Trinity Washington University
Washington, D.C.

Middle States Self-Study 2016

Report on Verification of Compliance
With Accreditation-Relevant Federal Regulations

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Verification of Compliance with Accreditation-Relevant Federal Regulations

The following report provides a review of institutional materials submitted by **Trinity Washington University** to document compliance with accreditation-relevant federal regulations. This report provides verification to the Commission of institutional compliance in the following areas:
1. Student identity verification in distance and correspondence education
2. Transfer of credit policies and articulation agreements
3. Title IV program responsibilities
4. Institutional records of student complaints
5. Required information for students and the public
6. Standing with state and other accrediting agencies
7. Contractual relationships
8. Assignment of credit hours

Student Identity Verification in Distance and Correspondence Education
In accordance with 34 CFR 602.17(g), the Commission must verify that institutions have effective procedures in place to ensure that the students who register in a distance or correspondence education course are the same students who participate in and complete the course, and receive the academic credit.

Institutions must provide the following documentation:

1. Written description of the method(s) used to ensure student identity verification in distance or correspondence education courses. Include information related to the Learning Management System (LMS) and integration with college-wide systems.

Trinity offers five online courses enrolling a total of fewer than 50 students. These courses are part of academic programs for which most courses are on campus in regular classroom settings. At the first point of enrollment, every student provides identifying information including full name, address, date of birth and social security number, transcripts and documents that verify the student's participation in prior educational institutions. Each student attests to the accuracy of the information provided. Trinity maintains this information throughout the student's relationship with Trinity.

Trinity employs Moodle as its learning management platform, and once a student is admitted to the University and is enrolled in a course, he or she is assigned a username and a randomly generated password with instructions as to how to change it to one unique to the student. The student's username is the same for both accessing Moodle and for an institutional student email account.

Trinity's faculty and staff continuously monitor student performance for integrity, including honesty and integrity in the use of all digital platforms and participation in Moodle sessions, hybrid and online courses. Trinity's Policy on Academic Honesty specifically prohibits cyber fraud as one

of numerous examples of cheating that may incur penalties of suspension or dismissal. Trinity's Technology and Telecommunications Policy also specifically prohibits fraudulent use of technology systems and the Office of Technology Services works in cooperation with the Provost and Director of Academic Technologies to ensure constant vigilance of system security.

2. Written procedure(s) regarding the protection of student privacy in the implementation of such methods. Include information related to the Family Education Rights and Privacy Act (FERPA), student record access, and process for resetting student passwords.

Trinity's Policy on Protecting Student Privacy describes applicable law (FERPA) and the University's policies regarding the protection of student information.

Faculty and staff receive regular training on the definitions of protected information and how it is to be handled both within the institution and in response to third-party requests.

Students who need to re-set their passwords may contact the office of Information Technology Services for assistance. At least two forms of identification must be presented, and must include some personally identifying information previously submitted to the University such as the student's date of birth, home address or last four digits of the social security number.

3. Written procedure(s) for notifying students about any projected additional charges associated with student identity verification, such as proctoring fees.

Trinity charges no additional fees for student identity verification.

4. Written procedure(s) indicating the office(s) responsible for the consistent application of student identity verification procedures.

The Office of the Provost, the Office of Enrollment Services, and the Office of Technology Services are responsible for implementation and oversight of the student identity verification procedures and related policies cited previously.

Transfer of Credit Policies and Articulation Agreements

In accordance with 34 CFR 602.24(e), the Commission must confirm that an "institution has transfer of credit policies that: (1) are publicly disclosed in accordance with section 668.43(a)(11); and (2) include a statement of criteria established by the institution regarding the transfer of credit earned at another institution of higher education."

Section 668.43(a)(11) states:

(a) Institutional information that the institution must make readily available to enrolled and prospective students under this subpart includes, but is not limited to-

(11) A description of the transfer of credit policies established by the institution which must include a statement of the institution's current transfer of credit policies that includes, at a minimum—

(i) Any established criteria the institution uses regarding the transfer of credit earned at another institution; and

(ii) A list of institutions with which the institution has established an articulation agreement.

