



## COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION

NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES

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# Procedures for the Evaluation of Overseas Instructional Locations

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## Introduction

This procedural statement is designed to provide the framework for the evaluation of overseas instructional locations, including branch campuses, of affiliated institutions at which credit-bearing programs are offered to non-U.S. nationals. It applies both to those institutions which have established their own instructional sites abroad and to those which offer instruction through a contractual relationship with a non-regionally accredited entity. Non-credit courses or courses offered primarily to U.S. nationals, such as study-abroad programs, are not encompassed by this statement.

### **An overseas instructional location is defined as:**

Any overseas location of an institution, other than the main campus, at which the institution matriculates students to whom it offers any portion of a degree program or offers on-site instruction or instructional support for students enrolled in a predominantly or totally on-line program.

Questions about whether a planned activity is subject to this policy should be directed to the Commission's President.

The Commission asks that institutions submit a report at least six months prior to the initiation of any overseas activity and that it undergo an on-site evaluation to assess implementation of the overseas location. The Commission will undertake an evaluation visit abroad when an institution has one or more overseas sites and has begun to enroll students or when it has been determined that an institution's existing programs have been substantively expanded. The Commission and the institution will jointly determine the appropriate time for an evaluation visit, usually within six months of the program's initiation. Institutions are reminded, however, that the Commission reserves the right to review overseas activities at any time circumstances warrant such a visit.

### ***Standards for Accreditation and Overseas Instructional Locations***

Accreditation by the New England Association of Schools and Colleges applies to the institution as a whole. As an institutional accrediting body, the Commission on Institutions of Higher Education regards credit-granting instructional sites abroad as integral parts of the home institution and not peripheral to it. Thus, it is the expectation of the Commission that overseas instructional sites fulfill the *Standards for Accreditation*. The application of those standards through evaluative processes, whether to the institution as a whole or to overseas locations, permits conclusions to be drawn as to the appropriateness of its educational purposes; the sufficiency of resources to accomplish those purposes; the actual accomplishment of its purposes; and its capacity to continue to accomplish its purposes.

While the Commission expects overseas programming to fulfill all the *Standards for Accreditation*, certain criteria are of particular salience to an institution offering such programs. Among them is the standard on *The Academic Program* which declares:

Courses and programs offered for credit off campus, through dual enrollment, through distance or correspondence education, or through continuing education, evening or weekend divisions are consistent with the educational objectives of the institution. Such activities are integral parts of the institution and maintain the same academic standards as courses and programs offered on campus. Faculty and students receive sufficient support for instructional and other needs. Students have ready access to and support in using appropriate learning resources. The institution maintains direct and sole responsibility for the academic quality of all aspects of all aspects of all programs and assures adequate resources to maintain quality. (4.46)

All students, including those enrolled in off-campus courses distance learning courses, correspondence education courses, and/or competency-based programs have sufficient opportunities to interact with faculty regarding course content and related academic matters. (4.47)

Furthermore, in keeping with *The Academic Program*, the Commission expects that degree program graduates “demonstrate collegiate-level skills in the English language.” (4.11). Additionally, institutions offering programming overseas are expected to demonstrate their “capacity to undertake such initiatives and to assure that the new academic programming meets the standards of quality of the institution and the Commission’s Standards and policies.” (4.8) The standard on *Organization and Governance* notes that overseas programs must be “clearly integrated and incorporated into the policy formation, and academic oversight, and evaluation system of the institution” and that the institution ensures the “integrity and quality” of such activities (3.14).

In addition, *The Academic Program* standard also addresses those circumstances where instruction offered overseas is provided through a contractual relationship with a non-regionally accredited entity:

The institution demonstrates its clear and ongoing authority and administrative oversight for the academic elements of all courses for which it awards institutional credit or credentials. These responsibilities include course content, the specification of required competencies, and the delivery of the instructional program; selection, approval, professional development, and evaluation of faculty; admission, registration, and retention of students; evaluation of prior learning; and evaluation of student progress, including the awarding and recording of credit. The institution retains, even with contractual, dual enrollment, or other arrangements, responsibility for the design, content, and delivery of courses for which academic credit or degrees are awarded. The institution awarding a joint, dual, or concurrent degree demonstrates that the program is consistent with Commission policy and that the student learning outcomes meet the institution's own standards and those of the Commission. (4.32)

The Commission has also adopted a statement which addresses in detail matters of importance and particular relevance to overseas educational activities. This document, *Principles of Good Practice in Overseas International Education Programs for Non-U.S. Nationals* is available on the Commission's website.

### **Procedures for the Evaluation of Overseas Instructional Locations**

Newly initiated overseas locations will not be automatically included in the institution's accreditation. The following procedures must be completed before an overseas location is encompassed within the scope of its accreditation by the New England Association.

#### ***Advance Notice to the Commission and Review***

It is the responsibility of an institution to notify the Commission about its intention to establish an overseas location before it becomes operational and to provide a report about its plans for the new activity. The report should follow the format specified in the Commission's *Guidelines for Preparing Reports on the Establishment of Off-Campus Programming: Branch Campus or Additional Instructional Location*

The institution's plans will be reviewed by the Commission at the earliest possible date following their receipt. Should the Commission conclude that the plans for the new overseas location appear to fulfill the *Standards for Accreditation*, the projected activities will be approved and considered as encompassed within the institution's accreditation. If approval is withheld, the reasons for doing so and subsequent steps will be specified.

