. See [34 C.F.R. §§ 602.22\(a\)\(1\), 602.22\(a\)\(2\)\(i, ii\)](#).

As explained in more detail in Appendix D, in the content of its substantive change application, UMS would state its request to unify the currently separate university accreditations under the System, provide a detailed description and analysis of the proposed change, including the purpose of the change and how it is consistent with the institution's mission, and summarily describe how it meets the Standards in a unified way. UMS would also identify which of NECHE's Standards for Accreditation it wished the Commission to focus attention on in its initial consideration of the unified accreditation request and NECHE would schedule a confirming visit within six months. Unified accreditation would be granted when NECHE acted to approve the substantive change request, subject to any conditions imposed at that time.

If the substantive change request is approved, NECHE will then schedule a comprehensive evaluation for approximately two years later. In this two-year period, UMS would prepare a comprehensive self-study that addresses how it meets all NECHE standards in a unified way, and NECHE will send a visiting team to meet with System and university representatives, with members of the team visiting every university, to review and assess the self-study and UMS's unified compliance with NECHE's Standards.

A major element of the necessary work in this two-year period will be ensuring that the right structures, resources, policies, and groups are in place to make and implement whatever changes the universities will need to execute to fully comply with NECHE's Standards for Accreditation in a unified way.

It bears noting here that UMS is not yet proposing either the material content of a unified accreditation substantive change request or the identity of the faculty, staff, and other academic leaders from UMS's universities who would participate in that effort. Indeed, these matters are not for the Chancellor to dictate prior to Board action on the unified accreditation recommendation. But should the Board provide such a mandate, the process and effort should be chartered by the Chancellor immediately thereafter and then developed in coordination with UMS Presidents, their Provosts and Chief Academic and Business Officers, UMS university faculty senates and assemblies, and NECHE staff.

To prepare a unified accreditation substantive change request, consideration should be given to the following possibilities:

- Substantive Change Steering Committee – the Chancellor will charter an appropriately sized representative steering committee of UMS Presidents or their delegates, System staff, and appropriate university representatives as determined by their Presidents and faculty senates/assemblies to be responsible for a unified accreditation substantive change request. Firm deadlines will be established in coordination with NECHE staff for (i) developing an outline of issues to be addressed in the substantive change request, (ii) assessing what the implications and needed resources would be for addressing the issues at individual universities, along with UMS staff and the Board as necessary, and (iii) drafting and submitting the substantive change report in time for consideration by

NECHE according to a schedule agreed upon between NECHE staff and UMS. The Board would be kept informed of this progress as appropriate given its fiduciary governance obligations.

- Given UMS's expectation that NECHE will require consideration of faculty-led System-wide academic and curricular governance processes for any System-wide academic program areas in the substantive change request, and in keeping with both UMS Shared Governance principles and NECHE Standards that require that "[f]aculty have a substantive voice in matters of educational programs, faculty personnel, and other aspects of institutional policy that relate to their areas of responsibility and expertise," UMS faculty senates and assemblies would be chartered to nominate representatives to an academic governance working group to propose options that will both meet NECHE Standards for institutional academic governance while preserving university-level governance as appropriate, in coordination with and subject to the same deadlines as the Substantive Change Steering Committee.

These teams will coordinate with the Chancellor and UMS Presidents to prepare for a NECHE confirming visit within six months of NECHE's consideration of the unified accreditation substantive change request.

- Unified accreditation implementation teams would be chartered by the Chancellor to prepare for a comprehensive evaluation by NECHE, which would occur approximately two years following approval of the substantive change request. These teams would be responsible for implementing new approaches, changes in organization, and communicating appropriately about the needed actions to ensure that, within two years, the UMS self-study will confirm unified compliance with NECHE's Standards as appropriate, in combination with or through substantial delegation back to UMS universities, or managed under some new approach determined to meet the Standards better.

Representatives from the implementation teams would be convened to lead the development of UMS's comprehensive evaluation report that demonstrates unified compliance with NECHE's Standards for Accreditation.

The Chancellor will lead appearances before the NECHE Commission as required regarding UMS's unified accreditation, joined by UMS Presidents directly as appropriate or as requested by NECHE. Additional UMS representatives would be chosen in consultation with UMS Presidents and subject to NECHE's directives about any areas of special focus in the appearance(s).

NECHE and UMS will determine how each university can inform the public that it remains fully accredited under a unified accreditation model, including by listing UMS's universities individually on NECHE's roster of accredited institutions. The matter could be simply addressed,

for example, by stating publicly that “The University of Maine (or the University of Maine at Augusta, etc.) holds NECHE institutional accreditation.”

UMS should seek external resources, including grant funding, to support the unified accreditation effort.⁶ National organizations that have expressed interest in the effort should be engaged as well, such as the American Council on Education and the Council for Higher Education Accreditation. UMS may also benefit from dedicated project and change management expertise to monitor and maintain progress on the effort.

U.S. DEPARTMENT OF EDUCATION RECOGNITION

If NECHE accredits the University of Maine System as an institution of higher education consisting of Maine’s existing seven public universities, UMS would thereafter seek recognition from the U.S. Department of Education as an institution of higher education under federal law, maintaining every UMS university’s participation in all federal financial aid programs that are conditioned on such recognition.

If recognized as the accredited institution of higher education under federal law, UMS’s intention, in keeping with Principle Five of the [Guiding Principles](#), is to follow the model for financial aid administration with the U.S. Department of Education already established for the University of Maine–University of Maine at Machias primary partnership relationship. There, with UMM maintaining separate IPEDS reporting while being accredited as part of the University of Maine, UMM also locally manages its financial aid programs.

To be sure, following NECHE unified accreditation of UMS as a single institution comprised of Maine’s seven public universities, U.S. Department of Education institution of higher education recognition would transition from UMS’s separate universities to UMS itself as an entity. Such recognition is subject to comprehensive federal regulation over federal financial aid programs. UMS has established contact with Tracy Nave and Scott Schramm, representatives of the Federal Student Aid – Program Compliance office in the Department’s New York/Boston School Participation Division, for this purpose. Given the imperative that UMS maintain eligibility for its

⁶ On a small scale, for example, UMS will consider applying for a \$10,000 grant through the Davis Educational Foundation’s Presidential Grant Program, which offers institutions the opportunity to apply for funding to “assist college and university leaders in laying the foundation to redesign ongoing practices with the intent to contain cost increases and improve college affordability.” Funding is available in two levels: up to \$2,500 for “first-step awareness building activities that broadly engage the campus community,” or up to \$10,000 for follow-up or longer-term initiatives. UMS could apply, for example, for the longer-term funding opportunity to help support travel and coordination of planning meetings connected to unified accreditation work during the 2019-2020 academic year. UMS could submit a larger Davis Educational Foundation implementation grant proposal in March or May 2020 to more fully support the broad, inter-university work to be done on the anticipated compilation of a self-study connected with pursuing a unified accreditation. The UMS last received a Davis Educational Foundation grant in 2012 connected with early work on the administrative review that resulted in the development of several shared service opportunities.

students to participate in federal financial aid programs through all of its universities, interaction with the U.S. Department of Education and coordination with NECHE will be critical to the success of the unified accreditation transition, and UMS will regularly update the Board on these matters.

If the Board approves unified accreditation, the Chancellor will charter a U.S. Department of Education recognition working group comprised of appropriately experienced UMS staff (e.g., Vice Chancellor for Finance and Administration and General Counsel or their delegates) and President-nominated university representatives with financial aid administration experience. The group’s charter will direct that, following NECHE unified accreditation of UMS as an institution of higher education, UMS immediately pursue U.S. Department of Education recognition that permits UMS universities to administer their present federal financial aid programs locally. It may be beneficial for UMS to re-engage legal counsel Jay Urwitz, formerly of the U.S. Department of Education’s legal counsel office, to assist and advise the UMS working group in managing the Department’s recognition process to meet the objectives set in Principle Five of the [Guiding Principles](#).

IMPACT ON CURRENT INSTITUTIONAL ACCREDITATION STATUS AND REVIEW SCHEDULES

As has been noted in Principles Five and Seven of the [Guiding Principles](#) (see Appendix A below), should the Board direct UMS to pursue unified accreditation from NECHE and corresponding recognition from the U.S. Department of Education, UMS and its individual universities will coordinate their current separate accreditation statuses and review/reporting schedules with NECHE through the transition and their local (e.g., university-based) financial aid administration with UMS and appropriate U.S. Department of Education staff.

Absent a transition to unified accreditation, UMS itself and its universities would be subject to the following NECHE accreditation review and reporting schedule through Fall 2025:

NECHE Review and Reporting Schedule*	UMS University/NECHE Areas of Focus (See also Appendix C regarding reviews currently in progress)
Fall 2019	<p>UMaine/UMM – Ten-Year Comprehensive Review expected to be complete following November 2019 NECHE Commission appearance</p> <p>UMPI/UMFK – Report on Focused Visit expected following September 2019 NECHE Commission appearance</p> <p>USM – Progress report submitted August 2019 (financial stability, use of assessment results, impact of One University collaborations); Commission action expected in November</p>
Spring 2020	<p>University of Maine System – Progress report due March 1, 2020 (if no progress toward unified accreditation, report on how multi-university academic programs comply with NECHE Standards with separate university accreditations, or focus on</p>

	<p>unified accreditation substantive change if Board acts to pursue transition)</p> <p>UMA – Fifth-Year Interim Report (retention/graduation, student loan default, metrics for student success, status of prison program)</p> <p>UMPI – Visit to Maine School of Science and Math instructional site</p>
Fall 2020	<p>UMFK – Fifth-Year Interim Report (combined President/Provost role, NACEP standards, cross-institutional programs with UMPI, deferred maintenance, shared student affairs officer with UMPI, distance education plan, communication, and update as necessary on unified accreditation)</p> <p>UMPI – Progress Report (update as necessary on unified accreditation or UMPI’s own compliance with NECHE Standards, Proficiency-Based Education, retention/graduation, website)</p>
Spring 2021	<p>USM – Ten-Year Comprehensive Review (including focus on retention/graduation rates)</p> <p>UMA – Substantive Change Visit (courses offered in USM’s Cybersecurity Master’s Program)</p>
Fall 2021	(no reviews scheduled at present)
Spring 2022	UMF – Ten-Year Comprehensive Review (including focus on financial stability, academic collaboration, general education, retention/graduation, assessment)
Fall 2022	(no reviews scheduled at present)
Spring 2023	(no reviews scheduled at present)
Fall 2023	UMPI – Ten-Year Comprehensive Review (no focus established yet)
Spring 2024	UMaine/UMM – Fifth-Year Interim Report (no focus established yet)
Fall 2024	(no reviews scheduled at present)
Spring 2025	UMA – Ten-Year Comprehensive Review (no focus established yet)
Fall 2025	UMFK – Ten-Year Comprehensive Review (no focus established yet)

** does not include NECHE consideration of substantive change requests that may be submitted by individual UMS universities*

It is reasonable to expect – though would need to be confirmed with NECHE – that NECHE reviews and reports scheduled from Fall 2020 and later would be adjusted to account for a Board-directed transition to unified accreditation. As such, it is expected, for example, that UMF, UMPI, UMA, and UMFK would not be required to undergo their currently-scheduled separate individual ten-year comprehensive reviews on their own – notwithstanding their local

focus on and attention to continuous improvement that is one of the hallmarks of the accreditation review cycle – but instead would be included in UMS’s comprehensive review two years following approval of a unified accreditation substantive change request, with one System-wide schedule set for a fifth-year interim and ten-year comprehensive review thereafter. Impact on USM’s presently scheduled Spring 2021 ten-year comprehensive review is less clear and would need to be clarified with NECHE as soon as possible to avoid potentially unnecessary work.⁷ And NECHE could of course request focused Progress Reports and focused visits to any UMS university or universities.