In addition, the Commission must confirm that any articulation agreements with other educational institutions are readily available to current and prospective students.

Institutions must provide the following documentation:

1. Written policies and procedures for making decisions about the transfer of credits earned at other institutions, including all modes of delivery.

   > Trinity's Provost oversees compliance with the institutional policies on the transfer of credit. Advisors in the respective academic units work with the Provost's Office to review transcripts and approve courses for transfer credit. The Policy on Transfer of Credits is available on the website.

2. Public disclosure of the policy for transfer of credit. Document the URL and the catalog location of this information; include other publications, if available.

   > Transfer policy: http://www.trinitydc.edu/transfer-credits-satisfying-degree-requirements/

3. Procedures that indicate the office(s) responsible for the final determination of the acceptance or denial of transfer credit.

   > Deans oversee the initial transcript evaluations in the respective academic units, and the ultimate authority for acceptance of transfer credit resides with the Provost.

4. A published and accessible list of institutions with which the institution has established an articulation agreement. Document the URL and publication location of this information.

   > Trinity has articulation agreements for the RN-BSN program with Montgomery College and the College of Southern Maryland. These agreements are posted in the Nursing section of the Policy on Transfer Credit on the website.

Title IV Program Responsibilities

In accordance with 34 CFR 602.16(a)(1)(x), the Commission must review the institution's record of compliance with its Title IV program responsibilities to determine if that record suggests the institution may not be in compliance with Commission standards and requirements. The Commission is particularly interested in reviewing significant deficiencies and material weaknesses that have been identified and any corrective action plans that have been developed to address those deficiencies and material weaknesses.

Institutions must provide the following documentation:

1. Formal documentation from the U.S. Department of Education regarding the institution's cohort default rate for the three most recent years. Provide the most recent three-year rates supplied by the U.S. Department of Education.

See **Appendix 1: Trinity USDE Cohort Default Rate Letters** Cohort Default Rates: FY12 – 10.6% FY11 – 12.7% FY10 – 14.2% FY09 – 13.1%

2. Reports on compliance from the U.S. Department of Education in regard to the cohort default rate.

None.

3. External audits of federal programs (A-133) for the past three years, if applicable to the institution. Include the complete single audit report (A-133) for the most recent three years as an appendix, even if included in other documentation.

See **Appendix 2: Trinity A-133 Audits for 2012, 2013 and 2014**

4. Relevant correspondence from the U.S. Department of Education, such as program reviews and any actions to limit, suspend, or terminate the institution's eligibility to participate in Title IV. Include institutional responses, if applicable.

> None

5. Financial Responsibility Requirements – documentation of the three most recent years of composite ratios used by the U.S. Department of Education

> These scores are available on the USDE website at
> https://studentaid.ed.gov/sa/about/data-center/school/composite-scores
>
> Additionally, Trinity's audit firm Brown Edwards includes discussion of the Financial Responsibility ratios in its annual financial analyses for Trinity.
>
> **Appendix 3** includes relevant USDE financial ratio pages excerpted from the Brown Edwards financial analyses for Fiscal 2013, 2014 and 2015. Trinity's scores were 3.0, 3.0 and 2.9 respectively.

Institutional Record of Student Complaints

In accordance with 34 CFR 602.16(a)(1)(ix), the Commission must confirm that institutions have effective policies and procedures for tracking and resolving student complaints.

Institutions must provide the following documentation:

1. Written description of the policy and methods used in handling student complaints.

> Trinity maintains a policy on Complaints and Grievances on the website. Students are encouraged to try to resolve complaints directly through discussion with the person responsible for addressing the issue. However, students may also complain formally to deans, vice presidents, provost and president. All senior executives have a practice of asking students to put their complaints in writing via email in order to have clear records and a cogent description of the problem. Trinity's executive team makes every effort to respond immediately to student complaints, to determine what kind of resolution is possible, and to correct situations that give rise to complaints. Not all complaints can be resolved in the student's favor, but Trinity executives make every effort to explain the rationale for final decisions.   The senior executive staff also discusses student complaints and issues related to resolving them on an institution-wide basis.

