VERIFICATION OF COMPLIANCE WITH ACCREDITATION-RELEVANT FEDERAL REGULATIONS

SUBMITTED JUNE 1, 2013 TO THE

MIDDLE STATES COMMISSION ON HIGHER EDUCATION

WITH THE

DUQUESNE UNIVERSITY

PERIODIC REVIEW REPORT

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APPENDIX

Appendix A
**INTRODUCTION**

Duquesne University is pleased to submit this “Verification of Compliance with Accreditation-Relevant Federal Regulations” along with its Periodic Review Report to the Middle States Commission on Higher Education.

This report documents institutional compliance in four areas as required by the Commission:

1. Student identity verification in distance and correspondence education
2. Transfer of credit
3. Title IV cohort default rate
4. Assignment of credit hours.

Duquesne University completed a comprehensive review of its policies and procedures related to the accreditation-relevant federal regulations and the Middle States Commission on Higher Education verification of compliance during AY 2012-2013.

**OVERVIEW OF FINDINGS**

Duquesne University is currently in compliance in all four areas:

- Student identity verification in distance and correspondence education
- Title IV cohort default rate
- Transfer of credit
- Assignment of credit hours.

**RESPONSE TO EACH REGULATION**

The following responses address each accreditation-relevant federal regulation as required by the Middle States Commission on Higher Education.

**Distance or Correspondence Education**

**University Response:** Duquesne University is in compliance with the Distance or Correspondence Education regulation.

1. **Written description of identity verification for access to distance education**

   Students are required to use a secure login and password for all systems. Known at Duquesne as MultiPass (See [FAQ](#)), it is the key to the student portal, Blackboard Learning Management System (LMS), email, wireless, and other electronic resources.
including the library. All students receive information for creating their Multipass upon deposit. This includes setup of the account, enforcement of strong passwords, and reminders not to share this information. Password changes are enforced every 120 days while the account is active. Active accounts become inactive after 13 months of separation from the University.

Duquesne’s policy on FERPA, The Administrative Policies (TAP) 28, specifically addresses Student Privacy as does TAP 26, Computing Ethics and Guidelines.

Additional information:

- The Office of the University Registrar is the main repository for academic records and access and maintains the student module of Banner, the University’s enterprise resource planning system (ERP).
- The University Registrar staff members take mandatory FERPA training.
- Help Desk staff do not have access to Multipass passwords.
- Staff members in Computing and Technology Services (CTS) areas all complete non-disclosure agreements.
- The Blackboard LMS is updated daily with registration changes verified through Banner which is the University system of record.

2. Procedure for protection of identity

While the FERPA policy/procedure is handled through the Office of the University Registrar, the account is established by Computing and Technology Services. The following describes the life-cycle of the account including the Multipass Un-Initialize Process requiring verification:

1. Upon deposit, a Multipass account is generated for students using a protected algorithm which creates a unique account. Students are told to initiate their Multipass. Included is information regarding changing passwords, strong passwords, and safety precautions.
2. Student initiates Multipass using self-service procedures
3. Within 120 days and while the account remains active, students are forced to change their Multipass password.
4. If a problem occurs that cannot be solved through self-service, the Multipass Un-initialize process is invoked.
5. Once separated from the University through graduation or other circumstances, active accounts become inactive after 13 months of separation from the University with provisions not to be duplicated through the creation process.
3. **Notification of charges**

Not applicable

4. **Offices involved**

A number of offices are responsible for the consistent application of identity procedures. The Office of the University Registrar is the chief maintainer of academic records related to identity. The **FERPA** policy discusses additional offices related to the use of academic records.

Computing and Technology Services and Educational Technology establish accounts with students in classes per the described process in #2 based upon authorization from the University Registrar.

