



## **REPORT OF THE SUBSTANTIVE CHANGE COMMITTEE**

### **Merger-Consolidation of SACSCOC Accredited Institutions**

#### **Statement Regarding the Report**

*The Board of Trustees of the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) is responsible for making the final determination on reaffirmation of accreditation based on the findings contained in this committee report, the institution's response to issues contained in the report, other assessments relevant to the review, and application of the Commission's policies and procedures. Final interpretation of the Principles of Accreditation and final action on the accreditation status of the institution rest with SACSCOC Board of Trustees.*

**Name of the Institution:**            **University of South Florida**

**Date of the Review:**                **January 26 – 28, 2021**

**SACSCOC Staff Member:**        **Dr. Denise Y. Young**

**Chair of the Committee:**            **Dr. Ann L. Kenimer**  
**Associate Provost for Undergraduate Studies**  
**Texas A&M University**  
**College Station, TX**

## **Part I. Overview and Introduction to the Institution**

The University of South Florida includes three campus locations, the primary campus in Tampa and branch campuses in St. Petersburg and Sarasota-Manatee, that were consolidated in July 2020 in response to legislative requirements enacted as part of the Florida Excellence in Higher Education Act of 2018. Prior to consolidation, the three campuses operated as independent institutions — the University of South Florida in Tampa, the University of South Florida St. Petersburg, and the University of South Florida Sarasota-Manatee. The three institutions were separately accredited by SACSCOC but were affiliated as part of the University of South Florida (USF) System and shared a system-level governing board, a system-level president, and many common regulations and policies. In addition, several administrative functions and services were coordinated centrally by the USF System. Following the 2020 consolidation, the once system-level Board of Trustees and President transitioned to providing institutional-level governance and executive oversight, and many administrative services continue to be provided centrally from the primary campus in Tampa.

Consolidation was initiated to expand access and opportunities for students at all levels and for faculty members while also providing campus leaders the requisite level of autonomy expected of branch campuses in a singly accredited institution. The three campuses are sufficiently close to allow a flow of students and faculty across campuses. The campus locations also allow the institution to serve the communities in which the campuses are located. The counties hosting campuses have different demographics with distinctive workforce and research and development needs that can be met by the institution's consolidated organizational structure.

Shortly after the Florida Excellence in Higher Education Act of 2018 was signed into law, the Board of Trustees approved seven guiding principles for consolidation. These guiding principles laid the foundation for months of planning to address logistical details of consolidation including curricula alignment, faculty governance, student government, among others. A substantive change prospectus for mergers-consolidations was submitted to SACSCOC in March 2020 and was subsequently approved in June 2020. The institution began operating under a single SACSCOC accreditation in July 2020.

Beginning in October 2020, SACSCOC received unsolicited information regarding the institution's consolidation. SACSCOC subsequently requested that the institution respond to concerns raised by this unsolicited information as part of the documentation submitted to the Committee. As part of its review, the Substantive Change Committee considered the unsolicited information along with the institution's response.

## **Part II. Assessment of Compliance**

### **Section 1: The Principle of Integrity**

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**1.1 The institution operates with integrity in all matters.**  
*(Integrity)* [CR]

The Substantive Change Committee found that the institution operated with integrity in all matters reviewed.

### **Section 2: Mission**

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**2.1 The institution has a clearly defined, comprehensive, and published mission specific to the institution and appropriate for higher education. The mission addresses teaching and learning and, where applicable, research and public service.**  
*(Institutional mission)* [CR]

The Substantive Change Committee reviewed the institution’s mission and goals as described in its documentation and published on the institution’s website, and undergraduate and graduate catalogs. The institution has a clearly defined and comprehensive mission that is articulated through a single statement. The mission statement is often accompanied by a set of five goals intended to “align with and expand on the mission statement.” The mission statement is appropriate to an institution of higher education in that it addresses teaching, research, and service and addresses the range of educational programs offered by the institution. During Committee interviews with members of the institution’s administration, discussions were often tied back to the university’s mission.

### **Section 3: Basic Eligibility Standard**

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**3.1 An institution seeking to gain or maintain accredited status**

**3.1.a has degree-granting authority from the appropriate government agency or agencies.**  
*(Degree-granting authority)* [CR]

The institution is a constituent public university of the State University System of Florida (SUS). As described in the institution’s documentation and supporting evidence, the SUS is governed by a Board of Governors (BOG) which has state constitutional authority to “operate, regulate, and be fully responsible for the management of the whole university system” and statutory authority for “defining

the distinctive mission of each constituent university” and “implementation and maintenance of high-quality education programs.” As a public university, the institution is directly administered by a Board of Trustees (BOT) whose responsibilities and authority are established by the BOG. As part of its duties, the BOG promulgates regulations which delegate powers and authorities to the BOT. Specific BOT responsibilities include “authorization and discontinuance of degree programs” and “establish[ment of] the powers and duties of the university president.” The President is thus authorized to award degrees as consistent with university policies and regulations.

## **Section 4: Governing Board**

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- 4.1 **The institution has a governing board of at least five members that:**
- (a) **is the legal body with specific authority over the institution.**
  - (b) **exercises fiduciary oversight of the institution.**
  - (c) **ensures that both the presiding officer of the board and a majority of other voting members of the board are free of any contractual, employment, personal, or familial financial interest in the institution.**
  - (d) **is not controlled by a minority of board members or by organizations or institutions separate from it.**
  - (e) **is not presided over by the chief executive officer of the institution.**
- (Governing board characteristics)* [CR]

In assessing compliance with this core requirement, the Substantive Change Committee reviewed documentation provided by the institution and supporting evidence including sections of the Florida Constitution and Statutes, regulations and policies for the Florida State University System Board of Governors and the University of South Florida Board of Trustees. The Committee also interviewed a representative from the Board of Trustees and the institution’s President.

The institution is governed by a multi-level structure which, starting at the institution level and moving upwards, includes:

- The University of South Florida Board of Trustees (BOT), the legal body with specific authority over the institution,
- The Florida State University System (SUS) Board of Governors (BOG), the state-level body that governs the State University System of Florida which is comprised of all public universities in the state,
- The Governor of Florida, and
- The Florida Legislature.