2. Documentation regarding the record of student complaints over the last five years, including the number, patterns in type of complaints, and their resolution.

3.

From 2010 to 2015 Trinity administrators received 62 student complaints about notable issues in academics, services and discrimination. (*See* **Appendix 4: Complaint Matrix**) 25 of these complaints were from Nursing students, and most of those complaints centered upon requirements for clinical participation, plagiarism accusation, and the required use of ATI predictor materials as part of coursework. 16 of the complaints were from undergraduate students in the College of Arts & Sciences and the majority of these complaints involved disability accommodations and grades. 12 of the complaints were from adult students in the School of Professional Studies and these complaints largely focused on grades and faculty. The remaining complaints were from graduate students in the School of Education and School of Business and Graduate Studies and these complaints centered upon grades, advising and claims of discrimination. In all, 26 complaints were about discrimination, with 16 focused on disability accommodations and 10 concerning race, national origin or age. 7 of the discrimination complaints were also filed with the Office of Civil Rights and 1 was filed with the D.C. Human Rights Commission; none of the outside agencies found discrimination. The balance of the cases involved student concerns about grades and grading policies; plagiarism accusations disputed; arguments about academic requirements or assignments; concerns about faculty dispositions toward students; or billing errors.

4. Written procedures for making modifications and improvements to the institution as a result of information obtained in handling student complaints.

The senior executives responsible for the various departments and programs review complaints routinely and make changes as necessary to ensure that problems are corrected, students receive fair treatment and policies and procedures meet standards for due process and integrity. The senior executive staff together reviews complaints routinely and discusses solutions for any major complaints that require substantial revision. The President and Provost review resolution of major complaints in academic programs, services, finances, safety and other major areas of concern.

Required Information for Students and the Public

In accordance with 34 CFR 602.16(a)(1)(iv), the Commission must confirm that institutions make available to students and the general public fair, accurate and complete information in catalogs, handbooks and other publications regarding the institution's calendar, grading, admissions, academic program requirements, tuition and fees, and refund policies.

In addition, the Commission must verify that institutions collect and post information on their websites concerning student performance in academic programs and their successful completion. Information should also be available regarding student employment after graduation and performance on licensing exams, as appropriate.

Finally, in accordance with 34 CFR 602.23(d), the Commission must verify that institutions provide clear and accurate information in their advertising and recruiting material about their accreditation status with the Middle States Commission on Higher Education.

Institutions must provide the following information:

1. URLs for course catalogs and student handbooks, or the location of any alternative institutional website documenting required disclosures.

> Trinity maintains a robust inventory of all policy statements and handbooks on the Trinity website at: http://www.trinitydc.edu/policies/
>
> The Academic Catalog: http://www.trinitydc.edu/catalog-15-16/

2. As required by Student Right to Know, the URL and supporting documentation for the following items:

    a. graduation and completion rate for the student body disaggregated by gender, ethnicity, and receipt of Pell grants

    b. overall cohort graduation rate

    c. process for withdrawing as a student (Carlota, Cathy and Juanita will create)

    d. cost of attendance (i.e. net tuition calculator)

    e. policies on the refund and return of Title IV funds

    f. names of applicable accrediting agencies

    g. description of facilities and accommodations available for the disabled

    h. policy on enrollment in study abroad

    i. as appropriate, licensure pass rates for the most recent three-years.

