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An Assessment of

**Single Accreditation**  
**versus**  
**Three Separate Accreditations**

for the University of Alaska's  
Three Universities

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UNIVERSITY  
*of* ALASKA  

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*Many Traditions One Alaska*

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## Executive Summary

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UAF has been continuously accredited since 1934, UAA since 1974, and UAS since 1983. All three universities are currently accredited by the Northwest Commission on Colleges and Universities (the Commission). The May 2016 announcement by UA President Johnsen that the University of Alaska was actively exploring single accreditation has generated a great deal of angst among faculty, staff, and administrators across the system. The discussion has resulted in a sense of urgency among administrators to make the student experience more consistent across the system. For example, there appears to be agreement among administrators that a single transcript, a single course catalog, and aligning academic policies (e.g., grading policies, credit for prior learning policies, etc.) would be positive and might avoid the anticipated loss of identity and the massive work involved in achieving single accreditation. Other state systems with separately accredited institutions, e.g., South Dakota and Montana State University, have already taken some of these actions.

Accreditation is a quality control process with reports and evaluations occurring on a periodic basis. The evaluation process assesses whether an institution is fulfilling its mission, if it is collecting and using evidence on fulfilling its mission, and whether the institution is sufficiently led, managed, organized, financed, staffed, and equipped to continue to do so.

As a quality control process, single accreditation is neither sufficient nor necessary to achieve cost savings or a common student experience. The resulting organizational structure under single accreditation, which has not yet been determined, and the guidance the campuses would receive through revised policy, regulation, and leadership and management structures would determine any resulting cost savings. Strategic Pathways consolidation efforts, especially those related to administrative functions, are likely to achieve cost savings more readily than single accreditation. A more common student experience can be achieved under single or separate accreditation through UA BOR policy or university regulation (under the president's authority).

There are no Commission constraints on centralizing or assigning one of the institutions responsibility for administrative functions such as procurement or information technology under separate or single accreditation as long as they serve the institution well. However, the Commission expects that separately accredited institutions would be responsible for and accountable for administrative functions like finance and human resources, which more directly affect the institution's ability to fulfill its mission and core themes.

The University of Maine System has implemented administrative centralization in cooperation with its regional accrediting commission (see Barbara Brittingham letter in Appendix). UA would have to work with the Commission (NWCCU) to determine if the same level of centralization could be achieved. Over the past two and a half years, the University of Maine has made significant progress in consolidating administrative functions, but little progress in consolidating academic programs.

Observations gleaned by examining other state university institutions and systems:

- Separately accredited institutions and multi-campus institutions with single accreditation (public or private for profit) typically have chancellors and a full contingent of vice chancellors at each campus of sufficient size so administrative cost savings related to single accreditation are not apparent. Arizona State University is an exception with a single president and provost and a single dean for each major area serving all its campuses.

- Many states examined have separately accredited public community colleges; Alaska does not.
- All states examined, except Wyoming, have both research universities and open access public universities and the admission requirements for these institutions differ.
- Several university systems with separately accredited institutions have implemented a single transcript and a single course catalog to alleviate course transfer issues.
- Multi-campus institutions with single accreditation commonly have somewhat distinct programs (emphases differ) in the same fields at their various campuses and these programs often have separate specialized accreditation.
- Purchasing, information technology, and information systems are commonly centralized administrative functions among university systems. Under separate accreditation, human resources and finance are expected to be the responsibility of the institution, not the system or parent institution because they are closely associated with mission and core theme fulfillment. Separately accredited institutions have sole responsibility for admissions and financial aid because these directly relate to the institution's mission. Multi-campus institutions with single accreditation have either centralized or distributed responsibility for admissions and financial aid.

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### Factors Favoring Single Accreditation

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**Momentum for change** — A decision to pursue single accreditation would be a clear statement that business as usual is not acceptable; change is coming and old approaches and differences will likely be swept away. It signals a cultural shift, changes expectations, and puts everyone on notice that new operating rules and procedures would have to be adopted and implemented. It provides momentum for change and indicates that a conversation is needed about how to move forward. Expert Barbara Brittingham noted an opportunity for institutional refreshment in her letter. The announcement that UA was actively exploring single accreditation has already had such an impact.

**Common mission** — Under separate accreditation, cooperation among the three institutions has been difficult to achieve in some instances because of differences in mission. Under single accreditation there would be one mission and one institution so leaders would be working to achieve common core themes and objectives.

**Articulation and transfer issues** — These issues would be eliminated for students and there would be a single set of academic standards. Depending on the implementation, single accreditation could result in a more consistent higher education experience for students across the state.

**Cost savings** — External experts Terrence MacTaggart and Dennis Jones indicated that modest savings may result by merging the three institutions (Appendix D).

**Reduced athletic team subsidies** — State and university subsidies of athletic teams could be reduced under single accreditation (because of NCAA rules, not Commission standards) and teams could be located at any existing campus with NCAA and league approval.

**Shared instruction** — Because courses and programs would necessarily be aligned across campuses under single accreditation than they are now, additional shared instruction across campuses could help alleviate low enrollments in some upper division course sections.

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## Factors Favoring Separate Accreditation

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**Mission dilution** — Combining the missions of a research university (UAF), a comprehensive metropolitan open-access institution (UAA), and a regional institution focused on instruction (UAS) would result in a single very broad mission and assessing mission fulfillment would be challenging. External expert Dennis Jones of the National Center for Higher Education Management Systems (NCHEMS) spoke to this issue when he stated, “Crafting a single mission statement that covers the breadth of the collective of these three institutions is likely to result in a statement so watered down that it will provide no guidance for action.” This is a primary concern expressed by the Commission staff and expert Terrence MacTaggart as well.

**Commission response** — A request to merge could be denied by the Northwest Commission on Colleges and Universities. The Commission staff and experts Terrence MacTaggart and Dennis Jones noted this potential outcome.

**Disruptive process** — Merging the three institutions would take at least two years to complete and may be delayed due to the scale of the merger and because the three universities are nearing their required comprehensive evaluations by the Commission. Transitioning from separate to single accreditation would consume the work of faculty, staff, and administrators during this period and this work would necessarily take time from teaching, research, and service, and progress on state higher education performance issues, e.g., completion rates. Faculty, staff, and administrator workloads are currently greater than they have been historically because of recent budget reductions and related layoffs. Expert Barbara Brittingham identified disruption, time, and cost as cons in her letter. Some employees would seek employment elsewhere rather than work on single accreditation and its associated committees and projects.

**Outcomes** — Because a merger of this scale is almost unprecedented, there is little evidence to suggest that a merger would result in improved educational quality or performance or significant administrative cost savings. Merging UAA, UAF, and UAS into a single accredited institution will not necessarily result in more students, higher quality programs, more external research funding, higher completion rates, or more teachers for Alaska. Expert Terrence MacTaggart stated, “If the real agenda is to achieve cost savings and better service to students from consolidating and centralizing operations, then pursue that goal and let the accreditation choice come down the road.”

**Institutional accreditation evaluations** — An unintended consequence of single accreditation would be that if two of the campuses were doing an excellent job of meeting the accreditation standards, e.g., assessing or achieving student learning outcomes, but the third campus was not, the institution as a whole would likely be viewed by the Commission as not meeting the relevant standard. Separate accreditation allows for separate evaluation.

**Local control** — Single accreditation would likely interfere with a campus’ ability to fashion the curriculum to fit the needs of the unique student population at each campus, and to recruit, hire, and retain faculty. The campus with the largest collection of faculty in a given field could effectively control each of these areas.

**Campus competition** — Single accreditation is unlikely to result in less legislative lobbying, and inter university competition among administrators and programs for state funding, donor support, or federal grants because the campuses will continue to compete in recruiting students, in seeking support for their campus and region, and in controlling program offerings. Single accreditation will

not overcome human nature. Having to designate a main campus (and branch campuses) for the US Department of Education under single accreditation will undoubtedly result in competition among UAA, UAF, and UAS for that recognition.

**Lack of support** — Administrators and staff interviewed during the drafting of this report are, by vast majority, not supportive of single accreditation, so motivating them to take part in making the lengthy list of changes required would be challenging. Three common themes came up when administrators across the system were consulted about a possible merger. First, mergers often result in the adoption of the lowest common denominator when selecting among competing policies or procedures because it is the easiest to be accepted by all parties. Second, the further away the decision process is from those impacted, the greater the sense of lack of input and impact. Third, having three institutions has allowed for experimentation and innovation in early adoptions of technology, e.g., e-learning platforms, that has provided valuable information in finding what works best. There are concerns that under single accreditation this experimentation may not be allowed.

**Workload equity among campuses** — Merging into a single institution would likely lead to calls for equity in faculty workloads across the system. Because a merged university, including the community campuses, would have a large majority of faculty focused on instruction, there could be pressures to make workloads more equitable, and either reduce the effort in research or to allow all tripartite faculty more time to conduct research. The first option would greatly reduce the ability of UA to compete for federal funds and lead the world in Arctic research, the second would probably be unaffordable. This issue was noted by expert Dennis Jones.

**Carnegie classification impact** — Under single accreditation, the Carnegie classification of a merged institution would likely fall to R3 or moderate research activity because the divisor, number of full-time faculty, would be significantly larger (about double) in the per-capita index and the numerators would not increase appreciably. This change in classification could negatively impact faculty recruitment. UAF is currently classified as an R2 or higher research activity institution and UAA and UAS are not classified as research universities.

**Future impacts** — Merging the institutions limits the future of higher education in Alaska. For example, a common higher educational structure as states mature is to have a selective research university system, a less selective state university system, and a community college system, e.g., Texas and California have adopted such systems. UAA, UAF, and UAS have invested a lot of faculty, staff, and administrator time and resources in achieving and maintaining separate accreditations. If UA moves to single accreditation, any future decision to move back to separate accreditations, for whatever reason, will be expensive and time consuming.

**Brand loyalty and identity** — Each of the three institutions has spent time, energy, and resources building a brand, identity, organizational structure, and processes that advance their missions. It will be painful and take a long time for faculty, staff, students, alumni, donors, advisory councils, and athletic boosters to accept a single institution with a new structure, processes, brand, and identity.

**More bureaucracy** — Merging the three institutions will likely result in additional layers of review and evaluation, e.g., the promotion and tenure process, by adding campus levels of evaluation and university wide evaluation. This layering exists at multi-campus institutions with single accreditation.

## Recommendation

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Single accreditation is neither necessary nor sufficient to achieve cost savings, enhance the student experience, or improve state higher education performance measures. In addition, the process to merge UA's institutions would be disruptive, take at least two years, and might not be approved by the Commission. Therefore, undertaking an accreditation merger at this time is not recommended.

The Strategic Pathways process is assessing potential consolidations among UA institutions and is designed to result in cost savings. Let that process run its course. Single accreditation could be re-evaluated after the full impacts of Strategic Pathways are realized. Meanwhile, UA could work on a more common positive student experience by, for example, adopting and implementing a common course catalog, a single transcript, and more consistent policies and procedures across all of its campuses. Many of these elements would be required under single accreditation so steps could be taken toward that end without merging the institutions.

Performance based budgeting, leadership incentives and accountability, or initiative funding could be used to address state higher education performance measures.

## Introduction

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This report was requested by and contracted by UA Statewide in response to inquiries by the Alaska Legislature and the UA Board of Regents. The specific charge was as follows:

Reporting to UA President Johnsen and in cooperation with members of the Chancellor's Cabinet members of UA's three universities, prepare a formal written assessment of standards, processes, implications, what is possible and what is not, and pros and cons of three separately accredited UA institutions versus one accreditation for all of UA (Appendix F).

This assessment and planned action by UA Statewide and the UA Board of Regents represents a major turning point for UA and its institutions. UA constituents outside the university generally do not understand accreditation or the structure of the system. This assessment provides information for a more informed future direction.

### Acknowledgements

Discussing the pros and cons of single versus separate accreditation is a large task and it could not be done without engaging many individuals within UA, at the Commission, and at other institutions. The author is sincerely grateful for all those who spoke candidly, challenged preconceived ideas about accreditation, and provided examples of how other institutions are organized. The written comments from the three national experts provide valuable external perspectives to better inform UA Statewide and the UA BOR on this important issue. Jackie Stormer improved the report significantly through quality editing and page layout. The author accepts responsibility for any and all errors of fact that may remain in this report.

### Potential Conflict of Interest

The author was a faculty member and administrator at the University of Alaska Fairbanks (UAF) for 30 years. His knowledge and experiences at UAF have shaped his view on many issues in this report. During the research and writing of this report the author submitted an application for the UAF interim chancellor position, was named the sole candidate for that position, and was selected as interim chancellor to begin August 14, 2016.

### Report Timing and Purpose

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This report was researched and written during summer 2016 from June 1 through July 26 with limited input from faculty, staff, administrators, and students. UA Board of Regents Policy P10.02.040. Academic Unit Establishment, Major Revision, and Elimination section B states:

Elimination or major revision of a unit at any level, if the unit employs tenured or tenure track faculty or delivers degree or certificate programs, will require a program review as specified in P10.06.010 and university regulation.

Section D of this policy lists UAA, UAF, and UAS as major units and these units employ tenured and tenure track faculty who deliver degree and certificate programs. Therefore, if the UA BOR is intent on pursuing single accreditation, a program review should be among the first steps taken. Such a program review would be consistent with the Commission accreditation standard 2.A.1 given below:



2.A.1 The institution demonstrates an effective and widely understood system of governance with clearly defined authority, roles, and responsibilities. Its decision-making structures and processes make provision for the consideration of the views of faculty, staff, administrators, and students on matters in which they have a direct and reasonable interest.

## Report Purpose

UA President Johnsen provided the following statement on the purpose of this assessment:

The University of Alaska is facing the dual pressures of major budget reductions from the state and significant opportunities for improvement in meeting our students' and the states' needs for higher education. In response, the university is examining options for reducing high administrative and academic costs for reallocation into high demand academic programs. A full examination of those options, and their potential benefits and risks, requires an understanding of institutional accreditation and the extent to which alternative approaches to accreditation—e.g., three or one—enables and/or constrains our options for restructuring and, in the end, the university's ability to serve our students and our state more effectively.

Additionally, President Johnsen requested this report because of interest expressed by the UA Board of Regents (UA BOR) and the Alaska State Legislature. The minutes of the April 2016 UA Board of Regents meeting include the following statement:

The board expressed its support for continued strategic priorities in the areas of deferred maintenance, teacher education, research, engineering, workforce development (e.g. healthcare and maritime), partnerships with industry, eLearning, taking a bold look at organizational structure on how to grow UA's programs and the benefits of one or three universities.

On May 31, the Alaska State Legislature passed an FY2017 operating budget that included the following intent language:

It is the intent of the legislature that the Board of Regents of the University of Alaska return to the legislature with a specific plan for consolidation that includes specified timelines for anticipated results by the end of the 2016 calendar year; the plan would include, but would not be limited to, the university restructuring to one administrative unit with one accreditation.

Separate institutional accreditation has often been cited in response to UA BOR queries about differences in policies, curriculum, calendars, course schedules, and intra UA credit transfers among the three institutions (UAA, UAF, and UAS). The legislature commonly asks UA administrators and board members, "Are you one or are you three?" In addition, UA budget reductions over the past few years have led the UA BOR and Alaska Legislature to question the cost of separate accreditation. Questions about potential cost savings related to a smaller administration and the consolidation of athletic teams have been raised.

The UA Board of Regents would like to see a common student experience across the three universities, and less territorialism and regional lobbying by the three institutions. The three

universities have set policies and procedures that they believe best align with their missions and the students they serve. The three institutions currently have, for example, different admission requirements, deal with non-paying students differently, and have different grading and credit for prior learning policies. As is the case at other university systems, not all credit transfers count toward a major when students move among the institutions. However, the institutions also share a common data system (Banner), have shared methods for dealing with disqualified students, all use google apps, and are currently moving to a single implementation of BlackBoard, a learning management system.

The UA Statewide administration and national experts, e.g., David Longanecker, past president of the Western Interstate Commission for Higher Education (WICHE), and Dennis Jones, president emeritus of the National Center for Higher Education Management Systems (NCHEMS), have described Alaska's lackluster performance in higher education compared to other states to the UA BOR. The following are a few of the areas where the UA BOR and Alaska Legislature would like to see improvement in performance and in meeting Alaska's needs:

- College-going rate
- Postsecondary program completion rates
- Cost per student and graduate
- Educating public school teachers

Each of these areas has confounding elements external to UA. For example, Alaska historically has had an abundance of low-skill (no postsecondary education required) high-paying jobs that negatively impact college-going and completion rates. Providing access to higher education in a large state that relies primarily on air transportation, and building and maintaining facilities in Alaska's challenging environment make higher education more expensive than in other states. The state's weakening of a defined benefit program for teachers, changes in the teaching profession, e.g., individual study plans for special need students, and the realities of rural living conditions make it difficult to recruit individuals into the education profession in Alaska.

The UA BOR and UA SW administration would like to see progress within the performance areas listed above through greater cooperation, accountability, and unity among its three separately accredited institutions. In particular, a more common student experience is sought in which the academic and student policies and procedures of the three institutions are similar across all institutions. The Board has pursued progress in this area through policy and regulation actions or proposals, e.g., common general education and common course scheduling blocks and calendars.

The three separately accredited institutions have acted on common general education (math is done, English is nearly complete, and the remaining areas are being negotiated) and calendars (a common calendar will be implemented in fall 2016). A collection of common course scheduling blocks were identified across the three institutions so that synchronous audio and video courses could be shared. The three institutions did not implement a complete alignment of all course scheduling blocks because they have tailored their programs and policies to best suit the students they serve and pursue their unique missions, and they often do not understand why the UA BOR or UA SW think such changes are needed. For example, UAA has a large commuter student population that has been well served by scheduling classes to keep commuting time and cost down, and their schedule has become a unique element that is commonly lauded by faculty, staff, administrators, and students at UA BOR meetings; UAF and UAS would be hard pressed to follow the same schedule because of classroom facility limitations.

## Purpose and Process of Institutional Accreditation

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The Council on Higher Education Accreditation (CHEA), a private organization that conducts periodic external review of accrediting organizations, identifies the roles of accreditation as follows (see [http://www.chea.org/pdf/2009.06\\_overview\\_of\\_us\\_accreditation.pdf](http://www.chea.org/pdf/2009.06_overview_of_us_accreditation.pdf), accessed June 14, 2016):

- Assuring quality. Accreditation is the primary means by which colleges, universities and programs assure quality to students and the public. Accredited status is a signal to students and the public that an institution or program meets at least threshold standards for, e.g., its faculty, curriculum, student services and libraries. Accredited status is conveyed only if institutions and programs provide evidence of fiscal stability.
- Access to federal and state funds. Accreditation is required for access to federal funds such as student aid and other federal programs. Federal student aid funds are available to students only if the institution or program they are attending is accredited by a recognized accrediting organization. The federal government awarded USD \$86 billion in student grants and loans in 2006–2007 alone. State funds to institutions and students are contingent on accredited status.
- Engendering private sector confidence. Accreditation status of an institution or program is important to employers when evaluating credentials of job applicants and when deciding whether to provide tuition support for current employees seeking additional education. Private individuals and foundations look for evidence of accreditation when making decisions about private giving.
- Easing transfer. Accreditation is important to students for smooth transfer of courses and programs among colleges and universities. Receiving institutions take note of whether or not the credits a student wishes to transfer have been earned at an accredited institution. Although accreditation is but one among several factors taken into account by receiving institutions, it is viewed carefully and is considered an important indicator of quality.

CHEA also lists the following core set of traditional academic values and beliefs of accreditation:

- Higher education institutions have primary responsibility for academic quality; colleges and universities are the leaders and the key sources of authority in academic matters.
- Institutional mission is central to judgments of academic quality.
- Institutional autonomy is essential to sustaining and enhancing academic quality.
- Academic freedom flourishes in an environment of academic leadership of institutions.
- The higher education enterprise and our society thrive on decentralization and diversity of institutional purpose and mission.

The second and last bullets emphasize the importance of mission and diversity in higher education. These elements are particularly pertinent in the assessment of single versus separate accreditation for UA's institutions.