The State of Florida Constitution states that each institution in the SUS of Florida be governed by a 13-member board with six members appointed by the Governor, five by the Board of Governors, plus the Chair of the Faculty Senate and President of the Student Body. The BOG grants the institution’s BOT statutory power to act in full legal capacity and fiduciary oversight. Because the BOT was in place for the pre-consolidation University of South Florida System, institutional consolidation had no impact to the governance structure or responsibilities.

The BOT's Operating Procedures establish clear policies for ethics and conflicts of interest, and the institution's documentation provided samples of each Board member's required annual financial disclosure form and conflict of interest disclosure form that encompasses contractual, employment, personal, or familial financial interest in the institution.

The BOT is subject to public records, and all business must be conducted in noticed open public meetings (State of Florida Sunshine Law). A majority of BOT members must be present to constitute a quorum, and the whole body and its subparts act pursuant to a majority vote on all matters. Appropriate safeguards are in place to ensure the BOT is not controlled by a minority member or by organizations or institutions separate from it nor was their evidence of actions or plans altered based on pressure from external sources.

The BOT is not presided over by the institution's President nor is the President a voting member of either the BOT or the BOG.

Committee interviews with the President and a representative of the BOT confirmed all aspects of Core Requirement 4.1.

#### 4.2 The governing board

- 4.2.b ensures a clear and appropriate distinction between the policy-making function of the board and the responsibility of the administration and faculty to administer and implement policy.  
*(Board/administrative distinction)*

Documentation and supporting evidence provided by the institution indicated that state law, BOG Regulation, and BOT Operating Procedures clearly defined the distinctive roles of the BOG, the BOT, the CEO (President), and the institution's administrative leaders. These documents also describe organizational structures, explanation of job responsibilities, delegation of authority, and faculty in academic governance. Interviews conducted by the Substantive Change Committee with the President, a representative of the BOT, and administrative leaders confirmed the clear and appropriate distinctive roles.

- 4.2.c selects and regularly evaluates the institution's chief executive officer.  
*(CEO evaluation/selection)*

As described in the institution's documentation and supporting evidence, the institution's BOT has primary responsibility for the selection and annual evaluation of the President. The State of Florida Constitution directs the BOG to establish the powers and duties of each university's BOT including the authority and responsibility to select the institution's President subject to confirmation by the BOG. In addition, the BOG delegates responsibility for the annual presidential evaluation to the institutional BOT. Evidence of the presidential annual evaluation process was provided from FY2020 including the President's self-assessment and scheduled full BOT evaluation. The selection and evaluation

of the institution's CEO was also discussed during interviews with a representative of the BOT and the institution's administration.

- 4.2.d defines and addresses potential conflict of interest for its members.  
(*Conflict of interest*)

The Substantive Change Committee reviewed the BOT's Operating Procedures, which establish clear policies for ethics and conflicts of interest. Further, the institution's documentation and supporting evidence included samples of each Board member's requirement to file an annual financial disclosure form and a conflict-of-interest disclosure form that encompasses contractual, employment, personal, or familial financial interest in the institution. BOT training is provided in an orientation by the institutional General Counsel's office. BOT training was discussed and confirmed during an interview with a representative of the BOT.

- 4.2.e has appropriate and fair processes for the dismissal of a board member.  
(*Board dismissal*)

As described in State University System BOG regulations, institutional BOT members are public officers subject to Florida law governing the suspension or removal of public officers. The Florida Constitution establishes the methods for removal of trustees. The BOT does not have the authority to directly dismiss its members. Though the process to remove a Board member is not vested with the university by Florida Law, the process described in the institution's documentation and supporting evidence indicates a fair process inclusive of a public hearing and entitlement of defense. At the time of the review, no BOT member had ever been removed for cause nor is there any evidence of current proceedings.

- 4.2.f protects the institution from undue influence by external persons or bodies.  
(*External influence*)

As described in the institution's documentation and supporting evidence, the institution is governed by state, BOG, and university regulations and policies to ensure the BOT is free from undue influence by external persons or bodies. As a state entity, the institution is subject to public records and all business must be conducted in noticed open public meetings (State of Florida Sunshine Law). A majority of Board members must be present to constitute a quorum and the whole body and its subparts act pursuant to a majority vote on all matters. Appropriate safeguards appear to be in place to ensure the Board is not controlled by a minority member or by organizations or institutions separate from it nor is their evidence of actions or plans altered based on public expressions from Legislators. Interviews with the institution's President and a representative from the USF BOT confirmed that these policies are strictly followed.

- 4.2.g defines and regularly evaluates its responsibilities and expectations.  
(*Board evaluation*)

As described in Core Requirement 4.1, the institution is governed by a multi-level structure: the University of South Florida Board of Trustees (BOT) is delegated authority by, and complies with regulations adopted by, the State University System (SUS) Board of Governors (BOG). The BOT's responsibilities and expectations are defined in its own Operating Procedures and within BOG Regulations. New appointees to the BOT are expected to attend an orientation session hosted by the SUS, and the institution also provides orientation to new trustees. Trustees stay apprised of responsibilities and expectations through workshops, retreats, and meetings.

In its documentation and supporting evidence, the institution indicated that the BOT, through its Governance Committee, completed a self-evaluation on a bi-annual basis. Prior to consolidation, the self-evaluation process operated informally. The BOT recently standardized a self-evaluation survey that was first administered in July 2020. The survey results were subsequently discussed at the August 2020 BOT meeting. The institution provided the survey results as well as minutes from the August 2020 BOT meeting. The Substantive Change Committee interviewed a member of the BOT and confirmed that the governing body engages in regular self-evaluation and implemented the standardized process that was first administered in July 2020.

- 4.3 If an institution's governing board does not retain sole legal authority and operating control in a multiple-level governance system, then the institution clearly defines that authority and control for the following areas within its governance structure: (a) institution's mission, (b) fiscal stability of the institution, and (c) institutional policy.  
*(Multi-level governance)*

As described in Core Requirement 4.1, the institution is governed by a multi-level structure: the Florida Legislature, Florida's Governor, the State University System's Board of Governors (SUS BOG), and the Board of Trustees of each institution. The authority to establish (consolidate and close) Florida's public universities is exclusive to the State Legislature with approval of the Governor. Florida Statute regarding BOG duties and the delegated authority of the institutional BOT as described in BOG regulation provide the necessary authority and control of the institution's mission, fiscal stability of the institution, and institutional policy. Interviews with the institution's President and a representative from the BOT confirmed the institution's defined authority and control within the prescribed governance structure.

