

Report to the
Faculty, Administration, Advisory Board, and Students

of the

United States Merchant Marine Academy
300 Steamboat Road
Kings Point, New York 11024
by
A Team Representing the
Middle States Commission on Higher Education

Prepared after study of the institution's Self-Study Report
and a visit to the campus on April 3-6, 2016

The members of the team are:

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At the Time of the Visit:

President/Chief Executive Officer:

Rear Admiral James Helis
Superintendent, United States Merchant Marine Academy

Chief Academic Officer:

Captain David Palmer
Interim Academic Dean, United States Merchant Marine Academy

Chair of the Advisory Board:

Dr. Sharon van Wyk
Chair, United States Merchant Marine Academy Advisory Board

Maritime Administrator

Paul Jaenichen, Sr
United States Maritime Administration

I. Content and Nature of Visit

Institutional Overview

The United States Merchant Marine Academy (USMMA) is one of the five Federal Service Academies. Its roots lie in the Merchant Marine Act of 1936, where Congress authorized a Federal merchant marine cadet program to educate mariners who would serve the economic and strategic needs of the Nation. In 1947, USMMA began granting four-year Bachelor of Science degrees; in 1956, Congress made the Academy permanent. The Maritime Administration (MARAD) of the United States Department of Transportation (DOT) operates the Academy. The current mission statement of the USMMA is as follows:

To educate and graduate licensed Merchant Mariners and leaders of exemplary character who will serve America's marine transportation and defense needs in peace and war.

Academy graduates earn baccalaureate degrees, U.S. Coast Guard Merchant Marine Credentials (commonly referred to as “license”) as Deck or Engineering Officers, and accept a commission, if offered, in the U.S. Navy Reserve or another uniformed service. On average, roughly 70 percent of graduates sail as merchant mariners each year, with about 25 percent choosing the military option, and five percent entering other approved maritime-related careers. Alumni serve in leadership positions across every segment of the U.S. maritime industry, in all branches of the military, in numerous government agencies, and in the private sector.

Four fundamental pillars constitute the USMMA educational experience: Academics, Regiment, Physical Fitness, and Sea Year. During Sea Year, a mandated experiential learning component, each student (“midshipman”) works and learns on board merchant ships or approved military or other federal government vessels for 300 to 330 days, depending on his/her academic major. As a result, the USMMA academic year is 11 months, with 40 instructional weeks; this academic calendar enables midshipmen to meet graduation requirements in four years. Once enrolled, all midshipmen are therefore engaged in the USMMA experience year-round, whether through Sea Year, regimental obligations, required internships, or, for some, summer school.

The academic majors presently offered by the Academy are housed in two departments: Marine Transportation (MT) and Marine Engineering (ME). The five majors offered are: Marine Transportation, Maritime Logistics and Security, Marine Engineering, Marine Engineering Systems, and Marine Engineering and Shipyard Management.

Maritime education and training programs must comply with the globally adopted Standards of Training, Certification, and Watchkeeping (STCW). These standards are promulgated by the International Maritime Organization (IMO), the United Nations agency responsible for maritime safety and pollution prevention. Institutional compliance with these standards is monitored through internal vetting as well as through external review by MARAD, DOT, and the United States Coast Guard (USCG). Accordingly, USMMA continually assesses its maritime education curriculum and makes changes in order to maintain a robust licensing program in compliance with any modifications or changes in national and international maritime education standards.

Self-Study Process

USMMA chose to complete a comprehensive Self-Study Report through the collaboration between a 14 member Steering Committee and nine individual subcommittees, all overseen and led by the Academic Dean. Faculty members representing the six academic departments and staff from other administrative units served on the Steering Committee, with each Steering Committee member simultaneously a “liaison” for a designated subcommittee. These subcommittees, each led by a chairperson, likewise consisted of representatives from academic, regimental, and administrative units.

Each subcommittee took ownership of one or two “Standards” from the Middle States Commission on Higher Education (MSCHE) Characteristics of Excellence, determined its own Self-Study questions based on the Standards’ respective “Fundamental Elements,” and researched the USMMA itself in order to find evidence for compliance and to tell the institution’s story.

After the Academy Superintendent provided in-depth comments on the July 2015 draft of the Self-Study Report – the third version circulated widely, to which the entire Academy community was invited to respond – the Steering Committee met frequently to analyze each comment and provide consensus responses. Spurred by helpful suggestions during the preliminary visit by the MSCHE team, the Steering Committee significantly revised and condensed Self-Study recommendations. In the final stages, the Maritime Administrator reviewed the document, offered recommendations, and proposed copy-edits. The interim Dean gave his own fine-tuning edits, and the document was forwarded to the Maritime Administrator and Superintendent for their approval. The report thus represents the collective effort of the faculty and administration as an institutional team.

II. Affirmation of Continued Compliance with the Requirements of Affiliation

Based on a review of the Self-Study, interviews with members of the leadership team, faculty, administration, and students, the certification statement supplied by the institution, and other documents, the team affirms that the institution meets nine of the ten requirements of affiliation in *The Characteristics of Excellence*. The team cannot affirm that the institution meets the seventh requirement of affiliation: Institutional planning integrates plans for academic, personnel, information resources and technologies, learning resources, and financial development.

III. Compliance with Federal Requirements; Issues Relative to State Regulatory or Other Accrediting Agency Requirements

Based on a review of the Self-Study Report, interviews with members of the leadership team, faculty, administration, and students, the certification statement supplied by the institution, and other documents, the team affirms that the institution continues to meet the following eight requirements under the Higher Education Opportunity Act of 2008.

- Student Identity Verification in Distance and Correspondence Education
- Transfer of Credit Policies and Articulation Agreements
- Title IV Program Responsibilities
- Institutional Records of Student Complaints
- Required Information for Students and the Public
- Standing with State and Other Accrediting Agencies
- Contractual Relationships
- Assignment of Credit Hours

Additional Overall Comments from the Reviewer:

- The reviewer wants to commend the USMMA for submitting such a well written and comprehensive verification of compliance report.
- Over the past five years there were a total of 14 sexual assault and three sexual harassment (dismissed) complaints. This number does raise some concerns.

The complete report is at Enclosure 1.

IV. Evaluation overview

In the opinion of the team, the institution has met 9 of the 14 standards.

The team found noteworthy achievements in the following areas: admissions; achievement of the licensing component of the institutional mission; the Advisory Board's assessment reports; the Sea Year; progress on developing a formal and integrated leader development program; and assistance provided to department and course-level assessment.

The team found opportunities for improvement in the following areas: lack of institutional authority over human resources, finance, and procurement; linking resource allocation to planning as well as to goal and mission achievement; important administrative positions that remain vacant; and institutional response to sexual assault and harassment.

The team is confident the institution will be able to meet the recommendations and requirements that are proposed.

V. Compliance with Accreditation Standards

Standard 1: Mission and Goals

The institution's mission clearly defines its purpose within the context of higher education and indicates whom the institution serves and what it intends to accomplish. The institution's stated goals, consistent with the aspirations and expectations of higher education, clearly specify how the institution will fulfill its mission. The mission and goals are developed and recognized by the institution with the participation of its members and its governing body and are utilized to develop and shape its programs and practices and to evaluate its effectiveness.