Similarly, the need for individual universities to submit substantive change requests to NECHE for collaborating with another UMS university to offer an academic program would be greatly reduced, if not eliminated altogether. NECHE has confirmed that unified accreditation would mean fewer reports to the Commission in that situation. One example is the substantive change report that the University of Maine at Augusta submitted to offer graduate courses in a cybersecurity program to be offered by the University of Southern Maine. If UMS were the accredited institution, NECHE President Barbara Brittingham confirmed, that report would not have been necessary. NECHE also reports anecdotally of a recent Commission meeting at which up to eight substantive change reports were proposed from several individual UMS universities, of which arguably only one or two would have been needed under unified accreditation.

Should the Board not approve a transition to UMS unified accreditation, the above schedule of separate NECHE reviews will remain in place and UMS will be required to report, by March 1, 2020, how its universities can continue to be separately accredited by NECHE while offering and managing a growing number of academic programs offered jointly by two or more UMS universities collaborating and sharing resources and governance. UMS’s individual universities would continue on their present accreditation review schedules, with NECHE paying particular attention to the significant resource and program sharing between UMFK and UMPI, as well as UMF’s individual financial stability, among other issues noted in the Table above and discussed in the Chancellor’s September 2019 Unified Accreditation Recommendation.

IMPACT ON CURRENT PROGRAM-LEVEL ACCREDITATIONS

Program-level accreditation is critically important to UMS universities for many reasons, including faculty and student recruitment, access to federal funding, certifications and professional credentials for students, and measures of reputation and quality. The Chancellor’s university engagement regarding unified accreditation has confirmed the importance of maintaining the program-level accreditations held across UMS’s universities. Thus, as has been established in Principle Eight of the [Guiding Principles](#) (see Appendix A below), UMS proposes that its universities retain their current program-level accreditations through a transition to unified institutional accreditation. In the future, if unified accreditation is pursued and attained, UMS intends that programs that continue to be offered by a single UMS university as well as

⁷ See Appendix C for USM’s discussion of its preparations for its currently scheduled Spring 2021 comprehensive review.

programs offered on a collaborative basis between two or more UMS universities will determine for themselves whether to maintain or seek new or different program-level accreditations.

For background and context, recall that there are two basic types of higher education accreditation:

1. Institutional accreditation conferred in New England by NECHE – this is the type of accreditation under discussion for the purposes of unified accreditation; and
2. “Specialized” or “programmatic” accreditation, referred to herein as “program-level accreditation”

Institutional accreditation, of course, applies to the entire institution – in the traditional sense, the “institution” has meant a single university, though in the case of unified accreditation, UMS as a whole becomes the accredited institution – indicating that each of an institution's parts is contributing to the achievement of the institution's objectives and mission as a whole. Regional and national accreditors perform institutional accreditation (e.g., NECHE in the six-state New England region).

Specialized or programmatic accreditation – program-level accreditation – normally applies to programs, departments, or schools that are parts of an institution. The program-accredited unit may be as large as a college or school within a university or as small as a curriculum within a discipline. Most of the specialized or programmatic accreditors review units within an institution of higher education that is accredited by one of the regional or national accreditors (e.g., NECHE). However, certain accreditors also accredit professional schools and other specialized or vocational institutions of higher education that are freestanding in their operations – within UMS, for example, the American Bar Association accredits the University of Maine School of Law. Thus, a “specialized” or “programmatic” accreditor may also function in the capacity of an “institutional” accreditor in specific situations. Some of these “institutions” are found within non-educational settings too, such as hospitals.⁸

To illustrate, at the University of Maine, forty-five of the university’s academic programs, as well as two of the University of Maine at Machias’s academic programs, are accredited (variously) by thirteen professional accreditors, one national association, and the Maine Department of Education. Prominent accreditations at the University of Maine include AACSB (the Association to Advance Collegiate Schools of Business), which accredits the Maine Business School's undergraduate program and the Maine Graduate School of Business’s MBA program, now offered in conjunction with USM Graduate Business faculty through the University of Maine Graduate and Professional Center, and ABET (the Accreditation Board for Engineering and Technology), which accredits all six departments and the School of Engineering Technology in the College of Engineering.

⁸ See generally <https://www2.ed.gov/admins/finaid/accred/accreditation.html#Overview>.

In light of the Chancellor's unified accreditation recommendation and the Board's consideration of potential action on it in early 2020, at University of Maine Interim Provost Faye Gilbert's direction, University of Maine Deans collected feedback from their units about the potential impact(s) of unified accreditation on professional accreditations. While there are many instances in which unified accreditation will not disrupt or otherwise inhibit an academic program's ability to obtain or retain program-level accreditation at a single UMS university, UMS has not yet been able to confirm with all program-level accreditors what unified accreditation's impact may finally be.

For example, the University of Maine has been able to confirm that, upon application, AACSB may permit an ongoing unit-level (in other words, university level) program accreditation for the University's business programs. The university has also confirmed that transitioning to a unified System-level accreditation will not impact program-level accreditations from the International Society of Wood Science and Technology and the Society of American Foresters (for the School of Forest Resources' B.S. in Forest Operations, Bioproducts and Bioenergy), as well as the latter's program accreditation for the M.S. in Forestry and B.S in Parks, Recreation and Tourism. The University's engineering degree program accreditations, along with the engineering school's accreditation itself, all from the Accreditation Board for Engineering and Technology, will not be affected by a unified accreditation transition either, as ABET will permit separate, location-based/university-level program accreditation that is common at other multi-campus universities.

Similarly, the University of Maine at Farmington has confirmed that Council for the Accreditation of Educator Preparation program-level accreditation for teacher preparation programs will not be negatively affected if UMS transitions to a unified accreditation.

On the other hand, UMS has not yet been able to finally determine how the Council on Social Work Education's separate program-level accreditations for the three UMS universities that offer undergraduate (UMPI, USM, and UMaine) and graduate (USM and UMaine) Social Work degrees will be administered in a System-wide unified institutional accreditation model. And the program-level accreditation implications are as yet not entirely clear for Nursing either. All four UMS Nursing academic programs (UMaine, USM, UMA, and UMFK) are accredited, either by the Commission on Collegiate Nursing Education (CCNE) or the Accreditation Commission for Education in Nursing (ACEN), but work remains to confirm how to continue such accreditations with UMS as the accredited institution, as the University of Maine encountered accreditation challenges in attempting to expand its Nursing curricula to Machias as part of the primary partnership between those universities.

As UMS universities are in the nascent stages of research on how each program accreditor will respond to unified accreditation, the matter merits continued attention. It is likely that, as long as UMS is accredited by NECHE, the majority of individual program accreditors will support continued program accreditation. UMS expects that the response of most individual program accreditors to unified accreditation will be that programs should continue operating as they have been. That said, following a transition to unified accreditation, some program accreditors

may require some change(s) to the process of reaccrediting individual programs. Finally, those accreditors that either accredit multiple programs across the UMS or who generally require that all similar programs at an institution be accredited will probably require additional conversation, explanation, and effort if UMS's individual universities are to maintain them.

UMS therefore recommends that it work with NECHE and the Council for Higher Education Accreditation to develop a joint letter from the Chancellor and UMS Presidents that would be sent to every professional/program-level accreditor that accredits one or more programs in the UMS academic program inventory. Ideally, the letter would include:

1. an overview of unified accreditation steps taken to date;
2. a clear statement of why the change is being pursued and what UMS universities collectively seek to achieve as a result;
3. assurances of our close working relationship with NECHE and the Board of Trustees in pursuing, achieving, and implementing unified accreditation;
4. a request for individual accreditors to identify any barriers to continued program-level accreditation by their organizations as a function of the UMS move to unified accreditation, along with the steps necessary to remove those barriers; and
5. a commitment to respond to any questions or concerns accreditors may have and keep them apprised of developments/timeline/outcomes in the process, etc.

After a transition to unified accreditation, those academic programs that are accredited will have to work individually with their accreditors to clarify expectations as to how to proceed under unified accreditation. UMS Academic Affairs can provide coordinated support to UMS universities to assist them with maintaining program-level accreditations. System-level coordination would be undertaken in a manner consistent with NECHE's Standards for Accreditation in a unified accreditation model, recognizing that a UMS university with an unaccredited program similar to one that is accredited at another UMS university, or vice versa, may require such coordination.

GOVERNANCE/POLICY CHANGES TO CONSIDER

Current UMS Board of Trustees Policy 308 states:

Accreditation is viewed as a necessary and valued means of quality assurance and self-improvement. Institutional accreditation should serve to ensure continuous self-review of mission, faculty, programs, resources, and support services, while specialized accreditation serves to improve professional education, prepare graduates for professional licensing, and protect the public. The University of Maine System supports the accreditation activities of its institutions.