## **Section 5: Administration and Organization**

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- 5.1 **The institution has a chief executive officer whose primary responsibility is to the institution.**  
*(Chief executive officer) [CR]*

As described in the institution's documentation and supporting evidence, the BOG delegates each university's BOT authority to establish the powers and authority of its

President. The institution's CEO responsibilities are specified in the BOT's Operating Procedures: "The President's primary responsibility is to serve as the CEO of the consolidated institution, responsible to the BOT for the operation and administration of the University in accordance with BOT policies and procedures." These duties are well defined and are enumerated in the CEO's contract of employment provided. Responsibilities of the institution's CEO were confirmed during interviews with the President and a representative from the BOT.

- 5.4 The institution employs and regularly evaluates administrative and academic officers with appropriate experience and qualifications to lead the institution.  
*(Qualified administrative/academic officers)*

The Substantive Change Committee reviewed the institution's organizational charts, which identified the key administrative and academic officers and the job descriptions for each of those positions, along with short biographies and resumes for individuals in those positions. This information confirmed that the institution hires the necessary administrative and academic officers and hires qualified individuals for those offices. The institution identified the following groups as their administrative and academic officers: President's Executive Leadership Council, President's Cabinet, Provost's Vice Provost Leadership Team, Regional Chancellor's Leadership team and the Council of Deans. For all members of these groups the institution provided a brief summary of credentials, a position description, and a complete resume. The institution maintains regulations requiring annual reviews for all faculty and all employees, provided descriptions of the review processes for these administrative and academic offices, and supplied examples of completed annual evaluations for individuals in each of the groups listed above. Interviews conducted with administrative and academic officers from each group listed above (including College Deans) confirm the annual review process is in place.

- 5.5 The institution publishes and implements policies regarding the appointment, employment, and regular evaluation of non-faculty personnel.  
*(Personnel appointment and evaluation)*

Documentation provided by the institution indicated that non-faculty employment policies established under the former USF System continue following consolidation. Policies pertaining to appointment, employment, and regular evaluation were included in the institution's documentation and are readily accessible to applicants and employees through the Human Resources website. Policy information is also provided for non-faculty positions through the New Employee Resource Guide. The institution provided examples of job postings, job descriptions, offer letters, and redacted evaluations documenting adherence to established policies. The Substantive Change Committee also reviewed Collective Bargaining agreements for staff, law enforcement, and graduate assistants and found that they aligned with institutional policies. The Committee's review of these policies and documents as well as interviews with administrative staff verified the institution's ability to hire and maintain a qualified workforce.

## **Section 6: Faculty**

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6.1 **The institution employs an adequate number of full-time faculty members to support the mission and goals of the institution.**  
(*Full-time faculty*) [CR]

The institution made a strong case that consolidation was intentionally designed to not increase or decrease in the number of full-time faculty, percentage of faculty who are full-time, the number of students enrolled and the student-to-faculty ratio. The Substantive Change Committee reviewed institutional data from before and after the merger that generally supported that assertion. Since 2014, full-time faculty increased from 2334 to 2502 while teaching faculty increased from 1468 to 1578. During the 2018-19 academic year, the percentage of courses taught by full-time faculty was 90% for graduate and 73% for undergraduate and the student to faculty ratio was 21:1 which is within the range of their peer institutions. The Committee reviewed the institution's policies, definitions, classifications, etc. for faculty and found them to be appropriate. The Committee also reviewed research data and found that in 2017-18 the institution had total research expenditures of over \$592M and that the institution had met or exceeded their research goals each year since 2013-14. Finally, the Committee reviewed examples of faculty engagement in service on each campus. Both USF-Tampa and USF-St Petersburg were identified as being Carnegie Community Engaged campuses in 2020. Interviews conducted with key administrators (including the President's Executive Leadership Council, President's Cabinet, Provost's Vice Provost Leadership Team, Regional Chancellor's Leadership team, members of the Council of Deans and representative Department Heads) from all three campuses confirm that the institution employs an adequate number of full-time faculty to support the mission and goals of the institution.

6.2 For each of its educational programs, the institution

6.2.c Assigns appropriate responsibility for program coordination.  
(*Program coordination*)

Documentation provided by the institution described: 1) responsibility for program coordination, 2) organizational structure, 3) graduate and undergraduate studies, 4) responsibility for curriculum and review, and 5) program curriculum committees. Supporting evidence included details regarding the history of curriculum alignment during the period leading up to consolidation. The documentation delineated the relationship between the faculty, who share primary responsibility for curricular integrity of the institution's education programs and administrators, including college deans and academic unit chairs/directors, who are responsible for administration of academic programs and services. Two organizational charts illustrated who is in charge of various units.

Interviews with college and departmental administrators, as well as with faculty from all three campuses, confirmed that this standard is being met through clear program coordination responsibility in addition to responsibility for curriculum review.

## **Section 7: Institutional Planning and Effectiveness**

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- 7.1 **The institution engages in ongoing, comprehensive, and integrated research-based planning and evaluation processes that (a) focus on institutional quality and effectiveness and (b) incorporate a systematic review of institutional goals and outcomes consistent with its mission.**  
*(Institutional planning)* [CR]

The institution's documentation described a planning process integrated at multiple levels – from governing boards to the unit level – to incorporate systematic review of the institution's goals consistent with its mission. Prior to consolidation, the three legacy institutions were governed by the institutional Board of Trustees (BOT), itself governed by the State University System Board of Governors (BOG). As such, the institutional BOT must establish, implement, and annually review an Accountability Plan in accordance with BOG regulations. Accountability Plans dating back to 2018 were provided as supporting evidence, and the plans addressed the institution's mission; strengths, opportunities, and challenges; and multiyear trends as well as forecasted performance metrics. The Office of Decision Support collects and reports data that adhere to the BOG's expectations for the Accountability Plan, and the process informs the institution's strategic planning, budgeting, and other policy decisions.

