

PROPOSED NEW POLICY

Policy on Exceptions due to a Regional Crisis or Pandemic (initial review)

The ABHE Commission on Accreditation (COA) established the following protocols for rapid response in circumstances where federal, state/provincial, or local restrictions due to a crisis or pandemic make it impossible for normal institutional operations and/or accreditation functions to continue without temporary exceptions.

The COA authorizes the COA Director or Director's designee to grant exceptions to accreditation policies and procedures as noted below on an act and inform basis. Such exceptions must comply with applicable laws and regulatory provisions in the jurisdiction(s) impacted by the crisis. Exceptions must also comply with any directives from the U.S. Department of Education and/or state/provincial education offices. Exceptions will be reported to the respective COA subcommittee (APCAN or PRSC) at the next scheduled meeting. The COA may elect to continue, modify, or rescind temporary provisions as it deems appropriate.

The COA recognizes the following alternatives for consideration. Other options may be approved by the COA Director or Director's designee where consistent with regulatory requirements:

1. Temporarily offering all courses via distance education (online) even if the institution has not been approved to offer 50% or more of a program via distance education.
2. Temporarily suspending classes or providing out-of-class learning activities as a substitute for in-class learning activities.
3. Temporarily shifting to competency-based education assignments.
4. Temporarily suspending or waiving ministry formation, chapel, field education, or other requirements that would normally involve close contact engagement with others or travel.
5. Temporarily switching to pass/fail grading.
6. Temporarily suspending student services where circumstances prevent reasonable access to or engagement with such services.
7. Temporarily suspending meetings of decision-making bodies (faculty, administration, board) or moving such meetings to virtual formats.

The institution must contact the COA office at coa@abhe.org to initiate an exception, provide a brief explanation for how educational quality will be sustained under the exception, secure COA Director/Director designee approval of the exception, and keep the COA office informed of the anticipated or actual start and end date for the exception. Where emergency action must be taken, the institution should contact the COA office as soon as possible.

The COA Director or Director's designee may also make adjustments to accreditation procedures as long as those exceptions are consistent with regulatory guidance in effect at the time of the decision. These are not limited to, but may include the following:

1. Conduct virtual evaluation team visits with a follow-up on-site visit at a later date to verify items that could not be examined virtually.
2. Delay evaluation team visits when a virtual visit is not possible (up to 7 months).
3. Delay or conduct virtual Commission staff visits.

On-site visits supplementing a virtual team visit may be conducted by a team evaluator or Commission staff representative up to one year after the team visit unless extended by COA action. Such visits will normally involve a few hours on campus during a single day. The on-site visit will include review of physical and technological resources, faculty records, records of student complaints/grievance, and items identified by the off-site team that could not be examined virtually. Usually, one evaluator will conduct the on-site visit; however, additional evaluators may be needed where additional issues need explored. The on-site evaluator(s) will prepare a brief summary report of findings which the COA staff will provide to the institution for response and to the COA for review. The report and any institutional response will be reviewed at the next scheduled meeting of the COA and may be separate from action taken on the virtual evaluation visit team report and the institution's response to the virtual evaluation visit report.

The COA may make exceptions in its actions consistent with regulatory guidance at the time of the action, including the following:

1. Delaying action on candidate status, initial accreditation, reaffirmation of accreditation, or sanction for up to one year.
2. Granting retroactive approval for candidate status, initial accreditation, reaffirmation of accreditation, or sanction based on the original timeline for review had the crisis not disrupted that timeline.
3. Taking action on candidate status, initial accreditation, reaffirmation of accreditation, or sanction at an electronic meeting.
4. Taking action on candidate status, initial accreditation, reaffirmation of accreditation, or sanction at a meeting during the year other than the normal February review cycle.

5. Delaying an evaluation team visit for more than 7 months.

Exceptions due to regional crisis or pandemic are temporary in nature and may not be extended beyond one year without special approval by the COA. Institutions that wish to make a temporary exception permanent must follow the applicable procedures in the Policy on Substantive Change and/or related policies in the *COA Manual*. Such changes should be pursued before regional or national circumstances render the exception no longer applicable as a temporary measure.

PROPOSED August 2020