If the Board directs UMS to seek unified accreditation for the System as a whole, considering the Guiding Principles, Policy 308 should be revised to reflect the change. The following proposed revision would reflect UMS's transition to unified institutional accreditation while recognizing the Guiding Principles and preserving university program-level and professional accreditations:

Institutional and programmatic accreditation are necessary and valued means of quality assurance and self-improvement for the University of Maine System and its universities. Institutional accreditation ensures continuous self-review of System and university mission, faculty, programs, resources, and support services, as well as providing UMS students eligibility for federal financial aid programs. Programmatic and professional accreditations ensure the quality and relevance of UMS degree-granting programs, including by providing graduates with eligibility for professional licensure where necessary and the public with assurances of program quality.

The University of Maine System will maintain a unified institutional accreditation for its universities through the New England Commission of Higher Education that ensures that all universities maintain federal financial aid eligibility, as well as their own local identities and missions, according to the UMS Guiding Principles established for unified accreditation.

It is the judgment of UMS General Counsel that UMS would remain in compliance with its legal charter by operating under a unified accreditation. But if unified accreditation is pursued, the Chancellor should charge the UMS General Counsel to review UMS governance policies and determine if any other policy changes should be made to ensure complete alignment of UMS governance and operations with NECHE's Standards for Accreditation, and such work should be undertaken in full coordination with a chartered Substantive Change Steering Committee as proposed above.

CONSIDERATION OF OTHER SYSTEM ACCREDITATIONS

In discussion at the Board's September 16, 2019 meeting at UMFK, Board members asked UMS representatives to provide information about other higher education institutions that have considered something analogous to the Chancellor's unified accreditation recommendation.

To provide comparative information to help inform Board members in their deliberations, three examples are summarized in Appendix E below: a state public university system consolidating their separate university accreditations (the University of South Florida), a state public university system that has merged universities together (the University System of Georgia), and a state public university system considering a unified accreditation due to a fiscal emergency (the University of Alaska System).

CONCLUSION

While this report discusses the general process considerations presently thought to be most relevant should the UMS Board direct a transition to System-wide unified accreditation, it bears repeating that, in an earlier time, after its Educational Policy Committee “applauded” the “novel and intriguing concept” of unified System-level accreditation as “an excellent opportunity to pioneer in the pursuit of excellence,” the UMS Board of Trustees voted in 1986 to “seek accreditation for the System in an appropriate time frame.”⁹

Now, more than three decades on – as higher education faces disruptions unknown in its history, and as Maine faces needs that UMS cannot afford to meet with the status quo – the opportunity to pioneer remains. Indeed, innovation is no longer optional, *but required* for institutions trying to advance their mission, to ensure their future viability and success, or to achieve their aspirational goals.¹⁰

Within UMS, some collaborative multi-campus programs are under way. More are in the works. There are some joint faculty appointments between campuses. More are needed if all UMS universities are to survive and thrive where they are, meeting the State of Maine’s public mission for higher education. System universities have launched partnerships and new initiatives together, and are exploring new credentials and certificates. Maine needs more. UMS connections with Maine businesses are growing, and its academic programs reflect more market relevance, sending engaged citizens into Maine communities to stay and raise families and fill the jobs of tomorrow.

At this time, unified accreditation is a necessary innovation to permit and foster more collaboration among UMS universities to do more of everything that Maine needs from UMS, meeting its tripartite mission of education, research, and service in spite of the challenges presented by Maine’s rural nature and economic and attainment challenges. Now is indeed “an appropriate time” for Maine’s public universities to unify their accreditations in the University of Maine System.

⁹ Malloy, D. and J. Thelen, [University of Maine System Unified Accreditation Recommendation](#), footnotes 11-12 and accompanying discussion at p. 4 (UMS Board Office, September 2019).

¹⁰ Id. (citing AGB Board of Directors’ Statement on Innovation in Higher Education, at 2 (2017)).

APPENDIX A

GUIDING PRINCIPLES FOR UNIFIED ACCREDITATION

Recognizing that greater coordination and integration among UMS universities, access to more collaborative, multi-campus programs, and the preservation of all UMS campuses where they are will maximize the benefit Maine students and the State realize under the UMS Board of Trustees' Strategic Priorities, while acknowledging the practical burdens that separate university accreditations impose on achieving these goals at the scope, scale, and pace necessary to meet the educational and workforce needs of the citizens of this State, UMS universities will unify their NECHE accreditations following a robust period of campus engagement led by the UMS Chancellor and System Presidents.

Principle One

UMS's primary goals are to:

- realize, to the fullest extent possible, the purpose and benefits the University of Maine System's formation was meant to achieve, which unified accreditation is expected to catalyze and foster;
- preserve the academic, financial, and administrative operations of UMS universities that best serve the interests of UMS students and the State and provide the highest quality educational experience; and
- relieve individual campuses of the burden of each fully complying on their own with all NECHE standards.

Principle Two

Pursuant to UMS Board Policy 212 and the UMS Statement on Shared Governance, faculty will retain all rights to academic freedom and shared governance to develop academic policy, curriculum, and faculty appointment and promotion and tenure standards on their campuses and as necessary for multi-campus programs developed under a unified accreditation.

Principle Three

UMS will follow existing collective bargaining agreements and bargain in good faith with its employees' representatives as necessary to achieve unified accreditation.

Principle Four

UMS universities will remain where they are as provided in 20-A MRS §10901-A, preserving all existing multi-campus arrangements (e.g., UMaine-UMM Primary Partnership, USM partnership in UMaine Graduate and Professional Center, etc.) and not merging or closing campuses to achieve unified accreditation. UMS Presidents will preside over their respective universities and

be responsible for the day-to-day operation and development of their university's academic, research, service, and extracurricular programs within limits defined by the Board of Trustees and Chancellor. UMS will continue to operate under its existing Charter, with Presidents accountable to the UMS Chancellor and Board as leaders of their universities and the Chancellor serving as UMS's Chief Executive Officer.

Principle Five

UMS will maintain, to the maximum degree possible, the current independent IPEDS reporting and financial aid eligibility and administration at each university (an example for which is the University of Maine at Machias IPEDS reporting separately from the University of Maine). Although UMS will be responsible for complying with NECHE standards, it will delegate substantial authority back to its universities for coordinated, unified compliance with NECHE standards where doing so improves the educational experience and student outcomes and maximizes efficiencies.

Principle Six

UMS will pursue unified accreditation transparently, making official written correspondence between UMS, NECHE, and the U.S. Department of Education and related materials publicly available without request, including past communications and records showing historical consideration of single and unified accreditation.

Principle Seven

UMS University Presidents will maintain and manage their current accreditations and correspondence with NECHE related to them and work with the UMS Chancellor to determine appropriate transition plans for unified accreditation. The Chancellor (and his designees) and UMS Presidents (and their designees) will develop and prepare all material UMS unified accreditation applications, reports, and correspondence, and Presidents will be copied on all records, reports, and correspondence received related to unified accreditation.

Principle Eight

The University of Maine will retain its land, sea, and space grant statuses, and each University will retain its Carnegie and related national classification and association status and individual program and professional accreditations according to all appropriate and relevant standards. All UMS universities will work to achieve strategic complementarity to ensure the success of unified accreditation. Each will retain, to the maximum extent possible within the higher education public policy of the State, its distinctive academic, research, athletic (including conference and division affiliations) and extracurricular programs.

APPENDIX B

October 22, 2019

TO: Academic and Student Affairs subcommittee of the UMS BoT

FROM: Faculty Representatives to the BoT

Lisa Leduc (UMPI); Patti Miles (UM); Heather Ball (UMM); Tim Surette (UMA);
Clyde Mitchell (UMF); Matthew Bampton (USM)

RE: Faculty feedback regarding Unified Accreditation planning

As part of our role as liaisons between our faculty constituents and the BoT and this subcommittee, faculty representatives have been gathering feedback on the planning documents for moving toward Unified Accreditation.

We very much appreciate the Chancellors' efforts of visiting campuses and meeting with faculty in different forums and venues to discuss the principles and objectives and get feedback. The information we present here is not meant in any way to usurp or demean those vital communications. What we want to present is what we are hearing from our colleagues; positive feedback as well as questions and concerns.

The following information has been gathered on our various campuses through personal conversations, closed faculty meetings, anonymous surveys, as well as on-the-record faculty governance statements/documents. It does not necessarily represent the views and opinions of the individual faculty representatives themselves. We do believe however that we should be offering an alternative vehicle for faculty input to be on the record with the BoT.

Positive feedback on the plan to move towards Unified Accreditation (UA) was a minority of the feedback we received. Common comments included:

- 1) This may save some money and make smaller campuses more viable
- 2) If we truly share all of the larger campuses resources (ie library), as would be required under UA that could be a benefit to smaller campuses
- 3) Currently NECHE has concerns with instances where a campus relies on outside entities for courses and services; a single accreditation umbrella would alleviate those concerns
- 4) It would be nice to get Institutional Research (IR) support

However, the majority of feedback we have received has been about concerns and questions. We will summarize these themes here:

CONCERNS

- 5) Small campuses will lose their voice
- 6) We will lose mission differentiation of smaller campuses

- 7) Small campuses will become satellite/feeder campuses to larger ones and will only get the less prepared students
- 8) There are big implications on the peer review process – we have different standards across campuses (research vs teaching vs service)
- 9) This may limit campus based curriculum development if all similar programs across the system must collaborate
- 10) We have ongoing serious trust issues with any BoT/Chancellor/UMS office initiatives because of bad experiences in the past with top down change
- 11) Assessments of course and program outcomes are difficult as is, it would be unmanageable for an entire system. We would lose the granular information
- 12) Individual accredited programs being forced to combine/collaborate with other non/differently accredited programs on other campuses
- 13) Resources across campuses are not equal (ie library) – NECHE will be looking at that
- 14) One serious issue in one program or one campus could hold up accreditation for all
- 15) Not enough clarity of leadership and decision-making between UMS and campuses
- 16) Have not had the best experiences with centralized IT and HR – do not see how centralized accreditation would be any better
- 17) This is too rushed and poorly defined
- 18) Only lip-service is given to shared governance – recent experiences (Academic Partnerships, Academic Integrity Policy, System Research Plan) tell us faculty will not really be included
- 19) Another UMS initiative that will require extensive investment of time and resources for what might possibly be an abandoned pursuit – resulting in lowered morale
- 20) The Trustees are probably not familiar with the complexity and nuances of the academic accreditation process, it does not make sense to have them be making this decision just based on recommendations from the Chancellors office

QUESTIONS

- 21) If UA takes 2-3 years to develop, what about current timelines for each campus within their own re-accreditation schedule?
- 22) Will we have unified Financial Aid?
- 23) How will UA affect the general education – will it become unified?
- 24) What can be achieved by UA that we cannot do now by using Cooperating Departments (and MOUs if needed)? We can get collaborative programs this way. Also if we implemented the BoT cross-listing policy that would remove another roadblock to collaboration
- 25) Why not just have a centralized IR to help smaller campuses gather data for their own accreditation? Putting resources into IR would seem to be more cost effective and timely than pursuing UA
- 26) Is collaboration going to be mandated?
- 27) How will this impact campus budgets?
- 28) What is the actual cost savings?

