Rutgers,
The State University of New Jersey

Documentation for Compliance with Accreditation-Relevant Federal Regulations

Submitted to: Middle States Commission on Higher Education

May 30, 2013
Distance or Correspondence Education

*The Commission must verify that institutions have effective procedures in place to ensure that the students who register in a distance or correspondence education course are the same students who participate in and complete the course, and receive the academic credit (34 CFR 602.17(g)).*

1. **Written description of the method(s) used to ensure student identity verification in distance or correspondence education courses:**

Rutgers University through the Rutgers [Division of Continuing Studies](https://www.rutgers.edu/continuingstudies) registers students for online courses using a student information system (SIS) and manages access through a Central Authentication System. The SIS includes courses, names, e-mail addresses and passwords for students. The vast majority of online enrollments at Rutgers take place in Pearson Learning Studio, a secure, off-site, third party learning management system. The remaining online enrollments take place in learning management systems that reside on Rutgers servers, with access also controlled by the Central Authentication System. In the case of Pearson, Rutgers uploads student information to a secure location, and then Pearson processes the student information. This information is stored in Pearson. Rutgers passes information to Pearson in encrypted format, for the protection of student privacy.

2. **Written procedure regarding the protection of student privacy in the implementation of such methods:**

Pearson provides student access to online courses through a secure connection to Rutgers systems, for the protection of student privacy. In terms of student identity verification, students login to their online courses using their Rutgers NetID and password (see: [https://netid.rutgers.edu/index.htm](https://netid.rutgers.edu/index.htm)), connected to the Pearson LMS through Rutgers Central Authentication Service (CAS – see: [http://idms.rutgers.edu/cas/](https://idms.rutgers.edu/cas/) and [http://www.jasig.org/cas/](http://www.jasig.org/cas/)) over a secure internet connection ([https://ecollege.rutgers.edu](https://ecollege.rutgers.edu)).

A student may elect to reset the password at any time using an elaborate and secure process (see: [http://password.rutgers.edu/](http://password.rutgers.edu/)). The use of CAS and the elaborate and secure process for resetting passwords ensures a consistent application of student identity verification.

The following Office of Information Technology policies address student identity verification and the protection of student privacy at Rutgers University:

- [https://netid.rutgers.edu/index.htm](https://netid.rutgers.edu/index.htm)
- [https://rusecure.rutgers.edu/](https://rusecure.rutgers.edu/)
- [http://oirap.rutgers.edu/7011-current.pdf](http://oirap.rutgers.edu/7011-current.pdf)
- [http://oit.rutgers.edu/policies.html](http://oit.rutgers.edu/policies.html)
3. **Written procedure for notifying students about projected additional charges associated with such verification:**

In addition to the Central Authentication Service (CAS), Rutgers Division of Continuing Studies has researched and makes available for purchase 3rd party products such as BioSig and Axiom that provide additional security at the course level, at a department’s request, and additional charges and fees do not apply. Also, Rutgers has researched and provides information about ProtorU for secure proctoring of online tests. Finally, Rutgers provides information for global testing centers for high stakes testing in online courses and programs through the Pearson VUE network of testing centers. No department has taken advantage of these latter services but students will be advised that additional charges would apply for these personalized, highly secure and proctored testing services.

4. **Written procedure indicating the office(s) responsible for the consistent application of student identity verification procedures:**

   See # 1 and #2 above.
Transfer of Credit

In accordance with 34 CFR 602.24(e), the Commission must confirm that an “institution has transfer of credit policies that: (1) Are publicly disclosed in accordance with section 668.43(a)(11); and (2) include a statement of criteria established by the institution regarding the transfer of credit earned at another institution of higher education.”

Section 668.43(a)(11) states:

(a) Institutional information that the institution must make readily available to enrolled and prospective students under this subpart includes, but is not limited to-(11) A description of the transfer of credit policies established by the institution which must include a statement of the institution’s current transfer of credit policies that includes, at a minimum—

(i) Any established criteria the institution uses regarding the transfer of credit earned at another institution; and

(ii) A list of institutions with which the institution has established an articulation agreement.

1. Written policies and procedures for making decisions about the transfer of credits earned at other institutions, including all modes of delivery;
2. Public disclosure of the policy for transfer of credit (i.e., on the institution’s website and in other relevant publications);
3. Procedures that indicate the office(s) responsible for the final determination of the acceptance or denial of transfer credit; and
4. A published and accessible list of institutions with which the institution has established an articulation agreement:

All transfer credits are evaluated by the respective school and/or department that students enroll in at Rutgers. Evaluation of transfer credit regardless of mode of delivery occurs after transfer students have confirmed their intention to enroll at Rutgers. Credit is granted for courses taken at other accredited colleges or universities if they are equivalent to courses at Rutgers and the student attained a satisfactory grade (usually a C or better).

Policies and procedures for making decisions about the transfer of credits earned at other institutions are formally documented on institutional websites and student catalogs. An inventory of these sources can be found on the Rutgers Disclosures webpage.