State systems with separately accredited institutions and religious organizations that sponsor an accredited institution are examples of parent institutions. Parental control is a concern of institutional accreditation. Separately accredited institutions must have sufficient institutional control to both fulfill their missions and respond to the accreditation standards and eligibility requirements. Regular engagement with the Commission on significant changes or consolidation efforts is strongly recommended.

The Association of Governing Boards of Universities and Colleges and the American Council of Trustees and Alumni (ACTA) provide specific guidance for boards on interacting with accrediting bodies. ACTA is particularly critical of the institutional accreditation process, stating that it is both costly and flawed. ACTA believes there is too much wasteful competition and too little cooperation between university branch campuses and separately accredited institutions in the same system, especially when each campus or institution has its own chancellor, provost, and deans. They argue that campus competition does not yield higher quality programs and that anything that improves cooperation, including single accreditation, can and should be used to make university systems more efficient and functional (personal communication with ACTA President Michael Poliakoff, July 22, 2016).

The Northwest Commission on Colleges and Universities (Commission herein, NWCCU in some external letters) is the regional accrediting agency, with authority approved by the US Department of Education, which evaluates UAA, UAF, and UAS for institutional accreditation. The Commission focuses on mission, assuring that student learning is achieved, and sustainability.

Institutional accreditation applies to the institution as a whole, not individual programs or units within the institution. Institutions maintain accreditation through continuous adherence to Commission eligibility requirements and standards. They follow a seven-year evaluation cycle during which institutional review is continuous. These reviews include the following reports and visits:

- Annual Report
- Year One Report
- Year Three Report, and
- Year Seven comprehensive institutional self-study and evaluation committee peer review.

Institutions are required to respond to Commission requests for any other reports.

Specialized accreditation is a quality assessment by a professional association. For example, the education programs at all three MAUs are accredited by the National Council for Accreditation of Teacher Education (NCATE) and approved by the Alaska State Board of Education, and engineering programs at UAA and UAF are accredited by ABET, Inc., the Engineering Accreditation Commission.

This report focuses on institutional accreditation and addresses the impact on specialized accreditation if UA moved to single accreditation. Institutional accreditation is not a legal status. The University of Alaska is the sole constitutionally and statutory entity with legal standing. Relinquishing separate accreditations has no legal impact on contractual liabilities.

### **Pathway and Timeline to Single Accreditation**

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If UA decides to merge its three separately accredited institutions into a single accredited institution, the Commission has two potential processes to accomplish this change. The first process is used for new unaccredited institutions seeking accreditation. A newly merged UA could apply for candidacy for accreditation as a new institution. However, historically new institutions are without accreditation for a year or more and so are not eligible for federal student financial aid. The proposed merger is breaking new ground as the Commission has not done this before, so the Commission is exploring whether UA could apply for candidacy as a new institution without impacting student financial aid.

The Commission has therefore identified the more commonly used second process, substantive change (Appendix C), as the most likely pathway for merging the three institutions. The Commission uses the substantive change process whenever an “accredited or candidate institution plans a substantive change in its mission and core themes, scope, ownership or control, area served, or other significant matters.” The substantive change process would require that one of the existing separately accredited institutions (UAA, UAF, or UAS) prepare and submit a substantive change request and proposal that indicates that the other two institutions would be subsumed under it; the chancellor or interim chancellor of the other two institutions would have to submit letters indicating that they have reviewed and agree to the proposal. The institution submitting the proposal would be considered the main campus of the new institution and the other campuses would be branch campuses (as federally defined). The Commission would discuss the request with each of the three institutions.

Moving UA to single accreditation through the merger of UAA, UAF, and UAS would be much more significant in scope than the vast majority of such requests and would be among the most significant substantive changes the Commission has ever considered. The Commission would likely examine the request in great detail and require substantial interaction with the three institutions. The Commission has indicated that the process would take at least two years to complete. The Commission meets twice a year and may want to time the substantive change so it does not disrupt current accreditation evaluation schedules (see table below).

Institution	Last Evaluation	Next Evaluation
UAA	Year three evaluation fall 2014	Comprehensive evaluation fall 2017
UAF	Year three evaluation fall 2014	Comprehensive evaluation fall 2019
UAS	Year three evaluation Fall 2013	Comprehensive evaluation spring 2019

The Commission’s requirements for a substantive change request proposing to merge two of the existing UA institutions into one of the existing institutions is listed in the Commission Substantive Change Policy (Appendix C). This policy requires that a comprehensive proposal must be submitted addressing:

- the need for the change,
- the authorization for the change,
- procedures used in arriving at the decision to change,
- budget projections including the financial support to be reallocated to accommodate the change,
- curriculum,
- student learning outcomes assessment,
- fiscal and administrative capacity to accommodate the change,
- the capacity of student services to accommodate the change,
- physical facilities, and
- faculty.

Under single accreditation the Commission would require UA to publish a catalog that provides in a manner reasonably available to students and other stakeholders, current and accurate information that includes the following (Standard 2.D.5):

- i. institutional mission and core themes;
- ii. entrance requirements and procedures;

- iii. grading policy;
- iv. information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion based on normal student progress and the frequency of course offerings;
- v. names, titles, degrees held, and conferring institutions for administrators and full-time faculty;
- vi. rules, regulations for conduct, rights, and responsibilities;
- vii. tuition, fees, and other program costs;
- viii. refund policies and procedures for students who withdraw from enrollment;
- ix. opportunities and requirements for financial aid; and
- x. academic calendar.

Currently, UAA, UAF, and UAS publish separate catalogs. All of the above-listed items, with the exception of tuition, differ at the three institutions. The Commission has indicated that they would expect a single catalog with the above list submitted with the substantive change proposal and that there could be supplementary campus-based catalogs which address non-shared programs, e.g., PhD in Physics at UAF or the Health Management Information Systems at UAS.

The Commission has indicated they would require a full-team site visit related to this change six months after approval, with follow up for three years. This is consistent with significant substantive changes.

A substantive change request to merge the three UA institutions can be submitted to the Commission at any time along with the required \$5,000 fee for merger with another institution.

The Northwest Commission on Colleges and Universities determines annual dues for member institutions based upon total education and general expenditures and mandatory transfers for the previous academic year as reported to IPEDS. Below is a summary of the Commission annual dues and the fees that each university will pay for the next full-scale comprehensive evaluation visit (based on a recent change from \$1,500/evaluator to \$2,000/evaluator):

University	Annual Dues	Fee for Comprehensive Evaluation Visit (based on current charges per evaluator)
UAA	\$18,080	\$12,000
UAF	\$18,080	\$18,000
UAS	\$14, 889	\$18,000

Under single accreditation the annual dues would be \$18,080 and the Commission has indicated the first evaluation visit after the merger (typically six months after approval) would cost approximately \$74,000 because they would likely send a full team of evaluators to the three largest campuses and send evaluators to every other campus to ensure that the merger substantive change was working well. As separately accredited institutions, UAA, UAF, and UAS each have an accreditation liaison officer who communicates with the Commission on accreditation issues, compiles annual reports, provides education on student learning outcomes assessment and reporting by all programs, a key component of institutional accreditation, and coordinates the institution-wide collection and compilation of required self-study documents. Under single accreditation, centralized compilation of documents would be required, but campus-based education and information collection would still be needed.

## Alternatives to Single Accreditation

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There are alternatives to single accreditation that the University of Alaska should consider before reaching a decision on this important issue. Providing incentives and funding for change typically works better than simply mandating change.

**Use performance based budgeting** to incentivize separately accredited institutions to make progress on important state issues; the **California State University System** uses this budget approach. Under the leadership of UA President Hamilton, performance based budgeting was used but it was not well received and was eventually abandoned. The single UA budget allocation allows the president to reward the behaviors he and the Board want to address.

**Administrative performance rewards** can be used to incentivize campus leadership, e.g., chancellors, vice chancellors, and perhaps deans to collaborate across the system and make progress on performance measures. UA President Johnsen's contract includes performance rewards. Promotion and tenure policies could be revised to incentivize faculty. Expert Terrence MacTaggart suggested that the job descriptions and responsibilities of chancellors be reviewed to emphasize their simultaneous roles as both system officers and campus heads. Part of their annual evaluations would rest on their contributions to greater system-wide efficiencies.

**Create an initiative fund** as an incentive to improve performance measures. This fund could be used for competitive grants to the institutions to improve performance measures or targeted at single institutions where performance measures need specific attention.

**Adopt a system-wide rigorous program review process** as outlined by Robert Dickeson in *Prioritizing Academic Programs* (Jossey-Bass, 2010). This approach was recommended by Terrence MacTaggart. Duplicate, low demand-high cost, and low priority programs could be reduced or eliminated to free up resources for programs that address top state needs.

**Continue to develop organizational structures** that facilitate cooperation. The UA Summit Team, the Statewide IT Council, and similar groups have made progress in systemwide cooperation. Additional teams could be formed to aid the collaboration effort. For example, the California system Statewide Academic Council has two faculty representatives from each institution empowered to make academic decisions for the system.

**Adopt and implement a common student experience** across the system based on a cost-benefit analysis. The three institutions could be asked to prepare a **proposal** to achieve that goal. The three institutions already have a lot in common and more could be done to ensure a consistent positive common student experience. The UA System uses the same student information system for admitting, managing financial aid, registering, and billing students, and UAA, UAF, and UAS share many common processes. Students disqualified or expelled at one institution are disqualified or expelled everywhere in UA and students who fail to pay their bills at one institution cannot enroll anywhere in UA until the debt is paid. In the past few years the UA BOR has required common general education and related common prerequisite assessment and placement, and common calendars; that work is in progress. However, there are still many areas where students notice differences among the three institutions; greater commonality could be required by the UA BOR in its pursuit of a common student experience in lieu of single accreditation or as first steps toward single accreditation. Some of the differences in the student experience are based on philosophical

differences among the institutions and some are scale issues (UAA has many more students than UAS). A common course catalog could be developed to alleviate course transfer issues. This approach has been implemented by the **Montana University System** and the **South Dakota Unified System of Higher Education** to significantly reduce course transfer issues. Courses with 80 percent or more similar content could have the same designator, number, title, and course description. A single transcript is also a common system requirement. In addition, policies and procedures could be more consistent across the system, e.g., grading, credit for prior learning, business approaches for nonpaying students, and secondary student enrollment. The cost of implementing these common approaches should be examined to ensure that the benefits are worth the investment.



## The National Perspective

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Written comments and interviews of national experts on higher education and institutional accreditation were solicited to provide an external perspective on UA's exploration of single versus separate accreditation. Background information about UA's three institutions and a brief description of why UA is exploring single accreditation, e.g. legislative intent language, the UA BOR's interest in a common student experience, potential cost savings, efficiencies, and improved institutional performance were provided in the solicitation and care was taken to avoid biasing responses. Appendix D includes letters from the following individuals:

- Barbara Brittingham, President, Commission on Institutions of Higher Education of the New England Association of Schools and Colleges.
- Dennis Jones (in collaboration with Peter Ewell), President Emeritus of the National Council for Higher Education Management Systems; Peter Ewell is the current President.
- Terrence MacTaggart, previous Chancellor of the Minnesota State University System and the University of Maine System; consultant to UA and UAF, many other institutions, and the Association of Governing Boards.

### Recent Lower 48 Institutional Mergers

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The following are a few examples of recent institutional mergers and how they compare to the potential UA merger.

The College of Eastern Utah (CEU), a community college, became part of the Utah State University (USU), a land-grant research institution, as a result of a substantive change request to the Commission in 2010. CEU's name was revised to be **Utah State University-College of Eastern Utah**. CEU was experiencing financial difficulties prior to the merger. USU already had an upper-division, regional campus presence in Price, where CEU is located. A search was conducted and a chancellor hired at USU-CEU who will report to the USU president. This merger is similar in nature but not scale to that of UAA's merger with Prince William Sound Community College in the 2015-2016 academic year.

In 2014, the Texas State Technical College Board of Regents authorized their administration to seek a change from four accredited community colleges to accreditation as one college with 11 primary locations. The Southern Association of Colleges and Schools approved this request, to be effective July 10, 2015. <http://www.tstc.edu/about/singleaccreditation> published June 25, 2015.

The University of Texas Brownsville (8,600 students) and the University of Texas Pan American (19,000 students) merged to create the **University of Texas Rio Grande Valley** in 2015. The merger unifies University of Texas system institutions geographically and provides access to the Texas Permanent University Fund (took a 2/3 majority vote of their legislature). The new institution is expected to meet the Texas Higher Education Coordinating Board's criteria for an emerging research university. Two AACSB-accredited business programs became one in that merger and there is now one dean.

Maine has two separate systems of higher education: a university system with seven universities, a law school, and eight outreach centers, and a separate community college system with seven institutions. All of the institutions are separately accredited. The **University of Maine System** is

working on a consolidation project, much like UA's Strategic Pathways, called "One University for all of Maine" and is considering, but so far reserving judgment on, single accreditation for its seven universities. Maine's consolidation effort has been aggressive. For example, they have centralized most administrative functions, including information technology, human resources, procurement, some elements of facilities (e.g., emergency planning, hazardous waste management), and finance at the system office. Each of the campuses still has a chief business officer who reports to the system chief financial officer (solid line) and the campus president (dotted line). Their accrediting commission is questioning the financial officer reporting lines and that is still under negotiation. After two and a half years they have made little progress on consolidating academic programs, in part because of changes in academic leadership. National higher education experts have weighed in on Maine's examination of single accreditation. For example, in a May 2015 article (Woodhouse 2015) about Maine's exploration of single accreditation, Peter Ewell, now President of the National Center for Higher Education Management Systems (NCHEMS), said he "is not aware of another system that has transitioned from each campus having its own accreditation to all campuses being under one accreditation." He also said, "The trend, more and more, is to have individual accreditation, and the accreditors like that better because [campuses] sometimes have different missions. They'd rather look at individual campuses."

There are two significant differences between the University of Maine System and the UA System. First, the merger being considered in Maine only involves their universities; it does not involve their community colleges. Second, there are many other easily accessible public and private universities in and around Maine.

## Organization of Other State Universities

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How are state universities and community colleges organized in states similar to Alaska in population and postsecondary enrollment? Risking the common Alaskan response of, "We don't care how they do it outside," below is a brief summary of higher education accredited institutions in five states similar to Alaska in population size and density and state institution postsecondary enrollment.

### Montana University System

Montana has a system of higher education governed by the Montana University System (MUS) Board of Regents which appoints a chancellor. MUS governs the University of Montana (UMT) with four separately accredited institutions, the Montana State University with four separately accredited institutions and three separately accredited community colleges. The University of Montana and the Montana State University each have community college elements to their mission and each centralizes procurement, information technology, and shared services for human resources (central control over review of benefits, classification of positions) for all their separately accredited institutions. UMT has a president who also serves as the CEO of the Bozeman Campus with chancellors/CEOs at the University of Montana Western and the Montana Tech of the University of Montana, and a dean/CEO at the Helena College University of Montana. Similarly, the Montana State University System has a president who also serves as the MSU Bozeman chancellor/CEO, chancellors/CEOs at MSU Billings and MSU Northern, and a dean/CEO at Great Falls College MSU. All CEOs are approved by the Board of Trustees. One feature of the Montana System is common course numbering across all institutions. In 2004, the Montana Legislature completed an audit of transferability among all the campuses of the system. The audit concluded that the system "failed to provide students with a reasonable level of transparency and predictability." Three years

later, the 2007 Montana Legislature funded a request to provide staff and operating resources to identify courses that will transfer as equivalents. Under common-course numbering, any course determined by faculty to be equivalent to any other course (80 percent) must have the same prefix, number, and title. This required all institutions to adopt a new set of course labels.

### **North Dakota University System**

The North Dakota University System (NDUS) comprises five community colleges, four regional universities, and two research universities; all are separately accredited. NDUS is governed by the North Dakota State Board of Education, which appoints a chancellor (CEO) who works with VP academics, VP Finance, VP IT-Institutional Research, and VP Strategic Engagement. The individual universities and community colleges each have a president (or dean in the case of smaller institutions) who report both to the chancellor and the Board; each institution has a full leadership contingent including vice chancellors for academics, student services, finance, etc. The system office organizational chart shows a total of 29 individuals.

### **Idaho**

Idaho has four universities (three research institutions and one college that offers four-year degrees) and four community colleges. All are separately accredited and all are governed by the Board of Trustees, which is the Idaho State Board of Education; an eight-member board with responsibility for K-20 education (includes one superintendent of K-12). An Executive Director of the Office of the State Board of Education is primarily responsible for K-20 policy oversight. The presidents of the institutions report to the board, not the executive director. There are no centralized administrative or service functions.

### **South Dakota Unified System of Public Higher Education**

The South Dakota Unified System of Public Higher Education (SDUSPHE) comprises eight institutions, including six public universities (two are research universities) and two schools serving special K-12 populations: the deaf and the blind/visually impaired. The six universities are separately accredited. The South Dakota Board of Regents selects an executive director who serves as the executive officer (rather than a president or chancellor) and is responsible for the administration and coordination of system resources, provides independent analyses and information to the Board, evaluates the institutional presidents, and is the system's principal spokesperson. The Board also selects executive officers, presidents, and superintendents of the individual institutions but these individuals report to the Board through the executive director. The executive director chairs the Council of Presidents and Superintendents and this group coordinates system activities and Board agendas. Courses permitted to meet system general education and institutional graduation requirements are approved by the Board of Regents each December. The system has implemented curriculum councils to facilitate cooperation among its institutions. The system chief academic officer chairs an Academic Affairs Council made up of the provosts from the campuses to facilitate coordination. The system uses a single student system, which is designed to allow a student to register for courses for any university at once using a single course catalog, access and pay a single bill from any location, and generate a single transcript. The same major at different institutions has different requirements. The system also has implemented a single human resources and financial information system, which is coordinated by the system's Business Affairs Council, composed of the CFOs from each campus and chaired by the system CFO. As with academic coordination, common policies, guidelines, processes, and definitions have been implemented. All activities on the

campuses are rolled up to the system office which serves as the sole contact with all executive branch agencies (budget, HR, etc.). All information systems are managed centrally by the Regents Information System, which is managed by a director who reports to the system CFO. The central office employs about 50 people; 25 address administrative work and 25 maintain and develop the Regents Information System. SDUSPHE has established shared services for accounts payable, purchasing, payroll, and international employment for all of its institutions. When asked if they had centralized any student service areas like admissions, financial aid, etc., they responded, “No, these are areas that are seen as mission critical to the recruitment of students and the institutions have full and total control of enrollment management services.”

## University of Wyoming

Wyoming has one university and seven community colleges organized by geographic region; all are separately accredited. The president of the university reports to the Board of Regents. The Wyoming Community College Commission oversees the community colleges and does not centralize any administrative functions. The Community College Commission has organized six Community College Councils to facilitate collaboration among the institutions; an Executive Council, an Academic Affairs Council, an Administrative Services Council, a Chief Information Officers Council, an Institutional Research Council, and a Student Services Council. The Executive Council includes the executive director of the Wyoming Community College Commission and the presidents of the seven college districts and is chaired by the executive director. The remaining four councils report to the Executive Council. All councils meet to share information about specific policy areas, debate policy options, and make informed recommendations to the broader Commission.

## Multi-Campus Institutions with Single Accreditation

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The **Pennsylvania State University** and the **University of Washington**—both are research universities and neither has a community college mission—will be used to illustrate the range of management approaches possible for mature multi-campus institutions with single accreditation. Both of these institutions began as single accredited institutions and have remained that way throughout their history so they did not merge with other institutions to become the institutions they are today. Before proceeding it is important to note that UAA, UAF, and UAS are currently multi-campus separately accredited institutions so they also serve as examples of such institutions.

