In Shakespeare’s *Hamlet*, Ophelia naively reveals the prince’s amorous blandishments to Polonius, her father, who derisively characterizes them as “springes to catch woodcocks” (i.e.: “traps for unwary birds”). The *Principles of Accreditation* are rift with standards that pose potential compliance traps for the unwary. As you know, the *Final Report of the SACSCOC Reaffirmation Committee* cited the university for three recommendations; and, in last quarter’s column, I focused on one of the three standards (i.e., CS 3.3.1.5) that tripped us up. In this column, I will address another one of these standards, viz.: CS 3.7.1. [In order to better elucidate the pitfalls coincident to this particular standard, however, I will also need to provide insights into other such “faculty” standards, notably CR 2.8, which is the core requirement “faculty” standard antecedent for the five comprehensive “faculty” sub-standards comprising 3.7. So, I will discuss CS 3.7.1 in combination with CR 2.8.]

Of the nearly 100 SACSCOC standards reviewed decennially for full institutional reaffirmation, many either directly or indirectly affect—or are affected by—faculty, for example,

- CS 3.4.10 Faculty Responsibility for the curriculum;
- CS 3.5.4 Terminal degrees of faculty;
- CS 3.7.2 Faculty evaluation;
- CS 3.7.3 Faculty development;
- CS 3.7.4. Academic freedom of faculty;
- CS3.7.5 Faculty role in governance.

In fact, the word “faculty” appears 247 times in the 130-page *Principles*. As I have noted, many of these standards constitute insidious noncompliance traps for unwary institutions. However, no faculty standards are more insidious and trap more unwary institutions than **CR 2.8 (“Adequate number of faculty”)** and **CS 3.7.1 (“Faculty competence”)**: the former standard appears on the SACSCOC “Top 10 Most Frequently Cited Principles in Reaffirmation Reviews for 2013 class institutions (N=75)” (q.v.) 53% of the time by off-site committees; and, remarkably, the latter appears a whopping 100% of the time in off-site reports! Over the
course of our most recent accreditation, these two standards, perforce, precipitated comments from our off-site committee; and later, as you know, we received a recommendation for CS 3.7.1 in the final Report of the Reaffirmation Committee. This SACSCOC (STILL) MATTERS column will focus on the vexatious “springes” within these two standards.

As I noted two columns ago (Volume3, Issue3, Spring 2015):

In their Evaluator Training Module: MODULE 4: FOUNDATIONS OF INSTITUTIONAL EFFECTIVENESS (http://www.sacscoc.org/trngmods/IEModules.pdf), SACSCOC lists three institutional effective Case Analysis Factors (CAF). CAF 1 – “Knowing and Understanding the Language of The Principles of Accreditation,” represents what SACSCOC wants its volunteer IE evaluators to know. Accordingly, it is paramount that we who generate documents to support the university’s compliance with SACSCOC standards be equally knowledgeable and understanding.

Moreover, each SACSCOC on-site and off-site committee will contain at least one peer evaluator who is an experienced expert in faculty issues. Therefore, it is critically important to know and to address all parts of these two standards.

| CR 2.8 The number of full-time faculty members is adequate to support the mission of the institution and to ensure the quality and integrity of its academic programs. (Adequate number of faculty) [SACSCOC keywords are underscored] |

The following highly elucidatory CR 2.8 Suggestions and Excerpt citing noncompliance are drawn directly from the SACSCOC Handbook for Institutions Seeking Reaffirmation:

- **Suggestion:** Define “full-time” faculty. Remember that a full-time administrator who teaches a class or two is not considered to be a full-time faculty member.
- **Suggestion:** List the expectations of the institution concerning duties of full time faculty.
For example, what are the expected teaching loads? What are other expected duties, such as advising, committee service, directing of theses and dissertations, etc.?

- **Suggestion:** Provide information for specific faculty members to include for specific terms the teaching load and, where applicable, advising loads, committee assignments, and other expected duties.

