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| <b>Policy Name:</b>              | Policy and Procedures Relating to the Approval and Administration of Off-Campus Instruction   |                       |  |
| <b>Associated Form(s):</b>       | <ol style="list-style-type: none"> <li>1. Off-Campus Instruction Proposal and Approval Form</li> <li>2. Dean's Periodic Report of Off-Site Courses</li> </ol>                   | <b>Policy Number:</b> | 2018-1   |
| <b>Reviewed:</b>                 | <ol style="list-style-type: none"> <li>1. Non-Academic Policy Committee</li> <li>2. Faculty Senate</li> </ol>   | <b>Approved:</b>      | <ol style="list-style-type: none"> <li>1. April 27, 2018</li> <li>2. May 4, 2018</li> </ol>  |
| <b>Approval Authority:</b>       | President   | <b>Adopted:</b>       |  |
| <b>Responsible Executive(s):</b> | <ol style="list-style-type: none"> <li>1. Provost</li> <li>2. Vice President for Enrollment Services</li> <li>3. Vice President for Admissions</li> </ol>                       | <b>Revised:</b>       | December 23, 2016  |
| <b>Responsible Office(s):</b>    | <ol style="list-style-type: none"> <li>1. Office of the Provost</li> <li>2. Office of Enrollment Management</li> <li>3. Office of Admissions</li> <li>4. School dean</li> </ol> | <b>Contact(s):</b>    | <ol style="list-style-type: none"> <li>1. Provost</li> <li>2. Vice President for Enrollment Management</li> <li>3. Vice President for Admissions</li> <li>4. School dean and academic unit head</li> </ol> |

## **I. Policy Statement**

As the University carries forth its mission of providing educational access to underserved and working students by expanding offered courses taught at off-campus locations, it must also balance its mission with its commitment to complying with all accreditation standards, federal and state laws, and regulations, as well as College policies. In particular, all courses as part of any University program taught at off-campus locations other than the Mercy University main campus, branch campuses (“Mercy University Campus”) or fully distance learning have a set of compliance requirements to which the University must adhere. As such, this Policy sets forth that course offerings at off-campus locations must comply with the specific program structure and processes for approval of required for courses offered at a Mercy University campus and will be subject to the same rigorous academic and administrative oversight. These requirements must be put in place before offering or advertising any course offered at an off-campus location.

## **II. Applicability of Policy**

This Policy applies generally to all courses offered by Mercy University at off-campus locations. This Policy **does not apply** to the following:

- A. Programs that are located at Mercy’s main Dobbs Ferry campus or Mercy’s branch campuses (as defined by the New York State Education Department), currently Bronx and Manhattan.
- B. Fully distance education programs registered with the New York State Education Department in the distance education modality through the main or branch campus.
- C. Internship or clinical courses.
- D. Programs that are explicitly excluded (in whole or in part of this Policy) by the Office of Provost due to factors that might include, for example, that the program has a long history of successful implementation with sufficient oversight measures already in place.

All other courses taught off-campus except for those listed above, regardless of the number of courses, number of enrolled students, distance to the University or any other fact or circumstance, are subject to the requirements herein. Hybrid/blended courses offered at off-campus locations that include an element of online and in-person courses, regardless of the percentage online and in-person, fall under this Policy. Under New York State Education Department regulations on off-campus instruction, hybrid/ blended courses are considered to be offered at the physical location at which the face-to-face portion takes place.

The Provost's Office is responsible for keeping track of all current off-campus course offerings and notating whether they are subject to all or part of the requirements of this Policy. Although it is the Provost Office's responsibility to keep track of all current off-campus course offerings, it is the responsibility of the academic unit heads and deans to disclose that such courses are being considered and implemented at any off-campus location. The Provost's Office will work with individual school deans and academic unit heads to note whether these courses are subject to all or part of the requirements of this Policy.

### **III. Permissible Off-Campus Program Structure**

In order to ensure regulatory compliance with Middle States, New York State Education Department and U.S. Department of Education accreditation standards, for off-campus courses covered by this Policy, the following elements must be adhered to:

#### **A. 60/40 Credit Hour Format**

Programs must be in a 60/40 format—that is, 60 percent of the program credit hours of any program must be taught at a Mercy University Campus or at Mercy in a registered online modality. As applicable, the core course(s) must be taken at the campus at which the program is registered. The remaining 40 percent of the program credit hours can be taught at the off-campus location (which must be approved in accordance with the processes set forth below). Program course offering schedule with locations and modalities are required to be submitted with the application. Any exception to this 60/40 format must be approved by the Provost, in consultation with the President and/or other senior leaders, and shall be granted only in extraordinary circumstances.

#### **B. Complete Off-Campus Programs**

Applications to offer a complete program at an off-campus location are not considered under this policy. They will be considered pursuant to applicable regulatory guidelines and subject to approval of the Provost and President.

### **IV. Approval Process for Off-Campus Instructional Offerings**

All course offerings not explicitly excluded in Section II above must be processed in accordance with the guidelines set forth below.

