

Third Party Comment

Effective Date: February 1, 2019

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I. Purpose

This policy defines the purpose and scope of the Middle States Commission on Higher Education's procedures to review third party comments involving its member institutions undergoing an accreditation review activity.

II. Statement of Policy

The Middle States Commission on Higher Education recognizes the value of the perspective of students, institutional employees, and others in the institutional community and therefore expects that the broader community be involved in accreditation and self-evaluation processes. Institutions are expected to publicize their self-study activities to all campus constituencies and to invite comments to assist in the accreditation review process. Appropriate opportunities for those constituencies to contribute should be provided by the institution. To further ensure that the broader community has an appropriate opportunity to assist the Commission in determining on an ongoing basis whether an institution's performance is consistent with the Commission's standards and expectations for accreditation, the Commission provides opportunities to submit individual comments through third party comment.

Third party comments are those comments submitted to the Commission outside of official communications between an institution and the Commission. The Commission's third party comment process provides the opportunity for information about an institution's compliance or ability to comply with the Commission's requirements of affiliation and accreditation standards to be shared with the institution and the Commission. Third party comments are considered at times when an institution is completing a self-study evaluation, follow-up report, candidacy, or grant of accreditation.

Although the Middle States Commission on Higher Education actively invites comments during the institutional self-study process for initial accreditation or reaffirmation of accreditation, if third party comments are received at other times, the Commission will determine how best to proceed, including an inquiry to the institution or consideration under the Commission's policy, *Complaints Involving Member and Candidate Institutions*. **The Commission reserves the right to initiate an independent review of an institution if no accreditation activity is scheduled within a reasonable period of time.**

The Commission will consider only those third party comments that are submitted online using the Commission's [Complaints and Third Party Comments Form](#). The form must be completed in its

entirety and submitted online.

If the comments are within the purview of the Commission's standards and requirements of affiliation, the Commission reserves the right to withhold the identity of the commenter if the Commission feels his/her student or employee status may be jeopardized if his/her identity is revealed. This decision is solely the Commission's, and not that of the commenter. All third party comments must be addressed specifically to one or more of the Commission's requirements of affiliation or accreditation standards. These requirements and standards appear in the Commission's [Standards for Accreditation and Requirements of Affiliation](#).

III. Notification and Invitation by the Commission

The Commission publishes on its website (www.msche.org) the [Evaluation Schedule By Academic Year](#) for the eight-year self-study evaluation cycle. The Commission also notifies state agencies by letter of those institutions within the state that will undergo an on-site evaluation during the coming year. Representatives of the state may or may not observe the on-site evaluation visit. The Commission may invite comments through other means, such as letters or announcements to specific groups, including other regional or professional accrediting organizations. Such invitations are at the discretion of the Commission.

The Commission's website provides the academic year in which the on-site evaluation is scheduled, the name of the institution, and a link to the Commission's [Complaints and Third Party Comments Form](#). Comments should be submitted no later than July 1 for visits occurring in fall and December 1 for visits occurring in spring.

IV. Areas That Can Be Addressed by Third Party Comment

Third party comments should relate to whether the institution's performance is consistent with the Commission's standards for accreditation or requirements of affiliation. The Commission's third party comment policy and procedures are not intended to be used to involve the Commission in disputes between individuals and affiliated institutions, or to cause the Commission to interpose itself as a reviewing authority in individual matters of admission, grades, granting or transferability of credits, application of academic policies, fees or other financial matters, disciplinary matters, contractual rights and obligations, personnel decisions, or similar matters. The Commission will not involve itself in matters related to collective bargaining issues or tenure. Individual issues should be reviewed and resolved through the institution's own published grievance procedures. The Commission does not seek any type of compensation, damages, readmission, or any other redress on an individual's or group's behalf. The Commission does not respond to or take action on any third party comment or allegation that is defamatory, hostile, or contains profanity.

V. Procedures

- Third Party Comments must be submitted online using the Commission's official [Complaints and Third Party Comments Form](#). Comments submitted without this form completed in its entirety will not be reviewed.
- The Third Party Comments and all related materials, including accompanying evidence or documentation, must be submitted in English.
- All documentation and evidence must be submitted at the time the online form is completed. The Commission cannot process materials submitted separately unless

specifically requested by the Commission's staff.

- The Third Party Comments should identify the specific Commission standards for accreditation, requirements of affiliation, policies and procedures, or institutional policies or procedures that have been allegedly violated.
- Confirmation of receipt of the Third Party Comments is received by the commenter by e-mail through an automated message upon the online submission of the comments. If an automated confirmation is not received, the Third Party Comments were not submitted.
- Commission staff will determine whether the comments are within the Commission's purview and will contact the commenter no later than 45 calendar days from the date the comments were received.
 - If the comments appear to be within the Commission's purview, the third party comments will be forwarded to the Team Chair and the Institution's chief executive officer.
 - The evaluation team will determine how to proceed in light of the comments and the evaluation report and accompanying materials.
 - Once the Commission takes its accreditation action, the third-party comment is considered closed.

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Related Documents: *Complaints Involving Member and Candidate Institutions; Complaints Against the Commission*

Federal Regulations: 34 CFR Part §602.23(b) The Secretary's Recognition of Accrediting Agencies