### Pennsylvania State University

The Pennsylvania State University (PSU) has 24 campuses. The original campus is located in University Park, and this is where the president and vice presidents are located. Nine campuses are named colleges and their chancellor serves the role of dean in various processes, e.g., Behrend College in Erie and Capital College in Harrisburg. Fourteen of the smaller campuses are administered by the University College. Many programs, e.g., baccalaureate programs in business, electrical engineering, English, and psychology, are available at multiple campuses and these programs differ by campus (college). Campuses commonly have their own specialized accredited programs including ABET, AACSB, and NCATE; a complete listing of these is available online (See References). The department chair with responsibility for a program, e.g., English, is commonly located at University Park. Smaller campuses, e.g., Wilkes Barre, have a single program coordinator who reports to the campus academic officer. Larger campuses, e.g., Penn State Erie, the Behrend College with 4,700 students, have directors (rather than deans) of major areas such as science, business, and engineering to manage program coordinators. The larger campuses have the following

leadership team members (note the use of the director title and not vice chancellor):

- Chancellor (CEO)
- Director of Academic Affairs (chief academic officer of a campus)
- Director of Information Technology Services
- Director of Student Affairs
- Director of Finance
- Human Resources Representative
- Director of Enrollment Management
- Director of Development & Alumni Relations
- Director of Community Relations and Public Communication
- Director of Business Services

Each campus has a Faculty Senate with authority on all matters that pertain to the educational interests of that campus. A single course catalog is used by PSU. Tuition varies among campuses.

### **University of Washington**

The University of Washington, with campuses in Seattle, Bothell, and Tacoma, is accredited by the Commission. The president of the university does double duty as the chancellor of the Seattle Campus. The Bothell and Tacoma campuses each have chancellors and a full collection of vice chancellors and deans. All three campuses have separate AACSB-accredited business programs and two campuses have separate ABET-accredited engineering programs. Education programs at UW are not NCATE accredited. While the major requirements for specific programs, e.g., BS in electrical engineering, differ at the campuses, there are few issues between campuses because the vast majority of required major courses, e.g., 5 of 7 required courses, must be taken in residence at a given campus. The university uses a single transcript. Each campus handles student admissions; the Bothell campus has its own application form, which differs from the Seattle campus form.

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## Accreditation Standards Impact on Single vs Separate Accreditation

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Institutions maintain accreditation through continuous adherence to eligibility requirements and standards as set forth by the Commission. The impact and limitations, if any, of single versus separate accreditation are summarized below based on the Commission eligibility requirements and standards (identified by number, e.g., (1.A.3)). Examples of approaches taken by other accredited institutions are used for illustration.

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### Standard 1.A – Mission

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UAA, UAF, and UAS each have their own distinctive mission, definition of mission fulfillment, and they articulate institutional accomplishments or outcomes that represent an acceptable threshold or extent of mission fulfillment. Under single accreditation one mission statement, one definition of mission fulfillment, and a single articulation of institutional accomplishments would have to be adopted and communicated. The resulting mission statement and definition of mission fulfillment would necessarily be unusually broad among institutions accredited by Commission. Combining the missions of a research university (UAF), a comprehensive metropolitan open-access institution (UAA), and a regional institution focused on instruction (UAS) would result in a single very broad mission and accessing mission fulfillment would be challenging. See also the Research section below for additional considerations.

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### Standard 1.B – Core Themes

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Each institution currently has its own core themes, objectives, and indicators of achievement based on their mission. Under single accreditation one set of core themes, objectives, and indicators of achievement would have to be identified.

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### Standard 2.A – Governance

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As a multi-unit governance system, the division of authority and responsibility between the system and the separately accredited institutions is delineated in UA BOR policy and University Regulation. UA BOR policy and University Regulations would have to be revised under single accreditation.

The three separately accredited institutions have distinct faculty, staff, and student governing bodies. Coordinating alliances have been formed for each group at the system level. New structures and processes could be defined and implemented under single accreditation or the groups and their processes could remain as they are. The accreditation standards do not specify how faculty, staff, and student governance must be structured at separately accredited institutions within systems so there are many possibilities as to how these are organized. The **California State University System** (all institutions separately accredited) has implemented a statewide academic senate with two representatives from each of the separately accredited institutions as a decision-making body for systemwide issues; each campus also has its own governance structure for strictly internal issues. The **South Dakota System** has implemented curriculum councils to facilitate academic cooperation among its institutions. The **Penn State University** and **University of Washington**, both multiple campus single accreditation institutions, have a hierarchical system of faculty governance beginning with campus committees and ending with a university wide group making decisions.

## Governing Board

Current UA BOR policy does not comply with standard 2.A.7 (provided below) because the BOR selects and evaluates only the president; the chancellors who are the CEOs of the separately accredited institutions would have to be selected and evaluated by the board.

2.A.7 The board selects and evaluates regularly a chief executive officer who is accountable for the operation of the institution. It delegates authority and responsibility to the CEO to implement and administer board-approved policies related to the operation of the institution.

Under single accreditation the board could appoint and evaluate only the president as they currently do or appoint and evaluate campus chancellors as well as the president.

## Leadership and Management

Under single accreditation a new organizational structure with identified administrators would have to be defined and that structure would be assessed by the Commission during the substantive change process (2.A.9 – 2.A.11). Common leadership and management models in use by multi-campus institutions of higher education are described below.

A multi-campus institution or system may have a president that does double duty as chancellor at the major campus (most commonly the largest, most prestigious campus and often the original campus). Major administrative and service functions are often located at that major campus. Each of the other campuses has a leadership team composed of a chancellor (sometimes a dean or director if the campus is small), academic officer, student affairs officer, administrative officer, etc. This model is widely accepted in accreditation evaluations whether it has single accreditation (**University of Washington, Washington State University, and Penn State University**) or separately accredited (e.g., **University of Montana, Montana State University, and University of Minnesota**). Single accreditation institutions may have deans of major areas, e.g., science, business, or liberal arts, at every campus (**University of Washington**) or only have deans at the major campus and directors or coordinators at the other campuses (**Penn State University**). Penn State University is unusual in that the chancellor at some campuses or a collection of campuses are the deans of a college. Separately accredited multi-campus institutions have deans at each campus (**Montana State University and University of Montana**).

University systems with separately accredited institutions may have a system president (or executive director) at a statewide office with vice presidents and chancellors (sometimes deans at small campuses) and vice chancellors at each major campus. This is the current UA model and that of many systems including but not limited to **South Dakota, North Dakota, and Idaho**.

Under single accreditation, multiple programs in the same subject area can be organized in a variety of ways. For example, **Pennsylvania State University** has a dean and department chair at one campus with broad responsibilities, e.g., program quality, promotion and tenure, etc. with directors or coordinators at other campuses handling local scheduling and student issues. Alternatively, the **University of Washington** has a dean and department chair at each campus with broad responsibilities.

UA would not be limited to the management and leadership models described above. New and innovative models could be considered. For example, **Arizona State University**, a multiple-campus

institution with single accreditation, has adopted a leadership structure with a single president and provost and one dean of each major area serving all campuses; there are no campus chancellors or vice chancellors. Commission accreditation standards 2.A.7 (above) and 2.A.10 (below) do not specify the title of the CEO for accredited institutions and the standards on leadership and management (2.A.9 and 2.A.11; see below) do not specify an organizational structure. The Commission would evaluate a proposed management and leadership model in a potential UA single accreditation substantive change submission.

### **Minimum Authority of a Campus CEO under Single versus Separate Accreditation**

UA President Johnsen specifically asked that this report address the minimum authority of a campus CEO under single and separate accreditation. This is a difficult question to answer because the accreditation standards are purposefully written to be broad and ambiguous because they must apply to a very wide range of institutions, e.g., large state research universities and small tribal colleges. The standards provide the following specific guidance on the authority of the CEO and leadership and management under separate accreditation:

- The CEO is accountable for the operation of the institution, and has been delegated the authority and responsibility to implement and administer board-approved policies related to the operation of the institution (2.A.7).
- The institution has sufficient organizational and operational independence to be held accountable and responsible for meeting the Commission's standards and eligibility requirements (Eligibility Requirement 4).
- There is an effective system of leadership, staffed by qualified administrators, with appropriate levels of responsibility and accountability, who are charged with planning, organizing, and managing the institution and assessing its achievements and effectiveness (2.A.9).
- The institution employs a sufficient number of qualified administrators who provide effective leadership and management for the institution's major support and operational functions and work collaboratively across institutional functions and units to foster fulfillment of the institution's mission and accomplishment of its core theme objectives (2.A.11).

The Commission (NWCCU) staff, Commission on Institutions of Higher Education of the New England Association of Schools and Colleges (where Maine is accredited), and Northwest commissioners provided guidance in interpreting the standards for this question. In general, if there is too much centralized system control of administration or service functions, the CEO cannot be held responsible for the standards. Because accreditation is mission and core theme driven, the CEO must be able to reallocate institutional funding as needed to support mission and core theme fulfillment. Admissions and financial aid are directly related to the mission and core themes of an institution so these functions should be led and managed by a CEO at separately accredited institutions. Similarly, recruitment, retention, evaluation, promotion and tenure, and development of faculty and staff relates to fulfilling the mission and core themes, so the CEO should have human resources personnel reporting.

Similarly, the Commission expects to see a CFO at each separately accredited institution because a position at the system office representing multiple institutions would not be focused on the institution's mission and core themes. As an example, the Commission worked with one institution whose reserve levels did not meet its expectations to cover four to six months of operating expenses



because the system office was holding a large portion of the reserves centrally. There is no standard addressing this level of detail for reserve funds specifically but this relates to the delegation of authority to manage a separately accredited institution.

The role of a campus CEO under single accreditation is best described in the definition of branch campus (38 CFR 21.4266) in the US Department of Education Regulations and used by the Commission; UAA, UAF, and UAS currently use this definition in qualifying community campuses for Title IV funding. One of the UA campuses would have to be designated as the main campus, the location of the primary office of its Chief Executive Officer, and all other campuses would be branch campuses. By regulation, the branch campuses must be geographically apart and independent of the main campus and (1) be permanent in nature; (2) offer at least 50 percent of the courses of an educational program leading to a degree, certificate, or other educational credential; (3) have their own faculty and administrative organization; and (4) have their own budgetary and hiring authority. Thus, a CEO at the branch campuses must satisfy these conditions.

### **Policies and Procedures**

**Students** — Policies and procedures regarding students' rights and responsibilities including academic honesty, appeals, grievances, and accommodations for persons with disabilities have been implemented by UAA, UAF, and UAS (2.A.15). These policies and procedures are generally similar with likely process differences in areas requiring individual judgment, e.g., willingness to intervene on accommodations for persons with disabilities. Under single or separate accreditation more consistency could be sought.

**Transfer of credit** — UAA, UAF, and UAS have similar transfer of credit policies that maintain the integrity of their programs while facilitating efficient mobility of students (2.A.14). The vast majority of course transfers between UA institutions count, at least for elective credit, at every institution. A significant student issue is whether the transfer courses count toward their degree programs, and because degree programs differ among the institutions, transfer courses do not always apply in that way. Several state university systems with separately accredited institutions have adopted a single course catalog to help avoid student transfer issues, e.g., **Montana State University system** and the **South Dakota Unified System of Higher Education**.

**Institutional integrity** — UAA and UAF have established different structures for intellectual property (2.A.24) and both have been positively evaluated in the accreditation process; UAF handles intellectual property for UAS. UAA has established a company that handles intellectual property that is incorporated in the university. UAF established a company that is incorporated outside the university. These are fundamentally different, there are pros and cons for each, and there are national models for each. Under single accreditation the intellectual property offices could be consolidated (or singly led) without changing the structure of the corporations or a single model adopted.

**Contracts** — Contractual procedures for external entities for products or services (2.A.26) differ by institution and by type of contract, e.g., classified research and requests for proposals for vendors differ (the elements are similar). Some of the differences are attributable to the distinct missions of the three universities. Procedures and requests for proposals could be standardized across institutions under separate or single accreditation.

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## Standard 2.B – Human Resources

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Human resources could be decentralized or shared (a mix of centralized and decentralized such as service centers, centers of expertise, and central policy oversight) under separate or single accreditation. A National Association of State Personnel Executives issue brief on human resource centralization or decentralization stated the following:

Current HR trends have been naturally causing the HR function to move to a shared service model in order to adequately meet the needs of the employees, while standardizing processes as much as possible to create consistency across organizations.

Decentralization or shared services varies across other state universities and systems. For example, the **University of Maine System** has centralized human resources for its (currently) separately accredited institutions to provide all administrative support in the areas of health and welfare benefits, leave administration, retirement, payroll, and recruiting, and established expertise centers to support their campuses. The **South Dakota Unified System of Higher Education** has established shared payroll services and shared international employment services for all of its institutions. The **University of Washington** human resources operations are centralized in Seattle with specific staff responsible for the branch campuses in employee relations, recruitment and staffing, and leave management. The Commission expects separately accredited institutions to exercise sufficient control over human resources to be able to meet their missions and respond to the accreditation standards.

UA institutions already share a great deal in common in human resources and many functions are already centralized. For example, there is a common UA BOR policy, a common HR data system (currently shifting from UAKJOBS to PageUp), and common position classifications (2.B.1). Labor negotiations are centralized with provisions for input from relevant MAU management teams. The adoption of benefit and retirement plans is centralized. UA Statewide approval is required for out of class pay over 10 percent and executive hires. UA Statewide HR is currently working with the three institutions to create a common module in PageUp to make performance evaluation tracking consistent across the system. Grievance appeals are also handled by UA Statewide.

Human resource functions that are mostly decentralized include onboarding, payroll, training policy and tracking, employee relations and grievances, recruitment (with the out of class pay and executive hire approval exceptions noted above), and personnel development. HR policy compliance is largely decentralized through job posting and position reclassification approval processes and investigations of complaints of violation of policy, e.g., bullying complaints.

Staffing needs and some policies, processes, and procedures differ among the three UA institutions because of differences in mission. For example, supporting a research institution with extensive field work in remote locations, operating medical facilities, and supporting a regional institution focused on teaching require different approaches. There could be more coordination and sharing of faculty and staff development and training across the system, which could improve efficiency. There are differences in required training, how training is delivered at the three UA institutions, and how training is tracked, due in part to differences in mission (2.B.3). There are also differences in the software used to deliver and document required training.

## Faculty workload

Under single accreditation or three accreditations, teaching load revisions could be made as long as they align with the collective bargaining agreements. In either case, faculty effort could and should be directed to best fulfill the mission of the university or universities. Each of the three universities has an established mission; if the three were merged under a single accreditation, a new mission statement reflecting the new institution would need to be created and workloads would have to align with that new mission.

Bipartite faculty workloads are currently generally consistent across the three universities. Tripartite faculty workloads (2.B.5) differ among and within UAA, UAF, and UAS in the areas of teaching and research and creative activity, and these differences relate to the distinct missions. Service is generally treated similarly at all three institutions and depends on the specific collective bargaining agreement. UAF tripartite faculty are subject to high expectations with respect to external grant funding and publication rates, especially for STEM and a few other areas. However, UAF instructional faculty teaching loads (credits per regular instructional faculty FTE) are comparable to those at UAA and UAS (Table 3.13, UA in Review); the main difference is that some tripartite UAF faculty (about 35 percent of the total tripartite faculty) have part of their appointment in an organized research unit, rather than an instructional unit, and so a part of their effort (typically 50 percent) is wholly devoted to research. UAF has distinct workloads for Cooperative Extension Service and Marine Advisory Program faculty, which are bipartite, with teaching and service workloads. UAS is teaching focused and faculty workloads reflect this emphasis. UAA faculty workloads are similar to other open access public institutions with exceptions for a few units where there are higher external funding and publication expectations, e.g., biology.

If the universities are merged under a single accreditation, it will be important to decide whether to maintain a strong research mission, and if so, whether to have research efforts concentrated in Fairbanks (as now) or more widely distributed. Because a merged university, including the community campuses, would have a large majority of faculty focused on instruction, there could be pressures to make workloads more equitable, and either reduce the effort in research or to allow all tripartite faculty more time to conduct research. The first option would greatly reduce the ability of UA to compete for federal funds and lead the world in Arctic research, the second would probably be unaffordable. If research is increasingly shifted to locations outside Fairbanks, the need to construct more facilities in the new locations could arise. The workload issues could be managed, but would be more complex than they are currently with three separately accredited institutions with distinct missions.

## Faculty Evaluation

Unit criteria provide guidance beyond UA BOR policy and regulations and collective bargaining agreements for annual, promotion, tenure, and post-tenure faculty evaluations. Each unit of each of the three institutions can establish and use unit criteria, with approval, in these evaluations. Many units have done so, and the unit criteria established at UAA, UAF, and UAS differ. Most UAF units have substantial expectations for accomplishment in research or creative activity, which include extensive publication or performance in national or international venues. UAA has incorporated specific elements into unit criteria related to their Carnegie Foundation's community engagement classification; neither UAF nor UAS has this classification. UAF has distinct unit criteria for the Cooperative Extension Service and Marine Advisory Program faculty. All three universities have library faculty that are evaluated under different unit criteria.

Under single accreditation a coherent process for evaluation, promotion, and tenure would have to be adopted and implemented. Evaluation, promotion, and tenure processes at multi-campus institutions with single accreditation are similar to those currently used by UAA, UAF, and UAS for community campus or faculty with joint institute appointments. Branch campus faculty have additional campus evaluations. For example, the **Pennsylvania State University** process for faculty who are not located at the main campus includes evaluation by a campus promotion and tenure committee, the campus administrative officer, department chair, a dean, and then the provost. **University of Washington** branch campus faculty are evaluated by a campus promotion and tenure committee, which includes a faculty member from another branch campus, a dean, a university wide promotion and tenure committee, and the provost.

## Tenure

Generally, there would be no impact on tenure if UA merged its three institutions into a single institution. If programs are terminated, tenured faculty in those programs can be terminated under single or separate accreditation. The language on tenure for the two full-time faculty collective bargaining agreements (UNAC and UAFT) is given below:

### UNAC: 9.3.1 Locus of Tenure

Unit members shall be tenured within their discipline at an MAU within the University of Alaska. Unit members may transfer with tenure to another academic unit in the same or another MAU only upon the mutual agreement of the unit member and the chancellor of the receiving MAU. For purposes of this Agreement, "discipline" shall be defined as the traditional academic field and recent teaching and research record as demonstrated in workload agreements, annual activity reports, and evaluations.

### UAFT: 6.3.1 Locus of Tenure

Bargaining Unit Members shall be tenured within a discipline at a university within the University of Alaska. Bargaining Unit Members may transfer with tenure to another academic unit in the same or another university only upon the mutual agreement of the Bargaining Unit Member and the chancellor of the receiving university. For purposes of this Agreement, "discipline" shall be defined as the traditional academic field and recent teaching and scholarly record as demonstrated in workload agreements, annual activity reports, and evaluations.

UA General Counsel Mike Hostina provided the following summary regarding tenure if UA merged into a single institution:

If UA relinquishes separate accreditations, its contractual obligations will not be significantly affected. UA is one legal entity, whether it includes one or three accredited institutions.

Similarly, tenure would not be affected. UNAC contract language ties tenure to a "MAU." Major Administrative Units would continue to exist even if the university relinquished separate accreditations.

Although UAFT contract language ties tenure to a “university,” and existing universities might not continue to exist if UA relinquished separate accreditations, UA would view tenure as continuing in the prior administrative unit.

## Standard 2.C – Education Resources

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### Individual Degree Programs

Faculty at separately accredited institutions design and implement degree programs with intended learning outcomes, course sequences and requirements, and student experiences, e.g., the BS in Biology or AAS in Automotive Maintenance Technology, based on the disciplinary standards of recognized fields of study as shaped by local demand and faculty expertise. As a result, the intended learning outcomes and related degree requirements for a program at one institution are typically different from those of another institution. That is the case for UAA, UAF, and UAS. Under single accreditation the Commission has indicated that every program shared in common across campuses must have at least a common core of course requirements for all campuses. Each campus could have their own emphasis area (some small collection of courses) for a program to meet local demand or to align with local faculty expertise. The guidance from the Commission does not entirely align with what occurs at multi-campus institutions with single accreditation. The **University of Washington** and **Pennsylvania State University** (each have single accreditation) have multiple campuses offering degree programs in the same field, e.g., BS in Electrical Engineering or BBA, with overlapping course requirements that appear to differ in more than just emphasis areas (see also specialized accreditation section below). The University of Washington campuses offer different degree programs in the same field; one campus offers a Bachelor of Business Administration while another campus offers a Bachelor of Arts in Business Administration. Penn State is accredited under a different regional accrediting organization than UAF, and UW established its branch campuses many years ago, and so some of its practices might not be approved if instituted now.