The state of New Jersey through legislation (called the Lampitt law and created by N.J. Rev. Stat. § 18A:3B-14) has instituted a formal process for the ‘seamless transition from public associate to public baccalaureate degree programs . . .’ for public two-year and four-year institutions in the state. A description of this comprehensive state-wide transfer agreement can be found on Rutgers’ websites (admissions, disclosures) and the New Jersey Office of the Secretary of Higher Education website. The New Jersey Presidents’ Council’s Transfer Committee is charged with “assessing the effectiveness of the implementation of the Comprehensive State-Wide Transfer Agreement in collaboration with the Commission on Higher Education (now the Office of the Secretary of Higher Education), and for recommending to the Council any modifications to the Agreement or related procedures.” A list of the New Jersey Community Colleges that participate in the statewide transfer agreement can be found here.
Tools to assist students in assessing the transferability of earned credits at New Jersey Community Colleges to Rutgers include the NJTransfer.org website.
Title IV Cohort Default Rate

In accordance with 34 CFR 602.16(a)(1)(x), the Commission must verify that the institution’s three-year cohort default rate is within the federal limit.

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

Rutgers Title IV three year cohort default rate is posted on the University’s disclosure webpage. The three year cohort default rate of 4.2 percent is substantially below the national average of 13.4 percent and the New Jersey average of 12.2 percent.

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

Audits of Rutgers financial assets, including the institution’s participation in federal programs, are conducted annually by an independent external auditor. The following are audit reports for the most recent three years: 2012, 2011, 2010.

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

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

Rutgers University has had no correspondence with the U.S. Department of Education regarding the university’s default rate. Rutgers cohort default rate is well below the ten percent that requires monitoring and reporting back to the department.
Credit Hour

In accordance with 34 CFR 602.24(f), the Commission “must conduct an effective review and evaluation of the reliability and accuracy of the institution’s assignment of credit hours.” The Commission must review the institution’s policies and procedures for determining the credit hours awarded as well as the application of the institution’s policies and procedures to its programs and coursework. The Commission must make a “reasonable determination of whether the institution’s assignment of credit hours conforms to commonly accepted practice in higher education.”

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

Rutgers University has policies approved by its Board of Governors that speak to the issue of credit hour assignment. These include the preamble to the Academic Regulations Controlling the Educational Divisions of the University (Rutgers Policy #10.2.1) and the Units of Credit (Rutgers Policy #10.2.4) policies. The latter defines course credit as the ‘academic currency’ of the university that is to be used by all schools and colleges. It delegates the authority for determining course credit by the ‘college, school, or Faculty authorizing the course.’

Related university policies that guide the use of credit assignment include:

   Student Scholastic Standing and Graduation (Rutgers Policy #10.2.5)
   Course Attendance (Rutgers Policy #10.2.7)
   Maximum and Minimum Loads (Rutgers Policy 10.2.8)

The determination of course credit within each school or college of the university is informed by New Jersey Administrative Code Title 9A:

Sub-Chapter 1: 9A:1-1.2

“Semester credit hour” means 50 minutes of face-to-face class activity each week for 15 weeks (or the equivalent attained by scheduling more minutes of face-to-face class activity per week for fewer weeks in the semester) in one semester complemented by at least 100 minutes each week of laboratory or outside assignments (or the equivalent thereof for semesters of different length).

Sub-Chapter 2: 9A:1-2.1

(a) An institution’s educational programs are the most tangible manifestation of its mission. In essence, the overall curriculum shall reflect and support the mission of the institution.

(b) The regular academic year, regardless of organization, should fall within a 10-month period and should include at least 30 weeks, or the equivalent in duration, of regularly scheduled student-faculty instructional activity, including final examination periods but excluding holiday and summer sessions.

(c) A semester credit hour shall not be counted on an hour-for-hour basis for library, independent-study, laboratory, or physical education activities. No more than one semester credit hour shall be granted for an experience compressed into one week’s time or less unless prior approval is obtained from the Commission in consultation with the Presidents’ Council.
hour is not required to be counted on an hour-for-hour basis for distance learning or blended (or hybrid) learning.

(d) Credit courses offered by a college in conjunction with or under contract with a noncollegiate organization shall meet the same requirements the college applies to its own courses with respect to quality, course content, class attendance and participation, student evaluation, etc. The standards presented at N.J.A.C. 9A:1-6.3, dealing with off-campus sites at which credit courses are offered by a college in conjunction with or under contract with a noncollegiate organization, shall apply to such courses offered at the principal campus.

(e) The rigor of all credit-bearing courses shall be substantially the same, regardless of the type of educational delivery mode (“distance learning,” “blended (or hybrid) learning” or “traditional face-to-face learning”), as demonstrated by the institution through various forms of evidence. Such evidence shall include, but shall not be limited to, at least two of the following: syllabi, documented faculty interaction with students, learning outcomes, documented units of curricular material and other documentation which objectively demonstrates the amount of time and/or the level of rigor necessary to complete coursework. Institutions of higher education offering or proposing to offer a course solely through only one educational delivery mode may demonstrate the rigor of the course through comparisons with the above forms of evidence for similar courses offered by institutions accredited by the Middle States Association.

