



September 17, 2012

Mr. Frank T. Brogan  
Chancellor  
State University System of Florida  
325 W. Gaines Street, #1614  
Tallahassee, FL 32399

Dr. Randy Hanna  
Chancellor  
Division of Florida Colleges  
Florida State Department of Education  
1314 Turlington Building  
325 West Gaines Street  
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Dear Chancellors Brogan and Hannah:

Thank you for your joint letter of September 11, 2012, outlining the impact of recently-passed legislation (House Bill 7135) on the general education curricula of students pursuing baccalaureate or Associate of Arts degrees in institutions within the State University System of Florida and the Florida College System. This legislation has significant ramifications for every affected higher education institution in our region with regard to compliance with the *Principles of Accreditation* and Southern Association of Colleges and Schools Commission on Colleges' (SACSCOC) policies.

As I understand your letter, it outlines the key changes in the general education curriculum scheduled to be in effect for students entering an institution beginning in 2014-15. These include:

- A required general education core of 30 semester credit hours
- Half of these hours will be prescribed state-wide
- Those hours must be transferable between state public institutions
- The remaining 15 hours will be determined by each institution (it is not clear if state transfer requirements override local control).

The letter also outlines in general terms the process you intend to use to implement the new requirements. The plan calls for state-wide faculty participation in committees to develop the common core, followed by action at each institution to complete the required 30 hours. A ten-person statewide General Education Steering Committee will provide direction for this project.



Mr. Frank T. Brogan  
Dr. Randy Hanna  
September 17, 2012  
Page 2

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Your letter requested my guidance regarding necessary accreditation procedures. My suggestions that follow center around three concerns: the key role of institutions, substantive change, and key standards in the *Principles of Accreditation*.

### The Key Role of Institutions

While the two state systems obviously play a key role in implementing this legislation, our accreditation extends to *member institutions*, not to the systems. Hence, there is an institutional obligation to report changes to us. It is possible for a single letter signed by each college or university president to be sent as notification of a change; however, any action we take will need to be done at the institutional level. Because the process for the approval of a common set of courses to fulfill 15 of the 30 hours of study will be the same for each institution, there may be some economies in that part of our review process.

### Substantive Change

The policy statement on "Substantive Change for Accredited Institutions of the Commission on Colleges" lists "developing a new general education program" as an example of expansion of programs, and hence, it is a change that requires Commission approval. This requires notification from each institution at least six months in advance of the planned implementation date, as well as submission of a prospectus at least three months prior to planned initiation; I encourage an earlier submission than the deadlines. Again, because 50% of each new general education program will be common across all institutions, we may be able to work with you to have that part of the change reviewed as a single change. Then, each institution could supplement the information with its local content. (See pages 15-16 of the Substantive Change Policy on our Web site at [www.sacscoc.org](http://www.sacscoc.org), under the Substantive Change tab.) You might want to consider developing the description of the statewide process in such a way that it can be shared with each institution for inclusion in their respective prospectus. That way, they can cover the full general education component in their institutions' prospectus to us.

### Key Standards in the *Principles of Accreditation*

When revising the general education policies, the statewide component as well as the local component, the systems and each institution will want to pay special attention to these standards found in the *Principles*:

- **Core Requirement 2.7.3 (General Education)** stipulates that baccalaureate programs must have a general education component that is a *minimum* of 30 semester hours or the equivalent. Because the new legislation sets the



Mr. Frank T. Brogan  
Dr. Randy Hanna  
September 17, 2012  
Page 3

requirement at exactly 30 hours, there is no room for a course that does not adhere to the rest of the expectations in this standard. Institutions would be advised to ensure that all courses acceptable for the general education core adhere to the language within this standard. Also, the standard requires that the general education component of the curriculum "is based on a coherent rationale."

- **Comprehensive Standard 3.4.1** (Academic program approval) requires that for each *institution*, programs are approved by both faculty and administration (at the *institution*).

- **Comprehensive Standard 3.4.10** (Responsibility for curriculum) requires that the *institution* places primary responsibility for the content, quality, and effectiveness of the curriculum with *its* faculty.
- **Comprehensive Standard 3.5.1** (General education competencies) requires the institution to identify general education competencies and the extent to which students have attained them. As requirements are modified, it might be prudent to build assessment expectations into the new curricula.
- **Comprehensive Standard 3.5.3** (Undergraduate program requirements) requires general education program requirements to be published, and also that they conform to "commonly accepted standards and practices."
- **Commission Policies** must be met as well. Institutions will want to make clear, for example, that revised general education expectations also apply to students earning degrees through distance or correspondence education.

Other standards may be appropriate as well. However, the above sections clearly apply to a revision of a general education curriculum.

Again, thank you for providing the information regarding the changes and good luck in your organizing efforts for this substantial task. If we can be of assistance, please let us know.

Sincerely,

A handwritten signature in cursive script that reads "Belle S. Wheelan".

Belle S. Wheelan, Ph.D.  
President

BSW/MSJ/SLA:rb