> a. and b.: Graduation rates: http://www.trinitydc.edu/policies/2015/09/08/trinity-graduation-and-success-rates/
>
> c. Withdrawing: http://www.trinitydc.edu/catalog-14-15/policies-cas/#I.E
>
> d. Cost of Attendance:
>   Net price calculator: http://www.trinitydc.edu/enrollment/net-price-calculator/
>   Tuition and fees: http://www.trinitydc.edu/enrollment/tuition-and-fees/

e. Refunds: http://www.trinitydc.edu/business/student-refunds\

f. Accreditation: http://www.trinitydc.edu/accreditation/

g. Disabilities Services: http://www.trinitydc.edu/disability/

h. Study Abroad: http://www.trinitydc.edu/career/about-study-abroad/

i. Licensure pass rates:

   Nursing/NCLEX: http://www.trinitydc.edu/nursing-health/nursing-accreditation/

   Teacher Education/Praxis: http://www.trinitydc.edu/catalog-15-16/education-masters/#summary-PassRates-om-Praxis_Exams-Title_II_DATA

   Occupational Therapy/NBCOT: http://www.trinitydc.edu/nursing-health/ota-accreditation/

3. Policies covering satisfactory academic progress (SAP), attendance, and leave of absence (URL and/or catalog location).

Policy on Satisfactory Academic Progress: http://www.trinitydc.edu/policies/satisfactory-academic-progress/

Attendance:

Class attendance is of vital importance, and excessive absences will affect the student's final grade at the discretion of the faculty. Faculty members are expected to take roll regularly. Students receiving financial aid are subject to a federal audit of attendance, and thus attendance-taking is a mandatory responsibility of a faculty member. Students bear the responsibility of properly notifying their instructors in advance of absences. Students are responsible for initiating a meeting with faculty to determine how all work will be completed, and for reviewing the attendance policy for each instructor as listed on the course syllabus. For undergraduates, absence in any course amounting to one-third or more of the class periods may result in a lower grade, including the grade of "F," at the discretion of the faculty member.

Leave of Absence:

With the intention of returning to Trinity, undergraduate students may request a leave of absence from enrollment for up to two years. Graduate students may request to take a leave of absence from enrollment for up to one year. A student taking a leave of absence is not required to apply for readmission as long as she/he returns within this time frame. Requests for a leave should be initially made through the Academic Dean in which the

student is enrolled. If the leave of absence begins in the middle of a semester in which a student is taking classes, the student must first withdraw from all classes in accordance with the policy for course withdrawals. Students on financial aid must have an exit interview with a representative of Enrollment Services before the leave of absence is approved. Students are responsible for all tuition associated with the course registrations and any other fees associated with the college.

4. Written description of the methods used to collect and review information on student outcomes and licensure pass rates.

Trinity collects and reviews student outcomes at the course and program levels in all academic units. The faculty and deans of the units have primary responsibility to review student outcomes, and the CAP committees for the units and the university at-large oversee the formal processes for outcomes assessment. The program reviews included with the Middle States Self-Study illustrate the ways in which programs collect and review information on student outcomes.

Trinity has several processes in place for continuous review of student outcomes and licensure pass rates. Trinity maintains a student record information system (POWERCAMPUS) to store collected student data which the Office of Academic Affairs, Office of Enrollment Services, Enrollment Development, and other relevant offices review and evaluate on a regular basis. These offices analyze the data to assess student outcomes areas such as academic performance, progression toward degree completion, retention, graduation rates, and cohort trends, among others.

In addition, through its University Committee on Academic Policy (UCAP), the Trinity faculty oversees its protocols for academic program review, which include multiple measures to assess student outcomes. UCAP reviews all academic programs on a five-year cycle; programs holding specialized accreditation may undergo even more stringent processes. Trinity uses a variety of direct and indirect methods to collect and analyze information on student outcomes and licensure pass rates; Trinity employs surveys and other data sources to collect information about student and alumni outcomes, as well as demonstrated achievements of graduates.

The programs in the School of Education (EDU) and the School of Nursing and Health Professions (NHP) monitor the state examination and licensure pass rates for all students enrolled in those units. EDU and NHP track student performance on the PRAXIS II and NCLEX and NBCOT report outcomes on the university website.

5. Documents and URLs for advertising and recruitment materials that are available to current and prospective students that show the accreditation status with the Commission and any other U.S. Department of Education approved agencies.