In the team's judgment, the institution meets this standard.

Summary of evidence and findings:

Based on a thorough review of the Self-Study, interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The mission of the United States Merchant Marine Academy is clearly articulated. That mission is to educate and graduate licensed Merchant Mariners and leaders of exemplary character who will serve America's marine transportation and defense needs in peace and war. The current mission statement was developed during a strategic planning process implemented in the Spring of 2012 when the Secretary of Transportation submitted the *USMMA Strategic Plan: 2012-2017* to the US House and Senate Committees on Appropriations in response to requirements in *Senate Report 112-83*.

The Secretary of Transportation and the Maritime Administrator commissioned a study performed in 2012 by the Volpe National Transportation Systems Center to identify the critical issues and recommended strategic planning process for the Academy. The Academy then undertook a strategic planning process that involved multiple stakeholders and solicited input from internal and external stakeholders and resulted in the 2012-2017 Strategic Plan. This planning process yielded a clearly defined mission statement and goals along with performance measures that was apparently intended to guide the institution in making decisions regarding planning, programs, and resource allocation.

However, evidence in the Self-Study that was confirmed by interviews suggests that some at the Academy, particularly many faculty, believe that strategic planning process was too externally driven and was not developed collaboratively enough with stakeholders internal to the Academy. The current strategic plan does not contain institutional-level learning outcomes and does not address athletics, which is a significant program in the lives of many midshipman. Further evidence suggests that the current performance measures are not necessarily appropriate for use in assessing an educational institution's effectiveness in meeting its mission.

Despite the concerns listed in the above paragraph, USMMA has a clearly defined mission and goals that it meets. Midshipman all eventually pass the US Coast Guard licensing exam required of Merchant Mariners, and national ranking organizations list USMMA graduates as commanding among the highest starting salaries in the country for new graduates of an undergraduate institution. The institution demonstrates some commitment to continuous improvement as it is currently engaged in an effort to create a more formal leadership development program to better define how they achieve the "leaders of exemplary character" portion of their mission statement.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- The MSCHE team was impressed with the success of the institution in meeting the “to educate and graduate licensed Merchant Mariners” portion of its mission statement.
- The team was also impressed with the institution’s collaborative effort to define and implement a formal leadership development program.

Non-binding Findings for Improvement (Suggestions):

- That USMMA continue the institutional commitment to defining and implementing a formal leadership development program that includes all major pillars of developmental programs at the Academy.

Recommendations:

- That the institution undertake a collaborative strategic planning process, developed with the direct involvement of the institution’s community, including faculty, staff, and midshipmen, to refine and develop its mission, goals and performance measures for 2018 and beyond.
- The resulting strategic plan should include institutional-level learning outcomes and relevant performance measures that can be realistically used to assess the institution’s effectiveness in meeting its mission and goals.

Requirements: None.

Standard 2: Planning, Resource Allocation, and Institutional Renewal

An institution conducts ongoing planning and resource allocation based on its mission and goals, develops objectives to achieve them, and utilizes the results of its assessment activities for institutional renewal. Implementation and subsequent evaluation of the success of the strategic plan and resource allocation support the development and change necessary to improve and to maintain institutional quality.

In the team’s judgment, the institution does not meet this standard.

Summary of evidence and findings

Based on a thorough review of the Self-Study, interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The Academy’s Self-Study states explicitly that: “Currently there are no clear linkages between the Academy’s budget requests or Spend Plans and the strategic goals and objectives of *USMMA Strategic Plan 2012-2017*.” [*Comprehensive Self-Study*, page 23]

Two interviews (April 22, 2014 and May 6, 2014) with the Deputy Superintendent verify the statement in the Self-Study that there is little evidence of an Academy-wide approach to integrated planning, and specifically resource planning: “Strategic Plan is not tied into resource planning and the allocation process...The Deputy advises that there is no consistent formal budget process that has been followed since she assumed the post. There is no standard process in place for the developing the annual financial plan.” [From *Resources Planning Subcommittee: Executive Summary of Interviews*, page 2.]

There are numerous references throughout the Self-Study and accompanying materials which indicate that linking planning to budgeting, integrated planning, and day-to-day activities are often hindered by additional bureaucracy, redundant scrutiny, and delays which appear to be associated with a lack of trust in the USMMA administrative structure.

The former Academy Chief Financial Officer's (CFO) description of the budget process indicates the Academy's lack of control over actual allocations. "Mr. Escoto conveyed that there were no formal processes in place for budget planning... 'The USMMA CFO shop works in reactionary mode, instead of planning mode... the Superintendent has the final say, those requests are then passed on to MARAD **where they are then adjusted**, then passed on to the Department of Transportation, **adjusted again**, then the funds are allocated for the various activities and projects.'" [Emphases added]. [From *Resources Planning Subcommittee: Executive Summary of Interviews*, page 5]

The materials provided to the team include program documents for what appears to be most functional units at USMMA. In some cases these unit reviews clearly attempt links to the Academy's strategic plan, but others seem to have been created primarily to make it clear to the reader that they are under-resourced. There are numerous references throughout the documentation to the absence of linked planning and budgeting. Perhaps the most pointed is a comment made by the former Academic Dean to representatives from the Resources Planning Committee in an interview dated May 1, 2014: "... The Academic Division metrics are not utilized for budget allocation decisions or for budget formulation purposes. Some of the metrics may be reported in the budget submission, but they are not utilized in resource decision making. Currently, there does not appear to be a standard process for budget formulation and financial planning." [From *Resources Planning Subcommittee: Executive Summary of Interviews*, page 3]

In meetings with Academy personnel the visiting team heard that, even in situations in which funding may be adequate, linking the expenditure of funds to the strategic plan may be precluded by the fact that there is not enough time remaining in the fiscal year to accomplish that. The team heard several times that funding had to be used or lost, so that any individual expenditure may not be necessarily strategic but, rather, opportunistic.

Similar to the Office of Academy Operations/Finance, the Office of Human Resources makes it clear that it does not report directly to USMMA leadership. The Office of Human Resources also has no discernable direct and clear links to the USMMA Strategic Plan; nor does it appear to have as its primary charge the advancement of the mission of the academy. The former Academic Dean states: "The Human Resources Office needs to improve its process for determining and communicating human capital decisions. Right now, there is no standard process in place for determining priority hires required to carry out the Academy's mission... The hiring process is too unpredictable. The time from a selection to when an employee is brought on board has been as long as 4 months. This is dangerous when it comes to trying to plan for instructors in upcoming trimesters. Planning is impossible in such a scenario – you never know who your instructors will be for the upcoming trimester." [From *Resources Planning Subcommittee: Executive Summary of Interviews*, pp. 3-4]

The Human Resources Director, who is currently on long-term medical leave, clearly stated that, "The Academy does not have its own Strategic Human Capital Plan... HR reports directly to MARAD... MARAD's Human Capital Plan has no ties to the Academy's current Strategic Plan." A

subsequent note by the interviewer accentuates the confusion: “Note: The HR Director got back to me after our interview and informed me that MARAD does not have a Human Capital Plan or a HR Strategic Plan.” [From *Resources Planning Subcommittee: Executive Summary of Interviews*, p. 7] It should be noted, however, that MARAD Human Resources prepares a monthly hiring summary showing the status of all vacancies and hiring actions including those at USMMA.