Interviews with institutional leaders across multiple units and all three campuses confirmed that the institutional planning process is ongoing. The President has convened a 19-person task force with representation from faculty, staff, and students to lead the institution in a process of strategic renewal. The process is leveraging multiple existing and ongoing initiatives along with input from stakeholders both within and outside the campus communities to establish a renewed strategic plan that will align with the institutional mission and integrate with the State University System's 2025 Strategic Plan. The strategic renewal process will culminate later in 2021 with a new strategic plan.

## **Section 9: Educational Program Structure and Content**

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- 9.1 **Educational programs (a) embody a coherent course of study, (b) are compatible with the stated mission and goals of the institution, and (c) are based on fields of study appropriate to higher education.**  
*(Program content)* [CR]

The Substantive Change Committee reviewed the Institutional Summary Form for the consolidated institution to confirm that current programs listed align with the institution's current web listings. Alignment of programs and curriculum on the three campuses was accomplished through the creation of three ad hoc committees made up of members from each campus. The Disciplinary Academic Curriculum Committee focused on alignment and integration of courses and curriculum that existed on more than one campus, the Inter-campus Consolidation Committee for Curricular Changes was responsible for final review and approval, and the third committee focused on General Education Core Courses/Curriculum. The Committee interviewed representatives from each ad hoc group, and it was clear that the process engaged faculty. Full-time faculty members with

disciplinary expertise were responsible for maintaining the appropriateness of the structure and content of courses and academic programs. In addition, program coherence is the responsibility of program, department, and college curriculum committees as well as the curriculum committees for the Faculty Senate's Graduate or Undergraduate Councils. These same groups also reviewed regulations and processes for creation of new and modification of existing programs. At the time of preparation of materials for this review, no new programs had been created following consolidation. The Committee interviewed representative Deans and faculty from each campus plus members of the Consolidation Committees (Intercampus Consolidation Committee, General Education Consolidation Committee, etc.) and the current Faculty Senate Curriculum Committees (Undergraduate, Graduate and General Education). Those interviews plus review of the materials provided confirm that the institution's educational programs embody a coherent course of study, are compatible with the stated mission and goals of the institution and are based on a field of study appropriate to higher education.

- 9.7 The institution publishes requirements for its undergraduate, graduate, and post-baccalaureate professional programs, as applicable. The requirements conform to commonly accepted standards and practices for degree programs.  
*(Program requirements)*

Documentation provided by the institution described the undergraduate general education and commonly accepted standards and practices for undergraduate and graduate students. Supporting evidence related to the general education requirement included the State of Florida's core general education courses, the institution's enhanced general education program, state communication and computation requirements, and graduation requirements. Sample degree programs from the undergraduate (B.S. in Accounting) and graduate (M.Acc. in Accounting) documented how the standard is met. Supporting evidence also included the Florida Board of Governors' Criteria for Awarding Baccalaureate Degrees and Student Learning Outcomes Assessment for 2020. All supporting documentation demonstrated how the institution meets this standard.

Interviews with the General Education Consolidation Committee provided additional insights into how the general education integration and new opportunities opened to students across campuses after consolidation.

## **Section 10: Educational Policies, Procedures, and Practices**

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- 10.1 The institution publishes, implements, and disseminates academic policies that adhere to principles of good educational practice and that accurately represent the programs and services of the institution.  
*(Academic policies)*

The institution's documentation indicated that, prior to consolidation, the three institutions that made up the USF System operated under a common set of academic policies and regulations; thus, no major revisions were required as a result of the merger. The Substantive Change Committee reviewed the institution's published policy for the initiation, development and maintenance of policies and regulations. As responsible

officers develop and review policies and regulations the process must include appropriate institutional groups, organizations, and offices. As an example, academic regulations involve the Faculty Senate and Undergraduate, Graduate, or General Education Council as appropriate. The Office of General Counsel maintains the on-line Policies and Regulations website, the undergraduate and graduate catalogs are maintained by the appropriate deans, and the Provost's Office maintains a faculty handbook. All are published on-line and readily available. Overall, the institutional policies appear to reflect commonly accepted good educational practices, and the faculty clearly play a substantial role in their development and review.

- 10.4 The institution (a) publishes and implements policies on the authority of faculty in academic and governance matters, (b) demonstrates that educational programs for which academic credit is awarded are approved consistent with institutional policy, and (c) places primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty.  
*(Academic governance)*

The Substantive Change Committee reviewed the institution's REG 10.000, which delineates the responsibility and authority of faculty in academic governance. The regulation states, "On the part of the Administration, Academic Responsibility implies a commitment actively to foster within USF a climate favorable to responsible exercise of freedom, by adherence to principles of shared governance, which require that in the development of academic policies and processes, the professional judgments of faculty members are of primary importance." The institution has a very traditional approval process for new courses, new programs and curriculum changes which starts at the program faculty level, goes through the appropriate Faculty Senate Committee (Undergraduate, Graduate or General Education) and is ultimately approved by the BOT (new programs) and Florida BOG (new doctoral programs). This positions the Faculty Senate as the primary faculty advisory body to the institution's administration on all matters related to the academic matters. At the time of submission of documentation for this review, no new programs had been developed for the merged campus. But, the institution's approach to the alignment of programs and curriculum on the three campuses during the merger process demonstrates the institution's commitment to shared governance. The Florida BOG has regulations requiring the faculty at each State University System institution to develop core student learning outcomes and methods for assessing student achievement of the expected core student learning outcomes for all programs. In addition, there is a regulation requiring the periodic review of all academic degree programs at least once every seven years. The institution provided examples of program reviews and completed academic program assessments completed by the faculty. The Committee interviewed representative deans and teaching faculty from each campus plus members of the Consolidation Committees (Intercampus Consolidation Committee, General Education Consolidation Committee, etc.) and the current Faculty Senate Curriculum Committees (Undergraduate, Graduate and General Education). Those interviews plus review of the institution's documentation confirms that the institution publishes and implements policies on the authority of faculty in academic and governance matters, demonstrates that educational programs are approved consistent with institutional policy, and places primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty.