The following paragraphs discuss the central roles of faculty in curriculum and in assessing student learning. These roles are specified in an accreditation standard, 2.C.5:

Faculty, through well-defined structures and processes with clearly defined authority and responsibilities, exercise a major role in the design, approval, implementation, and revision of the curriculum, and have an active role in the selection of new faculty. Faculty with teaching responsibilities take collective responsibility for fostering and assessing student achievement of clearly identified learning outcomes.

Under single accreditation, the faculty of the three UA institutions would need to agree on the intended student learning outcomes, how to assess those outcomes, programmatic content and rigor, admission requirements, one set of course offerings and sequences (titles, numbering, and course descriptions), degree requirements, and timelines to completion. The three current catalogs describing academic programs are the result of years of debate, compromise, and revision by the faculty at each institution and they will likely defend their choices. There is a practical reason; each new course taught represents weeks to months of scholarly research and preparation on the part of a faculty member, depending on course level, the availability of textbooks and other published instructional resources, and so on. Each faculty member will want to keep the courses that he or she has prepared in the curriculum.

Student learning is a major element of the mission of any institution of higher education so a primary role of institutional accreditation is assurance of learning, that is, to ensure that students are achieving the learning outcomes that the institution specifies for its programs. The assessment of student learning outcomes, and the continuous improvement of programs to improve learning outcomes, is the collective responsibility of faculty as specified in Standard 2.C.5 above, and as further specified in Standards 2.C.1 to 2.C.4 and 4.A.3:

2.C.1 The institution provides programs, wherever offered and however delivered, with appropriate content and rigor that are consistent with its mission; culminate in achievement of clearly identified student learning outcomes; and lead to collegiate-level degrees or certificates with designators consistent with program content in recognized fields of study.

2.C.2 The institution identifies and publishes expected course, program, and degree learning outcomes. Expected student learning outcomes for courses, wherever offered and however delivered, are provided in written form to enrolled students.

2.C.3 Credit and degrees, wherever offered and however delivered, are based on documented student achievement and awarded in a manner consistent with institutional policies that reflect generally accepted learning outcomes, norms, or equivalencies in higher education.

2.C.4 Degree programs, wherever offered and however delivered, demonstrate a coherent design with appropriate breadth, depth, sequencing of courses, and synthesis of learning. Admission and graduation requirements are clearly defined and widely published.

4.A.3 The institution documents, through an effective, regular, and comprehensive system of assessment of student achievement, that students who complete its educational courses, programs, and degrees, wherever offered and however delivered, achieve identified course, program, and degree learning outcomes. Faculty with teaching responsibilities are responsible for evaluating student achievement of clearly identified learning outcomes.

Each institution must have intended student learning outcomes, a process for collecting information on whether students are achieving those outcomes, and processes for improving programs when learning outcomes are not sufficiently achieved. UAA, UAF, and UAS have implemented different processes for assessing student learning outcomes and how that information is used to make curricular revisions. Under single accreditation, as indicated in the Standards 2.C.1 through 2.C.4, there would have to be a common approach adopted and implemented, e.g., program based or institutionally based. That is because, for a single accredited institution, learning outcomes of a program must be the same *wherever offered and however delivered*. An unintended consequence of single accreditation would be that if two of the campuses were doing an excellent job of assessing and/or achieving student learning outcomes but the third was not, the institution as a whole would likely still get a negative sanction from the Commission. Separate accreditation allows for separate evaluation that builds from the mission of the institution under review.

Under separate accreditation each institution has its own structures and processes with defined authority and responsibilities for faculty to exercise a major role in the design, approval, implementation, and revision of the curriculum. Faculty also have an active role in the selection of new faculty (2.C.5). Under single accreditation, well-defined structures and processes would have to be adopted and implemented to engage the collective faculty. Multiple campus institutions with single accreditation like the **University of Washington** and **Pennsylvania State University** have campus faculty governance and then university wide faculty governance with representatives from each campus empowered to act on academic changes with administrative approval.

Single accreditation would likely interfere with an institution's ability to fashion the curriculum to fit the needs of the unique student population at each campus. Faculty members are concerned that under single accreditation they could lose control over local curriculum, hiring, promotion and tenure reviews, and the selection of new faculty. The campus with the largest collection of faculty in a given field, e.g., English, automotive maintenance technology, or civil engineering, could effectively control each of these areas.

### Credit for Prior Learning

Under separate accreditation UAA, UAF, and UAS each are required to have a policy granting faculty control over decisions about credit for prior learning (2.C.7). Credit for prior learning does not necessarily transfer when a student transfers. Accepting transfer credit is the responsibility of the receiving institution (2.C.8). UAA, UAF, and UAS have established different policies on credit for prior learning. UAA offers credit for prior learning only via previous certification or through an acceptable examination outcome. UAF offers credit by examination, previous certification, and a portfolio process for students to earn credit for prior learning. UAS recently (May 2016) revised their credit for prior learning policy to be similar to UAF's policy, to be implemented this fall. Under single accreditation a single policy must be adopted and implemented.

### Specialized Accreditation

UAA, UAF, and UAS have numerous programs with specialized accreditation, e.g., ABET for engineering, AACSB for business, and NCATE (now known as CAEP) for education. Under single accreditation UA could have specialized accredited units at multiple campuses, e.g., the Anchorage and Fairbanks campuses could have their own separately ABET-accredited engineering programs. This is common among multi-campus institutions with a single institutional accreditation. For example, the **Pennsylvania State University** has one institutional accreditation for its 24 campuses and many of its campuses have separate specialized accreditation in business (AACSB), engineering (ABET), and education (NCATE). Similarly, the **University of Washington** has ABET and AACSB specialized accreditations at its three campuses. Alternatively, the new merged institution could have single specialized accreditation in some or all areas. Single specialized accreditation would require that one program be delivered at multiple sites with the same intended learning outcomes, course descriptions, curricular requirements, faculty qualifications and workloads, admissions standards, and outcomes assessment.

Locus of control is a key factor in deciding whether separate campuses should have separate specialized accreditation or there should be just one specialized accreditation for a particular program for an institution (personal communication with Jane Lawler of AACSB, July 6, 2016; and John Orr of ABET, July 22, 2016). Having distinct programs at different campuses or different learning outcomes related to emphasis areas and local faculty expertise are critical to the locus of

control. Separate deans (or distinct leaders) at each campus are often an indicator of appropriate locus of control for separate specialized accreditation. Campuses that have their own chancellor and chief financial officer are also favored by specialized accrediting bodies but more flexibility was indicated on that factor; the agency would examine the locus of control generally in making their decision on single or separate specialized accreditations for multiple campus institutions. Distinct program offerings, learning outcomes, and related assessment would result in separate specialized accreditations for campuses for NCATE's educator preparation programs (personal communication with Stevie Chepko, Council for the Accreditation of Educator Preparation, July 22, 2016). The **University of Washington** has a business dean at each campus and **Pennsylvania State University** has a director of the business school at each campus that offers that program. In addition, these two institutions each have a chancellor and chief financial officer at the campuses with separate specialized accredited programs. **Arizona State University** had separate AACSB accredited programs at two campuses and merged them into one program.

Under single accreditation a single school of management with specialized accreditation could offer courses at all campuses. AACSB substantive change requests would have to be submitted and approved to do so. UAS does not have an AACSB-accredited business program so the new merged institution would have to decide whether to offer management or accounting programs there and if so, whether those programs would be accredited by AACSB or not. If non-AACSB management or accounting programs were offered at UAS, AACSB would want those programs to be clearly distinct from the accredited programs, serving a substantially different group of students who were recruited through separate broadcast or direct marketing approaches. They would want to make sure that there could be no confusion (e.g., on the part of an employer) between a 'Juneau campus' graduate and an 'Anchorage campus' graduate. They would also strictly limit the number of credits that could counted toward programs offered at AACSB-accredited campuses. If AACSB-accredited programs were planned to be offered in southeast Alaska, AACSB would have to conduct an evaluation visit. Similar reviews would need to be performed in all cases where there are multiple programs accredited by a single body.

Some specialized accreditations are site specific so single or separate institutional accreditation would not have any impact. For example, the Federal Aviation Administration approves specific sites and facilities for Aviation Maintenance Technology programs.

### **Undergraduate Programs/General Education Component**

There would be one set of general education requirements (2.C.9) in a single accredited institution. Separately accredited institutions can have distinct general education requirements or have common general education requirements across a system. Many state university systems have established a common framework for general education across separately accredited institutions. For example, the **California State University System**, the **South Dakota Unified System of Higher Education**, and the **Montana State University System** have common general education frameworks. The common framework designates common student learning outcomes and common area foci rather than specific courses and allows each institution to decide how to fulfill the requirements. However, course transfers are guaranteed across the system for every general education course. A common general education framework rather than specific courses could serve UA well under separate or single accreditation because scale differences of the institutions would make it challenging for all the campuses to offer the same collection of courses.

UA's three institutions provide related instruction components (communication, computation, and



human relations) in their applied degree and certificate programs through embedded instruction within program curriculum or in blocks of specialized instruction (2.C.11). The three institutions may differ in their delivery of related instruction for the same program. This could remain as it is under single or separate accreditation or greater consistency could be sought as it is for general education.

UAA, UAF, and UAS each have implemented an academic advising program; however, they have somewhat different requirements for advising (2.D.10). Under single accreditation a single requirement would have to be adopted and implemented.

### **Graduate Programs**

Graduate programs at UAA, UAF, and UAS are clearly associated with the mission of those institutions (2.C.12). Under single accreditation, decisions would have to be made about where doctoral programs would be offered. Currently UAF and UAA are recognized by the Commission and the US Department of Education as doctoral-granting institutions and UAS as a master's degree-granting institution. UAF offers 18 doctoral programs including an interdisciplinary PhD and the joint doctoral program in clinical-community psychology. UAA offers two doctoral programs; the joint clinical-community psychology, and the nurse practitioner (DNP). Under single accreditation UA would be a doctoral-granting institution. The doctoral programs could continue to be offered where they are now or they could be expanded. The substantive change document for single accreditation, if submitted, should address UA's intention in this regard. It is important to understand that quality research doctoral programs (PhDs) must be based in strong faculty research programs. (See also the Research Section.)

### **Continuing Education and Non-Credit Programs**

UAA, UAF, and UAS offer continuing education programs consistent with their missions (2.C.16). The continuing education can lead to the award of credit, of Continuing Education Units (CEUs), or of other forms of certification required by professional bodies based on generally accepted norms, appropriate to the level of the course, and determined by student learning outcomes (2.C.18). Each institution maintains records describing the number of such courses and the nature of learning provided through non-credit instruction (2.C.19) and they do so differently. Under single accreditation the new institution would have to maintain such records.

## **Standard 2.D – Student Support Resources**

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### **Admissions**

Separately accredited institutions can and should manage their own admissions because student recruitment is strongly associated with the institution's mission (2.D.3). However, UA could implement one admission application procedure with distinct admission requirements. Single accreditation would require common institutional admission requirements and undergraduate admissions could be centralized. Baccalaureate admission requirements and general graduate program admission requirements currently differ among the three institutions. Admission requirements for individual programs or colleges or schools can differ under single or separate accreditation. The UA student information system currently records up to three admission records, one for each institution, depending on where the student applied. Under single accreditation there could be one such record.

Prerequisite knowledge and skills assessment policies (2.A.16) and processes are currently under revision to be consistent across UA as part of the UA BOR's common general education initiative; math is complete and English is close to completion. Open access metropolitan institutions (UAA), research institutions (UAF), and regional institutions focused on instruction (UAS) typically have distinct philosophies about prerequisite knowledge and placement. Continuation, termination, policies, and appeal processes differ at the three UA institutions but are generally similar.

**Pennsylvania State University** centralizes student service functions, e.g., admissions, financial aid, and registrar, at its University Park campus and each branch campus has staffing in those areas. Some branch campuses have their own program participation agreements with the US Department of Education so there is some distribution of financial aid responsibilities and related reporting (see Community Campus section below). The admissions, financial aid, and registration staff at the branch campuses report to campus leadership and there is significant and daily interaction among all of the campuses in alignment with the "one University, geographically dispersed" philosophy. Transfer credit assessment is entirely centralized at the University Park campus; faculty input on transfers is handled from there. Branch campus and directors of enrollment management report to the campus chancellor who reports to a vice president at University Park.

Admissions at the **University of Washington's** three campuses are handled independently. The Bothell campus has its own application form that is distinct from the Seattle campus.

### Registrar

Registration systems are commonly centralized at separately accredited institutions in a system (e.g., **South Dakota**) and institutions with single accreditation (**University of Washington**) but each campus tends to have its own registrar and related staff.

### Financial Aid

Like admissions, financial aid should be managed by the separately accredited institutions because of the strong association with the mission (2.D.8). Under single accreditation with a common mission financial aid could be centrally managed; the **University of Washington** and **Pennsylvania State University** have centralized financial aid (see the Community Campus section for more detail). The categories of financial assistance would have to be published and made available to prospective and enrolled students (2.D.8). Each major location should have financial aid staff because of the needed personal interaction with students. Each institution currently reports their own default rates. Under single accreditation a single default rate would have to be reported (2.D.9). Under single or separate accreditation some centralization of elements of financial aid could occur, e.g., Veterans Administration benefit processing.

### E-Learning and Distance Education

The Commission eligibility requirements and accreditation standards do not address the organizational structure or leadership of e-learning or distance education. UAA, UAF, and UAS and their community campuses offer courses by e-learning. Whether to centralize, decentralize, or use a hybrid approach for distance education is an ongoing debate (Millard 2011). UAA and UAS have implemented a decentralized approach with individual subject areas delivering distance courses. UAF has a centralized asynchronous delivery unit, the Center for Distance Education, which also provides instructional design services institution wide; synchronous distance course delivery through video or audio are decentralized. Faculty workload is an important element of concern in the debate

to centralize or decentralize e-learning. Faculty members delivering a course both in-person and by e-learning reduce the number of course preparations in the workload and improve quality and oversight of student learning compared to separate faculty teaching the course in person and by e-learning. **Arizona State University** advertises the quality of their online programs by stating that the same faculty teach the in-person and online courses. Tuition revenue distribution is also an important element of this debate and many departments have grown because of e-learning offerings.

There is no UA systemwide group coordinating e-learning course or program offerings. A statewide portal where students can find e-learning courses and programs available through any campus would be useful. Course registration already works this way and UA Statewide has established a website listing e-learning programs so the information is available but it is not clear whether students find this approach sufficient. Course offerings do appear to be reasonably efficient because sections tend to be full for the most common courses (general education courses) taken by e-learning. UAA and UAF have e-learning course fees and UAS has a consolidated fee so students enrolled in multiple UA institutions notice differences.

The Commission accreditation standards address identity verification processes for students enrolled in distance education courses and programs (2.D.14). The same methods for verifying identification are used across the system including but not limited to proctored examinations, learning management system login, and email login. The vast majority of UA e-learning students are within driving distance of a campus so proctored exams is a common identity verification approach.

UAF offers the most e-learning courses and programs and UAA enrolls the most e-learning students. Full program offerings by e-learning continue to grow. E-learning is consumer driven; students speak with their choice by enrolling in in-person courses or e-learning courses. The current trend is increasing enrollment in e-learning courses but in-person enrollment is still higher. The situation is still in transition and a new equilibrium has not yet been reached and likely will not be soon. Non-traditional students are moving increasingly to online courses for convenience related to work and family obligations.

If courses or programs are only available by distance at some UA locations from one UA institution then there are likely to be unintended consequences. Some students who want the social interaction of in-person course may choose to not enroll or enroll in-person out of state. International students are limited to three credits by e-learning and GI Bill-funded students' stipends are reduced based on the number of credits taken by e-learning. Many non-UA institutions offer e-learning courses to Alaska students so students may elect to enroll in such courses out of state if they perceive cost or quality advantages.

### Clery Act Reporting

Under separate accreditation each institution keeps and discloses information (published and sent to the federal government) regarding crime on and near their campuses. While the federal government provides definitions, categorizing incidents, behaviors, and arrests into the required Clery framework requires individual judgment so differences in reporting among the three institutions may be occurring. This information is not currently compiled for the UA System as a whole but would have to be under a single institution. This is likely an additional workload element and/or cost area under single accreditation. Failure to keep and disclose accurate crime information has serious liability issues.

## Student Rights and Responsibilities

UAA, UAF, and UAS have adopted and implemented rules and regulations for student conduct, rights, and responsibilities (2.D.5), and use different resources (educational tools, counselors, community service, etc.) to impact student behavior. Under single accreditation, student conduct rules, regulations, and sanctions should be more standardized across institutions to be in compliance with Commission expectations, the Drug-Free Schools and Communities Act, and the Violence Against Women Act.

## Standard 2.E – Library and Information Resources

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Library and information resources are well integrated and there is a great deal of collaboration among the libraries now. Changing from separately accredited institutions to a single accredited institution would likely impact two areas.

First, UAF has tripartite library faculty, UAA has both tripartite and bipartite library faculty, and UAS has only bipartite faculty. Each institution has its own unit criteria for library faculty that is used in annual, promotion, tenure, and post-tenure evaluations. Under single accreditation, unit criteria could remain campus based or a single set of unit criteria could be adopted and implemented.

Second, each institution currently subscribes to a collection of databases based on their distinct missions, e.g., UAA purchases medical databases and UAF purchases STEM databases. There is some overlap in current subscriptions and there are some shared databases where the needs of the institutions align and cost savings result in these cases. Subscription charges for databases are commonly based on student FTEs, by Carnegie Classification, number of degrees granted, and number of locations. Under single accreditation, student FTEs, number of degrees granted, and number of locations would be larger than under separate accreditation so fees for each subscription would be expected to increase. The Carnegie classification will likely be lower for a merged institution (see Research section below) so the impact of that element is unclear.

Karen Jensen, Collection Development Officer, UAF Rasmuson Library, estimated one-time costs to purchase access to owned resources, for all campuses at \$500,000 and estimated annual costs to expand access to all subscriptions across all campuses at \$800,000 - \$1,500,000 (Appendix E).

## Standard 2.F – Financial Resources

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### Finance

As separately accredited institutions, UAA, UAF, and UAS are required to plan and allocate resources to fulfill their distinct missions and core themes (3.A.1-3.A.5, 3.B.1-3.B.3, and 2.F.5). Each institution has a chief financial officer (the Commission expects this) and supporting staff that provide oversight and management of financial resources with UA BOR board approval and monitoring of financial planning, monitoring of operating and capital budgets, reserves, investments, fundraising, cash management, debt management, and transfers and borrowings between funds (2.A.30). As noted above in the Governance section in the subsection on Management and Leadership, the Commission expects to see a CFO at each separately accredited institution because a position at the system office representing multiple institutions would not be focused on the institution's mission and core themes. The Commission is conservative with respect to reserve levels at separately accredited institutions and expects reserves to cover four to six months of operating

expenses; the Commission expects these reserves to be held by the institution, not the system office. While there is no standard addressing reserve funds specifically, this issue relates to the delegation of authority to manage a separately accredited institution.

Many multi-campus institutions with single accreditation have a CEO and chief financial officer at each campus, e.g., **University of Washington** and **Pennsylvania State University**, because the locus of control of financial resources is a common delegation of authority and it is an important element for specialized accreditation at multiple campuses. The three institutions and UA SW prioritize the budget requests and submit a single budget proposal to the UA BOR, where it may be revised, and then final operating and capital budgets are submitted to the legislature. Some centralization of financial services could occur under separate accreditation as long as the locus of control element is satisfied and the planning and allocation of resources directly correspond to the mission and core themes of the three institutions. Under single accreditation the organizational structure could remain the same or could be centralized as long as the branch campus federal regulations are satisfied (see Leadership and Management section above). Budget planning and allocation must be tied to a new mission and core themes.

