

17. Policy on International Activities

As stated in C.1. Policy on Substantive Change and Notification, any changes in international activities, including recruiting or partnerships with institutions undertaken outside the U.S. by an institution headquartered in the U.S. is considered a “substantive change” and prior approval is required. (10/11)

The policy below sets forth the Accrediting Commission’s expectations of DETC approved programs that are offered to students outside of the United States of America in concert with partners in other countries. Both currently accredited institutions and applicants for DETC accreditation must observe the provisions below. Applicant or accredited institutions must seek DETC review and approval of any international activities covered by this Policy as a part of their initial application procedure.

Accredited status has always carried with it the expectation that the DETC institution will be held accountable for meeting all accreditation standards, whether programs are offered nationally or internationally. *The Commission considers any decision to operate overseas to be a “substantive change.”* (Rev 10/11)

The Accrediting Commission understands that an institution’s international operations may take many forms. There is no need for separate DETC approval when international students enroll directly into a DETC-accredited institution in the United States, when all instruction originates in the U.S., and when marketing and recruitment are conducted by employees stationed in the U.S. and with whom the institution has direct contact.

Action

Whenever any major function (training sites, recruiting, instruction, marketing, recruitment, business functions) is performed *outside* the United States, or when branch campuses or coordinating offices are opened in another country, or when the institution contracts with foreign agents or educational entities, including formal articulation agreements, the DETC institution must submit to the Commission in writing a complete description of the international program and activities and submit its contracts for review (see page 6). Significant expansion of an institution’s activities overseas may trigger a comprehensive examination of an institution. (Rev 10/11)

The Accrediting Commission reserves the right to order a comprehensive review of an institution at any time it has concerns that the institution is not in compliance with the DETC’s standards, policies, and/or procedures. (10/11)

At a minimum, when a DETC institution offers its programs outside of the U.S. using non-U.S. partners to market, service or otherwise facilitate the programs for non-U.S. students, the institution must comply with the following:

1. All standards for accredited institutions as set forth in the *DETC Accreditation Handbook* apply wherever programs are offered outside of the U.S. The DETC institution offering the program and issuing transcripts, certificates and degrees is fully responsible for ensuring that all DETC standards are met.
2. The institution will include information from its international programs, including the number of enrollments, on its Annual Report to DETC.
3. The institution must ensure that any international partner, agent or employee is held to the same standard of ethical practice and academic excellence as that followed in programs offered in the U.S. International students must also have access to services and resources of a type and at a level equivalent to those available to U.S. students.

4. The institution must exhibit appropriate due diligence before entering into any international partnership or employment agreements. The partner, if not a member of the same corporate/ecclesiastical structure as the DETC institution, must be licensed by or have received the necessary approval or accreditation from the country's higher education oversight organization.
5. The nature of the arrangement and the duties and responsibilities of each party will be set out clearly for the Accrediting Commission and the public, with special attention being given to activities that are within the scope of DETC accreditation such as advertising, recruitment, instruction, assessment of learning, student services, assignment of grades, record keeping and other tasks that are the normal purview of accreditation standards. If a non-U.S. partner is involved in any overseas activities, or if local recruiters, instructors, marketers or other personnel are hired, then the institution must submit copies of *specimen contracts* to the Commission for review before the program is launched.
6. Any contracts with non-U.S. partners or agents must include language clearly indicating that all parties agree to comply with DETC accreditation standards and policies, and that if such compliance does not occur, it is cause for immediate termination of the contract. If termination occurs, provisions will be made for fulfilling obligations to students already admitted to the program.

The DETC institution's contractual agreements **must be** submitted to the Commission for review and approval in advance of their implementation. If the Accrediting Commission approves the agreement, the approval will be for a fixed period, and thereafter will be periodically reviewed by the Commission on a schedule it chooses. A contract fee of \$500, set forth in DETC's E.1. Fees, will be charged each time there is a DETC contract review, including any follow-up reviews.

7. Programs offered outside the U.S. must be presented in English, or in the original language of instruction presented to the Accrediting Commission when the program received initial approval. At its election, institutions may offer tutorial or supplemental instruction in a local language to assist student comprehension. In no case will examinations be offered in a language other than English. Faith-based institutions offering religious programs abroad are exempt from this requirement.
8. If English is not the prospective student's native language, and s/he has not earned a degree from an appropriately accredited* institution where English is the principal language of instruction s/he must demonstrate college-level proficiency in English as prescribed in C.9. Policy on Degree Programs.
*accredited by an agency recognized by the United States Secretary of Education and/or the Council for Higher Education Accreditation (CHEA), or an accepted foreign equivalent that is listed in the International Handbook of Universities.
9. As required by DETC C.9. Policy on Degree Programs, transcripts not in English must be translated into English and evaluated by an appropriate third party or a trained transcript evaluator fluent in the language of the transcript. In this case, the evaluator must have expertise in the educational practices of the country of origin and include an English translation of the review.
10. If any marketing or promotion of the program is conducted in a language other than English, the institution must retain locally someone who reports directly to the U.S.-based office and who is fluent in both English and the local language to supervise all business and marketing transactions. This person will serve as the director or coordinator or quality control manager for the program and ensure that all functions performed are compliant with DETC standards and policies as well as internal institutional policies. The institution must maintain an accurate translation into English of all ads, flyers, brochures, commercials side-by-side with these materials in the original language and available at any time for review.

11. The institution must maintain for its non-U.S. partners a set of current operating procedures and policies that indicate not only how DETC accreditation standards will be met, but also identify how the local partner, campus, or employee will be evaluated for compliance with the policies. These policies and procedures should be enumerated in a printed operations manual that covers all areas. A copy of the manual should be given to each person directly involved with the program.
12. The institution must provide training for any non-U.S. instructors, finance, recruiting and marketing personnel to ensure that they understand and will abide by DETC standards. All non-U.S. personnel should sign written statements with the institution to indicate their understanding of and their agreement to comply with all DETC standards. All recruitment personnel must also sign the *DETC Code of Ethics for Student Recruitment Personnel*.
13. The U.S. home office for the institution must keep complete personnel files on all its non-U.S. employees or agents, including original academic transcripts for faculty.
14. Representatives from the home office should periodically visit the international campus or office and during these visits meet with students and any local employees.
15. The institution is encouraged to develop appropriate academic security practices that provide additional safeguards to prevent student cheating and fraudulent recruiting/marketing practices in their international programs. This may require additional elements for monitoring and additional requirements for proctoring examinations as well as additional training and monitoring of faculty and recruitment personnel. Even if the DETC institution has a contract with another entity, it cannot delegate responsibility for these functions to a local entity.
16. The Accrediting Commission reserves the right to conduct an on-site evaluation of international operations at any time, including as a part of an reaccreditation review. As a part of the re-accreditation review, institutions must include in their Self-Evaluation Reports a full description and comprehensive data for all international activity.
17. The institution must have in place measures, resources, plans, and procedures that will ensure that all students will continue to receive the education and training they were promised under the contractual arrangement, even if the business arrangements between the DETC institution and the non-U.S. institution are subsequently terminated.

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