The team heard repeatedly throughout the visit that the Office of Human Resources (HR) is not supportive of the Academy’s goals and objectives and often even hampers the timely hiring of personnel. In an interview on April 15, 2014, the Math and Science Department Head exhibited what appears to be a common frustration associated with attracting appropriate faculty and staff: “HR should be playing a support role... HR should not be driving or dictating the salary being offered and thus forcing the hiring of less experienced or desirable candidates.... The DHs [Department Heads] and Dean should be more directly involved with salary negotiations, within budgetary limits.” [From *Resources Planning Subcommittee: Executive Summary of Interviews*, p. 9] It is obvious that the Office of Human Resources does not regularly, if at all, consider the mission or strategic plan of the Academy in pursuing its mission. This was confirmed in the team’s meeting with the MARAD Liaison and Acting Director of Human Resources. The team could not find faculty, staff, or administrative leaders who claimed that Human Resources was meeting the needs of the Academy.

There is no well-defined decision-making process and authority to facilitate planning and renewal. The independent and separate reporting of several key functional units to MARAD clearly undermines integrated planning and, in the opinion of most at USMMA, is counterproductive and even demoralizing.

In addition to the Academy’s tenuous links between planning and budgeting in general, lack of control over human resources processes and decision making, financial operations and purchasing makes it challenging for USMMA to achieve its mission. Attainment of goals and objectives is severely hindered by the inability to prioritize and facilitate the assignment of resources.

The best example the team saw of assessment activities leading to institutional change was provided in the Advisory Board’s 2014 report to the Secretary of Transportation. The Board performed an assessment of Academy needs in 2013 that identified issues in food service and activities for midshipmen, funding available to support faculty professional development, and in some facilities. The Secretary of Transportation subsequently allocated resources to address these issues.

While some impediments to efficient resource planning are inescapable because of the vagaries of federal budgeting, a stronger Academy-wide approach to ongoing planning and resource allocation tied to continuous improvement is necessary.

Requirements:

- The institution must demonstrate resource allocation decisions that are directly linked to mission and goal achievement at the institutional and unit level, including Human Resources, Financial, and Procurement.

Standard 3: Institutional Resources

The human, financial, technical, facilities, and other resources necessary to achieve an institution's mission and goals are available and accessible. In the context of the institution's mission, the effective and efficient uses of the institution's resources are analyzed as part of ongoing outcomes assessment.

In the team's judgment, the institution does not meet this standard.

Summary of evidence and findings

Based on a thorough review of the Self-Study, interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The Federal Government budgeting process is unpredictable and unreliable, and it hinders development of reliably-educated, well-trained merchant mariners and leaders. The budgeting process at USMMA does not allow for long-term planning. Additionally, the Academy does not have consistent strategies in place to measure and assess the level of, and efficient utilization of, institutional resources required to support the institution's mission and goals. There are numerous examples throughout the materials provided and made evident in meetings with the visiting team, that resources, human and financial, are not readily available and accessible in order to meet Academy needs in a timely fashion. Additionally, strategies to measure and assess the use of resources that do become available are lacking.

As described in our findings relating to Standard 2, the reporting structures at the Academy do not facilitate reasonable and consistent policies and procedures to strategically direct the allocation of assets. The direct reporting of the Financial, Human Resources, and Procurement administrative service areas to MARAD, with an additional level of oversight from Department of Transportation in many instances, provides significant impediments to the allocation of assets in a timely way. The Self-Study addresses budgeting directly: "Without financial management standard operating procedures in place, however, a routine process for the Academy's annual Spend Plan development remains a challenge that needs to be accommodated each year due to continuing resolutions." [*Self-Study*, page 21] The Superintendent acknowledges these shortcomings: "...the Academy is beleaguered by the very late allotments. This has a negative impact on planning at the Academy." [*From Resources Planning Subcommittee: Executive Summary of Interviews*, p. 1]

The cumbersome approach to allocation does not ensure adequate faculty, staff, and administration to support the Academy's mission. For example, in a meeting with the Acting Director of Human Resources, the team was told that a timeline for replacing the Academic Dean on a permanent basis could not be determined at this time even though the Dean left the Academy almost 6 months ago. Similarly, several Department Heads outlined in detail their inability to fill critical positions and to access resources needed to fulfill department objectives or even to meet teaching requirements.

The inflexible and indifferent approach of Human Resources personnel coupled with the direct reporting relationship to MARAD introduces conflicting objectives, severely slows the hiring of employees and, it is widely reported, takes the hiring unit out of hiring decision. "...The Academy's human resource needs differ from those of MARAD, DOT, and much of the government... potentially well qualified applicants are not appearing on the lists provided to them by HR." [*Self-Study*, page 24] Numerous examples of the inaccessibility of human resources, including both

faculty and staff, necessary to support the mission of the academy were reported to the team throughout the visit.

The financial planning and budgeting process, such as it is, is inconsistent, unpredictable and does not have the confidence of the Academy's faculty, staff or administration. The process produces obstacles to timely resource planning and allocation, which creates inefficient and ineffective situations for those in the Academy attempting to meet their unit's objectives.

The former Director of Public Works/Maintenance and Repair described his frustration with the budget process in a May 2014 interview: "There needs to be a more streamlined way to get the money from Washington to the Academy." [From Resources Planning Subcommittee: Executive Summary of Interviews, p. 10]

The acquisition and replacement of educational and other equipment, including current and future technology in support of the educational mission of the Academy, face obstacles which are similar to other areas which rely on budgetary and resource planning: "...only 46 percent [of faculty] agreed that the plan to upgrade instructional resources was adequate." [*Self-Study*, page 40]; and, "There is no comprehensive IT plan. No evidence exists that the budget process relates to the Academy's strategic plan... The systems are adequate for a mediocre learning environment, not 1st class." [From *Resources Planning Subcommittee: Executive Summary of Interviews*, p. 8]

Illustrative of the types of negative impacts created by the Academy's lack of control over resources and reliance on an unpredictable allocation process are the continuing difficulties encountered in attempting to keep simulators operational, which is critical to the educational mission. Though the importance of the simulation program to the educational mission was highlighted to MARAD, Department of Transportation, and Congress, "Congress did not provide the FY 2016 requested increases. The Academy is currently continuing with its simulator program despite the much needed base funding necessary to support this mission-critical type of learning." [Comprehensive Self-Study, page 26]

The Academy has significant impediments to achieving institutional effectiveness, many created by the inadequacy of and the lack of control over its own resources.

Recommendations:

- The Capital Improvement Program (CIP) and the Information Technology Department require more formal and direct integration with the Academy's mission and strategic plan.