- **Excerpt citing noncompliance:** “The number of faculty and the faculty/student ratios appear to be sufficient in most programs. The number of hours assigned to individual faculty persons also appears to be appropriate, generally 12 to 15 per term. However, several programs appear to have few or no full time faculty involved in the program.”

Albeit a core requirement (CR), the data cited above from SACSCOC’s own “Top 10 Most Frequently Cited Principles in Reaffirmation Reviews” report would indicate that this standard is less vexatious than CS 3.7.1: 53% versus 100%. TRANSLATION: it might be easier - and it was for us - to confirm the adequate number of faculty (2.8) than to confirm faculty competence (3.7.1). For this standard, the commission has promulgated a recent (June 2014) policy:

**CORE REQUIREMENT 2.8 (Faculty)**

**Guideline**

**Why a Guideline instead of a Template?** This guideline replaces the CR 2.8 Template that was formerly posted on the SACSCOC website. The template focused exclusively on data-driven information regarding the teaching responsibilities of full-time faculty. This guideline appropriately addresses the array of responsibilities assigned to full-time faculty.

CR 2.8 The number of full-time faculty members is adequate to support the mission of the institution and to ensure the quality and the integrity of each of its academic programs. Upon application for candidacy, an applicant institution demonstrates that it meets the comprehensive standard for faculty qualifications. (Faculty)

**Rationale.** Adequacy of faculty resources is necessary to ensure the quality and integrity of an institution’s academic programs in order to support its mission. Moreover, the
mission of the institution will govern the type of faculty employed, including the num-
ber, distribution, and expected role of full-time faculty in academic and governance matters. The achievement of the institution’s mission with respect to teaching, re-
search, and service requires a critical mass of full-time, qualified faculty to provide
direction and oversight of academic programs. The number of full-time faculty should
be sufficient to fulfill basic faculty functions—curriculum design, development, and
evaluation; teaching; identification and assessment of appropriate student learning
outcomes; student advising; research, scholarship, and creative activity; and institu-
tional and professional service. Consequently, an institution relies on full-time faculty
engagement in all aspects of the academic program; its quality and integrity are not
driven solely by the number of hours that full-time faculty are teaching.

Expectation. CR 2.8 expects an institution to (1) define full-time and part-time faculty;
(2) define faculty oversight of its academic programs (beyond just broad areas such as
social sciences or humanities, or broad degree categories such as Associate in Arts or
Bachelor of Science) and academic processes; (3) describe the distribution/disaggregation of full-time and part-time faculty by academic program; (4) identify the expected role, responsibilities, and functions of full-time faculty charged to support
and ensure the quality and integrity of each academic program, while also referencing
work overloads; and (5) provide persuasive evidence that the number of full-time fac-
ulty in each academic program is adequate to fulfill those responsibilities. Institutions
committing such evidence to tables should use institutionally-generated tables/charts
as appropriate in lieu of those formerly provided by SACSCOC.

Document History
Approved: SACSCOC Board of Trustees, June 2014

Additionally, no less than 14 annual SACSCOC meeting presentations over the last several
years have been devoted to exegeses of 2.8 (NOTE: for hardcore assessment fanatics, please
see the SU Library folder Library>Accreditation>SACS Examples>2.8 to access handouts for
these presentations)
To comply with this standard, which - reflective of its overall importance – is one of the 17 subsets of approximately 100 overall standards that institutions need to address at the time of their SACSCOC fifth-year Interim Report, typically institutions will provide the following evidence:

- Peer-to-peer benchmarks (i.e., IPEDS, College Results Online, Common Data Sets, etc.) against institutions with similar programs;
- Faculty Rosters and job descriptions, and other documentation;
- Institutional SACSCOC-aligned credentialing validation processes and policies.

