



July 18, 2013

Dr. Belle S. Wheelan, President
Commission on Colleges
Southern Association of Colleges and Schools
1866 Southern Lane
Decatur, GA 30033-4097

Dear Dr. Wheelan:

Thank you for your letter of June 12, 2013, accepting notification that the university had found an unreported off-campus classroom at L-3, 10001 Jack Finney Boulevard, Greenville, TX 75403-6056. The university apologizes for the error, recognizes your concerns, and continues working to address program and site approvals in a comprehensive way. So as not to waste the Commission's time, we are carefully reviewing and revising the prospectus about the L-3 classroom prior to submission. We are still awaiting site approval from the Texas Higher Education Coordinating Board (THECB) and will submit a prospectus as quickly as possible. However, we thought it prudent to respond to the requested information from your letter now.

A&M-Commerce's Substantive Change Procedure was approved in September of 2012. At that time, Dr. Roseanne Hogan served as the SACS Accreditation Liaison for A&M-Commerce. She had begun a comprehensive review; however, her unexpected resignation in November of 2012 left the university without project completion. Dr. Marila Palmer began her position as Associate Provost for Institutional Effectiveness & Planning and Accreditation Liaison on February 1, 2013. A letter was submitted regarding the L-3 site on February 28, 2013 upon ascertaining that the university had, in fact, offered 50% or more of the M.S. in Management at that location.

As way of explanation but not excuse, the issue of unreported sites, such as those of the international locations, has been limited to the College of Business and Entrepreneurship (CBE). In August 2012, the Dean of CBE, who was responsible for initiating the off-campus L3 program, was placed on paid administrative leave. He subsequently resigned as Dean, returned to faculty status and an Interim Dean was appointed. Accordingly, we believe that we have placed individuals in leadership positions who now understand SACS policies. Furthermore, the Registrar's office at A&M-Commerce no longer allows courses to be scheduled at TBA locations. Dr. Mary W. Hendrix, Vice President for Student Access and Success, supervises the Registrar. She has instructed the office that before they post any courses to an off-campus site location, they must send the list of requests to the Provost and to Dr. Palmer before adding to the schedule to get their written approvals.

Office of the President

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The CBE Dean's position was recently posted and addresses the need for accreditation experience with the following qualification listed under "Required Education and Experience."

- Active engagement in support of institutional accreditation by a regional accrediting body such as The Southern Association of Colleges and Schools (SACS), The Middle States Association of Colleges and Schools (MSACS), The North Central Association of Colleges and Schools (NCA), The Western Association of Schools and Colleges (WASC), or others.

The university has undertaken additional measures to ascertain that academic leaders fully comprehend what it means to violate SACS Substantive Change Policy. The University Executive Council (UEC), chaired by President Jones, includes academic and administrative leaders. At the UEC meeting of February 25, 2013, minutes from the President's Office indicate a discussion about the necessity of following Substantive Change Policy. They state: "Dr. Palmer distributed the SACS Guidelines titled 'The Accreditation Liaison' and referenced some of her responsibilities. In particular, she spoke to item #2 about notifying the Commission 'in advance of substantive changes and program developments.' She emphasized the importance of advance notice by reading from SACSCOC's recently updated Substantive Change Policy about the consequences of not reporting... She reviewed some of the common substantive changes and urged the deans, graduate school and others in attendance to keep her apprised and ask her questions before undertaking anything new. After asking if there were any issues pending, President Jones concluded with his support for Dr. Palmer's role, appreciation for the explanation and caution to the UEC that they direct questions to her about substantive change."

On the following day of February 26, 2013 at a meeting of the Academic Council, which includes the Deans and other academic leaders, Dr. Palmer distributed handouts of the policy statement titled "Substantive Change for Accredited Institutions of the Commission on Colleges" (Edited: February 2013). She read aloud the section titled "Failure to Comply with Reporting Requirements" and explained the circumstances that require prior approvals. The university continued cleaning up issues of non-reported circumstances by seeking guidance from SACS Vice President Dr. Barry Goldstein, who had been recently assigned to us after the retirement of Dr. Rudolph Jackson. In reviewing its off-campus locations, A&M-Commerce advised the Commission it was closing those that were no longer in operation.

Near the same timeframe, the institution found that the Office of Academic Affairs had not appropriately reported to the A&M System and the Texas Higher Education Coordinating Board that programs had been added at off-site locations or online. Associate Provost Dr. Dan Edelman, serving as interim at that time, sent several explanatory emails to all of the department heads, associate deans and deans in order to clarify the required approval processes. In addition, Dr. Edelman held a preliminary information meeting on March 12, 2013 for department heads, associate deans, deans, and other interested parties regarding program approvals. Dr. Irma

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Harper, Assistant Vice Chancellor for Academic Affairs at The Texas A&M University System, presented information about the A&M System requirements and those of the THECB. She also referenced the differences when SACS approval is a required step.