- 29) Who will collect the accreditation data? Where will the voice of the small campuses be in that data collection?
- 30) How could NECHE do a visit?
- 31) How (specifically) will you reach the outcomes stated in the UA Recommendation document?
- 32) How will this end competition between programs and campuses?

Unified Accreditation FAQs (as of October 30, 2019)

The University of Maine System unites Maine’s seven public universities with a mission of education, research, and service for the State of Maine’s citizens, communities, and businesses. To provide our students and State with the highest quality academic programs and create knowledge through research and innovation, we need to consider all options that will allow us to act proactively and sustainably despite limited resources spread across a large rural state with a small population. Recognizing Maine’s challenging demographics and their state-wide mission, Maine’s public universities need to share resources and programs to maintain access to vital programs at every one of our universities and the local communities they serve, leveraging those resources and advances in technology across traditional university boundaries to increase access and attainment across the State.

Following his September 2019 recommendation to the UMS Board of Trustees that UMS universities unify their institutional accreditations, the Board directed Chancellor Malloy to develop a framework and planning process for Unified Accreditation for the University of Maine System and provide a report for the November Board meeting for how to successfully transition to a unified accreditation. The Board also directed the Chancellor to seek input from every campus to prepare the report, and to that end, the Chancellor committed to visiting each campus at least three times this semester and next. Starting September 30, the Chancellor and his team have visited each campus to discuss and gather feedback from faculty, staff, students, administrators, and Board of Visitor members about how to pursue Unified Accreditation to ensure that it allows Maine’s public universities to work together to better meet their education, research, and service mission to the State of Maine and its citizens. All campus community members have been encouraged to respond to an [online survey](#) regarding unified accreditation as well.

The following list of “Frequently Asked Questions,” with answers, is part of that effort. Faculty Representatives to the Board of Trustees compiled a list of Comments, Concerns, and Questions that were submitted to the Board’s Academic and Student Affairs Committee for its October 28, 2019 meeting. This “FAQ” document responds to the Faculty Representatives’ Concerns and Questions, noting each to which the answers below are responsive. The FAQ answers below also respond to questions posed during the Chancellor’s campus visits, as well as to issues raised to date in the online unified accreditation survey.

Thank you to all university community members who raised the issues and asked the questions thus far, to which the following “FAQs” respond.

FAQs

1) What is “Unified Accreditation”?

The University of Maine System is a single legal institution and instrumentality of the State of Maine that is made up of the University of Maine, the University of Southern Maine, the University of Maine at Augusta, the University of Maine at Farmington, the University of Maine at Fort Kent, the University of Maine at Presque Isle, and the University of Maine at Machias. Maine’s seven public universities are not separate legal institutions themselves – no one university can own property or sign contracts by itself, for example – but they have historically each been separately accredited by the New England Commission of Higher Education (NECHE) and recognized as separate accredited institutions by the U.S. Department of Education for purposes of federal financial aid. Since July 1, 2018, the University of Maine at Machias is no longer separately accredited, but is nevertheless fully accredited as a regional campus of the University of Maine and encompassed in the University of Maine’s institutional accreditation.

Unified Accreditation will be exactly what the term “unified” means: *a unification of each UMS university’s separate accreditation into one state-wide institutional accreditation covering all UMS universities*. Unified accreditation does not require or result in any university losing its accreditation -- quite to the contrary, it means that all currently separate NECHE accreditations will be joined together at the System level, with the University of Maine System recognized by NECHE and the U.S. Department of Education as one accredited institution made up of the current seven UMS universities. NECHE has committed to listing the individual institutions on its roster.

The Guiding Principles set the parameters for how unified accreditation would be implemented and how UMS universities will retain their identities and missions. New programs and curriculum will continue to be driven by campuses and their faculties, singly and in collaboration with each other and under the coordination of System leadership through the Chief Academic Officers Council and Vice Chancellor for Academic Affairs.

NECHE and UMS will determine how each university can inform the public that it remains fully accredited under a unified accreditation model, including by listing the individual institutions on its roster.

Responsive to Concern 17 (This is too rushed and poorly defined)

2) How long has Unified Accreditation been under consideration?

A state-wide, System-level accreditation has been under consideration in one form or another since 1986, when the UMS Board of Trustees accepted an independent review panel’s recommendation and voted that UMS should “seek accreditation for the System in an appropriate time frame” as a way to “pioneer in the pursuit of excellence.”

UMS began serious discussions with NECHE in 2015 about how to transition to what was then called a “single accreditation,” except that at the time NECHE did not believe a state-wide system of several universities could be accredited and recognized by the U.S. Department of Education as an institution of higher education under federal law. Since then, with input from a former U.S. Department of Education attorney, NECHE and UMS have worked with the U.S. Department of Education, which has confirmed that the University of Maine System itself can be accredited and recognized on behalf of its universities as an institution of higher education under federal law.

All of the relevant correspondence between UMS, NECHE, and the U.S. Department of Education since 2015 can be found here: [Unified Accreditation Historical Documents](#).

Responsive to Concern 17 (this is too rushed and poorly defined)

3) How will Unified Accreditation benefit students?

With Unified Accreditation, UMS universities and their faculties will be able to work out seamless ways for students to take courses from other UMS universities without having to transfer them back in, with their financial aid following them when they do, and with the credits they earn from other UMS universities applying to their qualification for Dean’s list status. Over time, with UMS universities working out the details in coordination with System leadership, UMS students could have access to the full array of courses and programs across the entire System.

Many Maine families already think we are acting as one institution and become confused and frustrated by barriers that prevent us from fluidly serving students. Unified Accreditation will simplify processes and make them more transparent, bring greater opportunities, facilitate more timely degree completion, and remove key barriers to student success.

4) How will individual campuses retain their voice and standing under Unified Accreditation?

UMS Presidents and provosts will retain their roles, and will continue to serve on the existing Presidents Council and Chief Academic Officers Council, respectively. Campuses will retain their faculty and student representatives to the Board of Trustees, as well as their internal mechanisms for ongoing engagement. The Board will continue to rotate its meetings among the campuses, and individual Boards of Visitors will continue to both serve their universities and meet with each other and the Trustees as they do now.

UMS universities will retain their already-established missions in coordination with the state-wide System mission. In fact, Maine’s universities, whether large or small, coastal or inland, *should* retain their distinct personalities because that will benefit students and local campus communities, and lend distinction to the whole System.

Additionally, faculty would be encouraged to develop System-wide programs, certificates, or minors, along with multi-campus System-wide academic governance policies, in keeping with their existing shared governance responsibilities. New multi-university programs can reflect the tone and essence of the universities from which they draw, and will be created by those involved in coordination with System leadership.

While the Board maintains governance authority and fiduciary responsibility for the System as a whole, there will be no top-down directive or mandate from the System or Chancellor's office about how unified accreditation must be implemented. Working with the System's leadership, each UMS university and their faculty will help to determine the proper implementation over a two-year period that will lead to NECHE's first comprehensive visit to assess the implementation of unified accreditation.

Responsive to: Concerns 5 (small campuses will lose their voice), 6 (we will lose mission differentiation of smaller campuses), and 15 (not enough clarity of leadership and decision-making between UMS and campuses)

5) How will Unified Accreditation affect small campuses?

Regardless of size, in a Unified Accreditation model, any UMS university will be able to share resources, positions, and programs with any other UMS university without being forced by NECHE to merge with whatever other university it chooses to share resources or programs. This will allow UMS universities to increase their programmatic options, which would improve retention and graduation of their own students, as well as welcome students from across the state into their programs and courses. Programmatic and campus admissions standards may remain the same, unless the faculty and admissions staff decide to change them within parameters established by UMS Board policy. Furthermore, Unified Accreditation will provide some protections for campuses that may not be able to meet every one of the individual accreditation standards and their requirements on their own.

Responsive to Concern 7 (small campuses will become satellite/feeder campuses to larger ones and will only get the less prepared students)

6) Will all academic programs be expected to collaborate? How would we assess program outcomes?

Under our current model, with each university being separately accredited, NECHE cannot permit the scope and scale of truly collaborative programs offered jointly by two or more UMS universities that will be necessary to meet state needs. Unified Accreditation will allow more programs to collaborate for a number of reasons, including to achieve greater efficiency, share faculty expertise, respond creatively to advances in technology and the economy, reduce internal competition, preserve programs that may be too small at any one university, and provide more options for students. Programs offered individually by a single university that have sufficient enrollment and resources and quality outcomes will not be expected to combine

with another program at another university unless faculty and academic leaders at both the involved universities and System think that makes sense as an opportunity to provide some of the benefits listed above or dwindling resources dictate the necessity of doing so.

Programmatic collaboration is an option that will benefit students and better serve the state through sharing resources and reducing unnecessary duplication of effort. There may be cases where it is not needed or desirable, but there may be other situations where it is a way to safeguard vulnerable (e.g., under-enrolled or under-resourced) programs and diversify curricular offerings. Unified Accreditation eliminates the primary impediment to collaboration so that faculty and academic leaders can explore those options and take advantage of the opportunities they present more nimbly.

Collaborative multi-university programs may need to be assessed differently than single-university programs, and multi-campus representative teams of faculty and academic leaders, including the Vice Chancellor for Academic Affairs office, will determine how best to coordinate program assessment across the System's universities in coordination with standard practices already in place at every university and in light of the Programs for Examination policy and process as well. It may become desirable for program assessments to become more standardized over the next few years, but that will be determined in a fully consultative fashion over time for NECHE's first comprehensive evaluation visit under a unified accreditation.

Responsive to Concerns 9 (this may limit campus based curriculum development if all similar programs across the system must collaborate), 11 (assessments of course and program outcomes are difficult as is, it would be unmanageable for an entire system. We would lose the granular information), and 12 (individual accredited programs being forced to combine/collaborate with other non/differently accredited programs on other campuses), and to Question 26 (Is collaboration going to be mandated?)