Requirements (*institutional actions needed to achieve compliance with the standard*):

- The institution does not have access to its approved annual budget in a manner that supports the effective, efficient, and timely use of financial resources at the institution level. The Secretary of Transportation must initiate and lead an effort to ensure statutory and regulatory change is made by Congress so that the annual budget is available to the institution at the start of the fiscal year.
- The Superintendent does not currently have direct control over the hiring process for faculty and staff. The Superintendent must have the authority and responsibility, assigned or delegated from DOT and/or MARAD as appropriate, to ensure adequate faculty, staff, and administration to support the institution's mission and outcomes expectations.

Standard 4: Leadership and Governance

The institution's system of governance clearly defines the roles of institutional constituencies in policy development and decision-making. The governance structure includes an active governing body with sufficient autonomy to assure institutional integrity and to fulfill its responsibilities of policy and resource development, consistent with the mission of the institution.

In the team's judgment, the institution does not meet this standard.

Summary of evidence and findings:

Based on a review of the Self-Study, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team concludes that the current leadership and governance structure of USMMA is not conducive to the institution fulfilling its stated mission in an effective and efficient manner that benefits the institution and its students. The evidence and resulting symptoms of the leadership and governance structure issues are summarized below and in other sections of this report.

USMMA does not have a governing board but does have an oversight and advisory board. Congress created a Board of Visitors (BOV) tasked with visiting the Academy annually and making recommendations concerning the operation of USMMA, basically serving an oversight function. However, the BOV, which was apparently dormant for years, was reactivated in 2012 and met at the Academy in 2014 and 2015. The Academy also has an Advisory Board established by US Code that is supposed to visit the Academy at least once a year "for the purpose of examining the course of instruction and management of the Academy and advising the MARAD and the Superintendent of the Academy." The Advisory Board is active and provides valuable information to the Secretary of Transportation. Neither the BOV nor the Advisory Board are governing bodies with decision authority or fiduciary responsibility for the Academy.

The authorities that established USMMA and govern its operation are granted by federal law. The US Department of Transportation operates the Academy with the Secretary of Transportation delegating responsibility for USMMA to the Maritime Administrator. The Maritime Administration (MARAD) publishes a series of Maritime Administrative Orders (MAOs) that define the processes for policy development and decision making at USMMA. US Code (46 CFR 310.67) states that, "the Superintendent of the Academy is delegated authority to issue all regulations necessary for the accomplishment of the Academy's mission." The Superintendent reports to the Maritime Administrator on many matters. The statutory and regulatory guidance regarding authorities for the operation of the Academy appear sound.

However in practice, Congress has placed limitations on USMMA's control over its finances for almost a decade. After the results of a 2009 General Accounting Office (GAO) audit of USMMA found weak internal controls, these limitations were expanded as key Academy business processes such as financial management, procurement, and human resources were removed from USMMA by Congress and now report directly to the DOT and MARAD headquarters with concurrent (but largely ineffective) reporting to the Superintendent. The net effect of this is that the Superintendent as the CEO of the institution does not in practice currently have the means, authority, and responsibility, assigned or delegated, to enable effective and efficient accomplishment of the Academy's mission. Specific symptoms of the issues arising from the current governance structure include:

- Hiring timelines for new personnel are excessively long and do not include disciplinary experts

in the initial review of applicants, so some believe the best qualified applicants are not being hired.

- The budget approval process and subsequent resource allocation process is cumbersome and much of the annual budget is not made available to the Superintendent until late in the fiscal year so resources cannot be effectively obligated in a timely manner against requirements over the course of the year.
- US Senate Committee on Appropriations “directed MARAD to conduct a legal review of existing statutory authorities of the USMMA and identify limitations that impede its ability to operate effectively and efficiently” (Senate Report 113-182), so concerns with the governance structure are recognized by Congress. The MARAD also agrees that changes must be made to restore authorities to the Superintendent.
- A 2014 report from the Advisory Board to the Secretary of Transportation also recommended restoring the Superintendent’s “discretionary ability to adjust budgeted funds to repair and maintain facilities, equipment, and grounds without multiple approvals.”

With the exception of the human resources, financial, and procurement functions, the internal leadership and governance structure at USMMA appears sound and generally consistent with accepted practices in higher education. The Academy appears to have a shared governance structure that is also consistent with accepted models in higher education. However, survey evidence suggests that members of the staff and faculty have concerns with communication flow, leadership cohesion, trust throughout the organization, and low faculty morale.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- Despite the restrictive governance processes, the USMMA leadership has accomplished its mission, though apparently with difficulty.
- The Advisory Board demonstrates significant value added to the Academy and may be its best advocate outside of the Academy.

Non-binding Finding for Improvement (Suggestions):

- Consider more effective ways to increase the communication of information between the USMMA leadership and staff, faculty, and midshipman through more frequent, informal interactions.
- Use the Advisory Board to the Secretary of Transportation to gain needed additional resources and regulatory changes.
- Consider creating a governing board consisting of representatives outside of USMMA that have a statutory and/or regulatory role in the operation of the Academy and that acts to assure institutional integrity and supports the institution in policy and resource development.

Recommendations: None

Requirements (*institutional actions needed to achieve compliance with the standard*):

- The Superintendent does not currently have direct control over the institutional functions of personnel hiring, financial planning and management, and procurement. The Superintendent must have the means, authority, and responsibility, assigned or delegated from DOT and/or MARAD as appropriate, over the institutional functions of personnel hiring, financial planning and management, and procurement required to effectively and efficiently accomplish the Academy’s mission.

Standard 5: Administration

The institution's administrative structure and services facilitate learning and research/scholarship, foster quality improvement, and support the institution's organization and governance

In the team's judgment, the institution does not meet this standard.

Summary of evidence and findings:

Based on a review of the Self-Study, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team concludes that the institution is not able to function successfully as it is not properly administered and staffed. The evidence and resulting symptoms of the lack of adequate administrative structure are summarized below and in other sections of this report.

The institutional strategic plan was led and produced by MARAD with assistance from the Volpe Center with marginal participation and input by faculty. Guidance for the plan, and most of the participants, came from the Office of the Secretary of Transportation. There has been very little buy-in into this strategic plan, and the administrative structure does not appear to provide support to effectively achieve the milestones in the strategic plan.

The progress of the institution has been severely handicapped by staffing issues. The Self-Study refers to the "frequent reorganization and reassignment of administrative responsibilities to units and personnel that are neither qualified nor prepared to assume them." This was also verified during interviews with faculty, staff, and administrators. As an example, the efforts towards institutional effectiveness were halted as the Director of Institutional Assessment left in February 2015. A new person has been hired only recently, but the institution continues to wait until that person arrives on campus to fully implement its institutional effectiveness process. Other efforts related to institutional effectiveness were halted as the Commandant at the institution had also left. A new Commandant was hired in December 2015, but the process will only be fully implemented when the Director of Institutional Assessment assumes the position, which means that institutional effectiveness efforts have been on "hold" for over a year.