UA Statewide established a periodic management report process in the 1990s to monitor finances. The current centralized financial management software does not provide modern financial analytic reports so additional staff effort is needed to conduct meaningful summaries and projections. For example, simple comparisons from month to month or year to year require the examination of multiple spreadsheets. Efficiencies could be found through modernization in this area.

UA has one official centralized annual financial report prepared by the system office and the system negotiates facilities and administrative rates with the federal government. Centralization of some financial services could result in cost savings (elimination of duplicate offices and effort), more consistent processes (similar transactions are not always processed across the system in the same fashion), and greater financial flexibility at the system level through the pooling of resources. Concerns about centralizing financial services are that the institutional CEO's ability to make strategic financial decisions related to the institution's mission could be impeded, potential changes could affect indirect cost recovery allocations for research, the potential loss of control over the use of carry forward funds, and delays in approvals or processing because of added bureaucracy.

### **Business Office Operations**

UAA, UAF, and UAS have implemented different business approaches regarding student non-payment of tuition and fees, appeals processes for tuition and fees, and when financial aid payments are posted to student accounts (2.D.9). Students enrolling in multiple UA institutions notice these differences. Greater consistency in these business approaches would result in a more consistent student experience across UA. Some of these differences in approach are philosophical and some are scale issues (UAA has many more students than UAS). UAS drops students for non-payment and UAA and UAF do not. UAF and UAS set up and manage payment plans in-house for students while UAA uses a third party vendor for payment plans. UAA and UAF assess different late payment fees while UAS does not have late fees. Fee payment due dates differ among the institutions. Recovery of unpaid student debt to the university is handled differently by the three institutions; UAA sends students a two-week notice letter, then engages a collection agency, UAF and UAS attempt to get payment from the student by direct contact and, failing that, engage a collection agency. UAF's process is more labor intensive, but it has high recovery rates, which more than offsets higher labor costs. UAF and UAA use the same two private collection agencies. The

two collection agencies differ in their reporting to credit bureaus; one reports nonpayment immediately and continues reporting for seven years regardless of whether the debt is paid, and the other reports after 45 days and stops reporting after the debt is paid. Thus, the impact on student credit differs by agency. UAF posts financial aid to student accounts prior to the start of the semester while UAA and UAS post this aid 10 days into the semester. UAF's approach makes scholarship money available prior to student arrival but it requires staff time to correct student accounts later for students who do not enroll. The UAA and UAS approach means that students do not have access to their funds for the first 10 days of the semester, which is sometimes a hardship, but there is much less staff effort in cleaning up accounts.

## Fees

Under separate accreditation UAA, UAF, and UAS have implemented different fees for their students, faculty, and staff. For example, UAS implemented a consolidated fee for all students, and student testimony suggests this approach is favored there. UAA and UAF have parking fees but UAS does not. UAA and UAF parking fees offset shuttle bus costs while UAS does not have a shuttle system. Decentralization of fees has allowed institutions to "tax" themselves, for example, as UAF's Fairbanks campus students did to fund construction of the Student Recreation Center and to fund sustainability efforts. UA BOR policy P05.10.070B states that fees are supposed to relate to actual costs incurred. Since the services differ at each campus, fees will naturally be different. Under single or separate accreditation, flexibility on fees among the campuses would be useful to meet local needs.

## Travel

Policies and procedures are set by the system and implemented at the institution level. The missions and campus locations of UAA, UAF, and UAS distinguish their needs for travel. For example, most of UAA's campuses are within driving distance of the Anchorage campus and they do not have widely dispersed research facilities. UAF accounts for a disproportionate amount of all travel because they have a statewide outreach mission (Cooperative Extension Service and Marine Advisory Program), have widely dispersed campuses not located on a road system, and UAF researchers travel to field stations in remote places like Antarctica and the Arctic Ocean and international conferences in fulfilling UAF's research mission. UAS campuses are not located on a road system and they do not have widely dispersed research facilities. Centralizing travel under separate accreditation could be disruptive to the institutions' distinct missions. Under single accreditation the role of research by the various campuses, in particular, would be an important factor in deciding how best to administer and manage travel.

## Procurement

Commission accreditation standards do not address procurement or how it should be organized. UAA and UAF have their own procurement units and UAF procurement handles purchasing for UA Statewide. UAS makes their own purchases but works with UAF on large purchases. This arrangement could continue under single or separate accreditation. Alternatively, procurement could be centralized or a shared service model could be implemented under single or separate accreditation. Several university systems with separately accredited institutions have established centralized or shared procurement units. The **University of Maine** system has a shared system-wide procurement service. The organization consists of three functional units: Procurement Operations, Procurement Services, and Strategic Sourcing with staff located throughout the state to ensure an

effective campus-based presence. **Montana State University** Procurement Services is responsible for all procurement activities of the university including developing and providing training on purchasing procedures to all MSU campuses and departments. The Director of Procurement at MSU-Bozeman is the University's procurement official. The **South Dakota Unified System of Higher Education** has established accounts payable shared services and purchasing shared services for all of its institutions. Shared services provide campus-based staff who know local vendors, and help with pro-card issues. UA institution concerns about centralization are lack of knowledge of local vendors and slow response times, and cumbersome processes.

Two negative examples were cited when discussing the potential to centralize some UA administrative service functions. First, many commented on the statewide implementation of the Travel Expense Management System (TEMS) to move to a paperless approach with greater accountability. Many found TEMS to be cumbersome and a failed system. Second, some commented that the implementation of the SEQUOIA cash register data management system used to manage sales and inventory was similarly cumbersome and lacked local problem resolution support.

### Auxiliary Services

UAA, UAF, and UAS each have a different array of auxiliary services and enterprises (2.D.6). For example, UAA has a self-sufficient in-house bookstore operation, UAF has outsourced its bookstore, and UAS does not have a bookstore. Similarly, the three institutions have arranged food services in different ways. There has not been a problem with such activities being campus based and that can be expected to remain the case under single accreditation. UAA and UAF charge the auxiliaries (residence life, dining, bookstore) a general administration recovery fee to help pay for some of the administrative services functions that support the auxiliaries. Under separate accreditation the UA System could have centralized auxiliary administration but understanding local customer needs and the availability of vendors would be critical. Efficiencies may be realized through centralization but boots on the ground are needed to ensure things are working well. As a single institution UA would have to define the financial relationship between its general operations and its auxiliary enterprises, including any use of general operations funds to support auxiliary enterprises or the use of funds from auxiliary services to support general operations (2.F.6).

### Audits

Financial audits are currently completed for UA as a system with information summarized for each institution (2.F.7). Under single accreditation there would be no accreditation need to summarize audit information for each institution.

## Standard 2.G – Physical and Technological Infrastructure

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The accreditation standards (2.G.3) require that the institutional master plan is consistent with the mission, core themes, and long-range educational and financial plans. Under single accreditation the mission and core themes would be quite broad. UA BOR policy requires campus master plans including all community campuses of UAA, UAF, and UAS and that is what has been implemented. These master plans have been accepted in Commission evaluations and would likely continue to be under single accreditation.

## Technological Infrastructure

UA Statewide has a chief information officer who also serves as the chief information officer for UAF; UAA and UAS each have a chief information officer. Separately accredited institutions, e.g., **Idaho, North and South Dakota and Montana** systems, consistently have their own chief information officers and single accredited multi-campus institutions, **University of Washington** and **Pennsylvania State University**, tend to have chief information officers at each major campus. The accreditation standards do not require any particular organizational structure or campus leadership in IT so centralization, shared services, expertise centers, or other organizational systems could be implemented under single or separate accreditation.

Technological infrastructure planning currently is addressed at both the individual institution level and across the system because of common systems so little change would be needed here if single accreditation is pursued.

### 3.A – Institutional Planning

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Under separate accreditation UAA, UAF, and UAS have established comprehensive planning processes (3.A.1) informed by data used to evaluate mission fulfillment (3.A.3) and input from appropriate constituencies (3.A.2). Their planning includes emergency preparedness and contingency planning for continuity and recovery of operations should catastrophic events interrupt normal institutional operations (3.A.5). New institution wide processes would have to be adopted and implemented under single accreditation.

### 3.B – Core Theme Planning

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A single accredited institution will have to define new core themes and objectives as noted in standard 1.B above. Core theme planning must ensure the selection of programs and services are aligned with and contribute to accomplishment of the objectives (3.B.1) and are informed by the collection of data that are analyzed and used to evaluate accomplishment of objectives (3.B.3).

### 4.A – Assessment

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UAA, UAF, and UAS collect and analyze data appropriate to their indicators of achievement to evaluate accomplishment of their core theme objectives (4.A.1). A new merged institution would have to define indicators of achievement as noted in Standard 1.B above and use data to evaluate core theme accomplishment.

The three institutions have different student learning outcomes assessment processes aligned with their missions and core themes as noted in Standard 2.C above. Under single accreditation new processes would have to be adopted and implemented to document, through a system of assessment of student achievement (by faculty with teaching responsibilities), that students who complete its educational courses, programs, and degrees, wherever offered and however delivered, achieve identified course, program, and degree learning outcomes (4.A.3) and that assessment processes are regularly reviewed and updated.

### 4.B – Improvement

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Under single accreditation the new institution would have to use the results of core theme assessments, results of assessments of programs and services, and results of its assessment of



student learning to inform planning, decision making, and resource allocation and make that information available to appropriate constituencies (4.B.1 and 4.B.2).

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### 5.A – Mission Fulfillment

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Based on a new definition of mission fulfillment, a new merged institution would have to engage in a participatory, self-reflective, and evidence-based assessment of its accomplishments (5.A.1) and demonstrate that it uses assessment results to make determinations of quality, effectiveness, and mission fulfillment and communicate its conclusions to appropriate constituencies and the public (5.A.2).

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### 5.B – Adaptation and Sustainability

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After establishing a new mission statement, a new merged institution would have to evaluate regularly the adequacy of its resources, capacity, and effectiveness of operations to document its ongoing potential to fulfill its mission, accomplish its core theme objectives, and achieve the intended outcomes of its programs and services, wherever offered and however delivered (5.B.1) and use the results of its evaluation to make changes, as necessary, for improvement (5.B.2).

Additionally, a new merged institution would have to monitor its internal and external environments to identify current and emerging patterns or trends and use those findings to assess its strategic position, define its future direction, and review and revise, as necessary, its mission, core themes, objectives, or intended outcomes of its programs and services, and indicators of achievement (5.B.3).

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## Development, Alumni Relations, University Relations

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### Development

The University of Alaska Foundation serves as the entity to develop and manage private gifts made to support the three universities and all their campuses of the UA System (2.F.8). Many systems have separate foundations for each of their institutions, e.g., **Montana State University System** and the **South Dakota Unified System of Higher Education**. Each of the separately accredited UA institutions has a development unit with distinct reporting and organizational structures. The current proposal to centralize leadership for development at the Foundation is possible under single or separate accreditation. Since UA announced that single accreditation was being explored, regional donors have asked local development officers if single accreditation might impact where and how their donations are used. In each case they sought and received confirmation that their donations would be used locally.

Corporate donors such as ConocoPhillips and the Rasmuson Foundation would likely prefer dealing with requests from a single institution rather than those of three separate institutions — and sometimes multiple entities from those institutions. However, there is no guarantee that uncoordinated requests to these donors would not continue to occur under single accreditation; faculty, staff, and administrators are often passionate about what they are trying to accomplish.

### Alumni Relations

Alumni typically identify with the branding of the campus they attended and prefer to donate to that campus. UAA has 51,015 living alumni, UAF 33,904, and UAS 7,799 based on the most recent UA

Foundation Constituent Inventory Report. UAA has alumni chapters located across the state and nation, e.g., UAA has chapters in Juneau, Chicago, Washington D.C., Houston, and the Pacific Northwest. UAF has chapters in Fairbanks and southcentral Alaska, and affiliation chapters (e.g., firefighters, process technology, and hockey). Similarly, event and sport team sponsors and many donors prefer to give to the local campus. Under single accreditation, the new UA would have to decide if there would be a single alumni association or one for each campus.

### Marketing, Branding, and Reputation Building

Under separate accreditation, UAA, UAF, and UAS have invested time and resources in branding and reputation building to aid student and faculty recruitment and generate donor, sponsor, and public advocacy support. Each major campus could maintain its own brand under single accreditation like the Tacoma and Bothell campuses of the **University of Washington**, or a single UA branding could be adopted and implemented for the new merged institution. Rebranding would be expensive and faculty, staff, students, administrators, alumni, and local donors and sponsors would feel a sense of loss. Faculty, staff, and alumni would likely speak out openly against a single brand. It would likely take many years to achieve full acceptance of the new UA single institution brand. The Alaskan independent spirit is reflected in branding of units and subunits of each institution, and each institution has been working — and making progress — at overcoming silos of branding. A lot of money is being spent to maintain separate brands. Moving to a new UA brand would be very challenging.

### University Relations

Regardless of single or separate accreditation, both internal and external communication at the system level and local level are needed because, for example, communication about local events and achievements, issues management, local crisis communications, and middle and lower level leadership changes are not warranted at the system level but are important to the local level. Similarly, working relationships with groups within the communities served such as the chamber of commerce, rotary clubs, local newspapers, school districts, community partners, and community advisory councils are important to the universities' role in their respective communities. Thus, no changes or cost savings are likely in this area.

### Community Campuses

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UA's collection of community campuses play an important role in higher education access in Alaska. These campuses are commonly a major cultural element of the towns and villages they serve. They provide local workforce development programs, local interest coursework, a bridge to baccalaureate and graduate programs, and in some cases a limited suite of baccalaureate and graduate degrees. They also connect UA to many of the school districts across the state.

In 1987 UA's separately accredited community colleges were merged with the three universities as a cost savings measure. Administrative, student service, and academic functions were centralized at the three institutions. This merger resulted in a major broadening of the mission of the three universities to include the community college mission. It also resulted in loss of self-governance for the community campuses and their unique missions. The 2015 merger of Prince William Sound Community College with UAA resulted in Alaska having no separately accredited public community colleges. In **South Dakota**, as in Alaska, the community college mission is subsumed within the state universities and there are no public community colleges. (There are postsecondary institutes

administered by local school districts that offer AAS programs.) **Montana** has three separately accredited community colleges and the University of Montana and Montana State University deliver community college and vocational-technical programs as well. **North Dakota, Idaho, and Wyoming** each have separately accredited community colleges.

Whether UA is accredited as one institution or three, and whether or not community campuses are separately accredited, does not by itself control IPEDS reporting and how that impacts national rankings. Currently UAA, UAF, and UAS are represented as four-year institutions in national rankings and the US Department of Education's College Scorecard (<https://collegescorecard.ed.gov/>) through UA's data submissions to the US Department of Education's Integrated Postsecondary Education Data System (IPEDS). IPEDS reporting is required for each institution that has a program participation agreement (PPAs) as a Title IV participating institution with the US Department of Education. Separately accredited institutions must have separate PPAs, but institutions like **Penn State** or the **University of Washington** with a single institutional accreditation and a number of branch campuses can have more than one PPA, for every unit that meets the US Department of Education definition of a branch campus. Currently UAA, UAF, and UAS administer the financial aid programs for their respective community campuses and aid to students falls under their umbrella PPAs, which allows financial aid to be granted to the students at community campus locations. This arrangement (and not the institutional accreditation per se) results in IPEDS data not being reported separately for community campuses, and this negatively impacts national rankings and the College Scorecard for some UA institutions. While separate PPAs for branch campuses could allow (and require) separate IPEDS reporting, the added costs of separate financial aid administration and unintended consequences (e.g., reporting of higher student loan default rates for some UA subunits) could outweigh any benefits. Under single or separate accreditation, the community campuses could continue to report to the three institutions as they do now or a different reporting structure could be implemented. For example, large campuses or some collection of campuses could be made colleges like **Pennsylvania State University's** Behrend College (Erie Campus) or University College (14 campuses) reporting to one of the separately accredited institutions or to a single UA institution. This is effectively how the community campuses are treated now by UAA and UAF; UAS has implemented a more integrated approach. The role of community campuses could be weakened or strengthened under single accreditation depending on the reporting structure implemented. Under separate accreditation the community campuses could be reassigned to one or more of the institutions or could form a new separately accredited institution; the latter would likely result in additional administration and cost.

If the community campuses were assigned to one of the existing institutions or separately accredited this would result in greater mission distinction among the institutions but this realignment could have negative political and legislative funding impacts. The more UA represents itself as one institution the more it can control higher education funding allocations across the state.

In addition, if the community campuses are separately accredited, clear articulation agreements would need to be established to avoid academic drift and credit transfer issues. A clear positive impact of the 1987 merger is that community campus to UA baccalaureate program course transfer problems have been reduced.

Structural changes in community campus reporting would require substantive change requests to the Commission and UA BOR approvals related to UA BOR policy 10.02.

## Research

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Research and creative activity are part of the tripartite duties of faculty at all universities and these activities are fundamental to UAA, UAF, and UAS. Faculty initial appointment and annual, promotion, and tenure evaluations are based on a combined assessment of teaching, research, and service for tripartite faculty. Graduate programs and student funding through research and teaching assistantships are intimately tied to research and creative activity and there is a national trend to make research integral to undergraduate programs as well. It is vital that the important relationship between research and teaching not be negatively impacted in any restructuring effort.

Externally funded research brings significant revenues to the state. The 2015 UA in Review lists FY14 non-general fund research revenue for UAA, UAF, and UAS as about \$10 million, \$102 million, and \$1 million, respectively. UAF, a Carnegie classified R2 institution, has annual research expenditures higher than 20 Carnegie classified R1 universities, including (in FY14) George Mason University, Northeastern, Rice, and the University of Oregon.

Externally funded research is administered by UAA, UAF, and UAS as follows:

- UAA has a vice provost administering research, an Office of Sponsored Programs, a Research Integrity and Compliance Office, a Technology Commercialization and Intellectual Property Office, and a collection of institutes and centers conducting research (see University Regulation 10.02.040 for a complete listing).
- UAF has a vice chancellor administering research, an Office of Intellectual Property and Commercialization, a Research Integrity Office, a Grants and Contracts Office, and a collection of institutes and centers conducting research (see University Regulation 10.02.040 for a complete listing). Externally funded research is also distributed throughout academic units (colleges and schools) that are not directly associated with research centers.
- UAS research is administered by the Vice Provost for Research and Sponsored programs, who is also the Dean of Arts and Science, and the Alaska Coastal Rainforest Center is their sole organized research unit. UAS works with UAF's Office of Intellectual Property and Commercialization as needed and with UAF's Institutional Animal Care and Use Committee for studies involving animals. UAS has its own Institutional Review Board.

Research administration could remain as it is or it could be centralized at one of the current campuses or at the SW office under either single or separate accreditation. An office of grants and contracts, as a service function, could be centralized. However, it is not clear how much administrative savings would be achieved, since grants and contracts administration is transactional, that is, it increases with the number of grants and contracts administered.

UA Statewide currently takes a portion of the indirect cost recovery (ICR) generated by external research grants from the three universities based on full recovery of their costs of sponsored research administration; 12.8 percent from UAA and UAS and 12 percent from UAF. The institutions recover less than their actual administrative costs, because recovery of those is capped by the federal government. ICR is unrestricted funds, and can be distributed in any way that an institution chooses. For example, the **Montana State University System** allows its institutions to retain 100 percent of ICR for reinvestment into their research programs, but other systems retain varying percentages.

The success of institutional research is partly related to institutional investment in research, although the amount of external research funding secured also depends upon the type of research conducted,

the quality of faculty, and strategic effort. A major challenge for a merged institution under a single accreditation would be maintaining or increasing investment in research when a majority of the new institution may not make research a high priority. UAF, the largest producer of external research revenues, invests in research by returning 50 percent of ICR to the research units. In addition, some general funds are allocated to research, and these yield substantial benefits to the state through practical application of the knowledge generated, such as prediction of the movements of volcanic ash clouds, which can endanger jet aircraft, a developing peony industry, and more affordable energy for remote rural communities. This allocation of general funds also results in a significant return on investment (about 4:1 in FY14 according to UA in Review Table 5.01). This investment has served the university and the state well for decades and should not be revised without a thorough assessment of potential impact.