7) How will Unified Accreditation affect the general education curriculum?

While we don't want general education requirements to create a barrier to student retention and achievement, there is no need to unify the current model at this time; a transition to unified accreditation does not require doing so. There is a block transfer agreement already in place that could form the basis of a shared general education curriculum if that is something the faculty believe would benefit UMS students.

Responsive to Question 23 (How will UA affect the general education – will it become unified?)

8) How will shared governance be maintained?

Shared governance is a core value of the System and its campuses, and faculty and staff have expressed their thoughts, ideas, and concerns on this and other major endeavors that affect the System. While the Board of Trustees has the deciding authority, Unified Accreditation is designed to be an open and transparent process throughout, with faculty having the same

input and voice from a System shared governance perspective as they do within their own universities now. As stated in the Guiding Principles, “faculty will retain all rights to academic freedom and shared governance to develop academic policy, curriculum, and faculty appointment and promotion and tenure standards on their campuses and as necessary for multi-campus programs developed under a unified accreditation.”

Any changes determined to be necessary to the University of Maine System’s shared governance policies to achieve a unified accreditation, such as multi-campus or system-wide curriculum committees, faculty bodies, or academic governance standards, will be determined by faculty system-wide and reviewed and approved by the Chief Academic Officers Council, Vice Chancellor for Academic Affairs, and UMS Board.

Responsive to Concern 18 (only lip-service is given to shared governance – recent experiences (Academic Partnerships, Academic Integrity Policy, System Research Plan) tell us faculty will not really be included)

9) What are the implications for the faculty peer review process?

We need faculty with multiple areas of expertise, including subject matter and teaching practices, aligned with university and student needs. There is no need to change the peer review process at the university level, which will remain flexible enough to recognize and honor distinctive faculty contributions. Subject to UMS policy and approval, faculty will themselves determine appropriate standards as deemed necessary on a System-wide basis for faculty engaged in programs offered by two or more universities.

Responsive to Concern 8 (There are big implications on the peer review process – we have different standards across campuses (research vs teaching vs service))

10) What happens with each campus’s current re-accreditation schedules and timelines?

Universities that are currently nearing completion of their 10-year re-accreditation review will continue those efforts. As stated in the Guiding Principles, UMS leadership, NECHE, and the involved universities will determine an appropriate unified accreditation transition schedule that takes into account the individual university’s accreditation status and schedule. Once a unified accreditation is achieved, UMS universities will not have to separately manage accreditation reviews on their own, although they will retain the opportunity to have NECHE teams visit their campuses as part of future System-wide accreditation reviews, and it is expected that NECHE teams will visit every university through the implementation of a unified accreditation model.

The current schedule of UMS university accreditation reviews can be seen [here](#).

Responsive to Question 21 (If UA takes 2-3 years to develop, what about current timelines for each campus within their own re-accreditation schedule?)

11) Who will be responsible for collecting the necessary data for accreditation? How would NECHE conduct its visits?

Both campuses and System staff will have a role to play. System IR will work closely with campus IR and experienced accreditation personnel to assure the self-study has sufficient data and other information for Unified Accreditation evaluations and reviews. Once NECHE has the self-study, we expect they would send a System-wide team, with sub-teams visiting individual universities. Individual universities can also request a visit, which NECHE will accommodate.

Responsive to Question 29 (Who will collect the accreditation data? Where will the voice of the small campuses be in that data collection?) and 30 (How could NECHE do a visit?)

12) Campuses have had some bad experiences in the past with the early stages of centralized services; why should they trust the System in this instance?

Trust is the foundation to any successful collaborative endeavor; to not invest time in building trust could negatively impact this work, which is so important to our future and that of our state. Transparency is also key, and the Chancellor has repeatedly stressed his commitment to transparency.

But Unified Accreditation is only the beginning. It is a mechanism by which to enhance campus-driven opportunities to work together to better serve our state, and, in cases where it makes sense, will allow interested provosts and faculty to partner on high-impact goals and multi-campus programs. The actual change, with Board approval, would take place over time by UMS universities working together to respond to their own needs in coordination with UMS leadership.

Responsive to Concern 10 (we have ongoing serious trust issues with any BoT/Chancellor/UMS office initiatives because of bad experiences in the past with top down change)

13) What can be achieved by Unified Accreditation that we cannot do now by cross-listing courses or by using MOUs? Why not just have centralized IR help smaller campuses gather data for their own accreditation?

Separate university NECHE accreditation is the main barrier to the scope and scale of meaningful collaborations that would allow us to best serve our mission and preserve all of our universities where they are. With separately accredited universities, NECHE will accept only a limited number of cross-listed courses and collaborative (multi-university) programs, as the accreditation process must hold the accredited institution accountable for the academic experiences of its students. Unified Accreditation removes that barrier so that faculty-driven programs and other academic collaborations across the system can be implemented to fully realize their potential and best meet our public mission all across the State.

The issue is more complex than the ability of any one university to get the data and related resources it needs for accreditation. Some of our universities, as they are currently configured, are in clear danger of not meeting all of the accreditation standards now. Because it draws on all of the resources of the entire System, and holds the entire System accountable and responsible, Unified Accreditation relieves those individual campuses of the burden for meeting each of the standards on their own, and reduces the expenses associated with undergoing individual accreditations.

Responsive to Questions 24 (What can be achieved by UA that we cannot do now by using Cooperating Departments (and MOU's if needed)? We can get collaborative programs this way. Also if we implemented the BoT cross-listing policy that would remove another roadblock to collaboration) and 25 (Why not just have a centralized IR to help smaller campuses gather data for their own accreditation? Putting resources into IR would seem to be more cost effective and timely than pursuing UA)

14) Could problems in one program or one campus hold up accreditation for all?

While the UMS will need to demonstrate system-wide compliance for each standard for continued unified accreditation, it will not depend on any individual program or university for doing so. Local problems will still need to be solved locally, but there will also be System and other university assistance and resources if needed, including adopting a collaborative program model if it makes sense to do so to preserve access to an otherwise under-resourced program. The preamble to NECHE's standards speaks to this: "Each of the Standards articulates a dimension of institutional quality. In applying the Standards, the Commission assesses and makes a determination *about the effectiveness of the institution as a whole*... The Commission recognizes that some aspects of an institution are always stronger than others. Meeting the Standards does not guarantee the quality of individual programs, courses, or graduates, but serious weaknesses in a particular area may threaten the institution's accreditation." (italics added)

Responsive to Concern 14 (one serious issue in one program or one campus could hold up accreditation for all)

15) Will Unified Accreditation save money? How will it impact campus budgets?

Some, as there will be savings in NECHE dues and the time and resources committed to preparing for six separate, uncoordinated university site visits and 5- and 10-year reviews. But Unified Accreditation is not being pursued as a cost savings initiative. It is, first and foremost, a mechanism to allow the universities and the UMS to better serve the State of Maine, and as a way to protect programs and campuses by giving UMS universities the ability to develop and offer shared programs, which is not possible in the current separate accreditation model. That said, Unified Accreditation may well create opportunities for savings and efficiencies that would not otherwise exist and in light of the scarcity of resources available to invest in System and

campus needs, System and campus academic leadership will be expected to look for and take advantage of any such opportunities.

The UMS already has a unified budget process and allocation model in place, and campuses have benefited accordingly as they are gradually being brought into closer alignment with their peers. The implications of Unified Accreditation on individual budgets will vary depending on how each campus approaches the opportunities available to them in a unified accreditation model. At the very least, there will be some savings as campuses will no longer handle the full re-accreditation process and related expenses themselves.

Responsive to Question 28 (What is the actual cost savings?) and 27 (How will this impact campus budgets)

16) What impact will Unified Accreditation have on competition between UMS programs and campuses?

Right now, our universities are competing for the 30% of Maine high school college-going graduates who end up matriculating at one of UMS's universities. This ignores our more serious competition with some of the state's private schools, where most of the other 70% go. Collectively, with a unified accreditation, we can be more outwardly-focused and better coordinate our marketing and outreach efforts, thus reducing internal competition. We can also offer greater access to the System's academic portfolio no matter where a learner resides.

Responsive to Question 32 (How will this end competition between programs and campuses?)

17) What will the impact of Unified Accreditation be on Financial Aid?

Our Guiding Principles state that individual universities will continue to manage financial aid locally, and a UMS model for doing so already exists between the University of Maine and the University of Maine at Machias. Even though the Machias campus is accredited together with the University of Maine, the U.S. Department of Education has permitted UMM to continue to administer financial aid for its students.

Responsive to Question 22 (Will we have unified Financial Aid?)

18) We will be able to share library and other resources?

In a Unified Accreditation model, UMS expects to reduce the number of licenses required for library and IT materials so that these resources can be shared more broadly across our universities, rather than being forced to maintain separate licenses and subscriptions by separately accredited universities.

Responsive to Concern 13 (Resources across campuses are not equal (ie library) – NECHE will be looking at that.)

19) How prepared is the Board of Trustees for something of this magnitude?

The Board of Trustees has the legal and fiduciary responsibility to oversee the University of Maine System. Board and System leaders, including Presidents and Chief Academic Officers, have met with Dr. Barbara Brittingham, president of the New England Commission of Higher Education (NECHE), and understand their responsibilities in the context of the challenges the System's universities face. They may have a better perspective than those who have never participated in accreditation efforts, since they have engaged directly with NECHE on this question.

Responsive to Concern 20 (The Trustees are probably not familiar with the complexity and nuances of the academic accreditation process, it does not make sense to have them be making this decision just based on recommendations from the Chancellor's office)

20) How much time and effort will this take? Will it be worth it? How will we meet all the outcomes identified in the Chancellor's recommendation to the Board?

There is no doubt that this endeavor will require concerted effort and commitment from all of us. The Board has asked the Chancellor to submit a framework for moving this forward, and expects to vote on whether to pursue unified accreditation at its January 2020 meeting. The System would then submit a substantive change request to NECHE that the Commission would consider in late spring or early summer 2020. If the Commission accepts the request, the System as a whole would effectively become accredited at that point, would be subject to an initial implementation visit from NECHE (likely within 6 months), and would then have two years to prepare for NECHE's comprehensive evaluation visit, during which time faculty and academic leaders at UMS universities will determine with UMS leadership how best to satisfy NECHE's standards in a unified way and best permits UMS to meet its state-wide public mission.

UMS and university leaders will also work with U.S. Department of Education staff to ensure proper financial aid administration at each university in a unified accreditation model.