The team did not find any evidence of efforts of the senior administrative structure to be in regular contact with faculty thinking or with students to understand their concerns and perspectives. The Superintendent periodically conducts town hall meetings for the faculty, staff, and midshipmen. According to the faculty these meetings are primarily meant to update them on the activities going on at the Academy and not for a dialogue with the faculty, staff, and midshipmen. The Superintendent has only recently had a meeting with the officers of the Faculty Forum and started to attend the Faculty Forum itself, which is a faculty body that acts in an advisory role to the Academic Dean. The officers of the Forum are encouraged by this overture of the Superintendent and are hoping that this will result in positive developments in the future.

The team found no evidence of efforts towards developing and/or implementing procedures for evaluating administrative units and opportunities. In the absence of such evaluations, it has not been possible for the administrative structure to effectively engage personnel or to effectively direct their own efforts towards systematic improvement of the institution.

Significant accomplishments, significant progress, or exemplary/innovative practices: None

Non-binding Findings for Improvement (Suggestions):

- The Superintendent should continue and build on his recent outreach to the Faculty Forum. He should also consider meeting directly with faculty and/or faculty groups to understand their concerns and aspirations.

Recommendations:

- The Superintendent, along with the Deputy Superintendent and the Academic Dean, should initiate meetings with midshipmen to learn about their experiences on campus and their concerns in both student-life and academics areas.
- A periodic review (every 2 years) of the administrative structure should be put in place. The review should be directed at assessing the effectiveness of the administrators as well as the administrative procedures in place. Mechanisms for reacting to lessons learned from the review should also be instituted.

Requirements (institutional actions needed to achieve compliance with the standard):

- The Director of Institutional Assessment, Director of Admissions, Academic Dean, Chief Financial Officer, Human Resources Officer, and other key administrator positions are all currently vacant or occupied by interim staff. While some of these positions, such as the Academic Dean, are filled on an interim basis with highly qualified, skilled and dedicated individuals, the Academy must move forward with permanently filling these critical positions with administrative leaders who possess the appropriate skills, credentials, and training.

Standard 6: Integrity

In the conduct of its programs and activities and involving the public and the constituencies it serves, the institution demonstrates adherence to ethical standards and its own stated policies, providing support for academic and intellectual freedom.

In the team's judgment, the institution meets this standard.

Summary of evidence and findings:

Based on a review of the Self-Study report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team concludes that while the institution is in compliance with this standard, it is weak in many of the tenets of integrity as outlined by MSCHE. The evidence and resulting symptoms of the lack of strong integrity structures are summarized below and in other sections of this report.

The Self-Study Report points to the midshipmen not being sure whether disciplinary actions taken for those found in violation of the honor code and standards of conduct are generally fair, appropriate, and consistent. This was corroborated by the team via meetings with the students during the team visit. The Regiment's honor code manual was revised in 2015 and is available on the website. However, the procedures and policies concerning other violations of institutional policies have not, for the most part, been made available to the students. The students are made aware of these policies during the indoctrination when they first arrive as freshmen. During an on-

site interview, an administrator noted that these policies were available to students, faculty, and staff on a centralized drive (the T: drive); however, their presence on the T: drive was not adequately publicized. The new Commandant, who joined in December 2015, has now made these policies available to students, faculty, and staff on the Academy's intranet. Students, faculty, and staff have been informed of their presence on the Intranet via an email as well as orally. It is not clear that enough efforts have been devoted towards making this widely known. In addition to the lack of availability of policies concerning alleged violations, there are also instances of unequal treatment for similar violations across midshipmen companies. This was confirmed by the Commandant, who is working diligently to fix this issue.

The Faculty Handbook provides for academic freedom to midshipmen and faculty in discussing any issues related to coursework. The team did not encounter any examples to indicate the lack of academic freedom at the institution. The faculty, however, expressed at several meetings that the rules/policies for engaging externally (with media and in presentation of papers outside) were not clearly spelled out.

While this issue is not explicitly addressed in the Self-Study, there is an overall sense of an unwieldy hierarchy at the institution conveyed by the Self-Study and confirmed during team visit. Such an environment may, in fact, not be conducive to mutual respect amongst various constituents of the institution. The lack of feeling of respect was expressed in meeting with the students. A key reason for such perceptions generally is the lack of adequate communication amongst various constituents of the institution.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- The institution puts in a significant effort in ensuring an ethical conduct on the part of administrators, staff, faculty, and midshipmen as described in the Self-Study. The revision and easy access to the honor code is a commendable effort on the part of the institution.

Non-binding Findings for Improvement (Suggestions):

- The Commandant has recently made the policies and procedures concerning violations of policies available to the students on the Intranet. Some initial efforts have also been made to make the students aware of their availability. This effort should be continued and additional avenues of making the students aware of the presence of the policies on the Intranet should be explored.

Recommendations:

- The Commandant should continue to work with Company Officers to ensure that there is fair, equitable, and impartial treatment of midshipmen across companies for disciplinary issues.
- The policies regarding communicating with outside entities should be spelled out and disseminated widely in order to strengthen the sense of academic freedom on campus.
- Develop specific means to enhance communication at all levels, especially in having institutional policies known so that there is a prevailing sense of mutual respect and commitment to the institutional mission.

Requirements: None

Standard 7: Institutional Assessment

The institution has developed and implemented an assessment process that evaluates its overall effectiveness in achieving its mission and goals and its compliance with accreditation standards.

In the team's judgment, the institution meets this standard.

Summary of evidence and findings

Based on a review of the Self-Study Report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The United States Merchant Marine Academy (USMMA) developed a strategic plan in 2012. The plan has five strategic goals related to cutting-edge programs, sound leadership, a dynamic campus culture, a first-class infrastructure, and meaningful communication and partnerships. Each goal has associated objectives and strategies. The plan includes objectives and strategies for each goal as well as performance measures to determine how well strategies are being achieved.

In 2013, USMMA created the Institutional Effectiveness Council (IEC) through Superintendent Instruction 2013-03 (SI 2013-03) to review and document improvements in overall institutional well-being in support of student learning. The IEC includes members of the USMMA senior leadership team as well the Director of Institutional Assessment (who departed USMMA in February 2015). SI 2013-03 tasks each department and program to establish a mission and goals, which are all mapped to the USMMA strategic goals. There is a draft institutional effectiveness handbook; however, it is not yet fully guiding the USMMA institutional effectiveness processes. The handbook includes a timeline for assessment activities.

- Based on interviews with the Senior Management Council and the Institutional Effectiveness Council, and a review of documents included in the Self-Study Report, it is evident that many divisions, programs, and units have been engaged in assessment, and there has been some assessment completed at the institutional level. The efforts at the institutional level, however, have not been organized and made systematic.
- The progress on strategic objective attainment described in the February 16, 2015 strategic plan assessment report does not appear to be aligned with the strategies' performance measures, and the level of objective attainment or strategy progress is not specified in the assessment report, which makes it difficult to determine how much progress has been made. The report suggests that many of the performance measures are ineffective for measuring the success of certain strategies, while other strategies do not have any performance measures. This is, in part, because groups external to USMMA led the development of the strategic plan and performance measures.
- It is not clear how program review supports assessment of strategic goal/objective attainment as the results of these reviews are not considered for the purpose of institutional assessment. Additionally, while many of the program reviews include assessment results, some do not.
- In 2014, the USMMA Advisory Board produced a report describing USMMA progress towards attaining the strategic plan's goals and objectives as well as recommendations for improvement. This report informed the Secretary of Transportation's letter (appendix 5-3, Self-Study), which directed USMMA to perform many of the recommended actions outlined in the Advisory Board report.