> See Trinity website generally at www.trinitydc.edu and the accreditation page
> www.trinitydc.edu/accreditation

Standing with State and other Accrediting Agencies

In accordance with 34 CFR 602.28, the Commission must verify that an institution is properly authorized or licensed to operate and is in good standing with each state in which it is authorized or licensed to operate. In addition, if the institution has status with a specialized, programmatic, or institutional accrediting agency recognized by the U.S. Department of Education, the Commission must verify that the institution is in good standing with the agency or agencies.

Institutions must provide the following documentation:

1. Written documentation about the relationships with any specialized, programmatic, or institutional accrediting agencies recognized by the U.S. Department of Education and all governing or coordinating bodies in the state(s) and countries in which the institution has a presence.

> See list of accreditations and licensure relationships here:
> http://www.trinitydc.edu/accreditation/

2. Written documentation regarding any review resulting in a non-compliance action determined by the accrediting agency, state, or country within the past five years.

> Due to the NCLEX pass rate, Nursing has conditional approval from the D.C. Board of Nursing, see http://www.trinitydc.edu/nursing-health/nursing-accreditation/

Contractual Relationships

In accordance with 34 CFR 602.22(a)(2)(vii), the Commission is required to review any contractual arrangements an institution enters into with an organization that is not certified to participate in the Title IV, HEOA programs and offers more than 25 percent of one or more of the accredited institution's educational programs.

As institutions seek to improve the ways in which they provide education to their students, they may find it more practical or efficient to contract with other institutions or organizations to provide certain components of the educational experience. Any institution accredited by the Middle States Commission on Higher Education is held responsible for all activities carried out under the institution's name. *Institutions must provide the following documentation:*

1. List of contractual arrangements for education services.

   > Trinity has contractual relationships for School of Education programs with:
   >
   > New Leaders for New Schools
   >
   > Center for Inspired Teaching
   >
   > Barrie School
   >
   > Trinity also has clinical affiliation relationships with a number of institutions for Nursing, Occupational Therapy and Education programs. The complete list of clinical affiliations is available in the Middle States Document Room Compliance Documents (password = **trinityweb**)

2. Written documentation such as policies and procedures or excerpts from contracts specifying that the institution is responsible for all required segments of the educational service.

   > All Trinity contracts for partnership services and clinical affiliation agreements spell out Trinity's responsibility to maintain academic control over the academic components of the program. See the contracts at: http://www.trinitydc.edu/2014-2016-ss-compliance-documents/

Assignment of Credit Hours

In accordance with 34 CFR 602.24(f), the Commission "must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours." Specifically, the Commission must review the institution's policies and procedures for determining the credit hours awarded as well as the application of the institution's policies and procedures to its programs and coursework, and make a "reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education."

The U.S. Department of Education defines "credit hour" as:

". . .an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than:

> *(1) One hour of classroom or direct faculty instruction and a minimum of two hours out-of-class student work for approximately 15 weeks for one semester or trimester hour of credit, or 10 to 12 weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or,*
>
> *(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours."*

Institutions must provide the follow documentation:

1. Written policies and procedures for credit hour assignment covering all types of courses, disciplines, programs, degree levels, formats, and modalities of instruction. Include each policy that documents the assignment of credit hours specific to the types noted above. Specify the location of the policy in the catalog and website. The following should be clearly indicated:

   o Academic period (e.g.,15 weeks plus one week exam over two semesters)

   o Recommended instructional time (e.g., three 50-minute sessions or two 75-minute session per week)

   o Recommended out-of-class time requirements (e.g., twice in-class time)

   > Trinity's Credit Hour Policy is available on the website. This policy statement covers all forms of instruction in all academic units and all degree levels.

2. Evidence that the institution's credit hour policies and procedures are applied consistently across the full range of institutional offerings. If the institution is required to obtain

approval from the relevant State Department of Education, compliance with this requirement should be documented. Other evidence must include:

- o documentation from recent academic program reviews

- o new course or program approvals

- o documentation for registration software/systems that ensure a consistent schedule of courses based on the credit hour assignment

- o academic calendars and/or schedules, and course matrices

- o documentation of adherence to credit hour requirements, consistent with federal regulations, from a system, or disciplinary organization; etc.