#### ***On Site Evaluation***

As soon as possible, but within six months after it becomes operational, the Commission will undertake an on-site visit to the new location. The purpose of the visit will be to assess the institution's success in implementing its plans for the new activity. Conduct of

the on-site evaluation is governed by the Commission's *Procedures for the Substantive Change Evaluation Visit*.

Materials: As noted in the *Procedures for the Substantive Change Evaluation Visit*, the institution should prepare an update to its original planning document to reflect and assess the institution's experience in implementing the new overseas location. This update should respond to any concerns raised in the notification letter from the Commission in response to the institution's planning report.

By their nature, international programs/institutions operate in contexts somewhat different from those found on U.S. campuses, with some accommodation to local customs or conditions. With international visits there is more than the usual need to describe the context in which the program/institution operates so that the Commission can determine whether its standards are met in ways appropriate to local conditions.

Approximately one month before the visit, the institution should send a copy of its original proposal and its update to each member of the visiting team. At the same time, four (4) paper copies of the update and an electronic copy (single, searchable pdf file) should also be sent to the office of the Commission.

Arrangements for the Team Visit: A visit by Commission representatives to evaluate overseas programs will normally include one day on the home campus in New England and two full days for the evaluation of the overseas campus. The semester, but not the actual dates, will be determined by the Commission in consultation with the institution to be visited.

Several months before the visit, the Commission staff selects a prospective visiting team, usually one or two persons, and requests the comments of the chief executive officer of the institution on the proposed team before appointing its member(s). When the team is complete, the institution and team are informed, and appropriate evaluation materials, including the letter from the Commission responding to the institution's plans for the site, are sent to the team from the Commission office.

Upon receipt of the team list, the institution contacts the chairperson to discuss the schedule for the visit, accommodations, and other arrangements. The team chair and chief executive officer of the institution establish the exact dates for the visit, at a time when classes are in session at the site. The chair is asked to inform the Commission of the dates for the evaluation when they are set and, if applicable, to communicate with the other team member in scheduling the visit. As noted above, the team should allow for one day on the home campus and two days of evaluation on the overseas campus. Because of time differences and travel arrangements, arrangements should be made for the team to arrive one day prior to the visit and return home the day following the evaluation. The institution notifies the team directly about all other matters related to the visit and arranges to have all hotel accommodations and meals, if possible, billed directly to the institution.

In keeping with the Commission's *Guidelines for Visiting Institutions Abroad and Overseas Instructional Locations*, team members need to make travel arrangements well ahead of the departure date. Team members wishing to prolong their stays beyond the dates mentioned, or wishing to travel by any but the most direct route, are expected to pay the extra cost involved.

Costs for an on-site evaluation will be borne by the institution. If the evaluation of the overseas site is part of the comprehensive evaluation of the institution, there is no further charge. If the visit to the program overseas is separate from such a visit, however, in keeping with Commission policy, the Commission office bills the institution for the substantive change evaluation fee.

Conduct of the Visit: The team should meet with those on the home campus involved in the overseas programs. The letter from the Commission and the institution's report will guide the team in discussing the relevance of the program to the institution's mission, its integration into the structure of the home campus, and the ways in which it fulfills Commission standards and the Commission's *Principles of Good Practice in Overseas International Education Programs for Non-U.S. Nationals*.

Abroad, the on-site evaluation follows the customary format established by the Commission. At the discretion of the team chair and the director of the overseas program, the visit may include a meeting with the overseas location's authorizing authorities. Because of the nature of the team's responsibilities to the institution and the Commission and since the American system of accreditation is almost unique to this country, the team will find it helpful in its conversations to refer to *Principles of Good Practice in Overseas International Programs for Non-U.S. Nationals* and other relevant Commission material. The visit should conclude with an oral report of the team's findings to institutional representatives.

### **Preparation of the Team's Report and Confidential Recommendation**

The steps in the preparation of the team's report and confidential recommendation are outlined in the *Commission's Procedures for the Substantive Change Evaluation Visit*. The team's report addresses the fulfillment of the Commission's standards by the institution in relation to its overseas program(s). It describes the ways in which the institution has satisfactorily incorporated its overseas unit(s) into the institution as a whole and how the program conforms to the *Principles of Good Practice in Overseas International Programs for Non-U.S. Nationals*. If appropriate, the report also specifically discusses whether or not the institution has adequately addressed areas of concern previously expressed by the Commission. The report concludes with a list of identified strengths and concerns related to the overseas program(s).

The confidential recommendation includes (1) the team's recommendation about whether or not inclusion of the overseas activity within the institution's accreditation should be

confirmed; (2) recommendations for follow-up reporting about the overseas activity; and (3) reasons for these recommendations.

Four (4) paper copies and an electronic copy (single, searchable pdf file) of the team's report and the team's recommendation should be submitted to the Commission office.

### **Commission Action**

The institutional update and the team's report and recommendations are considered by the Commission at one of its two regularly scheduled meetings the semester following the visit. After consideration of the report, the Commission will take an accreditation action. Among those possible are confirmation of the overseas site as part of the institution's accreditation, either without stipulation or stipulating the necessity for the institution to take corrective steps, or a refusal to confirm the site as part of the institution's accreditation. At this time, the Commission also sets the schedule for additional visits to the overseas site. Since the accreditation of the institution's home campus includes all its activities, a refusal is accompanied by suggestions for remediation which, if not followed, would result in the Commission's recommendation that the institution be placed on probation or lose its accreditation.

The institution and team member(s) are informed of the Commission's action shortly after the meeting.

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