- It is unclear whether and how institutional assessment results are shared and discussed with appropriate constituents, and how they are used for institutional planning, resource allocation, and institutional renewal.
- The February 16, 2015 strategic plan assessment report did not include any recommendations for improvement, so it is not clear that institutional assessment is informing improvement of institutional effectiveness.
- The 1 June 2015 Advisory Board Report to the Secretary of Transportation recommended strengthening the institutional assessment capability of USMMA so that the Academy could collect and use data to support decision making.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- USMMA has sent an offer to a candidate for the position of Director of Institutional Assessment. This is an important position that will ensure that USMMA sustains an effective institutional assessment process.

Non-binding findings for improvement (“Suggestions”): None

Recommendations:

- Develop institutional learning outcomes that integrate and synchronize the efforts of the institution to develop midshipmen.
- Fully implement an institutional assessment process that is systematic, organized, and sustained and that clearly identifies progress on strategic goal/objective attainment through the development of performance measures that are clearly and purposefully related to the goals/objectives they are assessing so that they can inform institutional decisions. The process should include a method of sharing and discussing assessment results with appropriate constituents and a process for using assessment results to improve institutional effectiveness.
- All divisions, units, and programs should fully implement assessment processes that provide them the information they need to identify how well they are achieving their goals and/or objectives as well as actions to improve. The results of division, unit, and program assessment should inform institutional assessment.

Requirements: None

Standard 8: Student Admissions and Retention

The institution seeks to admit students whose interests, goals, and abilities are congruent with its mission and seeks to retain them through the pursuit of the students’ educational goals.

In the team’s judgment, the institution meets this standard

Summary of evidence and findings

Based on a review of the Self-Study Report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

Overall, the Academy has a coordinated and well-organized enrollment plan and is on the path to enforcing persistence and completion by raising the admissions standards of the candidate pool to

reflect a better match of skills and competencies of students who have demonstrated the potential to progress and succeed. The admissions page is thorough, clear, and easily accessible. Applicants can navigate the quantitative and qualitative eligibility requirements with ease. The contact information is also visibly displayed making the process straight forward for applicants.

USMMA seems committed to optimizing persistence and completion by recruiting, attracting and enrolling students likely to succeed in such a rigorous academic environment. The Academy recently integrated the variable of “Adaptability” as the qualitative variable that complements higher SATs and ACTs in formulating admission’s index.

The Self-Study introduces data that reflect historic trends and current enrollment for the incoming classes up to the Class of 2019. While overall enrollment seems to have remained flat since 2012, there is growth up to 2017 and then a decline in applicants for 2018 and 2019. In addition, it is anticipated that the variables that define the applicant pool profile will shift somewhat with a significant increase in the academic qualifications of the pool of candidates vis-a-vis a decrease in the number of inquiries with a coupled growth in the yield.

While tuition, room and board as well as uniforms and books are fully funded by the Federal Government, other supplies and equipment required for the course of study at the Academy are the responsibility of the students. For that purpose, students may apply for Title IV grant aid and loans, and all information seems to confirm that the Academy is in full compliance with the regulations that govern eligibility.

The financial aid information posted on the website is in compliance with the federal regulations governing the Title IV Higher Education Act programs. Information is accessible, easy to find, comprehensive, and clearly explained. Net price Calculator is easy to find.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- The Self-Study, other documents, and the available data clearly reflect a well-orchestrated and strategic enrollment program of initiatives that successfully yields the desired outcomes. The institution is to be commended for its efforts and accomplishments.

Non-binding findings for improvement (“Suggestions”): None

Recommendations: None

Requirements: None

Standard 9: Student Support Services

The institution provides student support services reasonably necessary to enable each student to achieve the institution's goals for students.

In the team's judgment, the institution does not meet this standard

Summary of evidence and findings

Based on a review of the Self-Study report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The Self Study underscores the significance of Academics, Sea Year, Regiment and Physical Fitness as the “four pillars of a USMMA education. Furthermore, the Self-Study posits that one of the great strengths of the Academy is the mutual support, camaraderie, and friendship.

In regards to the academic support services, there seems to be a clear connection between the institution's mission, student learning expectations, and services delivered. Academic Support Services seem to be well orchestrated. An organized system of services is coordinated through the Academic Center for Excellent (ACE). The Self-Study describes how The Center seems to offer a comprehensive and consistent program of mentoring and tutoring services in the more challenging academic areas. A well designed system of alerts coordinated with mandated remedies addresses the needs of students at risk. The higher success and completion rates provide evidence that the programs/services offered are appropriate for the current student body and are supportive of the desired student learning outcomes.

The Self-Study, Midshipmen survey, and interviews with stakeholders provide evidence that the Sea Year is perceived as a rich and valuable experience. It is considered an invaluable and unique chance to have “hands on” experience that enriches the portfolio of skills of the Midshipmen.

The Regiment is organized into two battalions and five companies. The regimental staff perform administrative functions and oversee operations across the academy. All midshipmen live in one of the barracks facilities, which have been positively rated on the surveys. There is an array of social and special-interest student organizations on campus.

USMMA places great pride on its athletic programs, offering 18 intercollegiate sports under the NCAA Division III. Almost half of the midshipmen participate in a varsity sport. The intramural and fitness programs seem to represent a vibrant part of life on campus with high participation rates.

Documents that record the midshipmen surveys and interviews with the stakeholders confirm that the disciplinary processes that frame the implementation of the code of conduct seem to be questioned by students who remark on the lack of transparency and consistence with disciplinary decisions across companies. Students do not seem to perceive the campus climate in a positive light. Concerns with fairness and safety seem to have increased in the last ten years – according to the *Midshipmen Value Survey 2014*. In fact, the survey displays a decline in the perception on areas related to equality, fairness, and safety at the Academy.

The campus climate and incidence of sexual harassment and sexual assault have been a serious and recognized problem for over 10 years. This conclusion was echoed in the Reviewer's *Report on Compliance with Accreditation-Relevant Federal Regulations*. The pervasiveness of the incidents is perceived as undeniable and disturbing. While the Academy has consistently recognized the serious problem that it faces and has officially recorded it, the efforts in place to prevent new recurrences have been insufficient and ineffective. Perhaps most disturbing is that the victims do not report the incidents, and the only evidence of its pervasiveness is obtained through confidential surveys. While the trend is alarming, and there is clear evidence of the intention to implement corrective action, the initiatives in place have been inconsistent, not fully supported, and ineffective.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- Relatively new additions to the Student Service areas such as the Sexual Assault Response Coordinator, Student Activity, and Student Academic Support services have infused renewed energy and ideas that are recognized and valued by their colleagues and students.