The three universities and their various units have distinct criteria for promotion and tenure. UAF's unit criteria includes expectations of external grant funding and publications that reflect its mission as a research institution. UAA and UAS have distinct unit criteria based on their missions. Under single accreditation one would expect some compromise on unit criteria for particular disciplines within the institution. That in turn could mean less incentive for faculty to perform at the highest level in research and could negatively impact external funding and national and international recognition.

An unintended consequence of single accreditation is likely to be a downgrading of UAF's current research classification. That downgrading could negatively impact faculty recruiting, the ability to secure certain types of grants and contracts, graduate student recruiting, and philanthropic giving. The Basic Carnegie Classification of Institutions of Higher Education classifies doctoral universities that award at least 20 research/scholarship doctorates (UAA's DNP [Doctor of Nursing Practice] would not be counted here, since professional doctorates of this nature are not included) into one of three categories; R1 or highest research activity, R2 or higher research activity, and R3 moderate research activity. UAF is currently classified as an R2 or higher research activity institution and UAA and UAS are not classified as research universities. Two indices of research activity are used to categorize institutions. One index represents the aggregate level of research activity using expenditures in various research and development categories, postdoctoral staffing, and doctoral degrees awarded. The other index represents per-capita research activity using expenditure and staffing measures divided by the number of full-time faculty.

Under single accreditation, the Carnegie classification of a merged institution would likely fall to R3 or moderate research activity because the divisor, the number of full-time faculty, would be significantly larger in the per-capita index and the numerators accounting research performance would not increase appreciably. Merging to a single institution would drop UAF's per capita metrics by about a factor of two based on the change in the number of faculty.

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## Athletics

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Accreditation as a process has little to say about athletic programs with the exception that admission policies and procedures must be the same for athletes and non-athletes. However, NCAA rules have sport team sponsorships based on separately accredited institutions so a summary of possibilities under separate and single accreditation is provided below. The decision on whether to pursue single accreditation should not be decided based on athletics because academic quality is the purpose of accreditation.

UAA and UAF each have NCAA Division II programs, except for Division I men's hockey at UAA and UAF, and Division I gymnastics at UAA. Division II institutions have to sponsor at least five sports for men and five for women (or four for men and six for women), with two team sports for each gender, and each playing season represented by each gender. (UAF has a spring sport exemption; the only institution with such a waiver). UAA currently has 13 teams: men's and women's basketball, cross country running, in-door track, Nordic and alpine skiing, and outdoor track and field, men's hockey, and women's gymnastics and volleyball. UAF has 10 teams: men's and women's basketball, cross country running, Nordic skiing, and rifle (one team, not two), and men's hockey, and women's swimming and volleyball. UAS does not sponsor athletic teams. Title IX requires financial expenditure equity in addition to NCAA sponsored sport team minimums and more costly programs for one gender may be offset with additional teams for the other gender.

The Alaska State Legislature expressed interest in athletics in the FY2017 operating budget by including the following intent language:

It is the intent of the legislature that the University of Alaska conduct a comprehensive and transparent cost-to-revenue analysis, which does not include student fees or appropriations from the State of Alaska's General Funds as revenue, for all of its intercollegiate athletics programs; furthermore, the university is to report back to the legislature with its findings by the fifteenth day of the 2017 Legislative Session.

The options for athletics programs under separate or single accreditation are described below.

### Separate Accreditation

- Status Quo – UAA and UAF each meet NCAA sports sponsorship requirements and Title IX requirements, resulting in a total of 20 or more teams. Sponsored sports could change resulting in some cost savings; the most expensive sport, hockey, is currently sponsored by both institutions and the teams pay travel stipends to other WCHA teams; no stipends are paid for GNAC participation.
- UAA and/or UAF could request a waiver(s) of the sports sponsorship requirements based on financial hardship. Title IX requirements may not allow for the reduction because the financial expenditure balance may require more women's teams for equity. A plan to get back to the minimum number of sponsored teams would have to be submitted. An institution cannot stay below the minimum indefinitely.
- Form an NCAA Athletic Consortium between UAA and UAF. One NCAA Division II program would be run by one institution's athletics program. The consortium approach is plausible with NCAA and Conference approval. However, a student at either institution must be eligible to play on a shared team; given the distance between UAA and UAF, the solution that allows this would likely be unique and highly creative. It is not clear whether the NCAA, leagues, or conferences would accept such a consortium. Many current athletes are international students and these students are allowed to take a maximum of 3 credits by distance education so this would interfere with a consortium. Consortia are most commonly used by institutions geographically close to one another but there are exceptions, e.g., the shared sailing team of the University of South Florida/University of South Florida-Manatee consortium, which are more than an hour apart by auto – these two are sharing one sport. It is plausible that a consortium could result in some teams located in Fairbanks and some in Anchorage.

- UAA and/or UAF could move from Division II to Division III NCAA athletics programs. Division III programs do not pay student scholarships (a cost savings) and are commonly found at locations with other Division III programs nearby so that transportation costs are reasonable. There are no other Division III programs nearby in Alaska so this option does not appear viable.
- UAA and or UAF could move to all NCAA GNAC sports and still meet NCAA team sponsorship and Title IX equity requirements. No travel subsidies are paid for GNAC participation so athletic program costs would be reduced. Hockey (UAA and UAF), swimming (UAF), rifle (UAF), gymnastics (UAA) and skiing (UAA and UAF) are not GNAC sports. Hockey is the most expensive sport sponsored at UAA and UAF so the cost savings would be substantial. Dropping non-GNAC sports would create a public outcry because of the popularity of the teams involved and this option is not favored by the athletic directors.
- Do not participate in NCAA sports
  - Maintain some sports but participate in non-NCAA competitions. Cost savings would come from participation in fewer sports because NCAA minimum sport sponsorships would no longer apply. For example, Alaska Pacific University has a ski team and Brigham Young University has a semi-pro soccer team that are not NCAA associated; they compete nationally and internationally. The best skiers from UAA and UAF already compete in non-NCAA national competitions and sometimes international competitions. Hockey could move to professional or semi-pro status like the Anchorage ACES. These pro teams are not subject to NCAA or Title IX requirements. Title IX requirements could change in this regard because the university is still sponsoring the team. Alternatively, UAA and/or UAF could participate in sports through club teams, like UAF's Alaska Nanook Women's Hockey Club, which competes in the American Collegiate Hockey Association. The institutions are not interested in the pro team approach and would likely not pursue it because of other teams in their regions, e.g., the ACES and Ice Dogs. Another option is participation in National Association of Intercollegiate Athletics, which requires four or more sports to belong to a league; our institutions would likely have to cover travel costs for visiting institutions. The usual trend is for institutions to leave NAIA and move to NCAA not the other way around as suggested here.
  - No sports teams at UAA and/or UAF. A hybrid model where one institution maintains a full complement of NCAA teams while the other keeps only non-NCAA teams. For example, UAA keeps 10 teams, no hockey, and UAF has a pro or semi pro hockey team and a ski training program that competes on national and international circuits.

### Single Accreditation

- As a new single institution UA would meet NCAA sports sponsorship requirements and Title IX requirements of 10 or more teams, with some teams based in Anchorage and some located in Fairbanks. There would be no requirement to have players from Fairbanks and Anchorage as in the athletic consortium; an athletic consortium is not appropriate for a single institution. The NCAA may not approve this approach because they may see this as a forced consortium — physical location is important to their consideration.
- Do not participate in NCAA sports. (See the same two options described above under separate accreditation).

Commission accreditation standard 2.D.13 includes the requirement that “admission requirements and procedures, academic standards, degree requirements, and financial aid awards for students participating in co-curricular programs are consistent with those for other students.” UAA and UAF admission requirements currently differ and these differences sometimes impact an athlete’s enrollment at one institution or the other. Under single accreditation, a single set of admission requirements would have to be adopted and implemented.

Basketball is pervasive across Alaska and part of our culture; every village and town has a basketball program. Regionally, hockey and rifle have a huge following in Fairbanks and the rifle program has endowed almost all of its scholarships; it is hard to imagine those sports going away. UAA and UAF each have booster clubs and have invested time, resources and branding in their programs, as well as securing sponsors related to their NCAA teams. It is difficult to picture UAA’s athletic program supporters cheering for a singly accredited UA team located at Fairbanks or vice versa anytime soon. Reductions in athletic teams at either or both institutions will create a significant public outcry and are likely to negatively impact donor support for the university for an extended period of time.

Very few athletics programs at public institutions are self-supporting and most of those are at large institutions with football programs. Even among Division I athletic programs only about 10 percent are self-supporting (Berkowitz, S. et. al. July 1, 2013 *USA Today*). The NCAA® Revenues / Expenses Division II Report 2004 – 2014 compiled by Daniel L. Fulks provides a useful summary of the trends in athletic program revenues and costs. The following conclusions are paraphrased from that report:

- Generated revenues, which are an indication of the extent to which athletics programs provide their own support, fell from 9 percent to 7.5 percent between 2004 and 2014 for institutions (without football), implying that institutions are providing the remainder of support in the form of allocated revenues;
- Total athletics expenditures as a percentage of the total institutional budget have ranged from about 4 percent to 6.2 percent for institutions (without football). This rate of increase in total expenditures has been comparable to the rate of increase of the total institutional budget.
- Coaches’ salaries (without football) are highest in men’s ice hockey, followed by men’s basketball. Gymnastics, water polo, and basketball are highest among women’s sports.
- Cash contributions (36 percent), royalties/advertising/sponsorships (10 percent), ticket sales (10 percent), and miscellaneous (9 percent) provide the preponderance of generated revenues, but the four combined provide only 7 percent of total revenues.
- Grants-in-aid (34 percent) and salaries (30 percent) make up the majority of overall expenses.

Universities nationwide have invested in athletic teams, in part, because of identity, branding, and student recruitment. Some universities, e.g., **Montana State Billings**, have increased enrollment and tuition income by selectively growing the number of sport teams. In Alaska, international student recruitment is positively impacted by athletics and international athletes share their experiences with classmates, broadening the experience of all our students.



## Appendix A

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## Appendix B

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### Consultations

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Philip Ballinger, Associate Vice Provost for Enrollment Management, University of Washington  
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 Monte Kramer, System Vice President of Finance and Administration, South Dakota Board of Regents  
 Jane Lawler, Senior Manager, Accreditation Services, Middle East, Africa and USA Western Region, AACSB  
 Christopher Mathias, Chief Academic Officer for Higher Education, Idaho State Board of Education  
 Terrence MacTaggart, previous Chancellor, Minnesota State University System and the University of Maine System; consultant to the Association of Governing Boards  
 John Orr, Chair, ABET Engineering Accreditation Committee  
 Elizabeth Capaldi Phillips, Scholar in residence, American Council of Trustees and Alumni; previous provost, Arizona State University  
 Michael Poliakoff, President, American Council of Trustees and Alumni  
 Leslie Schmidt, Assistant Vice President for Research and Economic Development, Montana State University  
 Rebecca Wyke, Vice Chancellor for Administration and Finance, University of Maine System

#### UA Statewide

Jim Johnsen, President  
 Gwen Gruenig, Associate Vice President for Institutional Research and Analysis  
 Mike Hostina, General Counsel  
 Karl Kowalski, Chief Information Technology Officer  
 Saichi Oba, Associate Vice President of Student and Enrollment Services  
 Mike O'Brien, Associate General Counsel  
 Megan Riebe, Associate Vice President of Development & Interim President, UA Foundation  
 Dan White, Vice President for Academic Affairs and Research

#### University of Alaska Anchorage

Tom Case, Chancellor  
 Renée Carter-Chapman, Senior Vice Provost for Institutional Effectiveness, Engagement, and Academic Support  
 Sam Gingerich, Vice Chancellor for Academic Affairs and Provost  
 Keith Hackett, Athletic Director  
 Megan Olson, Vice Chancellor for University Advancement  
 Bruce Schultz, Vice Chancellor for Student Affairs  
 Bill Spindle, Vice Chancellor for Administrative Services

#### University of Alaska Fairbanks

Mike Powers, Interim Chancellor  
 Kari Burrell, Vice Chancellor for Administrative Services  
 Faye Gallant, Staff Alliance President  
 Gary Gray, Athletic Director  
 Susan Henrichs, Vice Chancellor for Academic Affairs and Provost  
 Karen Jensen, Collection Development Officer, Rasmuson Library  
 Evon Peter, Vice Chancellor for Rural, Community, and Native Education  
 Kate Ripley, Alumni Relations Director & Executive Director of the UAF Alumni Association  
 Mike Sfraga, Vice Chancellor for Students

**University of Alaska Southeast**

Rick Caulfield, Chancellor

Karen Carey, Provost (New)

Michael Ciri, Vice Chancellor of Administrative Services

Lynne Johnson, Director of Development and Alumni Relations

Joe Nelson, Vice Chancellor of Enrollment Management and Student Affairs

Priscilla Schulte, Former Interim Provost

## Appendix C

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### NWCCU Substantive Change Policy

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#### SUBSTANTIVE CHANGE

The Northwest Commission on Colleges and Universities monitors proposed changes whenever an accredited or candidate institution plans a substantive change in its mission and core themes, scope, ownership or control, area served, or other significant matters.

**Introduction.** Accreditation or candidacy for accreditation of an institution applies to those units, programs, and other institutional activities which were included in the institutional self-evaluation report and were reviewed by an evaluation committee as required by the Northwest Commission on Colleges and Universities. Insofar as institutions are in a continual process of change, the Commission requires that all institutions be reevaluated periodically. Most changes, such as adding or dropping courses, developing new concentrations that are allied with existing offerings, and changing personnel, are not substantive and therefore are categorized as minor changes. However, a substantive change is of a magnitude to alter an institution's mission, objectives, and supporting core themes; the scope or degree level of its offerings; its autonomy, sponsorship, or the locus of control; its offering of academic programs for credit through contractual relationships with external organizations; its offering of programs for credit outside the NWCCU region; or, its campus locations including a branch campus or the establishment of an additional location apart from the main campus at which the institution offers at least 50 percent of an educational program.

Substantive changes initiated subsequent to the most recent institutional evaluation are not automatically included in the institution's accredited or candidate status. While the decision to make changes is an institutional prerogative and responsibility, the Commission is obligated to monitor the effect of a substantive change on the validity of the institution's accreditation status with the Commission. Substantive changes in candidate or accredited institutions are to be reported to the Commission and approved in advance of implementation. When considering a substantive change, an institution may notify the Commission early in its deliberations with the submission of a completed Application Form prior to the submission of a substantive change proposal. Early notification enables the staff to provide information and advice regarding the effect of the proposed change on the accreditation or candidate status of the institution and the procedures to be followed in seeking approval. *The NWCCU Annual Report survey is not an appropriate vehicle for notifying the Commission of substantive changes.*

**Implementation of Unapproved Changes.** If an institution implements a substantive change without prior written notice or if it proceeds to implement a substantive change denied by the Executive Committee or Commission, the Commission may issue an order for the institution to show cause as to why its accreditation or candidate status should not be terminated.

#### PART A: TYPES OF CHANGES

**Determination of Significance.** The Northwest Commission on Colleges and Universities is concerned primarily with substantive changes and relies upon the staff of the Commission to determine if a proposed substantive change is a *substantive change* or a *minor change*. Careful consideration is necessary in deciding if an institutional change is substantive. Size, complexity, maturity, financial health, and experiences of the institution in effecting significant change are important factors. Usually, it is possible for the President of the Commission to determine whether a change proposed by an institution is a *substantive change* or a *minor change*. If the institution disagrees with the decision of the President regarding the significance of the change, the matter of categorization may be referred to the Executive Committee of the Commission for reconsideration.

**Substantive Changes include, but are not limited to, the following:**

- Changes in institutional mission, objectives, and core themes;
- Changes in legal status, form of control, sponsorship, or ownership of the institution (visit required within six months);
- Adding courses or a degree program at a new degree level not listed for the institution in the NWCCU [Directory](#) (See also \* below);
- Establishment of a branch campus (See \*\* below), (visit required within six months);
- Offering courses/program(s) for academic credit outside the NWCCU region;
- Entering into a contractual agreement with a regionally accredited or non-regionally accredited organization to provide courses and program(s) for academic credit on behalf of the candidate or accredited institution;
- Offering program(s) for academic credit within the NWCCU region in a legal jurisdiction not previously reported and evaluated;
- Establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an education program (see Follow-up Oversight);
- Adding courses or programs that represent a significant departure from existing offerings of educational programs or method of delivery from those that were previously reported and evaluated;
- Offering 50% or more of program requirements or offering degree-completion of a program by distance delivery; (Requires response to Standards 2.G.5 through 2.G.8 for first time use of a distance delivery infrastructure or for significant departure from a distance delivery infrastructure previously reviewed and evaluated);
- Offering Competency-Based Education Programs (Requires [additional institutional policies and procedures](#) per U.S. Department of Education guidelines. [Common Framework for Defining and Approving Competency-Based Education Programs](#) Located on the NWCCU website);
- Offering programs offered through direct assessment or “hybrid” direct assessment programs where 50% or more of the program can be completed via direct assessment and not previously reported and evaluated. (Requires [additional policies and procedures](#) per U.S. Department of Education guidelines. [Common Framework for Defining and Approving Competency-Based Education Programs](#) Located on the NWCCU website);
- Changes from clock hours to credit hours or vice versa, or a substantial increase or decrease in the length of a program or the number of clock or credit hours awarded for successful completion of a program;
- The acquisition of any other institution or any program or location of another institution;
- The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study;

*\*Program.* A systematic, usually sequential, grouping of courses forming a considerable part, or all, of the requirements for a degree or credential.

*\*\*Branch Campus:* A location of an institution that is geographically apart and independent of the main campus and (1) is permanent in nature; (2) offers at least 50% of the courses of an educational program leading to a degree, certificate, or other educational credential; (3) has its own faculty and administrative organization; and (4) has its own budgetary and hiring authority.

**Minor Changes include, but are not limited to, the following:**

- Offering existing program(s) for academic credit in a legal jurisdiction and location previously reported and evaluated where less than 50% of program requirements are

delivered and with minimal need for additional resources;

- Offering a new degree program in the same level of accreditation and closely related to fields of study previously reported and evaluated;
- Offering a new program on a trial basis or for a limited time, such as a summer session or for a special group.

**Minor Change Notification.** Prior to implementation, institutions notify the Commission in writing of the proposed minor change in a completed application form and a brief document outlining sections

***a. through i.*** of this policy

Commission staff review the notification and determines the nature of change. If the change is judged to be consistent with the institution's existing accreditation, the institution is notified in writing that the proposed change is included under the existing accreditation of the institution. The effective date of the approval of the minor change is the date of the notification letter unless otherwise specified by the Commission. The Commission will establish appropriate follow-up oversight of minor changes.

If the proposed change is determined to be a substantive change, the institution is notified and referred to the appropriate procedure within this policy for processing of a substantive change.

#### **PART B: SUBSTANTIVE CHANGE AND MINOR CHANGE PROCEDURE**

The Accreditation Liaison Officer (ALO) is required to complete the Application Form ([Substantive Change Application Form](#)) found on the NWCCU website) and to send a copy (via [change@nwccu.org](mailto:change@nwccu.org)) to the NWCCU Office with a substantive change proposal.

**Application.** The applications identifies the change as either substantive change or minor change along with the institution's proposed implementation date and the date of institutional governing board approval. The **Application Form** ([Substantive Change Application Form](#)) also prompts Commission staff to share guidance that may assist the institution in facilitating the substantive change process.