Not pursuing Unified Accreditation, however, may well result in the need to make some very hard decisions about eliminating unsustainable programs and practices. Given the known demographic threats, and the economic uncertainties we face, there may also be campus closures or reorganizations. If successfully realized, Unified Accreditation will allow us to better prepare for those challenges and, ideally, avoid them altogether.

At base, Unified Accreditation will give us the space and coordination we need to secure the futures of our smaller universities, respond more nimbly to market demands, serve the state more effectively, and, most importantly, better support our students and their success. It will require all of us working together to realize the potential of this initiative.

Responsive to Concern 19 (another UMS initiative that will require extensive investment of time and resources for what might possibly be an abandoned pursuit – resulting in lowered morale), and Question 31 (How (specifically) will you reach the outcomes stated in the UA Recommendation document?)

APPENDIX C

SUMMARIES OF SELECT UMS UNIVERSITY EXPERIENCE WITH NECHE FOCUSED VISITS AND FIVE- AND TEN-YEAR REVIEWS

UNIVERSITY OF MAINE/UNIVERSITY OF MAINE AT MACHIAS

Dr. Jeff St. John
Senior Associate Provost for Academic Affairs
University of Maine

The University of Maine and our regional campus, the University of Maine at Machias, are nearing completion of our ten-year accreditation review. We hosted a NECHE-appointed evaluation team in Orono and Machias in April 2019, received the team report in June 2019, and filed our response to the Commission in August 2019.

UMaine began preparing for its Spring 2019 evaluation in December 2016.

In early Spring 2017, we recruited writing teams attached to each of the NECHE standards. The 5-6 member teams comprised faculty, administrators, and staff. The teams produced drafts of the Self-Study's nine narrative sections in Summer-Fall 2017. (The most complicated and time-consuming draft— for Standard Seven: Institutional Resources—was completed in Spring 2018.) We assembled the first full draft of Orono's Self-Study material in Summer 2018, while a UMM writing team concurrently drafted Machias's contributions.

A six-member Steering Group comprising UMaine's Senior Associate Provost, Assistant Provost for Institutional Research and Assessment, Assessment Coordinator, and two faculty members, along with UMM's former Head of Campus, formed in August 2018. A subset of that group— a three-person writing team— combined and aligned the two Self-Study narratives in September 2018, made extensive revisions and additions throughout, added initial in-text data, and shared a working draft with NECHE Vice President Carol Anderson at her invitation.

Guided by Vice President Anderson's feedback, the writing team made further revisions and additions, embedded more data, and shared the updated document with the Steering Group, the President's Cabinet, and the Deans' Council in December 2018. The Self-Study underwent two further sets of revisions before taking final shape in early Spring 2019. With help from a number of UMS finance and data personnel, UMaine's Office of Institutional Research and Assessment compiled and validated all of the UMaine and UMM data appearing in the Self-Study.

The evaluation team chair made a preliminary visit to campus in December 2018 to meet with President Ferrini-Mundy and Orono and Machias administrators, faculty, and staff. The full team visited in Spring 2019. Team members met with campus leaders, faculty, staff, students,

Boards of Visitor members (Orono and Machias), the former UMS Chancellor and his senior staff, and members of the UMS Board of Trustees.

About 110 University of Maine and University of Maine at Machias faculty, staff, students, and administrators in Orono, Machias, and Portland have contributed to the ten-year accreditation review, with roughly 3100 hours of staff time invested in the process.

President Ferrini-Mundy will meet with the Commission and the team chair on November 21, 2019 to discuss the report, the response, and the actions we have taken (or are taking) to address the concerns shared with us. We expect to receive the Commission's "action letter"— assessing our evaluation and recommending areas of emphasis or improvement— in early 2020.

The university's next NECHE reporting obligation will be the (regular/standard) annual report we file for Orono and Machias in April 2020.

* * * * *

UNIVERSITY OF SOUTHERN MAINE

Dr. Jeannine Uzzi
Provost and Vice President for Academic Affairs

Dr. Dominic Barraclough
Vice Provost for Mission and Accreditation

In Fall 2019, the University of Southern Maine (USM) began the process of completing the requirements for reaffirmation of accreditation by the New England Commission of Higher Education (NECHE). This process involves creating a one-hundred page institutional self-study with supporting evidence and “data first” forms that addresses not only the nine accreditation standards but also federal regulations and information about the institution’s finances and enrollment. The self-study is expected by the Commission to be the culmination of a significant campus-wide conversation, normally comprising at least eighteen months, on what the institution already does well and where it can improve.

At the time of this writing, the Provost has designated a larger Accreditation Steering Committee and a smaller Executive Steering Committee led by the Vice Provost for Mission and Accreditation. Compared to the process for the 2011 reaffirmation, which engaged more than 220 people across the university, USM’s 2021 process will be more efficient, while still allowing members of the community ample opportunity to contribute. The Executive Steering Committee has drafted a timeline of the process (see below), developed a structure for how working groups will interact, and begun soliciting individuals to take on leadership roles in the self-study process. Working groups will begin meeting regularly in the coming months in anticipation of holding focus groups and open forums in Spring 2020.

Sixty percent of the self-study is expected to convey to the review team, and to NECHE, an institution's appraisal of how well it meets each of NECHE's Standards for Accreditation. Because of this emphasis, USM expects that the work in the Spring will consist primarily of engaging the campus community in a forthright reflection on where the institution may be challenged. Writing will begin in late Spring or early Summer, with continued campus engagement in the Fall. The final product must be delivered to NECHE and the review team in March 2021, with a review team visit to campus scheduled for April 18-22, 2021.

University of Southern Maine NECHE Self-Study Timeline
(as of October 30, 2019)

Fall 2019 Semester

October

~~Self-Study Workshop~~

~~NECHE VP Visit~~

Weekly Meetings on Calendar

Alternate between Full and Exec

November

Assign Standard Advisory Chairs and Committee Members

Develop Technology Plan (File-sharing and website)

First Run at Data First Forms

Campus Notification from Glenn

Develop naming convention for evidence files

December

Standard Advisory Committees begin regular meetings

Review previous NECHE Concerns

2019 Progress Report Response from NECHE (Dec. 1)

Winterim 2020

January

Data First Forms Workshop (January 16, 2020)

Schedule Campus Forums

Spring 2020 Semester

February

Hold Campus Forums

Writer's Instructions Shared

Develop Narrative Theme(s)

March

Hold Campus Forums

DRAFT First Draft of Description Sections

May

DRAFT Last Draft of Description Sections

Summer 2020 Semester**June**

DRAFT First Draft Appraisal Section (by August)

July

Self-Study Workshop II (July 28, 2020)

August

Schedule Appraisal-Projection Open Forums for September

Fall 2020 Semester**September**

Hold Appraisal-Projection Open Forums

DRAFT First Draft Projection Sections

October

DRAFT Last Draft Appraisal Sections

DRAFT Last Draft Projections Sections

Review Team Chair Campus Visit with President

November

Send DRAFT Self-Study to NECHE for Review

Bring in Professional Writer (?)

Last Run on Data First Forms

DRAFT Introduction, Campus Overview & Appendices

Review Commission suggested Review Team Members

December

Revise DRAFT per NECHE Feedback

Check Narrative against Last Run on Data First Forms

Winterim 2021**January**

Finalize DRAFT

Send Final Draft to Publications

Spring 2021 Semester

February

Coordinate with Team Chair on Visit Schedule, Accommodations, and tentative responsibilities

March

Final Self-Study sent to Review Team and NECHE (March 5, 2021)

Publish Invitation for Public Comments (March 15, 2021)

April

Comprehensive Review Team Visit (April 18-21, 2021)

Verbal Exit Report at Final Meeting (April 21, 2021)

POST-VISIT TIMELINE

Summer 2021 Semester

June

Review First Draft of Report for Factual accuracy

Submit Corrections (if any)

July

Review Final Review Team Report

Draft Response Letter

Submit Response Letter

Fall 2021 Semester

November

Attend Commission Meeting

Winterim 2022

January

Official Letter expected from NECHE on Accreditation Status

* * * * *

UNIVERSITY OF MAINE AT AUGUSTA

Dr. Greg Fahy

Dean of the College of Arts & Sciences

UMA began the process of developing our five-year interim report in the spring semester of 2019, convening a group of eight faculty and staff from across the institution to draft a report. Over the summer of 2019, our Accreditation Liaison Officer and an English faculty member polished the draft document. In September, we sent the thirty-three page document out to the entire UMA community.

The document contains three substantive sections. These include: 1) updates on our focused visit themes: student success, student default rate and our Second Chance Pell program; 2) a reflective essay on student success at UMA and 3) updates since 2015 on each of the NECHE standards. We received feedback from dozens of individuals across campus and are working with a review team made up of faculty to provide more substantive suggestions for the document. There will be several iterations sent out to the community during this fall semester for a final draft sent to NECHE on January 20.

As part of our interim report, we also hosted a NECHE visitor at our Rumford Center to evaluate how we are serving our students who access our courses and services primarily at a center. That visit occurred October 7-8, and we developed a six-page report devoted to courses and services at centers. We received a very positive exit report from Dr. Maria Altobello and are awaiting her written report.

* * * * *

UNIVERSITY OF MAINE AT FORT KENT/UNIVERSITY OF MAINE AT PRESQUE ISLE

*Dr. Tex Boggs, President and Provost
University of Maine at Fort Kent*

*Dr. Raymond Rice, President and Provost
University of Maine at Presque Isle*

In September 2018, NECHE recommended to President Rice and then-President John Short that a single evaluation team visit both the UMFK and UMPI campuses in Spring 2019 for the purpose of two year focused site visits that were required of each campus. UMFK was charged with providing documentation concerning (1) implementation of One University initiative and the academic integrity of the Rural U Early College program and (2) establishing UMPI as an instructional location for the University's nursing program. UMPI was charged with providing documentation concerning (1) implantation of its competency-based BA in Business Administration and (2) establishing UMFK as an instructional location for the University's education programs. As a result, although both institutions compiled individual reports, because the visit specifically examined elements of administrative service, staff, and academic collaboration, the reports were coordinated through a series of meetings between University leadership and the evaluation team chair.