Non-binding findings for improvement (Suggestions):

- Students shared a number of concerns regarding their Company Officers such as inconsistency in disciplinary actions, lack of maritime experience, and lack of respect. Perhaps a mandated regular training program might be effective in aligning the company officer's performance with clear outcomes that might improve the quality of life in the barracks.
- The Academy should establish forums that offer an opening for midshipmen to express their concerns, ideas and suggestions.
- Navigation of the pages of the website that focus on student services and support is difficult and counterintuitive, making student policies and regulations hard to find. Important definitions, program available and procedures under the policy for prevention of sexual assault, dating, and domestic violence and stalking are combined and buried under the Annual Security and Fire Safety Report 2014.

Recommendations:

- The Academy must establish a mandated training program for all employees that nurtures understanding, prevention, remediation, and eradication of current incidences of sexual assault and harassment, and stalking.
- The Academy must make every effort to disseminate information on sexual assault and sexual harassment policies, prevention mechanisms, important term definitions, available campus resources via every available medium from Course Catalog through website to flyers and frequent face-to-face and online training.

Requirements (institutional actions needed to achieve compliance with the standards):

- To improve the safety and climate of respect that all midshipmen encounter during the Sea Year experience, the institution must take demonstrable steps in preparation for and upon return from the Sea Year experience.
- The pervasiveness of sexual harassment on campus must be addressed as a pressing and substantial concern that has fostered a hostile environment for many cohorts of midshipmen. The institution must implement specific steps to build a climate of mutual respect and trust

among midshipmen, faculty, and staff with respect to sexual assault and sexual harassment.

Standard 10: Faculty

The institution's instructional, research, and service programs are devised, developed, monitored, and supported by qualified professionals.

In the team's judgment, the institution meets this standard.

Summary of evidence and findings:

Based on a review of the Self-Study Report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

- USMMA employs 141 part and full-time faculty, 85% of whom are tenured or tenure-track. Many of the faculty in the two major-granting departments (ME and MT) hold unlimited master's Merchant Marine Credentials or unlimited chief engineer's Merchant Marine Credentials. Instructional faculty consist of a balance of civilians and active duty military officers. [*Self-Study* p. 34]
- Effective teaching is a priority at USMMA; the annual Performance Management System (PMS) requires that Department Heads observe and formally evaluate (via a Classroom Observation Report) the teaching of all non-tenured faculty three times per year, and all tenured faculty twice per year. Those faculty not yet at full academic rank are also expected to provide a annual progress towards promotion report that self-evaluates their performance. [*Self-study* p. 35]
- The institutional emphasis on effective teaching and mentoring of students is also clearly evident: faculty are expected to participate annually in a full day teaching effectiveness workshop led by a Master Teacher; student course evaluations are administered regularly; Department Heads are required to formally verify that faculty maintain scheduled office hours. [*Self-Study* p. 35]
- Faculty members are unionized, with a labor agreement in place that governs many aspects of their work including timekeeping, and criteria for reappointment, promotion, and tenure. [*Self-Study* p. 38-39]
- The HR Supervisor and staff report directly to MARAD, with a concurrent (and largely ineffective as reported by USMMA leaders and faculty alike) reporting line to the Deputy Superintendent. Both senior USMMA leaders and faculty report that hiring processes are inefficient and ineffective. Department Chairs and many other faculty report that the processes do not include subject matter experts (SMEs) at key moments of the hiring process (such as the initial screening phase that determines who meets the minimum qualifications and should be further considered), and that well-qualified applicants are not appearing on the final lists of applicants provided to them by HR. Furthermore, compensation levels to be offered to applicants are determined initially without input from SMEs and are below market especially in the MT and ME departments, thereby limiting the quality of faculty that can be attracted to USMMA. Hiring processes that result from this reporting relationship require excessive lead times and long delays and often result in vacancies remaining unfilled for many months at a time. The processes for the hiring of adjunct faculty is equally inefficient, the consequence of

which is that full-time faculty often are forced to take on “overloads” to cover the necessary instructional shortfalls.

- The Faculty Forum consists of seven standing committees. One of these is the Curriculum Committee which reviews all proposals for course changes prior to being formally presented to the Faculty Forum, the Dean, and ultimately the Superintendent for final approval. The Committee on Academic Standards and Teaching (CAST) reviews NSSE results and takes on other “studies” as directed by the Faculty Forum, and makes recommendations to the Dean regarding improvements that may enhance student learning. [Self-Study p. 36]
- The Academic Outcomes Assessment Committee (AOAC) oversees assessment of teaching and learning, including course level assessments, but these assessment processes do not extend to the program or general education levels. [Self-Study p. 2 & 37]
- The Faculty Personnel Committee oversees faculty reappointments, tenure, and promotion, and the Faculty Incentive Awards Committee oversees sabbatical requests, although the number of sabbatical requests supported by USMMA leadership each year is very low. [Self-Study p. 37]
- Faculty teaching loads average three courses per term in each of three terms per year, for eleven months of the year. In order to advance in academic rank and receive positive annual performance evaluations, faculty are expected to engage in scholarly activity and professional development throughout their careers, and the institution provides support for one or, as funds permit, two faculty members each year to pursue a sabbatical (lasting two of the three terms). [Self-Study p. 37]
- Professional development funding, including funding for travel to scholarly conferences, has varied from \$26K in FY12 to \$40K in FY14 to \$120K in FY15. Even in times of greater funding levels such as FY15, federal government travel restrictions imposed by OMB have significantly limited the ability of faculty to engage in scholarly and professional development. As a result of this “cap,” faculty are required to report all planned scholarly and professional travel plans for the upcoming fiscal year at the start of the fiscal year. This creates a “first come – first serve” model that does not align well with higher education practices, or with the typical “call for papers” approach by scholarly venues throughout the year. [Self-Study p. 38]
- Faculty attitudes regarding USMMA fostering a positive working environment has increased from 46% in 2004 to 78% in 2014. However, overall faculty morale has declined over that same period; some cite a lack of sufficient opportunities to engage in open dialogue with leadership as one possible explanation for the low morale. Interviews with faculty, staff, administrators, and even external partners suggest that many members of USMMA have developed a culture of learned helplessness and victimhood. Several years of “receivership” resulting from the 2009 GAO review have resulted in a command climate among faculty and staff whereby proactive advice/counsel is rarely offered, inaction (or waiting to “be directed” to act) is the norm, and quick defensiveness of the status quo stifles any discussion that could lead to change and improvement. [*Self-Study p. 39-40; on-site interviews*]

Significant accomplishments, significant progress, or exemplary/innovative practices:

- The expectation that all Department Heads observe and formally evaluate the teaching of all faculty two or three times per year is a best practice within higher education. Furthermore, the requirement that all faculty not yet at full academic rank provide a progress towards promotion report that self-evaluates their performance annually is also a best practice.
- The institutional expectation that all faculty participate annually in a full day teaching effectiveness workshop led by a Master Teacher is to be commended; this demonstrates a strong institutional commitment to the importance of teaching and learning.