- 10.5 The institution publishes admissions policies consistent with its mission. Recruitment materials and presentations accurately represent the practices, policies, and accreditation status of the institution. The institution also ensures that independent contractors or agents used for recruiting purposes and for admission activities are governed by the same principles and policies as institutional employees.  
*(Admissions policies and practices)*

Documentation and supporting evidence provided for this standard indicates that the institution has successfully combined three separate admissions policies into one set of admissions criteria for all campuses through the establishment of the Office of Admissions. Consolidation data show that SAT and GPA for incoming students at all three campuses increased each of the last three years. Admissions criteria for undergraduate students (both first-time in college and transfer), graduate students, and international students are clear and understandable. Admissions staff stated open-house events recruit students for all programs regardless of the location allowing them to help students decide which campus is the best home for them. Redacted applications for undergraduate (first-time in college and transfer) and graduate students along with two examples for admissions exceptions helped verify the adherence to the institution's admissions policies.

Several documents and websites, including the undergraduate catalog, graduate catalog, and Admissions website, provide admissions information for prospective students and families. The institution ensures correct information in recruitment materials by establishing written editorial standards that they disseminate to all three campuses and independent contractors and conducting consistent reviews of all materials for accuracy. Training for recruitment staff is centralized to ensure information is uniform across all three campuses. Admissions staff noted that recruiters talk with students about all three campuses during recruitment events to assist students in their decision-making process.

- 10.8 The institution publishes policies for evaluating, awarding, and accepting credit not originating from the institution. The institution ensures (a) the academic quality of any credit or coursework recorded on its transcript, (b) an approval process with oversight by persons academically qualified to make the necessary judgments, and (c) the credit awarded is comparable to a designated credit experience and is consistent with the institution's mission.  
*(Evaluating and awarding academic credit)*

The institution's documentation provided information on academic credit, transfer of coursework from institutions participating in the statewide course numbering system, transfer of coursework from institutions not participating in the statewide course numbering system, articulation agreements and dual enrollment programs, and acceleration mechanisms, the last of which focuses on CLEP, AP, and other forms of alternate credit. The documentation was supported by evidence including examples (properly redacted) of student transcripts that show how military training is awarded credit for veterans, how international transcripts are evaluated, and how a student from a Florida state institution was awarded transfer credit. In addition, the documents include institutional policies as well as Florida Board of Governors' regulations on other forms of credit.

In interviews with administrators, faculty, and students, it became clear that everyone embraced the new institution and the enhanced ease with which students could take courses on all three campuses. Although it was pointed out that distance and traffic often complicated travel (especially between the Tampa and St. Petersburg campuses), the increased hybrid and online offerings arising out of the COVID pandemic provided new and exciting opportunities for students to take courses taught by faculty from other campuses. Indeed, during the interviews, the issue of the pandemic came up repeatedly, and students, faculty, and administrators discussed innovations undertaken to meet the challenges it created and how those challenges were successfully met.

## **Section 11: Library and Learning/Information Resources**

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### **11.1 The institution provides adequate and appropriate library and learning/information resources, services, and support for its mission.** *(Library and learning/information resources) [CR]*

Based on review of the documentation and evidence provided by the institution and interviews with the libraries' leadership (dean, associate deans, campus dean – St. Petersburg campus, director of Health Libraries, and Library Operations manager – Sarasota/Manatee campus), the institution's library program includes: professional level staff expertise (subject and functional); a wide range of general, subject and special-archival library collections and scholarly resources (both physical and digital forms and formats) supporting the spectrum of its educational, research and clinical programs; curriculum aligned and otherwise focused library instructional and research consultation services; varied contemporary information technology infrastructure and tools; suitable library facilities for study and research; and other specialized and ancillary services conducive to the learning and academic success of students and the teaching and research/scholarship of the faculty.

Access to library collections is provided on-campus, off-campus and/or online (via remote authentication/proxy system or virtual private network). Depth and breadth of collections is based on factors such level of courses supported, overall undergraduate and graduate/professional curricular needs, and broader support of research/scholarship and clinical activities of students and faculty. Collection development and management processes adhere to professional standards and practices, incorporate discipline faculty input, are guided by policies/guidelines, and encompass formal assessment as to adequacy and usage (including adherence to requirements of accreditors of specialized academic or professional programs), and provide for perpetual access of digital resources. The Textbook Affordability Project ensures students' access to course materials.

The institution expands access to scholarly-scientific research materials available at other institutions of higher education via inter-institutional borrowing/lending arrangements, particularly in Florida's public university system, and as well nationally through the RapidILL network, the Center for Research Libraries, and HathiTrust.

Standard reference and research consultation services are provided to students and faculty across the institution through a variety of modalities, including virtual. Specialized

library research consultation services include tenure and promotion support for faculty, literature and data management support for grants activity, and guidance for faculty and students in the scholarly communications domain (e.g., research impact and visibility).

Library educational services focus on development of information and data literacy competencies, as well as higher order, complex skills for actively engaging in research and knowledge discovery/creation. Library instruction is provided for both undergraduate and graduate/professional students, in partnership with academic departments or as stand-alone modules, and incorporates a structured framework for learning outcomes (aligned with the institution's Enhanced General Education curriculum and informed by the Information Literacy Framework of the Association of College and Research Libraries). Library instructional materials and modules, along with subject and course guides, are embedded in the institution's Learning Management System for access and use by students. Customized library instruction is provided for research methods, capstone, seminar, and graduate courses in coordination with teaching faculty. Specialized library instructional materials and activities address advanced topics such as ethical use of information, conducting research with original sources, use of digital scholarship tools for analysis and presentation of data, intellectual property and copyright aspects of research and scholarship, and creation of conference presentations and scholarly publications. The library educational program actively utilizes formative and summative assessment methods to measure outcomes and improve both domain content and its delivery.

Students in the institution's distance education programs are served principally through digital means (including access to digital resources, virtual instructional and reference services, electronic transmission of digitized print content), but also through shipment of physical library materials.

The institution maintains an institutional repository (Scholar Commons), engages in curated digitization of subject/special collections projects, and supports various open access library publishing activities.

Assistive Technology tools and resources for various disabilities are provided for students and other members of the institution's constituency, and there is active consideration of ADA-compliance in the licensing/procurement of digital resources.

The institution's library professional and support level personnel possess requisite educational training and expertise and management and technology skills. Reflecting shared governance, the leadership of the institution's libraries is officially advised (on goals/objectives, policies, and resources/service performance) by the library faculty, the Faculty Senate's Library Council, and the Dean's Advisory Board (comprised of stakeholder representatives such as students, faculty, and the region's community). The administrative structure is appropriate to the complexity of a multi-campus institution. Library administration engages in periodic assessment of library services and resources, including surveying students and faculty to appraise user needs and satisfaction, effect improvement, and/or to compare performance with peer or aspirant institutions.

