Introduction

Off-Site Reaffirmation Committees, On-Site Reaffirmation Committees, and Accreditation Committees are expected to develop comments for each Core Requirement, Comprehensive Standard, and Federal Requirement. Comments for the standards found in compliance by the Off-Site Reaffirmation Committee are entered verbatim on the Report of the Reaffirmation Committee, which is completed by the On-Site Reaffirmation Committee. Substantive Change, Special, and Candidacy Committees are expected to develop comments for each standard identified for review by the committee.

Investing time in the development of comments for all of the standards reviewed serves two important purposes. First, the addition of comments for those standards found in compliance provides a richer report with greater historic value. Second, the added depth provided by these comments assists the Commission in demonstrating fulfillment of its responsibilities as a regional accrediting entity.

In an effort to ensure that these comments are cogent, coherent, and informative, this set of guidelines offers four strategies for developing substantive comments that succinctly reflect the institution’s status of compliance at the time of the peer review.

Strategy One

*Do not simply repeat the standard.*

Why not? Because a simple repetition of the standard provides no specific details relative to the institution under review. This lack of detail significantly reduces the report’s historic value.

**Example One:** CR 2.5  *The institution engages in ongoing, integrated, and institution-wide research-based planning and evaluation processes that (1) incorporate a systematic review of institutional mission, goals, and outcomes; (2) result in continuing improvement in institutional quality; and (3) demonstrate that institution is effectively accomplishing its mission. (Institutional Effectiveness)*

<table>
<thead>
<tr>
<th>Compliance</th>
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<tbody>
<tr>
<td>Comment: The institution engages in ongoing, integrated, and institution-wide research-based planning and evaluation that lead to improvement of its programs and services and the fulfillment of its mission.</td>
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</table>

Notice how this comment lacks any reference to the institution reviewed. A comment should contain some specific details that not only tie it to the institution under review but also make that particular comment inappropriate for other institutions. In other words, comments need to be customized. This comment, however, could be applied to virtually any member institution.
Strategy Two

*Include details specific to the institution.*

Why? Because specific details not only confirm that the reviewer has digested the narrative and documentation presented in the Compliance Certification, but they also provide a thumbnail sketch of the institution’s compliance at the time of the review.

**Example Two:** CR 2.5 *The institution engages in ongoing, integrated, and institution-wide research-based planning and evaluation processes that (1) incorporate a systematic review of institutional mission, goals, and outcomes; (2) result in continuing improvement in institutional quality; and (3) demonstrate that institution is effectively accomplishing its mission.* (Institutional Effectiveness)

Compliance

Comment: The college uses a multifaceted approach to planning and evaluation that includes a systematic strategic planning process, an annual planning and evaluation process, and a program review process. The institution’s Advisory Committee on the Planning Process and the Planning Committee coordinated the development of the institution’s current strategic plan (2010-2014) ensuring that all campus constituencies were involved. The institution’s annual evaluation and planning process involves 2-3 day planning and assessment retreats held each spring or summer for the purposes of reviewing progress on current goals and for developing goals, expected outcomes, and methods for achieving outcomes for the upcoming year. A review of the results from these retreats revealed evidence that the institution uses the evaluation and assessment results to improve its programs and services. Changes resulting from assessment are clearly linked to the institution’s mission as indicated in the minutes of the Planning Committee.

Notice how details such as the “Advisory Committee on the Planning Process,” the dates of the current strategic plan, and “2-3 day planning and assessment retreats held each spring or summer” tie this comment to a particular institution. That the language of this comment would apply verbatim to any other member institution is unlikely.

Strategy Three

*Reference the documentation reviewed.*

Why? Because references to the documentation that has been examined tie the comment even more tightly to the specific institution under review and establish an important historical note should further review of the same issue become necessary in the future.

**Example Three:** CR 2.5 *The institution engages in ongoing, integrated, and institution-wide research-based planning and evaluation processes that (1) incorporate a systematic review of institutional mission, goals, and outcomes; (2) result in continuing improvement in institutional quality; and (3) demonstrate that institution is effectively accomplishing its mission.* (Institutional Effectiveness)
Strategy Four

Address all parts of the standard.

Why? Because the Commission needs to document a comprehensive review. The historic value of a report is severely compromised when the comment does not clearly indicate compliance with all aspects of the standard.

Example Four: CS 3.2.10 The institution periodically evaluates the effectiveness of its administrators. (Administrative staff evaluations)

Non-Compliance

Comment: The Committee’s review of section 5.3.1 of the Staff Policy Manual indicates that the institution has a process for the evaluation of administrative staff and, based on samples provided, recent administrative staff evaluations have occurred. The evaluation forms are substantive and allow for an adequate review of performance.

The process, however, is silent on the timing of reviews and does not indicate a schedule that would require a “periodic” review.

The dual requirements embedded in this Comprehensive Standard are not enumerated, yet the comment needs to establish (1) whether the institution has implemented a process for evaluating the effectiveness of its administrators and (2) whether the evaluations are conducted on a periodic basis.
Some standards flag multiple requirements more clearly. Consider, for example, Comprehensive Standard 3.2.13:

For any entity organized separately from the institution and formed primarily for the purpose of supporting the institution or its programs, (1) the legal authority and operating control of the institution is clearly defined with respect to that entity; (2) the relationship of that entity to the institution and the extent of any liability arising out of that relationship is clearly described in a formal, written manner; and (3) the institution demonstrates that (a) the chief executive officer controls any fund-raising activities of that entity or (b) the fund-raising activities of that entity are defined in a formal, written manner which assures that those activities further the mission of the institution. (Institution-related entities)

Length

How long should these comments be? Just long enough to make a clear, unambiguous statement of the institution’s degree of compliance with all parts of the standard and to provide details specific to the institution and the documentation reviewed.

Some standards, such as Core Requirements 2.1 and 2.6, may generate comments as short as a single sentence.

2.1 The institution has degree-granting authority from the appropriate government agency or agencies. (Degree-granting authority)

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<td>Comment: The Committee’s review of the South Carolina Code of Laws confirms that the college has authority to grant the baccalaureate degree.</td>
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2.6 The institution is in operation and has students enrolled in degree programs. (Continuous operation)

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<td>Comment: The Committee’s review of the University Enrollment Management Report, Fall 2013, and the Fall 2013 Class Schedule confirms that the college is in operation and has students enrolled in degree programs.</td>
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Other standards, as illustrated above, require greater length. Instances of non-compliance may demand the greatest length because the text needs to establish the foundation for a recommendation or for an Off-Site Reaffirmation Committee referral to the On-Site Reaffirmation Committee.

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