**Proposal.** The purpose of a proposal is to enable the institution to set forth the activities constituting the change and the impact expected on the institution as a whole. The Commission requests an electronic version of the **application form** and **proposal** for all substantive changes be sent to [change@nwccu.org](mailto:change@nwccu.org). ***A request for substantive change (not a minor change proposal) will include a hard copy application and proposal which is single-spaced, printed on both sides, and submitted in four unbound copies.*** The Commission staff will review the proposal and request any further information that is needed. Although the scope and depth of information to be provided in the proposal will depend upon the nature of the proposed change, **responses to the following are required:**

- a. Mission and Core Themes:
  1. clear statement of the nature and purposes of the change in the context of institutional mission and core themes;
- b. Authorization:
  1. evidence of formal approval by the governing board and by the appropriate governmental agency to offer the proposed existing and/or new program(s) at the proposed site(s). If the institution is located in, or operates in, a state that has only minimal requirements for chartering, but also a higher level of authorization to grant degrees, approval at the higher level is required;
- c. Educational Offerings:
  1. descriptive information of the educational offering(s);
  2. description of expected student learning outcomes;
  3. description of the plan for student learning outcomes assessment; and

4. evidence of approval by the appropriate academic policy body of the institution;
- d. Planning:
  1. plans and descriptive materials indicating evidence of need for the change, the student clientele to be served;
  2. procedures used in arriving at the decision to change;
  3. organizational arrangements required within the institution to accommodate the change; and
  4. timetable for implementation;
- e. Budget:
  1. projections (revenue and expenditures) for each of the first three years of operation at the program or department level, plus, one year prior to the change at the institutional level;
  2. revenue and expenditures associated with the change itself;
  3. institutional financial support to be reallocated to accommodate the change; and
  4. budgetary and financial implications of the change for the entire institution.

Changes categorized as a **Substantive Change** should include a copy of the institution's most recent IPEDS financial report.

When an institution seeks approval to establish a branch campus or additional location where 50 per cent or more of a program is offered, the proposal must include a thorough response to each of

**e.1 through e.4 above**

to assist in an evaluation of the institution's fiscal and administrative capacity to operate the additional location as required by 34 CFR 602.22(c) and 34 CFR 602.24(a). Revenues and expenditures must include a cash flow analysis.

- f. Student Services: capacity of student services to accommodate the change; and implications of the change for services to the rest of the student body;
- g. Physical Facilities: provision for physical facilities and equipment;
- h. Library and Information Resources: adequacy and availability of library and information resources;
- i. Faculty: analysis of the faculty and staff needed: Educational and professional experience qualifications of the faculty members relative to their individual teaching assignments; and anticipated sources or plans to secure qualified faculty and staff.

**Review of Minor Change Proposal.** If a change is determined to be a minor change, Commission staff review the proposal, establish appropriate follow-up oversight, and notify the institution in writing of the approved minor change. The minor change proposal is then noted as an information item on the agenda for the Executive Committee's next regularly scheduled meeting.

**Review of Substantive Change Proposal.** If a change is determined to be a substantive change, the Commission assigns a Substantive Change Review Panel to review and to take action on the proposal. The Substantive Change Review Panel consists of a current Commissioner serving as Chair and two to four additional members chosen based on knowledge and expertise, regional location, and affiliation with a public or private institution. The composition of the Substantive Change Review Panel is consistent with the Commission's philosophy of peer-evaluation of member institutions.

**Review of the Proposal by the Substantive Change Review Panel.** In order to expedite consideration of a substantive change proposal, the Commission follows these procedures:

1. member and candidate institutions may submit a proposal for a substantive change at any time of the year;
2. following receipt of a substantive change proposal, Commission staff prepare an analysis of the proposal and send the analysis with a copy of the proposal to members of a Substantive Change Review Panel;



3. on behalf of the Commission, the Substantive Change Review Panel considers the impact of the proposed change on existing institutional programs, resources, and services and judges whether it is reasonable to expect that the Commission's accreditation criteria will continue to be met;
4. the Substantive Change Review Panel may take the following actions:
  - a. accept the proposal without conditions;
  - b. accept the proposal with conditions;
  - c. defer action pending the receipt of additional information;
  - d. defer action and refer the proposal to the Executive Committee of the Commission with a recommendation for action at its next regularly scheduled meeting.

The Substantive Change Review Panel communicates its action to the President of the Commission. If the proposal is approved by all members of the Substantive Change Review Panel, the institution is notified in writing to proceed with the change which is noted in the institution's accreditation. The effective date of approval of the change, which is not retroactive, is the date of the notification letter unless otherwise specified by the Commission. In the case of change of ownership, the Commission may designate the date of the change of ownership as the effective date of approval if the accreditation decision was made within 30 days of the change of ownership. The proposal is then noted as an information item on the agenda for the Commission's next regularly scheduled meeting. If one or more of the members of a Substantive Change Review Panel recommend that the proposal be denied, the proposal is put on the agenda of the next regularly scheduled meeting of the Executive Committee for review and action. Also, if the Substantive Change Review Panel recommends deferring action and referring the proposal to the Executive Committee, the proposal is put on the agenda for the next regularly scheduled meeting of the Executive Committee for review and action.

**Review of the Proposal by the Executive Committee.** The Executive Committee meets twice per year. If a substantive change proposal is put on the agenda of an Executive Committee meeting and considered by the Executive Committee acting on behalf of the Commission, one of the following actions will be taken:

1. accept the proposal without conditions;
2. accept the proposal with conditions;
3. deny approval of the proposal;
4. defer action pending the receipt of additional information;
5. defer action and refer the proposal to the Commission at its next regularly scheduled meeting;
6. request that a new Substantive Change Review Panel consider the proposal.

The Executive Committee communicates its action to the President of the Commission. The President notifies the institution's chief executive officer in writing of the action taken by the Executive Committee. If the proposal is approved, follow-up actions, if any, are determined by the nature of the change and any other factors deemed appropriate by the Executive Committee. If the proposal is denied, the reasons for the denial are specified in the written notification within 30 days of closure of the regularly scheduled meeting of the Executive Committee.

**Request for Reconsideration of Executive Committee Action.** If the substantive change is denied by the Executive Committee, the institution may request consideration by the Commission by way of communication in writing within 30 days of the date of notification of the Executive Committee's denial of the change.

**Review of the Proposal by the Commission.** The Commission meets twice per year. If a substantive change proposal is put on the agenda of the next regularly scheduled meeting and considered by the Commission, one of the following actions will be taken:

1. accept the proposal without conditions;
2. accept the proposal with conditions;
3. deny approval of the proposal.

The institution's chief executive officer is notified in writing of the action taken by the Commission and the reasons for the action. If the proposal is approved, follow-up actions, if any, are determined by the nature of the change and any other factors deemed appropriate by the Commission. If the proposal is denied, the reasons for the denial are specified in written notification within 30 days of closure of the regularly scheduled meeting of the Commission. If the proposal is denied approval by the Commission, the Commission's decision is final and cannot be appealed.

**Resubmission of a Proposal.** Institutions may resubmit a substantive change Application Form followed by a significantly revised proposal for a substantive change at least three months beyond the notification date of denial.

#### **PART C: FOLLOW-UP OVERSIGHT**

Following approval of a substantive change, the Commission may conduct follow-up oversight of the change. The nature of the oversight is determined by the nature of the change. Approved substantive change proposals are included under the accreditation of the institution subject to the conditions listed below.

**Accreditation and Candidacy at a New Degree Level.** If approval is given to offer a program at a degree level not previously approved and listed for the institution in the Commission's Directory, the institution is granted *candidacy* at the new degree level while retaining accreditation at the previously approved degree level(s).

*Candidacy.* When an institution is granted candidacy status at a new degree level, it is expected to host an evaluator(s) dedicated to the review of the new degree level at the next scheduled report, with a visit, in the seven-year process of accreditation. The policies and procedures for evaluations as listed on the Commission's website will apply, and the action taken by the Commission following such evaluation will apply to the accreditation of the institution as a whole, not merely to the programs at the new degree level. The effective date of accreditation at the new degree level is September 1 of the academic year immediately preceding the academic year in which the evaluation took place.

**Branch Campus.** U.S. Department of Education regulations require an evaluation visit within six months following approval for the establishment of a branch campus by an institution. (34 CFR 602.24(a) (3))

**Additional Locations.** U.S. Department of Education regulations require an evaluation visit within six months following approval for the establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an educational program. (34 CFR (c)). The Commission must determine if the institution has the fiscal and administrative capacity to operate the additional location. In addition, the Commission will visit within six months, each additional location the institution establishes, if the institution:

- (i) has a total of three or fewer additional locations;
- (ii) has not demonstrated, to the Commission's satisfaction, that it has a proven record of effective educational oversight of additional locations; or
- (iii) has been placed on warning, probation, or show cause by the Commission or is subject to some limitation by the Commission on its accreditation or preaccreditation status;
- (iv) adds a location abroad, regardless of the number of domestic additional locations, unless waived by staff.

The purpose of the visits to additional locations is to verify that the additional location has the personnel, facilities, and resources it claimed to have in its proposal to the Commission for approval of the additional location.

In addition, the Commission will conduct, at reasonable intervals, visits to additional locations of institutions that operate more than three additional locations. When an institution initiates its fourth off-campus site/location, the Commission may, at its discretion, authorize a site visit to review one or more of these additional locations. The Commission, however, may require visits to a representative sample of sites at the third-year interval between scheduled reaffirmations, if (1) the additional sites have been initiated since the last scheduled reaffirmation, and (2) the sites have not been visited.

**Rapid Growth.** The Commission may, at its discretion, conduct visits to additional locations, to ensure that accredited and pre-accredited institutions maintain educational quality when experiencing rapid growth in the number of additional locations. Institutions contemplating rapid growth (or uncertain as to whether planned changes fall under this category) should be in contact with the Commission staff prior to submitting information to the Commission.

**Change of Ownership.** U.S. Department of Education regulations require an evaluation visit within six months following approval for change in legal status, sponsorship, form of control, or ownership of the institution including merger with another institution. (34 CFR 602.24(b))

**Other Substantive Changes.** For all other kinds of substantive changes, the Commission may, as a condition of approval, request follow-up oversight, including the scheduling and conduct of an on-site evaluation. The nature of the change will determine the scope of any follow-up evaluation.

**On-site Evaluations.** The size and composition of the on-site evaluation committee will depend on the nature of the substantive change. The dates for the on-site evaluation are set by Commission staff in consultation with appropriate institutional officials.

**Report.** Prior to the substantive change evaluation visit, the institution will prepare and submit a concise report that assesses the effect of the substantive change. The report need not repeat material submitted in the substantive change proposal but should provide evidence and analysis of:

- a. effects of the change on the total institution;
- b. desirable revisions in the change based on the first year's experience;
- c. new program(s) not previously approved or existing program(s) offered at a new location(s),
  - 1. adequacy of administrative, faculty, financial, library, and facilities support for the program's objectives;
  - 2. evidence of the program's effectiveness;
  - 3. plans for continuing assessment of the effectiveness of the change; and
  - 4. impact of the change on the institution as a whole.

Adopted 1972

Revised 1978, 1994, 1996, 2001, 2002, 2007, 2013, 2016

## Appendix D

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### Expert Letter: Barbara Brittingham

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**NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES  
COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION**

3 Burlington Woods, Suite 100, Burlington, MA 01803-4514  
Voice: (781) 425-7785 Fax: (781) 425-1001 Web: <http://cihe.neasc.org>

TO: Dana Thomas  
FROM: Barbara Brittingham DATE: July 20, 2016  
RE: Alaska public higher education

Below are some thoughts on your interest in possibly combining the three public higher education institutions in Alaska. I have included a brief description of how we are working with the University of Maine System, some Pro's and Con's of combining the institutions vs. maintaining the status quo, and also some questions for your consideration.

**CIHE of NEASC and the University of Maine System.**

Two factors encouraged the University of Maine System to consider "a single accreditation" for what are now seven separately accredited institutions, some of which have branch campuses. (Maine has a separate system of community colleges.) First, Maine is experiencing a decline over about a decade of 20% of its traditional college-age population. Second, Maine is not a wealthy state, some of its traditional industries (i.e., paper and pulp) are in decline, and there is no realistic reason to think that the state will be willing (or perhaps able) to make significantly greater investment in public higher education.

Our Commission met with the System Chancellor, the Board Chair, the System CFO, and two of the campus Presidents at the Commission's June 2015 retreat. The System presented the issues and the option they were considering. They asked for an advisory opinion, a mechanism that the Commission uses to provide feedback to an institution (or in this case a system) that is considering something that has implications for accreditation. The Commission told the Maine System that a "single accreditation" would mean a single institution, and that the best way to think about what that would mean would be to consider the *Standards for Accreditation* (which were in the process of being revised, though not radically) and think about how the combined entity would operate under standards that specify what "the institution" is expected to do.

We have kept an open communication with the system and the campuses, and are working to be helpful to them. I will spend most of a week next month, with the Chancellor, visiting four of the smaller Universities in the system to better understand the challenges and opportunities. These institutions face declining enrollments, but remain important to their local communities. The Chancellor has stated that a "single institution" would not mean closing any of the campuses.

**Separate Accreditations – maintaining the status quo.**

Some pro's:

- You would avoid the disruption – and time and cost – involved in the significant change.

- With respect to accreditation, each institution gets the advantages of doing a candid top-to-bottom self study, and each institution gets the advantage of peer review. Your current Chancellors and chief academic officers could likely assess the advantage here.

#### Some con's

- You'd lose the potential opportunity for improvement that comes with 'shaking things up a bit' – the curriculum review and other alignments that would come with combining the institutions.
- Re: accreditation, it is likely more expensive to have three accreditations than one (though given the additional complexity, perhaps not excessively so).

#### **Single Accreditation – single institution. One University of Alaska**

##### Some Pro's

- There may be an opportunity to institutional 'refreshment' by aligning educational programs and institutional practices.
- To the extent that Alaska can identify and eliminate redundancies, a single institution can save money for re-investment.
- A single accreditation can be used to assess and improve the integration/alignment of the three institutions into one and build involvement in the pursuit of strategic initiatives.

##### Some Con's

- It is timely and perhaps costly to align educational programs and practices that have grown up in three somewhat separate cultures. The time of those involved will, of necessity mean that other priorities are not being pursued.
- Aligning programs and practices may sacrifice legitimate or creative differences.
- Combining institutions could eliminate or reduce mission differentiation which could, for example, reduce rather than maintain or increase the research mission for Alaska public higher education.

#### **Questions to think about if a single accreditation is pursued:**

1. Would the current system office become the office of the CEO of the combined institutions? Or would the flagship CEO become the President of the combined institution, and if so, how do (some/all?) of the functions of the system office become absorbed into the flagship?
2. How would faculty governance work to align and oversee the quality of the academic programs? Would there be a single general education program? (It's difficult enough to review/revise/refresh general education at a single-campus institution. How a combined institution not make this more difficult and perhaps make it easier?
3. Would it be difficult to attract talent to key positions at the non-flagship campuses? Now, folks are hired as Chancellors in your system. What titles would be used, and what authority beyond campus manager would these camps leaders have? Higher education values "autonomy" to a great extent. Would the reduced perception of autonomy have its downsides?

4. Are the opportunities for improvement listed in your paper (high cost per student, low college-going rates, low completion rates, "insufficient number of public teachers are graduating") best addressed by combining the institutions? How would combining the institutions help address these challenges?
5. Are different admissions standards a problem, or is Alaska currently functioning with something like the California plan? If so, should attention be directed less at aligning admissions standards and more on making transfer straightforward and even encouraged?

I hope there is something helpful here.

Best wishes to you and your colleagues. If there is something else I can do, please let me know.

## Appendix D

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### Expert Letter: Dennis Jones

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To: Dana Thomas  
From: Dennis Jones, president emeritus of the National Center for Higher Education Management Systems (NCHEMS)  
Date: July 6, 2016  
Subject: Pros and Cons of a Single Accreditation

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First, a disclaimer: this topic is not one in which I profess to have a lot of knowledge. To ensure that I'm giving you valid comments, I've run this response by Peter Ewell, a colleague at NCHEMS who is a national expert on accreditation. If his schedule permits, I'll rope him into at least part of our conversation tomorrow.

Second, an observation about the Northwest Commission on Colleges and Universities, the body that accredits Alaska institutions: NWCCU is probably the least innovative and flexible of all the regional accrediting bodies. A quick review of their standards reveals a very strong orientation to the centrality of institutional mission as their guiding principle. This poses an immediate problem for you. The UA System is comprised of three very different institutions, each with a distinct mission. Crafting a single mission statement that covers the breadth of the collective of these three institutions is likely to result in a statement so watered down that it will provide no guidance for action. Thus, there is a considerable question as to whether NWCCU would agree to accredit UA as a single entity – ignoring the disincentive associated with losing two dues-paying members. As a final point in this background statement, we would note that there are no precedents of which we're aware for moving from several to one accreditation particularly when the constituent units are very different types of institutions. All of the examples we can think of move in the opposite direction, from a single accreditation for a main campus and branches to separate accreditation for the individual units. As a result, there isn't a body of experience to investigate and draw upon.

Now to my sense of the pros and cons.

#### Pros

1. It would likely save money, but not as much as you might anticipate. You would pay dues for only one institution and undertake a single self-study, not three – although the application for a single accreditation and the increased complexity of the self-study for the combined enterprise would likely mitigate some of the apparent savings. At the same time, site visits (which the institution pays for) would still have to be made to all three sites and the team would consequently be bigger.
2. It would necessarily eliminate articulation and transfer issues for students. As a single institution there would have to be a single set of academic standards. Any behavior that makes it look like UA continues to operate academically as three separate institutions would jeopardize application for a single accreditation.
3. It would force UA to more clearly articulate a concise “promise” of service to Alaska and its citizens. Following this, it could force a reexamination of how the academic assets resident at each site could be deployed to meet the needs in all parts of the state (including on sister

campuses). It would force a careful review of which assets the UA wanted/needed to maintain where.

### Cons

1. When created as a single institution, NWCCU would expect a single set of policies that applies throughout. This is particularly problematic with regard to policies regarding faculty workload and terms of employment. This likely means a lot of pressure from faculty at UAA and UAS to have the same work rules as the research-oriented faculty at UAF. To get around this you'd have to develop a much more complicated faculty classification system, one that reflects very different expectations for different categories of full-time faculty. Sustaining different policies on the three campuses would reinforce the perception that UA really was three distinct places and, therefore, ineligible to be accredited as a single institution. The costs associated with dealing with consolidation of policies could easily outweigh savings of a single accreditation.
2. Success will require substitution of a system culture for campus cultures, a difficult task at best. Getting folks at UAA and UAS to think statewide, not about the regions they've been focused on serving, runs the risk of diminishing some of the special relationships that have been nurtured locally over the years. Maintaining the unique capacities of the three institutions will get harder.
3. The criteria for campus leadership will have to change. Moving from a situation in which leadership was put in place to further the existing institutional mission to a situation in which chancellors are asked to lead their institutions in a different direction may prove difficult. However, if I recall correctly, one of the three Chancellors positions is now being filled by an interim. This provides an opportunity for aligning leadership with new missions in a way that could reduce this difficulty (if handled properly). Even if possible, however, it will be problematic. There have been examples of a single individual serving as President of multiple institutions. These have proven to be untenable, not because of the management difficulties, but because of community backlash. Each community wants "their" president, someone they can count on to participate as a partner in economic development and other civic matters and who will be an advocate with undivided loyalties. Development of ties to the business community, donors, and municipal leaders is heavily dependent on the presence of someone who is clearly the campus leader.



## Appendix D

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### Expert Letter: Terrence MacTaggart

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Terrence MacTaggart is previous Chancellor at the Minnesota State University System and the University of Maine System and consultant to the Association of Governing Boards.

#### Terrence MacTaggart PhD Comments

July 3, 2016

#### Comments on University of Alaska System Restructuring Proposals

##### 1) The Common Student Experience—an idea whose time has come

A common student experience—understood as high quality engagement between every student and the University across the board—is an excellent goal. I know personally that UAF has pursued this idea vigorously, and I am reasonably confident UAA and UAS have as well. Of course, there is more work to be done. Students, like any customer, have a right to expect prompt, accurate, convenient, reliable and courteous service in all their engagements with the University from their initial experience through graduation and as alumni afterwards. A high level of customer service should range from initial counseling and advising, orientation, placement in courses, registration for them, billing, financial aid administration, class scheduling, the class room and laboratory experiences, the quality of life at campuses and learning centers, and the safety and quality of residence halls for residential students.