Located within library facilities, the institution provides various other services for students and faculty. Ancillary support for the students' learning, engagement and

academic persistence is provided by such services or programs as subject/course tutoring, writing, career readiness, and undergraduate research. Similarly, pedagogical and instructional design services support the faculty across the institution.

## **Section 12: Academic and Student Support Services**

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### **12.1 The institution provides appropriate academic and student support programs, services, and activities consistent with its mission.** *(Student support services)* [CR]

The Substantive Change Committee reviewed documentation and supporting evidence provided by the institution and interviewed faculty, administrators, staff, and students at each campus location. The documentation identified programs and services for all levels of students from undergraduate through graduate as well support for those who struggle academically to the high achievers. The services provide for holistic development of the student supporting them in the following areas: academic, social, wellness (mental, physical, financial), as well as in their leadership and career development. While there are larger, and more, facilities on the Tampa campus than at St. Petersburg or Sarasota-Manatee, all services and programs are offered on each campus and students can access services on each campus regardless of their enrollment location. Interviews with students from each campus confirmed they were able to access facilities, services and programs at any location and appreciated the opportunities this access affords to them.

Students noted that consolidation provided more opportunities to participate in activities. Since opportunities have been offered virtually due to COVID, students have been able to attend activities hosted by the other campuses and interact with students from all campuses. Students also said they appreciated having access to more student organizations, and one student leader noted that her student organization has grown in membership due to the consolidation. Student government representatives discussed how they worked diligently to create a process that allowed for all students, regardless of their campus, to be able to have their voice heard. These leaders also noted that it was important to be transparent with their work and to create a system that will last for years.

Diversity and inclusion efforts are available on all three campuses and support includes mentoring' training, leadership development, as well as cultural celebrations. The institution received the 2020 Higher Education Diversity in Education Award, for the second year in a row, further supporting their diversity commitment. Student representative comments reinforce the positive impact these efforts have had on them as they have navigated the tumultuous racial climate in our country.

The institution relies on survey data from BCSSE, NSSE, National College Health Assessment, among others, to identify needs of students and determine appropriate services to support them. Additionally, academic and student success staff noted in their interview that the institution relies heavily on predictive analytics to identify students who need support. Students from all three campuses specifically noted their appreciation for expanded counseling services citing both the increased availability of counseling sessions as well as access to the new online peer support program, *togetherall*.

Faculty teaching support is found through the Center for Innovative Teaching and Learning as well as through the division of Digital Learning. Faculty can access services from all three campuses and receive support both in person and virtually.

Availability of virtual services and programs is sufficient and offered in all areas of support for students and faculty. Discussions held with administrators, staff and students representing all three campuses confirm that COVID has helped units on each campus better leverage their virtual services and has led to a more seamless transition following consolidation. Students from all campuses stated they felt unified under one campus and that the interactions created by virtual activities, services and programs allowed that to happen more quickly than they imagined.

- 12.4 The institution (a) publishes appropriate and clear procedures for addressing written student complaints, (b) demonstrates that it follows the procedures when resolving them, and (c) maintains a record of student complaints that can be accessed upon request by SACSCOC.

*(Student complaints)*

The Substantive Change Committee reviewed documentation and supporting evidence provided by the institution and interviewed administrators, faculty, staff, and students at each campus location. The institution's procedures differ for academic versus non-academic complaints and grievances. Academic complaints are the responsibility of Academic Affairs and follow the General Student Grievance Process Index, Policy 30.053. Non-academic complaints, except for those of discrimination, are the responsibility of the Dean of Students and follow Policy 30.054. The Director of Equal Opportunity and Compliance oversees complaints related to discrimination, harassment, and/or retaliation which are covered under Policy #0-007 and Policy #0-108. Complaints in all areas are encouraged to be resolved informally before moving to the formal outlined processes.

Since all campuses were components of the USF System and bound by those policies and regulations, consolidation has not changed the complaint processes. Several redacted examples were provided including a grade appeal process, a Student Code of Conduct violation appeal, as well as a admissions discrimination complaint. All examples provided sufficient documentation to show adherence to policy. The institution has begun use of Symplicity as a database to track complaints for all campuses through the Dean of Students office. Other logs are held in the areas of the complaint.

Students can find information about complaint policies and processes in several locations online including the University Student Ombuds Office and the Dean of Students office as well as both the undergraduate and graduate catalogs. Documentation provided shows students can utilize online forms for complaints. Several students indicated during the interview process that they utilized the University Student Ombuds Office and valued the support received.

The Substantive Change Committee's review of this standard identified a complex and extensive process for complaints across the campuses. Students from all three campuses

noted an understanding of how to file a complaint, which supports the outlined processes are utilized by the student community.

- 12.5 The institution protects the security, confidentiality, and integrity of its student records and maintains security measures to protect and back up data.  
(*Student records*)

The Substantive Change Committee reviewed documentation and supporting evidence provided by the institution including FERPA provisions as well as Florida Statutes 1002.225 and 1006.52. The institution's documentation was divided into sections on Student Records, Other Types of Records, Special Circumstances that Affect Records, Enterprise Resource Planning Systems and Electronic Data Security, Mitigation and Management of Data and Systems Security Breaches, Anomalies and Events, Continuous Monitoring, Detection Process, and Disaster Management Plan for Records Backup and Retrieval. The narrative was supported by 14 documents, including a sample FERPA tutorial and quiz (redacted) and all relevant institutional policy documents. Processes for safeguarding security, confidentiality, and integrity of student records were not changed during consolidation. Since the institution's documentation related to this standard was extensive, there was no further discussion on this topic in the interviews.