UMFK and UMPI Site Visit Processes

At UMFK, prior to the generation of its report, the University Liaison Officer emailed the individual directly responsible for each of the areas (6 areas) identified by the Commission as requiring a response in preparation for the focused evaluation visit. In each email, the University Liaison Officer asked the responsible individual to prepare a response to the Commission's request for information. At UMPI, a similar process was followed, with the two

individuals responsible for the areas identified by the Commission identified to draft a response; the University Liaison Officer was identified as having provided the final editing and preparation of the document. The President/Provost serves as the Liaison officer at both UMPI and UMFK.

At UMFK, to ensure that there were no misunderstandings about the Commission's expectations, the University Liaison Officer cut and pasted the expectations directly from the August 7, 2018 letter prepared by Dr. David P. Angel. After receiving the responses for each section, the University Liaison Officer used them to prepare a draft report. The appropriate sections of the draft report were then returned to the responsible individuals for editing and correction of any errors of fact that had been introduced during the preparation of the draft. A similar process was followed at UMPI.

For the shared positions section of the report, an email was sent to each UMFK staff member reporting to an administrator in a shared position. Each staff member was asked to share with the University Liaison Officer the member's perspective of the effectiveness of the shared position. This information was used to further develop the draft report. A similar letter with a similar request was sent to each academic division chairs and their responses were considered in the preparation of the next draft. A similar process was followed at UMPI, with the academic Deans providing input to the draft.

Penultimate drafts were sent to institutional Presidents for review and edits. Drafts were also distributed to the members of the President's Cabinet, and to the University of Maine System Vice Chancellor of Academic Affairs for review. Final drafts were submitted to NECHE and the members of the Visiting Team.

The Visiting Team spent two full days during the April visit, one at each institution, and met with program leadership, program faculty and students, and presidents and select members of the cabinets. The Visiting Team delivered a draft of its report to UMFK and UMPI Presidents for factual accuracy and a final draft to each institution and NECHE following feedback. The single report addressed the NECHE considerations for each institution individually as well as providing commentary upon the One University initiative in common to both.

Finally, UMFK and UMPI provided testimony directly to the Commission in Massachusetts concerning the Site Visits and Visiting Team report in September 2019. Four individuals from UMPI and one from UMFK comprised the specific teams (which met with the Commission in back-to-back sessions). This required two full days of additional compensation time for each member of the institutional teams. UMPI received verbal confirmation from the Commission to continue its CBE programming and its Education program delivery at UMFK; the institution is awaiting official NECHE correspondence concerning these findings. UMFK received verbal confirmation from the Commission to continue its Nursing program delivery at UMPI, and for its progress toward accreditation of its Early College program by the National Alliance of Concurrent Enrollment Partnerships.

Gathering information, preparing drafts for each of the areas of concern (5), seeking reviews and revisions from the individual contributors (6), circulating the initial draft, using responses to the initial draft to revise the report, and asking for higher level administrator review prior to submission required that the author devote approximately 4-5 hours of work per week at each institution for more than 4 months.

UMPI Fifth-Year Interim Report

UMPI submitted its Fifth-Year Interim Report in August 2019. UMPI was the first UMS institution to complete the fifth-year report under the revised guidelines, passed the previous spring, which included highly expanded assessment expectations (Standard Seven) and assurance of capacity/fiscal viability. UMPI responded explicitly to three areas of special emphasis as requested by NECHE correspondence from 2015: (1) the implementation of proficiency education pedagogy, (2) fiscal sustainability; and (3) implementing and evaluating university-wide strategic planning designed to inform decision-making and strengthening institutional effectiveness.

The report was directed by the University Liaison Officer and included input from multiple cabinet leaders and specific administrators and faculty holding administrative duties (i.e., the Director of Academic Planning and Program Assessment, Registrar, Executive Director of Enrollment Management, CBO, and Executive Director of University Advancement and External Affairs). Data gathering for approximately four weeks prior to the writing of the narrative required approximately 8 hours of work per week. The drafting of the narrative required approximately 30 hours of writing per week for 4 weeks for the University Liaison and 8 hours per week for 4 weeks in terms of aggregated work for other contributors.

UMFK Fifth-Year Interim Report

The University of Maine at Fort Kent began its Fifth-Year Interim Report process in Fall 2019 with submission of the Report due in Summer 2020. Concerns identified by the Commission that must be addressed in the Interim Report are UMFK's capacity to address the impact of major demographic shifts on enrollment, the stability of leadership, and the need to monitor majors and concentrations with low enrollments and few full time faculty while adequately serving students in accordance with the Standards for Accreditation.

APPENDIX D

SUMMARY OF NECHE SUBSTANTIVE CHANGE, EVALUATION VISIT, AND FIVE- AND TEN-YEAR REVIEW PROCESSES

Dr. Kathy Yardley

Associate Provost and Dean of Education, Health and Rehabilitation

University of Maine at Farmington

NECHE Substantive Change and Evaluation Visit

NECHE details many types of change that would require a substantive change request, including the joining of separate units into a single accreditable institution. A move to unified accreditation therefore requires a substantive change report and confirming visit.¹¹

Given its preliminary consideration of unified accreditation, UMS has already had exploratory discussions with NECHE about a potential substantive change.

If the University of Maine System decides to move ahead with unified accreditation, it must provide a report, typically 25-30 pages in length, to the Commission before the date of implementation. In addition to a cover sheet and introduction that summarizes the proposed change and timeline, as well as a brief institutional overview, the report must include the following:

(1) A detailed description and analysis of the proposed change, including the purpose of the change and how it is consistent with the institution's mission. Each of the Standards for Accreditation must be addressed, and evidence must be provided to show how the institution will continue to meet each of the standards after the change;

(2) A multi-year revenue and expense budget, including the assumptions underlying the projections as well as an indication of the fiscal and administrative capacity of the institution to oversee and assure the quality of the proposed change;

(3) A projection of Future Developments.

NECHE expects institutions to include an assessment of institutional strengths, concerns, suggested responses to concerns identified previously, and long-range plans in the report.

After the Commission reviews the submitted report, it may choose from the following actions:

(1) Approve the change without conditions;

¹¹ See NECHE's [Policy on Substantive Change](#).

- (2) Approve the change with conditions specified;
- (3) Defer consideration, pending receipt of additional information;
- (4) Disapprove the proposed change

The Commission may also:

- (5) Require a focused visit or other measures to assess implementation of the change

(6) Require a comprehensive evaluation of the entire institution. The Commission may act to accelerate the date for the next comprehensive evaluation when there are extensive changes.

Under some circumstances, the Commission requires a site visit to assess the implementation of the proposed change.¹² The Commission selects a single evaluator or a team comprised of two to three individuals to visit the institution for a period of one to two days, depending on the complexity of the substantive change. The evaluator/team is responsible for validating the information provided in the institution's written update/report, evaluating the institution's success in implementing the substantive change, and preparing a report and recommendation for the Commission's consideration.

The institution's update/report includes a description of the steps taken to implement the proposed change, relevant enrollment and financial information, continued plans for implementation, plans for additional substantive changes, and any other information believed to be useful. This report, along with the original substantive change proposal, is sent to the evaluator/team at least four weeks prior to the evaluation visit.

Within a month of the completed evaluation visit, the evaluator/team prepares a five to six page report, which includes any strengths and concerns related to implementation of the change. The institution has the opportunity to review the report for factual accuracy and can write a substantive response to the team report.

The evaluator/team leaders also prepares a confidential recommendation for the Commission that contains the following elements:

(1) The team's recommendation on whether the substantive change should be included in the institution's accreditation.

(2) The team's recommendation on the timing and content of any follow-up reporting on the implementation of the substantive change.

¹² See NECHE's [Procedures for the Substantive Change Evaluation Visit](#).

(3) The rationale for the recommendations.

The Commission considers the team report and confidential recommendation, as well as institutional materials and response, at its earliest meeting, and informs the institution of the action taken.

NECHE Interim Review (Five-Year Report)

Five years after a comprehensive evaluation, institutions are required to prepare an interim report that includes how the institution continues to meet the Commission's Standards for Accreditation, updates on work undertaken since the comprehensive review, and projected areas of focus for the next five years.¹³

In addition to a cover sheet, brief institutional overview, and introduction that describes the process followed and individuals involved in the report's preparation, the approximately fifty-page report must include the following:

(1) Response to Areas Identified for Special Emphasis - Institutions are expected to discuss, analyze, and appraise actions taken in response to areas identified by the Commission in its notification letter, and include a projection of areas/issues needing continued attention.

(2) Standards Narrative - Institutions are expected to respond briefly to Standards 1-7 and 9, addressing any significant changes since the comprehensive review and how the institution continues to meet each standard. The narrative must be supported with evidence, contextualized analysis, and appraisal.

(3) Reflective Essay on Educational Effectiveness to Address Standard 8 - The essay is expected to address the following:

- a. What students gain as a result of their education
- b. Assessment of student learning; "what and how students are learning"
- c. Measures of student success, including retention and graduation
- d. Satisfactory levels of student achievement on mission-appropriate student outcomes.

The recommended format for addressing each area includes a description of how the institution measures its effectiveness, the incorporation of supporting data and summaries of data analyses, and an evaluation of current successes and plans for further progress in achieving educational effectiveness. Information collected in the E-Series forms is used as a foundation for the essay.

¹³ See NECHE's [Statement on Interim \(Fifth-Year\) Reports](#).

(4) Institutional Plans - Institutions are expected to summarize their most significant issues and initiatives for the next five years.

(5) Appendix - The appendix includes an affirmation of compliance with Federal Regulations Relating to Title IV, the institution's most recent audited financial statement, the auditor's management letter, interim report forms, and the E Series forms.

In addition to the narrative report, institutions complete two sets of data forms. E-series Forms (Making Assessment more Explicit) provide a template for institutions to share their basic approach to assessment and summarize improvements made as a result of their findings. Data First Forms provide a template for sharing basic information relative to each standard. Data First Forms for Standard 8, Educational Effectiveness, provide a template for reporting on progression, retention, and graduation rates; licensure passage and job placement rates; and other measures of success.

NECHE Comprehensive Evaluation (10-Year Review)

NECHE accredited institutions undergo a comprehensive evaluation at least every ten years. At the center of the evaluation is the institutional self-study, a roughly 100-page report in which the institution evaluates how and how well they meet the Commission's Standards for Accreditation. The self-study typically begins eighteen months to two years prior to the on-site evaluation team's visit, and is a means of providing quality assurance to external stakeholders while informing continuous institutional improvement.¹⁴

The on-site evaluation is led by a team of trained faculty and administrators from peer institutions. The team spends multiple days on campus reviewing documents and conducting interviews with faculty, staff, students, BOT, and other stakeholders as they seek to validate the self-study in light of the institution's mission. The Commission considers the self-study, the team report, the confidential recommendation of the team chair, the institution's response, the history of the Commission's action with respect to the institution, and public comments solicited by the Commission typically during the semester following the visit. The institution's president and team chair also participate in this interactive discussion.