Credit hour decisions for online and hybrid courses and other alternative format courses are also governed by the tenured and tenure-track full time faculty within the colleges and schools of the university, in conformity with standard accepted practice in higher education. Each school has its own procedures for how this is accomplished, depending upon size of school and the concomitant faculty, as well as tradition. In some instances, for example, within the largest academic unit at Rutgers, the School of Arts and Sciences, online and hybrid courses proceed through a formal faculty process that begins by review and recommendation from a curriculum committee and then a faculty vote on course approval. At the Graduate School-New Brunswick, these courses and complete degree programs are vetted by faculty committee and then approved by the graduate faculty.
2. Evidence that the institution’s credit hour policies and procedures are applied consistently across the full range of institutional offerings. Please note that if the state in which the institution is licensed has credit hour regulations that are consistent with the federal credit hour definition, documentation of compliance with those state regulations may be sufficient evidence of compliance with the federal requirements. Other evidence could include: documentation from recent academic program reviews, new course or program approvals; documentation for registration and catalog software or systems; calendars, schedules, and course matrices; course syllabi; documentation of adherence to credit hour requirements, consistent with federal regulations, from a system, or disciplinary organization; etc.:

The state of New Jersey maintains an inventory of approved programs for each institution in the state, including Rutgers. Programs must meet the state’s specifications for the assignment of credit hours (as defined in the New Jersey Administrative Code Title 9A (cited in response to #1 above) and the New Jersey Presidents’ Council Academic Issues Committee manual). Each degree program for Rutgers is developed through the university’s new program approval process, which ensures that the university’s credit hour policy is applied consistently across the full range of institutional offerings. The new degree programs at Rutgers undergo a dual approval process that includes a consistent and coordinated internal process for program development and resource allocation and a statewide review process once the new program is approved internally by the university’s Board of Governors. The development of new courses or the designation of already developed courses as part of that new program includes the process of assigning credit hours to courses.

All campuses at Rutgers follow the same academic calendar. The academic calendar is vetted and approved by the Rutgers university senate. Rutgers units abide to a semester instructional system except for a few graduate and professional school programs. These latter units include:

- School of Law–Newark: http://www.law.newark.rutgers.edu/academic-calendar
- School of Law–Camden: http://camlaw.rutgers.edu/cgi-bin/academic-calendar.cgi
- Rutgers Business School: http://www.business.rutgers.edu/calendars/2012-2013-academic-year
- Rutgers Business School – Professional Accounting M.B.A. Program: http://business.rutgers.edu/calendars/pamba-program

Each academic semester is approximately 15 weeks with classes for the most part following a two 80 minute classes or three 55 minute classes per week. The standard class period schedule is found here.

Rutgers has three summer sessions that have much longer classes that meet daily – class time and expected academic work outside of the classroom is equivalent to the traditional semester time period (see http://summersession.rutgers.edu/, http://summer.newark.rutgers.edu/2013/, and http://summer.camden.rutgers.edu/). The university also has a winter session, which is carefully crafted to include all the necessary hours per credit generated (see http://winter.rutgers.edu/, http://winter.newark.rutgers.edu/, and http://winterim.camden.rutgers.edu/).

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:

Policies in the Rutgers University Policy Library are maintained and regularly updated/amended according to Rutgers Policy: Formulation and Issuance of University Policies.
The faculties at Rutgers have primacy in setting the policies and procedures of credit hours for their respective schools and units. Through each school’s faculty, Rutgers has a clear and sustainable process for creating courses and deciding how many credits they will carry. Each school has its own set of bylaws that grant power to standing faculty entities, usually a faculty curriculum committee, which includes an ongoing process of review and assessment of assigned credit hours. Illustrative examples of this activity within the colleges and schools of the university include the School of Arts and Sciences, Ernest Mario School of Pharmacy, School of Communication and Information, Graduate School-New Brunswick (see page 3 section 2.7), School of Environmental and Biological Sciences, Newark School of Arts and Sciences, and the School of Management and Labor Relations.

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 (for example, online or hybrid, laboratory, studio, clinical, internship, independent study, and accelerated format) and evidence that such variations in credit hour assignment conform to commonly accepted practice in higher education:

As a matter of policy Rutgers University has no courses or programs that do not adhere to the federal definition of “credit hour” or its equivalent as specified in the MSCHE Credit Hour Policy [http://www.msche.org/documents/CreditHourPolicyRev112012.pdf]. Rutgers Policy 10.2.4 – Units of Credit, states that “The course credit shall be the academic currency to be used in all schools and colleges of Rutgers University in measuring a student’s progress towards a degree and shall be the official unit of record.” The policy further states that the credit value of a course includes time in laboratory. Also see #1 above concerning online and hybrid courses.