



3624 Market Street
Suite 2 West
Philadelphia, PA 19104
(267) 284-5000
www.msche.org
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Institutional Federal Compliance Report

- Please read *Verification of Compliance with Accreditation-Relevant Federal Regulations* before completing this form.
- Institutions must use this *Institutional Federal Compliance Report* for submission, which is available at <https://www.msche.org/resources/>
- Institutions should provide evidence that will best demonstrate the institution's compliance including the evidence identified in *Verification of Compliance with Accreditation-Relevant Federal Regulations*.
- Documentation of policies and/or procedures must be (1) in writing, (2) approved and administered through applicable institutional processes, (3) accessible to constituents, and (4) reflect current practice.
- In the event one or more of these regulations do not apply to an institution, the institution shall indicate that fact and provide an explanation in the space provided. Otherwise, all applicant, candidate, and accredited institutions are expected to provide documentation for each of the requirements.
- The *Institutional Federal Compliance Report* and supporting evidence should be combined into a single, bookmarked, PDF file. A hard copy of the report is not required and will not be accepted.
- Institutions must upload this *Institutional Federal Compliance Report* in conjunction with all other accreditation materials according to established deadlines. The institution must upload the *Institutional Federal Compliance Report* as evidence under Standard II, Criterion 8.
- For technical support with this form or its submission, contact support@msche.org. For all other questions, contact compliance@msche.org.

Please type the following information.

Institution: SUNY OLD WESTBURY

Report completed by: Danielle Collins Groner, Werner Sbaschnik, & Anthony Barbera

Date: February 4, 2021

1. Student Identity Verification in Distance and Correspondence Education

	<u>Evidence to Demonstrate Compliance:</u>
<p>1. Policies and/or procedures used to ensure student identity verification in distance education or correspondence courses</p>	<p>To ensure that students who register for online courses are indeed those who take the course and receive credit for it, the College policy requires each student to have a unique username and password to access the online resources. The access to course materials is via the login page of the Blackboard system, the Learning Management System used by the College, which is hosted by the SUNY Information Technology Exchange Center (ITEC) located at SUNY Buffalo State in Buffalo, NY.</p> <p>Due to the COVID-19 disruption of operations, the College has contracted for online proctoring services (ProctorU and Proctorio) that confirm the test-taker's identity at the beginning of each test in classes making use of them.</p>
<p>2. Policies and/or procedure(s) regarding the protection of privacy (i.e. FERPA) for students enrolled in distance education and correspondence courses</p>	<p>The College's method used to ensure student identity verification does not entail the use of any extraordinary procedures or policies. Accordingly, the College's regular procedures to restrict student record access encompassed under FERPA are utilized to protect student privacy in the implementation of such method. The College's FERPA policy, including definition of "directory information" is available on the website (https://www.oldwestbury.edu/academics/registrar/ferpa-family-educational-rights-and-privacy-act-1974)</p> <p>and on page 37 of the College Catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20.pdf).</p> <p>The online proctoring services used due to the COVID-19 disruption of operations are contractually bound to adhere to the same FERPA regulations.</p>
<p>3. Procedure(s) for notifying students at the time of registration or enrollment about any projected additional charges associated with student identity verification including any required travel to campus. Evidence should include URLs, catalogs, student handbooks, and other locations of any alternative institutional website documenting required disclosures</p>	<p>Students are not charged any additional fees with regard to the student identity verification process described in Item 1 above. Students do not need to travel to campus for identity verification, so there is no additional cost to students in this way.</p> <p>Distance learning students do not need to travel to campus for ITS support.</p> <p>Due to the COVID-19 pandemic, the College has instituted a virtual Panther ID card so students, faculty and staff do not have to visit the campus to get their card. It is available to all over their cell phone.</p>

Explanation if a compliance requirement is not relevant for your institution:

Not applicable

2. Transfer of Credit Policies and Articulation Agreements

	<u>Evidence to Demonstrate Compliance:</u>
<p>1. Policies and procedures for making decisions about the transfer of credits earned at other institutions (regardless of modality) including any types of institutions or sources from which credits are not accepted. *Demonstrate public disclosure of policy by URL, catalog, or other public location</p>	<p>The College has uniform policies and procedures in place for making decisions about the transfer of credit earned at other institutions that address such issues as:</p> <ul style="list-style-type: none"> • the maximum number of transfer credits allowed • quarter vs. semester credits • criteria for different types of Associates degrees • minimum course GPA requirements. <p>They do not explicitly address mode of delivery since that is not one of the criteria we use to evaluate transfer credits.</p> <p>The College’s Transfer Credit Policies are publicly disclosed on pages 43 and 44 of the Undergraduate Catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20.pdf)</p> <p>and on the College website (https://www.oldwestbury.edu/academics/registrar/transfer-credit-policies).</p> <p>Information regarding transfer credit policies and articulation agreements is also available on the College’s “Student Consumer Information” website (https://www.oldwestbury.edu/about/student-achievement).</p>
<p>2. Demonstrate public disclosure of the list of institutions with which the institution has established an articulation agreement by URL and other public locations, if any</p>	<p>For a listing of articulation agreements currently in place, students are instructed to contact an Admissions Counselor in the Office of Enrollment Services. Wording to this effect is on the College website (https://www.oldwestbury.edu/admissions/transfer/articulation) geared toward new transfer students.</p> <p>In the past the College has established, with regional two-year colleges, cooperative articulation agreements that specify procedures designed to encourage and facilitate transfers from these colleges into upper-division academic programs at SUNY Old Westbury. Old Westbury has had articulation agreements in several academic disciplines. However, due to curriculum changes all such agreements are currently under revision. These agreements list degree programs at two-year colleges that are parallel to Old Westbury's degree programs. Associate degree holders admitted into the parallel program are granted full credit for courses completed at the two-year college and are given junior standing.</p> <p>Generally, these students would be able to complete a bachelor's degree in four semesters of full-time study at Old Westbury.</p> <p>In addition to articulation agreements with individual institutions, as a member of SUNY, Old Westbury is a participant in the SUNY Seamless Transfer initiative – a comprehensive program to facilitate transfer of</p>

	<p>qualified students from one SUNY institution to another. The College has implemented the components of Seamless Transfer dealing with General Education and SUNY Transfer Paths for majors, which help qualified students transfer seamlessly and earn their degrees in a timely fashion. This information can be found on the College website under Transfer Credit Policies (https://www.oldwestbury.edu/academics/registrar/transfer-credit-policies).</p>
<p>3. Policies and procedures for making decisions about credit for prior learning experience including service in the armed forces, paid or unpaid employment, or other demonstrated competency or learning. Demonstrate public disclosure of policy by URL, catalog, or other public location</p>	<p>The College has a procedure for prior learning experience through a faculty-led committee, the Accreditation Program for Experiential Learning (APEL) Committee, for students that seek to receive credit based upon their work experience or similar. This policy is on page 44-45 of the Undergraduate catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20.pdf) and on the College website (https://www.oldwestbury.edu/academics/registrar/transfer-credit-policies).</p> <p>The College has a Veteran’s Affairs Coordinator to assist with transfer credits for services in the armed forces. For military training, students can submit two items in order to apply for credit. One method is providing their DD-214 (separation papers) which, if they indicate a total of 2 years or more of active military service, allows a student to be awarded 8 general elective credits. The second is a student can submit their Joint Services Transcripts or the Air Force equivalent and it can be reviewed like any American Council on Education approved transcripts for transferable credits as we do with any transcript.</p> <p>SUNY Old Westbury is a NCCRS and ACE partner, so any work experience or similar whose training has been approved by NCCRS or ACE can be reviewed by the APEL Committee for credit and is subject to any policies already in place.</p> <p>For example, the Nassau County EMT course has been put through NCCRS, as has the NYPD Recruit Academic Training Program, so students who have completed these programs can submit their official training records (transcripts) for evaluation for transferable credit and their records will be valuated against all already existing policies.</p>