The following highly elucidatory CS 3.7.1 Suggestions and Excerpt citing noncompliance are drawn directly from the SACSCOC Handbook for Institutions Seeking Reaffirmation:

- **Suggestion:** Ensure that the qualifications are directly and specifically linked to the courses assigned to the faculty member. For all cases, the institution is responsible for justifying and documenting the qualifications of its faculty. (See Commission guidelines “Faculty Credentials.”) (Faculty competence)

- **Suggestion:** Support justifications of faculty qualifications and experience through third-party documentation, such as transcripts and letters of recommendation, rather than rely-
ing on faculty-generated documents, such as resumes and personal websites. However, do not include transcripts or letters of recommendation with the Application for Membership.

- **Suggestion:** When developing justifications for faculty whose expertise derives from personal/professional experience rather than from degrees earned, use the compliance components provided in the standard as appropriate for competence, effectiveness, and capacity as the organizing principle for presenting the documentation.

- **Excerpt citing noncompliance:** “The faculty roster was found to be incomplete. In some cases, courses taught were missing; in others, the academic degrees of the faculty member were not presented. Lacking a complete faculty profile, the Committee was unable to determine the competency of thirteen faculty members.

CS 3.7.1 is one of the longer - and, hence, more complicated standards, which, in SACSCOCspeak, is referred to as a “Multi-faceted Standard” http://www.sacscoc.org/2016trackaorientation/pres/2016TrackAOrientationPresentation.pdf. Faculty competence also applies to the total faculty complement, which involves a large number (typically, hundreds) of potential qualification pitfalls. Due, perhaps, to its complexity and to its alignment with standards and requirements that directly parallel the criteria of the USDoE as well as to its high rate of noncompliance, the Commission has developed useful “Faculty Credentials” guidelines (http://www.sacscoc.org/pdf/081705/faculty%20credentials.pdf), which read:

When an institution defines faculty qualifications using faculty credentials, institutions should use the following as credential guidelines:

a. Faculty teaching general education courses at the undergraduate level: doctorate or master’s degree in the teaching discipline or master’s degree with a concentration in the teaching discipline (a minimum of 18 graduate semester hours in the teaching discipline).

b. Faculty teaching associate degree courses designed for transfer to a baccalaureate degree: doctorate or master’s degree in the teaching discipline or master’s degree with a concentration in the teaching discipline (a minimum of 18 graduate semester hours in the teaching discipline).

c. Faculty teaching associate degree courses not designed for transfer to the baccalaureate degree: bachelor’s degree in the teaching discipline, or associate’s degree and
demonstrated competencies in the teaching discipline.
d. Faculty teaching baccalaureate courses: doctorate or master’s degree in the teaching discipline or master’s degree with a concentration in the teaching discipline (minimum of 18 graduate semester hours in the teaching discipline).
e. Faculty teaching graduate and post-baccalaureate course work: earned doctorate/terminal degree in the teaching discipline or a related discipline.
f. Graduate teaching assistants: master’s in the teaching discipline or 18 graduate semester hours in the teaching discipline, direct supervision by a faculty member experienced in the teaching discipline, regular in-service training, and planned and periodic evaluations.

Approved: College Delegate Assembly, December 2006

Astutely, the university has incorporated most (not the last one relating to “Graduate teaching assistants”) of these key guidelines into its “Faculty Qualifications” in the SU Faculty/Staff Manual.

Obviously, faculty credentials and qualifications constitute integral parts of this standard. To better abet one’s understanding, the following definition may be found in the SACSCOC Resource Manual’s Appendix B “Glossary of Terms,”

Faculty Credentials: When an institution defines faculty qualifications using faculty credentials, institutions should use the Commission’s credential guidelines.