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**Transfer of Credit**

**University Response:** Duquesne University is in compliance with the Transfer of Credit regulation.

Duquesne University has had university-wide policies for the transfer of credit for both undergraduate and graduate students. During AY 2012-2013 the University reviewed and updated its policies. Graduate transfer of credit policies were previously decentralized by school but a University-wide policy was adopted in spring 2013 and is currently being implemented.

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

Written policies and procedures for making decisions about the transfer of credits for undergraduate and graduate credits earned at other institutions, including all modes of delivery, are available on the University website.

2. **Public disclosure of the policy for transfer of credit.**

The policies for transfer of credit are publicly available on the University website.

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

The final determination of the acceptance or denial of transfer credit is clearly indicated in the undergraduate and graduate policies for transfer credit which are publicly available on the University website.
4. A published and accessible list of institutions with which the institution has established an articulation agreement.

The list of institutions with which Duquesne University has established articulation agreements is publicly available on the University website.

**Title IV Cohort Default Rate**

**University Response:** Duquesne University is in compliance with the Title IV Cohort Default Rate regulation.

1. **Formal documentation from the U.S. Department of Education regarding the institution’s cohort default rate for the past three years.**

   Duquesne University’s Official Cohort Default Rates over the prior three years have all been well below the U.S. Department of Education’s regulation threshold. As a result, Duquesne has not been subject to any sanctions. Duquesne University is also below the national average each year as evidenced by the following rates over the past three years:

   - Fiscal Year 2011 (2 year draft Cohort Default Rate)…….. 1.5%
   - Fiscal Year 2010 (3 year Cohort Default Rate)……………. 3.5%
   - Fiscal Year 2009………………………………….1.3%

2. **External audits of federal programs (A-133) for the past three years.**

   For the past three years: 2010/2011, 2009/2010, and 2008/2009, Part III Federal Award Findings and Questioned Costs Section of the audit reports stated: “No matters were reportable.” These audits are available in Appendix A.

3. **Relevant correspondence from U.S. Department of Education, and institutional responses, if appropriate.**

   There was no relevant correspondence from the U.S. Department of Education or institutional responses necessary for the years reported above.

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

   There were no reports on compliance from the U.S. Department of Education in regard to the cohort default rate based on Duquesne’s very low rates over the past three years.
Credit Hour

University Response: Duquesne University is in compliance with the Credit Hour regulation.

Duquesne University has historically followed the Carnegie credit hour rule when scheduling courses and assigning credit hours. It has also met the requirements of the Pennsylvania Department of Education Title 22 Pennsylvania Code 31.21. (b) which states “A semester credit hour represents a unit of curricular material that normally can be taught in a minimum of 14 hours of classroom instruction, plus appropriate outside preparation or the equivalent as determined by faculty.” Therefore, it has been in compliance with MSCHE standards for the assignment of credit hours.

During AY 2012-2013 the University reviewed and updated its credit hour and credit hour review policies. The updated policies are currently being implemented. The credit hour policy is publicly available on the University’s website, as is the formal review policy.

1. Written policies and procedures for credit hour assignment covering all types of courses, disciplines, programs, degree levels, formats, and modalities of instruction.

   Duquesne University has written policies and procedures for credit hour assignment covering all courses offered. It describes the requirements for instructional time and credit hour assignment policies for each of the University’s scheduling modes.

2. Evidence that the institution’s credit hour policies and procedures are applied consistently across the full range of institutional offerings.

   The Office of the University Registrar maintains a historical record of its review of courses in order to verify compliance with the University policy. These records are maintained for a period of at least five years in order to provide documentation to the Middle States Commission on Higher Education as part of the University’s Self-Study or Periodic Review Report.

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.

   The University’s official review policy is available on the University’s website. The Office of the University Registrar monitors course offerings for compliance each term when the Schedule of Classes is developed.

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.
The Office of the University Registrar maintains a record of courses that do not adhere to the MSCHE credit hour policy along with evidence that such courses either adhere to specialized professional accreditation standards or follow commonly accepted practice within higher education.