**If possible, institutions should use same URL as the institution uses for Student Right to Know. The URL provided here should match what is submitted for the Student Achievement Webpage as reported in the Annual Institutional Update (AIU).*

Explanation if a compliance requirement is not relevant for your institution:

Not applicable

3. Title IV Program Responsibilities

	<u>Evidence to Demonstrate Compliance:</u>
1. The most recent three-year Official Cohort Default Rate. If applicable, submit reports on compliance from the USDE in regard to the cohort default rate, including any default reduction plans	See Appendix 3.1 for the 2020 Cohort Default Rate (CDR) Letter from the U.S. Department of Education indicating that our three-year default rate was 5.8% for FY 2017, compared to the national CDR of 9.7%.
2. Financial Responsibility Composite Scores for the three most recent fiscal years. For clarity, this information may be presented as a table. <i>(private and for-profit institutions only)</i>	This requirement does not apply to Old Westbury, since the College is a public school whose debts and liabilities are backed by the full faith and credit of the State of New York. See Appendix 3.2 for a letter from the SUNY Office of General Counsel and New York State Education Law Section 352 indicating that SUNY Old Westbury is an entity within SUNY, a public school.
3. Letter or notification confirming the institution's status as a public institution from an appropriate official from a state or other governmental agency with the legal authority to make such a designation <i>(public institutions only)</i>	See Appendix 3.2 for a letter from the SUNY Office of General Counsel and New York State Education Law Section 352 indicating that SUNY Old Westbury is an entity within SUNY, a public school.
4. Final Program Review Determination Letter or Expedited Determination Letter and any major correspondence from the most recent program review since the institution's last Verification of Compliance Review. If a program review is in process or an audit is underway, provide major documentation that is available such as Notification for the Program Review or Preliminary Findings. The institution should provide status reports or documentation if it has requested an extension or filed an appeal	Not applicable. We have no such documentation on file. We have not had a Title IV program review in over 10 years.
5. Single Audit (OMB-Circular A-128; OMB Circular A-133, 2 CFR 200 Subpart F; Uniform Guidance) on federal programs for the most recent three fiscal years available <i>(non-Profit institutions only)</i>	Old Westbury is an entity within the State University of New York (SUNY), an agency of the State of New York, and as such does not have stand-alone A-133 single audit reports. See Appendices 3.3, 3.4, and 3.5 for the A-133 single audit reports for the State of New York for 2016-17, 2017-18, and 2018-19, respectively.

6. Relevant correspondence from the USDE, since the institution’s last Verification of Compliance Review, such as any actions to limit, suspend, or terminate the institution’s eligibility to participate in title IV programs, including institutional response, if applicable	The September 2020 Cohort Default Rate Letter from the USDE (Appendix 3.1) indicates that we are “...not subject to any sanctions based on [y]our school’s FY 2017 CDR,” since we are not in the jeopardy range.
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Explanation if a compliance requirement is not relevant for your institution:

Not applicable

4. Institutional Records of Student Complaints

	<u>Evidence to Demonstrate Compliance:</u>
<p>1. Policy and/or procedures for student complaints. Include the URL and any other public location where these documents are made available to students and the public</p>	<p>The College has distinct procedures depending on the nature of the student complaint, which are all listed on the College website (https://www.oldwestbury.edu/student-complaint-procedures) available to students and the public.</p> <p>The processes and procedures listed are designed to resolve problems for students who are having difficulties with other students or staff that cannot be resolved through the informal report and resolution process, or that students choose to have investigated and adjudicated in a formal setting.</p> <p>- Academic Grievance procedures pertaining to student complaints alleging violations or misapplications of College and/or course academic policies, or alleging unfair treatment, in violation of established academic policy or practice, are described on pages 53 through 55 of the Undergraduate Catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20.pdf)</p> <p>and on the College website (https://www.oldwestbury.edu/student-complaint-procedures).</p> <p>- As noted on page 32 of the Undergraduate Catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20.pdf)</p> <p>and on the College website (https://www.oldwestbury.edu/life/student-conduct) the processes by which complaints about alleged student misconduct can be resolved are outlined in the Code for Student Conduct. The Code was updated in 2011-2012 to include a sexual assault and a sexual harassment policy.</p> <p>- The definitions and procedures that outline the College's expectations related to discrimination and harassment, and the manner in which complaints can be made and are investigated, are discussed on pages 35 and 36 of the Undergraduate Catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20.pdf)</p> <p>and on the College website (https://www.oldwestbury.edu/student-complaint-procedures).</p> <p>The procedures outlined on the website (https://www.oldwestbury.edu/policies/student-complaint-procedures-administrative-units)</p>