Assignment of credit hours to courses and degree programs are available for public view in the Academic Catalog: http://www.trinitydc.edu/catalog-15-16/ and in Self-Service: https://selfservice.trinitydc.edu/SelfService/Home.aspx

Assignment of credit hours: At Trinity, the Office of the Provost, the University-Wide Curriculum and Academic Policy Committee (UCAP), the local Curriculum and Academic Policy Committees in each academic unit, and disciplinary program chairs oversee assignment of credit hours to degree programs and individual courses. The local CAP committees, in collaboration with faculty and deans, review and approve course proposals and syllabi in the general education and specialized accreditation curricula; UCAP reviews all cross-unit programmatic course offerings; disciplinary program chairs review proposals and syllabi for major courses. All courses and programs are subject to final review in the Provost's office, where the ultimate responsibility for assuring integrity of credit hour assignment resides.

At each level of review, academic representatives ascertain that credit hour requirements conform to industry standards and are being met in a particular course or degree program. Trinity requires that all syllabi note the number of credit hours required for the course and that all degree programs clearly state the number of credit hours required for degree conferral. Trinity further mandates that all syllabi are posted in Moodle, the university's learning management system portal (Moodle).

Course descriptions, including credit-hour assignments, are tracked, stored and retrieved using PowerCampus, Trinity's student and academic information system. Credit hour assignment information can be accessed directly in PowerCampus or through Self-Service, Trinity's student portal. In Self-Service, students may view academic plans for each major and minor in order to monitor their progress toward graduation, including credit accumulation. The academic plan tracks major requirements, core requirements, and electives, all of which meet Trinity's credit hour requirements. One hundred and twenty-eight semester credit hours are required to achieve an undergraduate baccalaureate degree (B.A., B.S., or B.S.N.). Associate's degrees vary in requirements from 61 to 70 credits, based on discipline, and Master's degree programs also vary, from 36 to 69 credits.

3. A description and evidence of the processes used by the institution to review periodically the application of its policies and procedures for credit hour assignment. Indicate the individual(s) and/or entities responsible for the final review and approval.

> In the semester prior to a given sequential academic term, the provost receives draft course schedules from the academic units and meets with each dean review courses and assure that credit hour requirements are met (evidence includes the draft review schedule produced on a semesterly basis in the Provost's office). UCAP and the local CAP committees each meet monthly to review curricular proposals and academic program reviews (evidence includes the collected agenda, meeting minutes and approved proposal statements generated by the committee chairs). The registrar and enrollment services enter all credit hour assignments into PowerCampus and are responsible for the integrity of Powercampus data, including maintaining updates for all academic changes (evidence includes the electronic new course, catalog change, and course schedule change forms processes by enrollment services personnel). In all cases, the registrar and provost are responsible for final review and approval of credit hours in the course schedule.

4. A list of the courses and programs that do not adhere to the federal definition of credit hour or its equivalent as specified in the MSCHE Credit Hour Policy (e.g., online or hybrid, laboratory, studio, clinical, internship, independent study, and accelerated format) and evidence that such variations in credit hour assignment conform to commonly accepted practice in higher education.

   o Each course or program that does not adhere to the federal definition should be specified and supporting evidence that it conforms to commonly accepted practice should be provided using the criteria described above in Item 2.

> In all undergraduate disciplines, students may complete directed research or independent study courses (typically utilizing the numbering system XXX 498 in the discipline, with some variances) for 1-4 credits. Each course proposal is created at the program level, and must be reviewed by the Dean, with ultimate review in the Provost's office via the Course Schedule Change Form. Faculty administering the independent study experiences produce syllabi that justify the credit assignment as a function of meeting schedules and independent work or projects completed by the student over the course of a semester. Please see attached list for additional courses in this category.