In preparing for a comprehensive evaluation, an institution typically identifies a steering committee and a self-study chair or co-chairs. The institution also identifies the committee structure that will best serve the campus and advance the work of the self-study. Each committee is responsible for drafting a response to an assigned standard.

In addition to the Cover Page, Table of Contents, Institutional Characteristics Form, and a Table of NECHE Actions, Items of Special Attention or Concern, the self-study includes the following components:

¹⁴ See NECHE's [Statement on Comprehensive Evaluation](#).

(1) Introduction - a brief summary of the self-study process, participants, and goals, and identification of areas the institution was asked to focus on

(2) Institutional Overview, including a summary of the principal self-study findings

(3) Narrative - the 100-page narrative is organized in chapters according to the standard addressed. The analytical framework used to address each standard is Description-Appraisal-Projection.

a. Description - a realistic and objective presentation of the present status of the institution with respect to each standard.

b. Appraisal - a thorough analysis and evaluation of institutional practices in a given area, recognizing achievements and areas for improvement and informed by evidence. This section demonstrates accuracy of an institution's self-perception and integrity in identifying areas of growth.

c. Projection - specific commitments made by the institution to maintain and enhance strengths and address areas of concern.

(4) Data First Forms

(5) Appendix - includes the completed Affirmation of Compliance, the most recent year's audited financial statements, auditor's management letter, list of supporting documents available in the work room and/or URLs, and E Series forms.

Three to six months prior to the team visit, the team chair visits campus to familiarize him/herself with the institution's organization, touch base on the progress of the self-study, assist with the development of the visit schedule, and address logistical issues. The actual team visit typically occurs from Sunday afternoon until mid-day Wednesday.

APPENDIX E

CONSIDERATION OF OTHER SYSTEM ACCREDITATIONS

UNIVERSITY OF SOUTH FLORIDA¹⁵

Founded in 1956, USF is the fourth-largest public university in Florida, with an enrollment of 50,755 in the 2018–2019 academic year. USF has, since 2001, operated as a system of three separately accredited institutions: USF Tampa, USF St. Petersburg, and USF Sarasota-Manatee. Each of the three universities is currently accredited on its own by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC).

In March 2018, Florida Governor Rick Scott signed into law the Florida Excellence in Higher Education Act of 2018, requiring the USF system’s three universities to consolidate their separate institutional accreditations into a single institutional accreditation. In March 2019, the USF Board of Trustees adopted [an implementation plan](#) that included, among other things:

- The process, steps and timeline to terminate the separate institutional accreditation of each USF campus by June 30, 2020 with no lapse in accreditation.
- An organizational chart that detailed a new administrative structure; Registrar and Student Records; Inter-campus transportation and campus access.
- A process that ensures students graduate in four (4) years.
- Consolidated Data Reporting to IPEDS beginning with the 2020-21 IPEDS Data Collection schedule.
- A vision for a three-campus university functioning seamlessly across the geographic boundaries of the campuses with limitless potential for local and global impact. A critical element to ensuring a successful environment post-consolidation will be the creation of opportunities to bridge the geographical distance between the campuses through increased communications, virtual connectivity, and online and blended learning opportunities.

As described, USF’s accreditation implementation plan is not intended to achieve a full “switch-on” on July 1, 2020, but rather sets in motion a series of actions with prescribed timelines that ensure a consolidated, single accreditation on July 1, 2020 and continued development beyond that date. The USF Board proposes to achieve USF accreditation consolidation through a detailed plan that will establish and ensure academic and administrative structures consistent with that of a preeminent research university in the State and the requirements of SACSCOC accreditation, as well as university and academic administration that is responsible and efficient in unifying operations, ensuring alignment of accountability and authority across campuses while providing local leadership and immediacy of response.

¹⁵ Summarized by Beatrice Fevry, UMS Executive Director of Finance Policy and Special Projects.

A USF working group proposed [a detailed plan](#) to achieve USF consolidation and ensure, among other things:

- Uniformity of student admissions across the university while maintaining access, diversity and student success;
- Uniformity of learning outcomes for a degree program offered at multiple sites across the university irrespective of campus delivering the program; • Equitable access for students to services across the university;
- Faculty control of curriculum;
- Unified faculty governance across USF;
- Unified faculty tenure and promotion guidelines consistent with workload assignments; and
- Access to academic programs and infrastructure through digital and physical connections between campuses;

Speaking to the necessary culture change attendant with accreditation consolidation, USF intends that the unique identities and attributes of each campus in “a single university that is geographically distributed” can be expressed through the degree programs offered on each campus, and the related unique High Impact Practices, service learning and internships offered, research conducted, and community engagement activities promoted based on the local strengths of each campus. This is expected to enhance opportunities available to current and future students in a consolidated USF, while simultaneously promoting and celebrating local identity.

Additional information about the USF university accreditation consolidation is available [here](#).

UNIVERSITY SYSTEM OF GEORGIA¹⁶

Between 2012 and 2018, the University System of Georgia (USG) merged 18 of its original 35 institutions into nine through a Board of Regents- (BOR) approved consolidation process, resulting in USG’s current 26 institutions. In her article “Better Outcomes Without Increased Costs?”,¹⁷ Lauren Russell evaluated the effectiveness of the first five of those consolidations, which resulted in merging ten institutions into five between 2012 and 2015.

Before the mergers at issue, the BOR had identified six principles by which they would administer and assess the proposed consolidations:

- greater opportunities to increase student attainment levels;
- improved access and enhanced regional identities of the merged institutions;
- improved economies of scale and scope;

¹⁶ Summarized by Dr. Kay Kimball, UMS Deputy Vice Chancellor for Academic Affairs.

¹⁷ Russell, Lauren. (2018). Better Outcomes Without Increased Costs? Effects of Georgia’s University System Consolidations. *Economics of Education Review*. 68. 10.1016/j.econedurev.2018.12.006.

- enhanced regional economic development;
- streamlined administrative services without loss of quality; and
- reduced duplication of access to programs while enhancing access to instruction.

At the time of Russell’s study, there were a combined total of 325,551 students in the System, 91 percent of whom were drawn from within Georgia as first-time, first-year students. Employing a “differences-within-differences” methodology, Russell explored the impact of those initial consolidations on student retention and graduation cohorts before and after consolidation, and in comparison with other, non-consolidated institutions within the USG. Russell found that, on the whole, consolidation resulted in improved outcomes for students without increased costs for them or for the institutions. Additionally, transfers within the USG, collaborations, pooled resources, policy revisions, and academic student supports were all enhanced or made easier through consolidation.

The retention rates at the USG non-consolidated institutions had been higher than those at the consolidated institutions prior to consolidation (82-84 percent vs. 73-75 percent), in part reflecting the need for consolidating the underperforming institutions. That gap narrowed by five percentage points following consolidation despite the lack of evidence that the consolidated universities were enrolling students who were any better prepared than they had been previously. Students who matriculated after consolidation were 2.3 percentage points more likely to re-enroll in a USG institution the following year compared to the non-consolidated universities, reducing the dropout rate at those consolidated institutions by 8 percent. Consolidation also reduced the three-year graduation rate for Associate’s degrees by three percentage points, mostly due to students transferring into baccalaureate programs within the USG.

Analysis of student attainment in baccalaureate programs was based on persistence estimates since consolidation was too recent for the author to track graduation rates. Those data revealed that the percentage of students graduating in four years improved by four percentage points, an increase of 29 percent, which was greater than the 1.7 percentage-point improvement for first-to-second-year retention. Russell posits that consolidation improved the probability of on-time graduation for students who would not have dropped out after their first year. In fact, she found that the effects of consolidation were largest on students in the top quartile of predicted retention and on-time graduation distributions, but the effects were positive for students in all quartiles.

Russell also reviewed pre- and post-consolidation expenditures in instruction, academic supports, and student services, as well as total operating expenditures, in an effort to determine whether the economies of scale and related BOR principles were reached through consolidation. Although total spending was decreased by five percent relative to that of the non-consolidated universities, there was no statistically significant evidence of reduced instructional spending. There were, however, statistically significant shifts in academic supports and student services expenditures. In fact, consolidation reduced spending in administrative and student services by 18 percent, which allowed USG to invest those savings in enhancing

academic supports by increasing those expenditures by 47 percent. The investment in academic supports seems an obvious, if potential, source for the improvements in persistence.

The author supplemented her statistical analysis with interviews with institutional administrators, who acknowledged greater ability to be more innovative and flexible specific to revising policies and reorganizing offices. Consolidation enabled them to create a more seamless experience for students in a more academically supportive environment by allowing them to reduce duplicative positions in student services and academic administration and reinvest the realized savings in academic advising and support personnel. Additionally, while new academic advising systems were implemented across the USG, the consolidated institutions were able to do so more quickly and with more staff than the non-consolidated institutions.

Considering whether the mergers increased the costs for students, Russell concluded the data were “too noisy” to reveal clear significance, but she found no “robust evidence” that consolidation negatively impacted costs for students, and also found clear evidence that it reduced costs for the universities themselves, which allowed them to reduce unneeded duplicated student services and invest in academic support. As she states in her conclusion, “Taken as a whole, the evidence suggests that consolidations were quality improving and benefited students ... [and constitute] a promising policy option that merits further consideration.”

UNIVERSITY OF ALASKA SYSTEM

In early August 2019, as university leaders worked feverishly to manage a proposed \$135 million cut to their system's state appropriation, the University of Alaska System's Board voted overwhelmingly to pursue a transition from three separately-accredited universities to a single accredited institution with three locations. As reported, the proposal would have streamlined curricula and student services as well as created a single college for each major field of study throughout the university system.

By mid-September 2019, however, in response to smaller enacted state appropriation cuts – \$70 million over three years instead of \$135 million all at once – the University of Alaska Board of Regents approved a motion to consider both single- and multiple-university accreditation models.

Given the immediacy and scope of the budget crisis that motivated the University of Alaska System Board's consideration of unifying their university accreditations, it is difficult to draw parallels to UMS's motivations for pursuing a unified accreditation.