	<p>are in use by each major functional area of the College and are meant to guide students motivated to formally complain about such items as a campus policy, procedure, condition or staff member. The procedures, however, do not replace or supersede any applicable law or legal process that might be required, depending on the complaint made.</p>
<p>2. Public location of contact information that the institution provides enrolled and prospective students for filing complaints with the institution's accreditor and with its state approval or licensing entity and any other relevant state official or agency that would appropriately handle a student's complaint. Include the URL and any other public location, if any</p>	<p>The contact information for the accreditor of SUNY Old Westbury, as well as for SUNY and the New York State Education Department, is available online (https://www.oldwestbury.edu/student-complaint-procedures) for enrolled and prospective students.</p>

Explanation if a compliance requirement is not relevant for your institution:

<p>Not applicable</p>

5. Required Information for Students and the Public

	Evidence to Demonstrate Compliance:
<p>1. URLs, catalogs and student handbooks, and other public locations of any alternative institutional website documenting required disclosures of graduation, completion, licensure pass rate and other data required by <i>Student Right to Know</i>*, as well as policies on Satisfactory Academic Progress (SAP), refund, withdrawal, leave of absence, and attendance</p>	<p>Our Undergraduate Catalog is available online (https://www.oldwestbury.edu/academics/registrar/catalogs/undergraduate-catalog).</p> <p>While the College does not have a Student Handbook, it does periodically publish a Guide to Campus Living available online (https://www.oldwestbury.edu/sites/default/files/documents/reslife/guide-to-campus-living-2018-2019.pdf).</p> <p>We have collected links to all the Right To Know items on one webpage on the College's website (https://www.oldwestbury.edu/about/student-achievement).</p> <p>Our policies covering satisfactory academic progress (SAP) are included in our Undergraduate Catalog (https://www.oldwestbury.edu/academics/registrar/catalogs/undergraduate-catalog) and begins on page 51.</p> <p>The School of Education provides their student teachers three handbooks: 1) Special Education and Bilingual Education Student Teacher Handbook (see Appendix 5.1); 2) Childhood Education and Bilingual Education Student Teacher Handbook (see Appendix 5.2); 3) Adolescence Education and Middle Childhood Education Student Teacher Handbook (see Appendix 5.3).</p> <p>Student retention and graduation rate data is available on the College website (https://www.oldwestbury.edu/academics/academic-affairs/ir/retention-graduation-data).</p>
<p>2. URLs, catalogs and student handbooks, and other public locations of any alternative institutional website documenting disclosure of program completion eligibility to meet State licensure requirements including States for which the curriculum meets and does not meet State eligibility requirements, and for which eligibility has not been determined</p>	<p>We have determined that our M.S. in Mental Health Counseling, our three SOB graduate programs, and all the programs offered by our SOE are professional licensure programs that require mandatory disclosure of program completion eligibility to meet State licensure requirements including States for which the curriculum meets and does not meet State eligibility requirements, and for which eligibility has not been determined. For instance, for Mental Health Counseling (https://www.oldwestbury.edu/academics/offerings/mental-health-counseling-ms/licensure-disclosure).</p>