Essentially, institutions are asked to employ faculty qualified to teach the courses it offers. At bottom, this assertion may seem axiomatic, but aligning faculty credentials/qualifications to courses is not as straightforward as it seems. Managing faculty credentials contributed to the university obtaining the latest Xitracs™ web 2.0 software in October, 2013. The Xitracs™ Plus software comprises a dual module: one for compliance and one for credentials. As you may know, I used the Xitracs™ compliance module to build for and deliver to SACSCOC both the Compliance Certification and the subsequent Focused Report. Additionally, however, the Xitracs™ Credentials module – aided by recent policy enhancements (i.e. the new “Verification and Authentication of Educational Credentials for Faculty and Professional or Para-Professional Staff Members” policy) - helps us to continuously manage the often thorny qualitative issues relating to SACS CR 2.8 (Faculty) and CS 3.5.4 (Terminal degrees of faculty). Functioning as the university’s credential repository, this module may be accessed by authorized personnel for individual/departmental/school review of:
• **Base Data** (with a *CV online* hyperlink);
• **Qualifications** (with *Transcript* hyperlink(s));
• **Experience with other Qualifications** (with *Transcript* hyperlink[s]).

To any speculative calculus designed to achieve compliance with CS 3.7.1 (and CR 2.8), one will also need to factor in the CS 3.5.4 (Terminal degrees of faculty) requirements, viz.:

*At least 25 percent of the discipline course hours in each major at the baccalaureate level are taught by faculty members holding the terminal degree – usually the earned doctorate – in the discipline, or the equivalent of the terminal degree.*

Proverbially, this additional complexity “piles Ossa upon Pelion,” due mainly to faculty talent management difficulties prior to and after recruitment. To be sure, the academic credentials – or work experience - for any and every faculty member must be defensible in order to be compliance-proof. That is, if a faculty member possesses such and such academic degrees supplemented by such and such experiences, is he/she qualified to teach such and such class(es). A large number of highly differentiated credentials and experiences reside among any given faculty candidate; and those credentials and experiences may or may not align with the course’s academic qualification requirements. At some point, subjectivity may creep into the qualification calculus, which depreciates any *ex post facto* credentials’ defense to SACSCOC. As evidenced by googling “SACSCOC 3.7.1,” institutional faculty defenses can and often are made, but SACSCOC remains the final arbiter of these defenses. Plus, if one is routinely defending large numbers of faculty, one’s credibility may be compromised. So, recruiting qualified personnel is hypercritical and poses many problems for the compliance officer’s consideration. Yet, once again, the Xitracs™ Credentials module can be used to archive the qualifications of these faculty.

Having purposefully comported with all the CR 2.8 and CS 3.7.1 standards’ many complex issues – including those associated with CS 3.5.4 – an institution may still end up with noncompliance’s steely teeth biting into one’s ankle. Notwithstanding our best efforts to achieve and - with Xitracs™'s help - to demonstrate compliance with these important standards, they trapped us in 2005 and again in 2015, plus CR 2.8 solicited clarification for our 2010 *Interim Report.*
So, what is an institution to do – besides attempt to scrupulously adhere to the standards as they understand them? As illustrated in the University of Kentucky 2011 PowerPoint slide below, often institutions will enlist technology (e.g. Xitracs™) to manage transcript/CV credential digitization and strengthen upstream recruitment practices to align them with SACS criteria. (Google: University of Kentucky SACSReaffirmationUpdateGeneric PowerPoint)

Also, at the time of his/her application and appointment, each faculty member is strictly evaluated for his/her potential to contribute to the mission, vision, and goals. Additionally, the credentials of all fulltime faculty, all special faculty, and all part-time faculty are assessed by the appropriate department/program head and dean of their school or college, before the faculty member is hired and can teach any classes. Department chairs enter a justification for
each instructor and teaching assignment that does not satisfy SACS criteria with the university’s Office of the Provost reviewing all transcript to the course-level. As an integral part of this process, all credentials are digitized and archived in Xitracs™.

Lastly, institutions may feel like the person in the cartoon below: that the SACSCOC one-size-fits-all assessment criteria does not work for such a variety of applicants teaching such a variety of courses. As detailed in these standards, the essence of what SACSCOC requires is that qualified individuals should be enlisted to teach disciplines for which they are academically or experientially qualified. We want that; ACPE wants that; ARC-PA wants that; IACBE wants that. Even Major League Baseball wants that.

I hope this more fine-grained insight into this particular standard has been helpful. If you have questions, kindly let me know.