To be sure, the *purely educational side of the student experience* will differ with the curriculum and the student. An education major will engage in study different from one seeking a degree in electrical engineering. A student fresh from a small town or village will likely need different support than the valedictorian of a major urban high school. The older student returning for career alternatives will seek a different experience than the doctoral student working with a research scientist—though both have careers in mind. The personal transformations of these students that comes about as part of the educational experience may well differ as well. However, all students should report that they received a common, top quality experience in whatever studies they pursue and in all their other interactions with the University in each of its locations.

What can the University System and especially the Regents, President and Chancellors do to ratchet up the level of service to achieve the common high standard? The actual delivery of service will rest in the hands of the thousands of staff and faculty who meet face to face with students as well as those working diligently in the back room. However, the senior leadership can make a difference through strong leadership from the Chancellor's office; effective standardization and centralization of services; setting high expectations for managers and staff; and asking students to evaluate the quality and convenience of the services they receive.

## **2) The Single Accreditation Model—an idea whose time has not yet come**

This intriguing idea is well worth investigating, but in my view its benefits are not achievable at this time. There are far less expensive and less risky ways of achieving some of those benefits much sooner. The first list below itemizes the difficulties to be encountered in seeking a single accreditation now; the second list suggests more practical, immediate alternatives.

### **The costs outweigh the potential benefits**

- What are the tangible benefits to Alaska of a single accreditation? The change is far too disruptive if the chief outcome is modest cost savings of moving from three reviews to one. If the real agenda is to achieve cost savings and better service to students from consolidating and centralizing operations, then pursue that goal and let the accreditation choice come down the road.
- The Northwest Commission on Colleges and Universities would either need to develop a new set of standards to evaluate this new institution (a lengthy, expensive, and probably unattractive option for the Commission) or try to fit the consolidated university into the current standards which are not designed to measure the effectiveness of a complex, hybrid institution.
- As talented as the members of the current central administration are, it is unlikely that it employs or can hire enough staff to adequately prepare for and achieve unqualified approval of the Commission.
- Finally, Alaska would not have a “single” accreditation in any event. The many, many professional program accreditations now in place would need to continue, unless the goal is to have, for example, one business program, one engineering program, one education program and so on for the whole state. Achieving that level of consolidation would be a long term distraction from the main goal of providing high quality professional education to students.

### **There are better alternatives to cost savings and improved service**

- First, remember the “revenue theory of costs” for most nonprofits including universities holds that these entities spend all the money they get (allowing for prudent reserves). Savings come when there is less money to spend. In and of themselves, consolidations, centralizations, single accreditations and the like don’t save any money. Absent cost reductions elsewhere, they often add to total cost. Applying technology and reorganization of processes only lead to less cost if the workforce is reduced.
- Consider consolidations of the administration and academic programs of smaller institutions, and/or tighter ties between the MAUs and the regional campuses. The approach used in Georgia would be worth reviewing. Costs from duplicate administrations may be reduced thereby.

- Achieve cost savings through a more thorough centralization of shared services and so called “back room” operations. Maine’s experience would be instructive. Again, reductions at the campuses must accompany these changes if total costs are to be reduced.
- Mandate a rigorous program review process as outlined by Robert Dickeson in *Prioritizing Academic Programs* (Jossey-Bass, 2010) from a system-wide perspective to ensure that duplicate, low demand—high cost, and low priority programs are reduced or eliminated to free up resources for programs that address top state needs.
- Consider and negotiate early retirement incentive programs to reduce staff voluntarily as a possible alternative to retrenchment.
- Review the job descriptions and responsibilities of chancellors to emphasize their simultaneous roles as both system officers and campus heads. Part of their annual evaluations would rest on their contributions to greater system-wide efficiencies.
- Review former UAF Chancellor Pat O’Rourke’s chapter in my *Restructuring Higher Education: What Works and What Doesn’t in Reorganizing Governing Systems* (Jossey-Bass, 1994) for a personal account of the effects of the last major organizational change in the UA System. O’Rourke sees mostly negative results for the last experience, but he offers valuable lessons to be considered.

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## Appendix E

### Estimated Financial Impact on Libraries

**Estimate of Financial Impact of Single Institutional Accreditation on University of Alaska Libraries**  
**Prepared by Karen Jensen, Collection Development Officer, UAF Rasmuson Library**  
**Friday, July 15, 2016**

#### Background

The UAF Libraries' collections currently serve faculty and students by providing essential physical and electronic information resources for use in teaching, individual study, and research. The goal of this report is to attempt to estimate the potential budget impact on the three libraries' collection expenditures (not including other resources, programs or services, or staffing funded by the libraries,) if the University of Alaska were to change to a single accreditation process, from the current process of accrediting each institution separately.

Note: This report assumes that "single accreditation" would mean a merger of libraries and library budgets, so that all resources are shared across the institution, and accessible to all the libraries' patrons. If that is not the case, and there remain three separate libraries with separate patrons, separate subscriptions, and separate IP ranges, then a change in accreditation status may not affect collection expenditures in any way, since vendors and publishers of library resources generally do not factor accreditation alone into price quotes or charges. The question for library collection purposes, is whether we are a single institution with branches, or three institutions.

It must be noted that at the present time, under separate accreditation processes, all three libraries regularly confer and collaborate on subscriptions whenever it is practical to do so, that is to say, when the resources are of interest and useful to all three libraries' patrons, when it is likely that a better pricing model can be obtained through a shared subscription, and when all libraries have funding available to put toward a consortial license. Our accreditation status has never been considered or questioned in this context of negotiating shared licenses.

#### How library subscriptions work

The UAF Libraries, as with our sister institution libraries, subscribe to a wide variety of information resources, offered by many different for-profit, non-profit, and society publishers and library vendors. Pricing and purchasing for subscriptions or one-time purchases require consideration of all of the following variables:

1. Uniqueness of content, i.e., something not necessarily replaceable with any other product, and therefore having no competing product to consider as an alternative [Note: only rarely there is a competing product worth comparing, since most journals or indexes are one-of-a-kind for their subject and importance]
2. Type of content, including online-only, print+online, print only
3. Pricing or subscription models
  - a. one-time price with no annual fees, perpetual access
  - b. one-time price with annual fees, perpetual access as long as annual fees are paid
  - c. one-time price with annual fees, perpetual access to the paid content but new content requires fees or subscriptions
  - d. annual subscription cost (no perpetual access)
  - e. annual subscription cost (perpetual access)
  - f. annual subscription cost + additional fee for full content

- g. consortium agreement (e.g. Lyrasis, UA, etc.) for annual subscription + full content fee
  - h. subscription paid by another entity (e.g., outside department, special grant, allocation from legislature)
  - i. Statewide (Alaska Library Network) access subscription
  - j. Pay-per-use
  - k. Pay-per-use + auto-purchase
4. Licensing restrictions, including:
- a. ILL permissions
  - b. Perpetual access
  - c. Portico or other long-term preservation
  - d. IP, password, proxy server access
  - e. Patron definition (does it include staff, walk-ins, alumni, etc.)

Most major library vendors do not publish prices, but instead work with each entity to arrive at a mutually agreeable price, based on a number of institutional factors, including but not limited to:

1. Carnegie classification [some vendors continue to use the old classification system, and some use the new one]
2. Student FTE
3. Research output
4. Faculty FTE in department for whom resource is intended
5. Student FTE in department for whom resource is intended
6. Ph.D. candidates in department for whom resource is intended

#### **Getting product prices**

As the above incomplete lists of product and institution variables demonstrate, it is hardly a simple matter to determine the price of any particular resource. Prices can rarely be located on vendor websites, or in published material from vendors. Instead, based on the product desired and the type of institution, price quotes are unpredictable and usually highly negotiable. There is little consistency from vendor to vendor, so it's difficult to predict an answer to the question of what a merged UA might pay for all of the information resources which we now own, or to which we currently subscribe. Should an actual merger occur, quotes would need to be obtained from 100+ vendors, and those prices would then need to be negotiated, one by one. Obtaining "what if" pricing is problematic and extremely time-consuming, due to the complex nature of the process.

One vendor - JSTOR - was queried for this report as to the cost difference if the three institutions were to merge. After some back and forth discussion and 17 days, we received an excel spreadsheet (see the last report page) showing what we are now paying (in yellow) and what we would pay if we were ranked in JSTOR as either a Large, or a Very Large. Because JSTOR uses a complex set of variables to make this determination, we do not know which classification the University of Alaska as a whole would receive. It was also carefully noted in the email reply that this is not quote, just a hypothetical scenario. This would be a typical reply, so total actual costs would not be known until a change actually occurs.

**Sharing content**

Information resource content, including online journals, indexes, abstracting services, databases, and e-books, is licensed to a single particular entity, such as an academic library campus. License restrictions control access, to which the signatory is bound by law. The three campus libraries have all licensed and purchased perpetual content as well as annual subscriptions, sometimes as a group, but often individually, based on the perceived needs of patrons at that campus. For example, some years ago all three campuses purchased perpetual access to the Gale Literature Resource Center, as a group. There would be no change in access to that resource, except that if IP ranges were merged, administration of the database might be centralized, which would not result in any cost savings or likely any additional expenditures to the campuses. Those resources would be zero budgetary impact on the libraries, if a merger occurred.

Other perpetual content, such as the Sabin Americana collection of primary sources, has been purchased separately by UAA and UAF, but not by UAS. In a single accreditation scenario, the libraries would need to approach the vendor for a price quote for including UAS in access to that same resource. There are many examples of these purchases; we all “own” different content, purchased for our own patrons when funding was available. If the three institutions were to share IP ranges, proxy servers, and therefore access to all resources, negotiations over all previously purchased content would be legally required in order to expand access to the additional patrons; additional funds would undoubtedly be required to maintain access. Factoring the exact dollar figure is impossible without having a complete list of all unique purchases, and getting new vendor quotes for all of the products. Based on analyzing a few recent database purchases at UAA and UAS, we might estimate about \$500,000 to get UA-wide access to all of the previously purchased content.

Annual subscriptions also vary widely among the institutions. While all three campuses share licensing for some of the largest vendors, such as Wiley and Elsevier, there are also some two-way licenses, such as IEEE for UAA and UAF, or Springer for UAA and UAS. All three libraries also have subscriptions to unique content not shared with other campuses, because of patron information needs specific to a particular campus. All of these subscription licenses would need to be expanded to cover the entire student body, likely resulting in a huge increase in annual costs. If that were not possible, journal and database access would be lost, with potentially serious consequences to programs and departments.

While impossible to know for certain, based on some of the larger packages and subscriptions at UAA and UAF, we might estimate that expanding access to all campuses for subscription journals might cost between \$800,000 and \$1.5 million annually.

**Individual institution needs**

Many administrators, faculty and students assume that the three MAU libraries would see savings as a result of combining current subscriptions, when in fact that is not likely to be the case, for a variety of reasons. First, each institution presently serves a clientele with significantly different information needs, due to differences in degree programs, different levels of research intensity in different subjects, and different approaches to general education. If the “Strategic Pathways” concept is fully implemented, the three campus libraries will have even more differentiated needs, in order to serve their unique patron bases, and even less overlap than at present.

Under a single accreditation, merged-library model, all campuses would have access to the same resources, forcing the libraries to hold subscriptions to journals or databases needed only at one location.

#### **Increasing costs of library resources and current budget situation**

Much of the UAF libraries' annual collections allocation is dedicated to expensive, on-going database and journal subscriptions in the sciences and engineering. Consortia subscriptions to commercial publishers such as Wiley, Springer, Elsevier, Thomson Reuters, and UAF subscriptions to a number of society publishers such as the American Chemical Society, Royal Society of Chemistry, the American Society of Mechanical Engineers, etc. need to be retained in order to support research programs on campus. It is estimated that these subscriptions comprise about 80% or more of library materials costs.

Library materials costs continue to rise above the rate of inflation, with 5%-11% increases annually. Because funding for additional fixed costs has not increased for a number of years UAF, along with all of the UA libraries, have had to cancel all less-critical products, as well as many badly needed resources. Significant cuts have been made annually for more than five years in a row, and there is nothing "extra" to cut from library materials. A single institutional accreditation process would not simplify library processes, nor would it cost less in information resources; instead it is likely to cost quite a bit more. There may be additional resources on which the three campus libraries could collaborate, but the accreditation issue does not aid in that goal. If such a decision is taken, it is likely that patrons at all three campuses will lose access to significant content.

#### **Summary of library collection costs associated with single accreditation**

Estimated one-time costs to purchase access to owned resources, for all campuses:

\$500,000

Estimated annual costs to expand access to all subscriptions across campuses:

\$800,000 - \$1,500,000

Collection	University of Alaska, Anchorage	University of Alaska, Fairbanks	University of Alaska, Southeast	Total
Arts & Sciences I	\$4,000.00	\$4,000.00	\$2,000.00	\$10,000.00
Arts & Sciences II	\$1,780.00	\$2,000.00	\$1,000.00	\$4,780.00
Arts & Sciences III	\$3,500.00		\$1,300.00	\$4,800.00
Arts & Sciences IV	\$3,300.00	\$3,300.00	\$1,200.00	\$7,800.00
Arts & Sciences IX	\$3,000.00	\$3,000.00		\$6,000.00
Arts & Sciences V	\$3,500.00			\$3,500.00
Arts & Sciences VI	\$3,500.00	\$3,500.00		\$7,000.00
Arts & Sciences VII	\$1,500.00	\$2,100.00	\$500.00	\$4,100.00
Arts & Sciences VIII	\$2,800.00			\$2,800.00
Arts & Sciences X	\$2,500.00			\$2,500.00
Arts & Sciences XI	\$1,800.00			\$1,800.00
Arts & Sciences XII	\$1,650.00			\$1,650.00
Arts & Sciences XIII	\$1,575.00			\$1,575.00
Biological Sciences			\$1,080.00	\$1,080.00
Language & Literature		\$1,050.00		\$1,050.00
Life Sciences		\$6,000.00		\$6,000.00
<b>Grand Total</b>	<b>\$34,405.00</b>	<b>\$24,950.00</b>	<b>\$7,080.00</b>	<b>\$66,435.00</b>

Collection	University of Alaska Complete - Large	University of Alaska Complete - Very Large
Arts & Sciences I	\$6,500	\$8,500
Arts & Sciences II	\$5,000	\$8,000
Arts & Sciences III	\$6,000	\$10,000
Arts & Sciences IV	\$5,000	\$9,500
Arts & Sciences IX	\$6,000	\$10,000
Arts & Sciences V	\$6,000	\$10,000
Arts & Sciences VI	\$2,500	\$4,000
Arts & Sciences VII	\$5,000	\$8,500
Arts & Sciences VIII	\$5,000	\$9,500
Arts & Sciences X	\$4,500	\$7,500
Arts & Sciences XI	\$3,225	\$5,438
Arts & Sciences XII	\$3,075	\$5,213
Arts & Sciences XIII	\$2,925	\$4,950
Biological Sciences	n/a	n/a
Language & Literature	n/a	n/a
Life Sciences	\$9,700	\$15,000.00
<b>Grand Total</b>	<b>\$70,425</b>	<b>\$116,100</b>



## Appendix F

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### Consultant Scope of Work (Purpose and Timeline)

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#### Assessment Plan

June 14, 2016

Assessment of Single Accreditation versus Three Separate Accreditations for the University of Alaska

Conducted by Dana L. Thomas PhD

#### Why is an assessment needed?

UA President Johnsen provided the following statement on the purpose of this assessment:

The University of Alaska is facing the dual pressures of major budget reductions from the state and significant opportunities for improvement in meeting our students' and the states' needs for higher education. In response, the university is examining options for reducing high administrative and academic costs for reallocation into high demand academic programs. A full examination of those options, and their potential benefits and risks, requires an understanding of institutional accreditation and the extent to which alternative approaches to accreditation--e.g., three or one--enables and/or constrains our options for restructuring and, in the end, the university's ability to serve our students and our state more effectively.

Additionally, President Johnsen requested this report because of interest expressed by the UA Board of Regents (UA BOR) and the Alaska State Legislature.

The minutes of the April 2016 UA Board of Regents include the following statement:

The board expressed its support for continued strategic priorities in the areas of deferred maintenance, teacher education, research, engineering, workforce development (e.g. healthcare and maritime), partnerships with industry, eLearning, taking a bold look at organizational structure on how to grow UA's programs and the benefits of one or three universities.

On May 31st, the Alaska State Legislature passed an FY2017 operating budget that included the following intent language:

It is the intent of the legislature that the Board of Regents of the University of Alaska return to the legislature with a specific plan for consolidation that includes specified timelines for anticipated results by the end of the 2016 calendar year; the plan would include, but would not be limited to, the university restructuring to one administrative unit with one accreditation.

#### Charge:

Reporting to UA President Johnsen and in cooperation with members of the three Chancellor's Cabinets, prepare a formal written and authoritative assessment of standards, processes, implications, what is possible and what is not, and the pros & cons of three separate accreditations vs one accreditation according to the following timeline:

June 15 – Submit Detailed Assessment Plan; UA Statewide will Post Plan Online

July 15 – Submit Report

July 15 – August 1 – UA Statewide Posts Report and Solicits Feedback

- I. **June 1 – June 30 Describe the purpose and process of institutional accreditation.** Cite and/or provide reference materials from the Council of Higher Education Accreditation and the Northwest Commission on Colleges and Universities.
- II. **June 1 – June 30 (follow up questions may continue through mid-July) – Consult with the Northwest Commission on Colleges and Universities** to identify the following:
  - a. The collection of possible alternative pathways to change from three separate accreditations to single accreditation;
  - b. The timeline for each of the alternative pathways in item a;
  - c. The NWCCU’s preferred pathway and summarize their logic for such;
  - d. The collection of information required by the NWCCU to review the possible accreditation change; is this a complete self-study process? In what time frame? Or something less complex?
  - e. The implications of single accreditation for UA; Cite accreditation policies, eligibility requirements, and standards as appropriate. Describe examples of things UA:
    - a. Would not be able to do under single accreditation that it can do now as three separately accredited institutions. For example, the accreditation eligibility requirements and standards appear to indicate that a single institutional admission policy would be required. Thus, UA would not be able to have a “research campus” with admission requirements that differ from that of the other campuses (different admission requirements by individual programs, e.g., BS in Biology, or colleges, e.g., Engineering, are feasible but would have to be consistent across campuses).
    - b. Would not be able to do under separate accreditation that it can do single accreditation.
  - f. The minimum scope of authority for CEO(s) under the single accreditation and separate accreditation models. What are the limitations, if any, to centralizing or assigning administrative functions to Statewide or to a single campus, e.g., HR, purchasing, admissions, and research administration, under the separate accreditation model? What are the limitations, if any, to centralizing or assigning academic programs to a single campus?
- III. **June 1 - 30 – Describe the national perspective**
  - a. In consultation with NWCCU, President Johnsen, and Chancellor’s cabinets contact and/or cite national experts on institutional accreditation. When contacting national

experts their opinion of the pros and cons of single accreditation versus separate accreditation.

- b. Briefly describe state university and community college organizations in states similar to Alaska in population size and density and state institution postsecondary enrollment.
- c. Briefly describe accredited institutions with multiple locations and how they are organized, e.g., the Maine System and Penn State University.

**IV. June 1 – July 10 – In cooperation with the Chancellor’s cabinets of the three UA institutions, identify the pros and cons and what is possible and what is not by major administrative area (list subject to change based on feedback).**

- a. Chancellors
- b. University Advancement
- c. Administrative Services
- d. Student Affairs
- e. Academic Affairs
  - i. Impact on Tenure (may be none depending on pathway) and on faculty evaluation, promotion, tenure processes.
  - ii. Assess impact on specialized accreditation
  - iii. Provide examples of how multiple programs at different campuses might be organized
  - iv. Accreditation management under single accreditation
- f. Community Campuses
- g. Research
- h. Athletics
- i. Faculty, Staff, and Student Governance

**V. July 10 – July 15 Complete the report**