<p>3. Documents and URLs for clear and accurate information wherever accreditation is referenced available to current and prospective students that show the accreditation phase and accreditation status with the Middle States Commission on Higher Education as well as the contact information for the Commission</p>	<p>Our website includes accreditations/certifications on a dedicated webpage (https://www.oldwestbury.edu/about/accreditations).</p> <p>It includes:</p> <ul style="list-style-type: none"> • Middle States Commission on Higher Education • American Chemical Society – The B.S. in Chemistry of SUNY Old Westbury is certified. • Council on Education for Public Health- The B.S. in Health & Society at SUNY Old Westbury is accredited. <p>Our Middle States accreditation is also referred to in the Undergraduate Catalog on the inside of the front cover. We show our accreditation status in compliance with Policy P4.2-Advertising, Student Recruitment, and Representation of Accredited Status.</p> <p>The School of Business is in the process of seeking Association to Advance Collegiate Schools of Business (AACSB) accreditation. This accreditation will apply to all programs and degrees offered by the SOB. Our Eligibility Application was approved in 2018 and our Initial Self Examination Report was approved in 2020. Our first Annual Progress Report was submitted November 25, 2020.</p> <p>The School of Education is a member of the American Association of Quality Educator Preparation, anticipating AAQEP accreditation in the Fall of 2021.</p>
<p>4. Provide an explanation for how the institution verifies that the posted student outcomes data are accurate</p>	<p>At each fall census, entering FTCs and Transfer students are assigned a cohort using the Banner SGRKNOW process and report; the cohorts are matched to Student and Graduated student data files for subsequent terms to ascertain students’ current enrollment and/or graduation. This is used to ascertain FTC graduation and retention rates.</p> <p>The SGRKNOW reports (from Banner) are a check and balance to verify the enrollment and graduation of the students. The report provides data on the enrollment and graduation of each cohort in aggregate as well as a listing for each cohort. Also, student data files are regularly matched to subsequent terms for additional data and verification.</p> <p>The School of Education follows NY State Education Department procedures utilizing the Title II Report, completed by Pearson Education, the vendor and administrator for licensure examinations. We complete the Westat Title II Compliance based on data received from Pearson,</p>

	<p>according to Institution and Program Report Card Instructions (see Appendix 5.4).</p> <p>Student outcomes are confirmed by the state annually in the Title II report. We submit the names of all of our graduating students that year and the state produces a report of the student pass rates and mean scores for each of the certification exams. The outcome measures on the website are drawn directly from SUNY BI data, which are authoritative within SUNY, and based on SIRIS reporting.</p>
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**Many institutions create a single portal page on the institution's web site that provides hyperlinks to disclosure information (Consumer Information Page, Student Right to Know, HEOA, Fast Facts, At A Glance, etc.). This is the recommended approach as it facilitates the review by the Commission since it consolidates the information in one place and meets multiple accountability requirements at one time.*

Explanation if a compliance requirement is not relevant for your institution:

Not applicable

6. Standing with State and Other Accrediting Agencies

Not applicable

	<u>List of Evidence to Demonstrate Compliance:</u>
1. Names of other accreditors, program(s) it accredits, and year of next review	<p>All degree programs of the State University of New York at Old Westbury have received approval from and are registered with the New York State Education Department, Office of Higher Education.</p> <p>The School of Education is approved by New York State Education Department, and is anticipating American Association of Quality Educator Preparation (AAQEP) Accreditation in the Fall of 2021.</p> <p>The School of Business is in the process of seeking AACSB Accreditation. This accreditation will apply to all programs and degrees offered by the School of Business. The College's Eligibility Application was approved by AACSB in 2018, and the Initial Self Evaluation Report (iSER) was approved in 2020. Our first Annual Progress Report was submitted November 25, 2020.</p> <p>The College's Public Health degree is certified as a standalone baccalaureate program (one of just 18 nationwide) by CEPH, the Council on Education in Public Health. The current accreditation goes through June 2024.</p> <p>The B.S. in Chemistry degree is certified by the American Chemical Society.</p>
2. Documents and URLs available to current and prospective students that show the most recent updated degree granting authority, charter, or license with an appropriate jurisdiction and the current accreditation status with other USDE recognized accrediting agencies	<p>The College has a web page (https://www.oldwestbury.edu/about/accreditations) dedicated to state authorizations and current accreditations.</p>
3. Report from State or other accreditor if institution has been found noncompliant (including institutional response) within the last five years	<p>Not applicable. We have not received any notices of non-compliance.</p>