## **Section 13: Financial and Physical Resources**

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- 13.1 **The institution has sound financial resources and a demonstrated, stable financial base to support the mission of the institution and the scope of its programs and services.**  
(*Financial resources*) [CR]

Combined financial reporting and budgeting for the three campus locations was in place before consolidation when the three institutions were part of the USF System. The Substantive Change Committee reviewed documentation provided by institution including five years (2015-2019) of annual financial reports audited by the State of Florida, external rating agency reports, multi-year financial and debt ratios, outstanding debt trends, student enrollment trends, performance-based revenue trends, and guidance from the State of Florida related to pandemic state support reduction planning. During the virtual visit, the Committee conducted interviews with the institution's Senior Vice President for Business and Financial Strategy, six members of the Business and Finance leadership team, and two regional campus Vice Chancellors for Administration and Finance.

The institution's consolidated annual financial statements for 2015-2019 were prepared in accordance with Governmental Accounting Standard Board (GASB) requirements, State of Florida Auditor General Reporting Requirements and USF System Policies. Total operating revenues increased from \$756 million in 2015 to \$849 million in 2019 and non-operating revenues increased from \$439 million in 2015 to \$600 million in 2019. During that same period headcount enrollment grew from 48,700 students in the Fall 2014 to 51,100 students in the Fall 2018. Financial and debt ratios as well as external debt rating

agencies all indicate stable operating performance, debt coverage, liquidity, and overall low debt levels relative to USF's peer rating group.

The institution experienced a 6.5% decrease in state appropriations in 2020 and is planning for an additional state appropriations reduction for 2021. Based on the diversified overall revenue stream, existing reserves, one-time CARES and HERRF Funds, overall financial strength together with strong enrollment during the pandemic, the institution is well positioned to continue to support its mission.

13.2 **The member institution provides the following financial statements:**

- (a) **an institutional audit (or Standard Review Report issued in accordance with *Statements on Standards for Accounting and Review Services* issued by the AICPA for those institutions audited as part of a system-wide or statewide audit) for the most recent fiscal year prepared by an independent certified public accountant and/or an appropriate governmental auditing agency employing the appropriate audit (or Standard Review Report) guide.**
- (b) **a statement of financial position of unrestricted net assets, exclusive of plant assets and plant-related debt, which represents the change in unrestricted net assets attributable to operations for the most recent year.**
- (c) **an annual budget that is preceded by sound planning, is subject to sound fiscal procedures, and is approved by the governing board.**

*(Financial documents)* [CR]

Combined financial reporting and budgeting for the three campus locations was in place before consolidation when the three institutions were part of the USF System. The institution provided five years (2015-2019) of annual financial reports audited by the State of Florida. The institution also provided ten years of budgets, evidence of long-term budget and financial planning, and governing board evidence of financial review and budget approval. During the virtual visit, the Substantive Change Committee conducted interviews with the institution's Senior Vice President for Business and Financial Strategy, six members of the Business and Finance leadership team, the Executive Director of Audit, and two regional campus Vice Chancellors for Administration and Finance.

The institution's consolidated annual financial statements for 2015-2019 were prepared in accordance with Governmental Accounting Standard Board (GASB) requirements, State of Florida Auditor General Reporting Requirements and USF System Policies. The Auditor General of the State of Florida provided the following opinion for all five years (2015-2019): "In our opinion, based on our audit and the reports of other auditors, the financial statements for the USF present fairly, in all material respects, the respective financial position of the USF and its aggregate discretely presented component units as of June 30 2015 to June 30, 2019, and the respective changes in financial position and, where applicable, cash flows thereof for the respective fiscal year then ended in accordance with accounting principles generally accepted in the United States of America."

The institution's unrestricted net assets decreased from \$190 million in 2015 to negative \$212 million in 2019. Implementation of GASB 75 impacted the institution's recorded

liability for post-employment benefits (pension and OPEB) that are expected to be satisfied by the State of Florida since these plans are multi-employer established by State laws and regulations. Following this change, the institution's unrestricted net assets available for current operations increased from \$409 million in 2015 to \$494 million in 2019.

The institution's budget process starts at the state level with an annual Legislative Budget Request and continues on campus featuring an annual budget request, stakeholder input, instructions, and a budget planning calendar. Review and approval the annual budget is performed by the Board of Trustees and Board of Governors.

- 13.4 The institution exercises appropriate control over all its financial resources.  
*(Control of finances)*

Documentation and evidence provided by the institution indicated appropriate segregation of duties, reconciliation of account monitoring, annual financial reporting and budget variance analysis, and assessment of risk in collaboration with the Offices of Internal Audit and Compliance, Board of Trustees approval of Internal Audit work plan. In addition, the documentation indicated review and monitoring of findings, key personnel resumes, organization charts, budget related policies, and other information supporting this standard.

The Substantive Change Committee found that the institution exercises appropriate control over financial resources and exercises appropriate control and manages risk through hiring and retaining of qualified staff, comprehensive regulations and policies, formal external and internal audits functions, and resource management and financial planning functions that support the institution's mission.

- 13.6 The institution (a) is in compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended and (b) audits financial aid programs as required by federal and state regulations. In reviewing the institution's compliance with these program responsibilities under Title IV, SACSCOC relies on documentation forwarded to it by the U. S. Department of Education.  
*(Federal and state responsibilities)*

The Substantive Change Committee examined the institution's Student Financial Aid under Title IV as a part of the State of Florida's Office of Management and Budget (OMB) A-133 report on compliance and internal controls over financial reporting of federal awards annual audit. Included were annual A-133 audit reports for five fiscal years from 2015-2019. In those five years the institution had only one audit finding related to Title IV funds in Fiscal 2015. That finding related to improvement recommendations on "last day of attendance" capture and timing of the return of Title IV funds. The next years' A-133 audit documented that prior year finding was "fully corrected."

The Committee also reviewed the institution's and the State of Florida student loan default rates. USF's student loan default rate for the most recent year (FY2016) was only 1.2% and the average for the State of Florida was 7.3%. The institution's default rate is

well below the maximum threshold's set by the U.S. Department of Education regarding student loan default rates and continuing Title IV eligibility. There are no outstanding issues or known complaints between the U.S. Department of Education and USF further supporting this standard.

The Committee found the institution compliant with its program responsibilities under Title IV of the most recent Higher Education Act as amended and audits financial aid programs as required by federal and state regulations.