On April 11, 2013, Dr. Edelman held a follow-up, two-hour meeting for department heads, associate deans, deans, and other interested parties to explain further the required documentation and format. At that meeting, Dr. Edelman frequently asked Dr. Palmer to comment on SACS requirements for approval in matters of question. It was another opportunity for Academic Affairs to emphasize which changes require prior approval and must go through process channels. It was also a time to stress that advance planning is requisite, because approvals by all groups might take up to a year.

In its comprehensive review, A&M-Commerce finds that two, three-credit hour courses were taught via televised instruction to students at Paris Junior College's main campus: 2400 Clarksville Street, Paris, Texas 75460. The course numbers and titles are: ECE 366 Learning Environments, Hours: 3 and ELED 300 Introduction To Teaching, Hours: 3. These six hours of a 124 credit hour degree represent less than 5% of the program, which meets the current Substantive Change policy's requirement of no prior approval as long as the "Student can obtain 24% or less" of a program. The same two courses are scheduled to be taught again with two-way video to students at the PJC campus in Fall 2013. This off-campus location is still subject to approval by the A&M System and THECB. The Registrar's processes, which have been implemented with approval required before posting any courses to an off-campus location on the schedule, will allow for monitoring in order to stay under the 24% or less of a program at Paris Junior College. On several occasions, Deans have been asked and have verified that there are no other unreported sites where a program is being offered.

In another attempt to clarify approvals for off-campus locations, some confusion had surfaced about the level of approval of the Midlothian Higher Education Center. A&M-Commerce has worked to correct that understanding and verified that SACS approval has been limited to up to 49% of a program for that off-campus location. The Registrar's office, in conjunction with the Assistant Vice President of Student Access and Success, has reviewed multiple student transcripts to ascertain that the institution has not gone over the 49% of program taught there, since many students take classes online. In addition, we have emphasized that a prospectus must be submitted at least six months in advance of moving to a complete program at Midlothian. The staff representative at that location has been apprised and understands that it is essential to hold the line. While administrators had asked that a complete prospectus be submitted at a prior time, it was not done. Perhaps the retirement of a long-term Accreditation Liaison in August 2011, followed by another retirement of the subsequent interim Associate Provost in August 2012 and only ten months in transition to a new liaison contributed to the confusion. Letters of SACS notifications are now posted on an institutional web page for ease of

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reference at <http://www.tamuc.edu/aboutUs/institutionalEffectiveness/SACSCOC/sacs-notifications.aspx>.

As becomes obvious, multiple transitions in recent years within the Office of Academic Affairs have caused unevenness in compliance, but necessary steps have been taken to address the issues. In August of 2012, the university reassigned Provost Larry Lemanski to another position in the Office of Research and Sponsored Programs. In order for the university to undertake a comprehensive search, Dr. Gary Peer served as Interim Provost through May of 2013, with a commitment of full support to all accreditation requirements. The university is pleased to report that its new Provost, Dr. Adolfo Benavides, has served on visiting committees for SACSCOC and understands regional and specialized accreditation.

Even though the information above does not address all issues, it is intended to give a snapshot of the efforts undertaken to move the university to compliance with SACS Substantive Change Policy. Academic Affairs has verified that there are no unreported locations where a student can obtain 25% or more of credit toward a program. There is a new and improved understanding of the gravity of the issues of non-reporting. It is a topic returned to often at Academic Council and Deans Council meetings with many questions now asked of the SACS Accreditation Liaison to ascertain that the Commission is appropriately notified—in advance and with time allowed for approvals.

At the present, until the prospectus for the L-3 at Greenville, Texas can be submitted and until SACSCOC approval is received, the university is not teaching any classes at the L-3 classroom in Greenville, Texas. We appreciate the difficulty of your work as a regional accreditor who must abide by federal regulations. I have confidence in the present academic leaders responsible for reporting, and you have my assurance that we have assiduously worked and will continue working to prevent an infraction like this in the future.

Sincerely,



Dan R. Jones, Ph.D.
President

cc: Dr. Barry D. Goldstein, Vice President, SACSCOC
Dr. Adolfo Benavides, Provost, A&M-Commerce
Dr. Mary Hendrix, Vice President, Student Access & Success, A&M-Commerce
Dr. Marila Palmer, Assoc. Provost, Inst. Effectiveness & Planning, A&M-Commerce
Dr. Dan Edelman, Associate Provost, A&M-Commerce
Dr. Derald Harp, Chair, Reaffirmation Committee, A&M-Commerce