Explanation if a compliance requirement is not relevant for your institution:

7. Written Arrangements

	Evidence to Demonstrate Compliance:
1. List of current written agreements, including the name of third-party and educational program(s) involved, and date of Commission approval	Not applicable. We do not have any such contractual arrangements.
2. Documents and/or URLs available to current and prospective students that describe written arrangements including: the name of the educational program(s) involved; the portion of the educational program not provided by the institution; the name and location of the other unaccredited or ineligible third party providers; and the method of delivery and estimated additional costs of that portion of the program	Not applicable.

Explanation if a compliance requirement is not relevant for your institution:

Not relevant. We do not have any such contractual arrangements.

8. Assignment of Credit Hour

	<u>Evidence to Demonstrate Compliance:</u>
1. Policy and procedures for assignment of credit hour for all types of courses, disciplines, programs, credential levels, formats, regardless of modality). Include the URL and any other location where the documents are disclosed to students and the public	<p>Beginning with the 2015-16 academic year, the College has utilized a course schedule that maximizes class availability, with more course periods offered throughout the day in comparison to the prior course schedule. The Policy on Credit Hours and Course Expectations is available on our website (https://www.oldwestbury.edu/sites/default/files/documents/Policy%20on%20Credit%20Hours%20and%20Course%20Expectations.pdf), and is also available in our College Catalog (https://www.oldwestbury.edu/academics/registrar/catalogs).</p> <p>Information on length and frequency of class meetings is provided through the online Class Schedule available online (https://www.oldwestbury.edu/academics/registrar/class-schedule). Information on the academic period has been provided in the academic calendar (https://www.oldwestbury.edu/academics/calendar) and information on the amount of in-class and out-of-class time is available on page 46 in the College Catalog (https://www.oldwestbury.edu/sites/default/files/documents/Catalogs/2018-20/undergrad-catalog-18-20-general-information.pdf).</p>
2. Course or program review procedures and	Our credit hour policies and procedures are applied consistently through the use of the Banner software program. The Course Schedule produced

<p>sample approval documentation, as they relate to credit hour</p>	<p>by Banner indicates class meeting days (R = Thursday) and times, credits, and class formats (i.e., course prefixes signify: NE = online course; HY = hybrid course; BL = blended course). All new courses are reviewed and approved by the appropriate department Chair, school Dean, and ultimately the Office of Academic Affairs, through the use of a New Course or Change of Course Form (see Appendix 8.1) that requires a course syllabus be attached. Such reviews include ascertaining that the course contains the appropriate amount of work for the credits to be awarded. Furthermore, each academic program conducts a review, including the participation of a reviewer from off-campus, every 5 years that includes all aspects of its operations, under the supervision of the faculty Curriculum and Academic Planning (CAP) Committee.</p>
<p>3. Process the institution utilizes to verify length of academic period and compliance with credit hour requirements through course scheduling</p>	<p>As discussed in Item 2 above, when a course is created the assignment of credit hours is reviewed by the department Chair, school Dean and Office of Academic Affairs, which has final approval. All academic programs periodically conduct a self- assessment, including all aspects of the courses they offer, such as whether the amount of student work required is appropriate for the number of credits awarded, through the 5-Year CAP Review process. CAP, a committee consisting only of faculty members from across the campus, gives final approval to departments' Review Reports. In addition, every semester as course schedules are compiled, the Office of Academic Affairs and the Registrar continuously review schedule submissions to verify the appropriateness of credits, in-class hours, and delivery formats assigned to courses being put on the schedule.</p>

Explanation if a compliance requirement is not relevant for your institution:

Not applicable