#### **A. Preliminary Review**

Prior to any formal proposal being submitted, a preliminary proposal should be presented to the Provost or his/her designee electronically, who shall consult with senior leaders and other relevant University constituencies regarding the viability of the proposal and whether seeking formal approval is appropriate. The Provost shall communicate his/her opinion with the proposer via email as soon as practicable.

#### **B. Formal Proposals**

All proposals submitted by the relevant school to offer Mercy University credit-bearing courses at any off-campus location must be submitted to, and approved by, the Office of the Provost *at least eight weeks* prior to the start of recruitment, marketing and course offerings, using the *Off-Campus Instruction Proposal and Approval Form*. Proposals made on shorter notice will be reviewed as soon as practicable.

Proposals to teach courses at off-campus locations must affirm that the proposed implementation complies with legal and regulatory requirements as an extension site, as well as Mercy University policy.

In addition, applicants are required to detail the mechanisms in place to ensure compliance with the University's relevant academic and administrative policies. In particular, applicants are required to describe the manner in which they intend to provide administrative oversight of the course offerings and how they will monitor the relationship with any outside partner, including but not limited to, overseeing the areas of recruitment of students and faculty, admissions, billing, financial aid, and by conducting site visits and periodic review of website and marketing materials.

Applicants are also required to describe the manner in which they intend to provide academic oversight, including but not limited to conducting faculty observations, collecting student evaluations, and assessing student performance. Applicants must indicate the faculty member's name assigned the off-campus site coordinator responsibilities. A detailed schedule of the planned course offerings for the program including modality and location must be submitted with the application.

### C. Checklist for Formal Approval

Proposals should be approved and submitted by the relevant school dean and shall be reviewed and approved by the Provost, Vice President for Admissions, the Vice President for Enrollment Services, and the General Counsel, in consultation with the President and other senior leaders as necessary, prior to the commencement of any recruitment or marketing, or the instruction of any courses at the off-campus location, unless otherwise approved by the Provost. Failure to adhere to the requirements for the approval process could result in delays to, or potentially closures of, off-campus programs.

## V. Oversight and Reporting Requirements

### A. Academic and Administrative Oversight

The relevant school dean is responsible for ensuring that academic and administrative oversight responsibilities pertaining to the off-campus courses are met on a regular basis. The relevant school dean shall ensure the following:

1. Compliance with relevant University policies and procedures, such as those related to course offerings;

2. Vetting of faculty qualifications and hiring faculty in accordance with ordinary University processes and procedures;
3. Scheduled observations of faculty and student evaluations occur pursuant to the Faculty Handbook, the Faculty Procedures Manual and other University policies;
4. The education provided at the off-campus location is consistent with the application and with the quality of offerings at the University's main campus; including the assessment of student learning outcomes;
5. Unannounced site visits are performed at a minimum of twice per term at the off-campus location to ensure that courses are meeting and in compliance with Federal, New York State and University policies;
6. Conducting annual reviews of information relating to any outside partner, including online news searches, reviews of webpages, documents being provided to prospective and current students, and marketing materials being distributed in connection with the courses.

#### B. Reporting Obligations

The relevant school dean is also required to submit a report to the Provost once per term in the first year of any offerings at an off-campus location, and then annually thereafter, detailing compliance with all legal and regulatory requirements, as well as University and academic policies. Such report must be submitted within 30 days after the end of the term.

If any Mercy University administrator, faculty or staff member believes or has reason to believe that actions of others, in connection with University business related to off-campus locations, are or may be in violation of this Policy, or any other Mercy University policy, or any state, local or federal law or regulation, he/she must immediately report the matter to the Provost or the General Counsel.

#### C. Format of the Report

Reports shall be submitted via the "Dean's Report on the Administration of Off-Campus Instructional Locations." The report indicates whether there are any changes to the courses offered, such as the number of courses offered and the number of students enrolled or format of offerings (if distance learning or hybrid formats are incorporated for example), and to affirm that the off-campus location has not changed.

In addition, the report shall set forth all of the steps taken during the previous relevant term to provide academic and administrative oversight of the location, providing samples of site visit logs, teaching observations and student evaluations as appropriate.

The Provost shall thereafter be responsible for reviewing the report and if additional information or review is warranted, shall request such information. The Provost's Office shall also provide guidance to the relevant school dean as needed to ensure continued administrative and academic compliance with laws, regulations and University policies.

## **VI. Training Requirements and Audit Oversight**

The Office of the Provost, in coordination with the General Counsel, shall conduct annual training for relevant campus administrators regarding all aspects of this policy, including the legal and regulatory requirements, University policies associated with off-campus course offerings, and the manner in which academic and administrative oversight can, and should, be conducted. Such relevant campus administrators shall include but are not limited to: deans, academic unit heads, Enrollment Services and Admissions staff, faculty who teach at off-campus locations, and any other relevant full- or part-time faculty or administrators who handle matters relating to off-campus course offerings. Every core or adjunct faculty member who teaches at an off-campus location shall be informed about the requirements under this Policy.

The University's independent internal auditor shall conduct periodic reviews to ensure compliance of all aspects of the policies and procedures relating to approval and administration of off-campus instruction.