- 13.7 The institution ensures adequate physical facilities and resources, both on and off campus, that appropriately serve the needs of the institution's educational programs, support services, and other mission-related activities.  
*(Physical resources)*

The institution's documentation indicated that the institution encompasses approximately 908 acres, 190 buildings, and over 9.1 million square feet of space across all three campuses. This does not include the space in downtown Tampa for USF Health and the Center for Advanced Medical Learning Simulation. The Tampa campus also has 780 additional adjoining acres for future campus expansion. A Master Plan for all three campuses was completed in 2015 and addresses facilities planning for the next ten years (2015-2025). A copy of the master plans was provided and examined.

The Substantive Change Committee participated in a virtual tour of all three campuses and reviewed materials provided by the institution. The Committee also conducted interviews with the institution's Senior Vice President for Business and Financial Strategy, six members of the Business and Finance leadership team, and two regional campus Vice Chancellors for Administration and Finance.

The institution operates and maintains physical facilities, both on and off campus that appropriately serve the needs of the institution's educational programs, support services, and other mission-related activities. The Substantive Change Committee reviewed multiple plans including, but not limited to, the Master Plan, the Strategic Plan and the Capital Improvement and Deferred Maintenance reports. The Committee found the Master Plan and the Capital Improvement project report to support the Strategic Plan and the university's ability to provide comprehensive services, maintain adequate facilities and support the university's overall mission.

The institution tracks all deferred maintenance in areas of: ADA, fire code, roof, exterior building systems, interior building systems, and utilities. Institutional administration uses the deferred maintenance list to plan appropriately so that facilities are maintained in optimum condition and to ensure that capital investments are documented accordingly.

## **Section 14: Transparency and Institutional Representation**

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- 14.1 The institution (a) accurately represents its accreditation status and publishes the name, address, and telephone number of SACSCOC in accordance with SACSCOC's

requirements and federal policy; and (b) ensures all its branch campuses include the name of that institution and make it clear that their accreditation depends on the continued accreditation of the parent campus.

*(Publication of accreditation status)* **[Off-Site/On-Site Review]**

The Substantive Change Committee reviewed documentation provided by the institution, the institution's web sites, 2020-21 undergraduate and graduate catalogs, and 2020 Fact Book. In all publications, the institution's accreditation status was published in accordance with SACSCOC's requirements and federal policy and included the name, address, and phone number of SACSCOC.

Web sites specific to the St. Petersburg and Sarasota-Manatee branch campuses include the name of the institution and clearly indicate that SACSCOC accreditation is dependent on the continued accreditation of the primary campus in Tampa.

- 14.5 The institution complies with SACSCOC's policy statements that pertain to new or additional institutional obligations that may arise that are not part of the standards in the current *Principles of Accreditation*.

*(Policy compliance)*

*(Note: For applicable policies, institutions should refer to the SACSCOC website [<http://www.sacscoc.org>])*

14.5.a “Separate Accreditation for Units of a Member Institution”

**Applicable Policy Statement.** If an institution is part of a system or corporate structure, a description of the system operation (or corporate structure) is submitted as part of the Compliance Certification for the decennial review. The description should be designed to help members of the peer review committees understand the mission, governance, and operating procedures of the system and the individual institution's role within that system.

**Documentation:** The institution should provide a description of the system operation and structure or the corporate structure if this applies.

The institution is part of the Florida State University System which includes all public universities within the state. The institution provided a description of the multi-level governance structure, which includes the Board of Governors for the State University System, in its documentation for Standards 4.3 and 14.5. These descriptions included information about the role of each level of governance and the associated mission, responsibilities, and procedures. These descriptions were supported by evidence from the Florida Constitution, Florida Board of Governors Regulations, and University of South Florida Board of Trustees Procedures. The corporate structure was confirmed during interviews with the institution's President and a representative of the Board of Trustees.

14.5.b “Separate Accreditation for Units of a Member Institution”

**Applicable Policy Statement.** If the Commission on Colleges determines that an extended unit is autonomous to the extent that the control over that unit by the parent or its board is significantly impaired, the Commission may direct that the extended unit seek to become a separately accredited institution. A unit which seeks separate accreditation should bear a different name from that of the parent. A unit which is located in a state or country outside

the geographic jurisdiction of the Southern Association of Colleges and Schools and which the Commission determines should be separately accredited or the institution requests to be separately accredited, applies for separate accreditation from the regional accrediting association that accredits colleges in that state or country.

**Implementation:** If, during its review of the institution, the Commission determines that an extended unit is sufficiently autonomous to the extent that the parent campus has little or no control, the Commission will use this policy to recommend separate accreditation of the extended unit. No response is required by the institution.

The Substantive Change Committee reviewed the institution's documentation and supporting evidence, participated in virtual tours of facilities at the primary campus in Tampa and the branch campuses in St. Petersburg and Sarasota-Manatee, and interviewed administrators, faculty, staff, and students at each site. The Committee concluded that the extended units are at least partially reliant on the primary campus for many centralized services including but not limited to human resources, fiscal resources, and student administrative services such as admissions, registrar functions. Thus, the Committee does not believe that either of the extended units should be recommended for separate accreditation.

**Additional observations regarding strengths and weaknesses of the institution.**  
(optional)

## APPENDIX A

### Roster of the Substantive Change Committee

Dr. Ann L. Kenimer - **CHAIR**  
Associate Provost for Undergraduate Studies  
Texas A&M University  
College Station, TX

Mr. Rick L. Anderson  
Executive VP for Finance & Administration  
The University of Texas Rio Grande Valley  
Edinburg, TX

Dr. T Christopher Jespersen  
Dean, College of Arts & Letters  
University of North Georgia  
Dahlonega, GA

Dr. Duane K. Larick  
Senior Vice Provost for Academic Strategies and Resource Management  
North Carolina State University  
Raleigh, NC

Dr. Kyle Marrero  
President  
Georgia Southern University  
Statesboro, GA

Ms. Mickey Williford  
Vice President for Institutional Effectiveness  
Augusta University  
Augusta, GA

Dr. Elizabeth A. With  
Vice President for Student Affairs  
University of North Texas  
Denton, TX

Mr. John G. Zenelis  
Dean of Libraries and University Librarian  
George Mason University

#### **SACSCOC STAFF REPRESENTATIVE**

Dr. Denise Y. Young  
Vice President  
Decatur, GA

## **APPENDIX B**

### **List of Recommendations Cited in the Report of the Substantive Change Committee**

The Substantive Change Committee wrote no recommendations.