Non-binding findings for improvement (Suggestions):

- The institution is encouraged to study higher education best practices regarding models for effective annual planning for and allocation of financial resources in support of travel (including conference related travel) relating to the scholarly and professional development of the faculty.
- The institution is encouraged to engage in a serious and thoughtful dialogue involving all members at all levels of the institution about the pervasive culture of victimhood, including but not limited to the sense that nothing can be done unless directed (or unless a policy is written to permit it).

Recommendations:

- The institution should vigorously pursue relief from the “travel cap” imposed by OMB; faculty scholarly and professional development is a “mission critical” requirement of the profession both for faculty at USMMA and elsewhere within higher education across the nation, and it should be articulated as such.
- The institution should study higher education best practices regarding effective recruiting and hiring practices of faculty and staff. The current HR processes internal to USMMA are both ineffective and inefficient, and USMMA leadership must work to streamline these local HR processes by creating process improvements that will result in the hiring of highly qualified faculty and staff with minimal delays in filling all positions.
- The institution should study higher education best practices regarding the support and implementation of a faculty sabbatical/professional development program (including the underlying philosophical principles that justify such programs) that will provide better support for the continuous scholarly and professional development of the faculty.

Requirements: none

Standard 11: Educational Offerings

The institution’s educational offerings display academic content, rigor, and coherence that are appropriate to its higher education mission. The institution identifies student learning goals and objectives, including knowledge and skills, for its educational offerings.

In the team’s judgment, the institution meets this standard.

Summary of evidence and findings

Based on a review of the Self-Study report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

- The Maritime Education and Training (MET) program of study at USMMA consists of four years of in-residence study in one of two professional tracks: Deck or Engine. There are five academic majors available among those two tracks (Deck: Marine Transportation, Maritime Logistics and Security; Engine: Marine Engineering, Marine Engineering Systems, Marine Engineering and Shipyard Management). Students spend a total of 3 years (9 trimesters) on campus completing academic coursework and 1 year (3 trimesters) out to sea over 2 sailings (the first sailing is 1 trimester and the second sailing is 2 trimesters long). During the sailings, students operate merchant marine ships or other approved military or federal government vessels. Midshipmen earn a BS degree, obtain a Merchant Marine Credential as either a Third

Mate or a Third Assistant Engineer, earn multiple specialized certificates involving ship and cargo operations, and fulfill requirements for commissioning as officers in the US Navy Reserve or for active duty service in one branch of the Armed Forces. Total in-residence credits for the BS degree vary from 143 to 155, with an additional 20-22 credits earned during the Sea Year. [Self-Study p. 59-60]

- The five academic majors are overseen by two academic departments: Department of Marine Transportation (MT), and Department of Marine Engineering (ME). [Self-Study p. 60-61]
- Curriculum in MT support two of the academic majors and consists of a core in nautical science and business management. Students in MT are prepared to take the USCG license exam for Third Mate of Ocean Steam or Motor Vessels of Any Gross Tons. [Self-Study p. 60]
- Curriculum in ME support three of the academic majors and consists of a core in engineering science and marine engineering, sufficient to credential them as a Third Assistant Engineer. An informal Engineering Industry Roundtable consisting of maritime constituents provides input and advice to the program on regular intervals. ME is also responsible for oversight of the Master of Science in Marine Engineering program. [Self-Study p. 61 & 66]
- Both the Marine Engineering & Shipyard Management and Marine Engineering Systems majors are ABET accredited. The Maritime Logistics and Security major has been evaluated by the American Society of Transportation and Logistics. [Self-Study p. 60]
- USMMA relies on privately owned merchant ships and approved military or government owned merchant ships for hosting midshipmen during their Sea Year. The declining number of private vessels available is placing a greater burden on the military and government owned sector to provide that access. There are federal regulations that require private carriers to provide these training opportunities, but competition from the other six maritime colleges continue to limit the options available. [Self-Study p. 63]
- The T/V *Kings Pointer* is the USMMA's primary training vessel, used to promote leadership training and development on the waterfront. [Self-Study p. 64]
- Curriculum based learning objectives at the course and program level, and the methods and criteria for assessment, are dictated by the International Maritime Organization (IMO) competencies that are required of all mariners. Recent changes by the IMO (the "Manila Amendments") have resulted in changes to the curriculum for the Class of 2017 and following. Those changes meet the USCG's Standards of Training, Certification, and Watchkeeping for Seafarers (STCW) requirements. [Self-Study p. 64-65]
- The strategic plan does not contain any institutional level learning goals, even though the institution recognizes the need for them. [Self-study p. 2]
- Transfer credit policies exist and permit students to be exempted from courses in which a grade of C or better was earned at the prior institution. [Self-Study p. 66]
- The Master of Science in Marine Engineering graduate program requires 36 credits across 12 courses in a blended online synchronous asynchronous format. Seven of the courses are required of all students; another five are electives. There are approximately 20 students enrolled in the program per year. There are 14 faculty assigned to the program, four of whom are full-time USMMA faculty. The remaining ten are faculty at other institutions, retired USMMA faculty, or industry experts (adjuncts). [Self-Study p. 66-67]
- USMMA provides extensive technical and experiential learning (including both the Sea Year and simulators) opportunities to its student. The facilities and equipment necessary to support this program are available, but obtaining funding for ongoing maintenance support remains a challenge. [Self-Study p. 67]

- In response to industry concerns, the institution is considering the development of an academic concentration in maritime cyber security. [Self-Study p. 73]

Significant accomplishments, significant progress, or exemplary/innovative practices:

- During their Sea Year, midshipmen work and learn under the mentorship of experienced merchant marine officers. All midshipmen spend at least 300 days in this exceptional hands-on learning environment, applying their in-classroom knowledge and skills in real situations. In addition, midshipmen complete sea projects and written assignments that account for another 20-22 semester hour credits.
- An internship is required of all midshipmen during their second period of the Sea Year. The internship includes requirements for a written report that will provide an opportunity for students to demonstrate their professional writing skills as applied to their intended profession.
- USMMA strives for and routinely achieves a 100% success rate prior to graduation for all students taking the USCG license exams. In addition, graduate employment approaches 100% within six months of graduation.

Non-binding findings for improvement (“suggestions”):

- The institution should begin planning for a review of the impact of the recent changes to the curriculum (resulting from the Manila Amendments).

Recommendations: none

Requirements: none

Standard 12: General Education

The institution’s curricula are designed so that students acquire and demonstrate college-level proficiency in general education and essential skills, including at least oral and written communication, scientific and quantitative reasoning, critical analysis and reasoning, and technological competency.

In the team’s judgment, the institution meets this standard.

Summary of evidence and findings

Based on a review of the Self-Study report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The Academic Division has articulated five goals that serve as student learning outcomes for the general education curriculum. These five goals focus on critical and creative thinking and problem solving; oral and written communication; the use of technology; understanding and operating in a diverse global environment; and continued intellectual and professional development. These goals are supportive of the institutional mission and aligned with the skills required of general education curricula articulated in the MSCHE Standard 12 narrative.

The general education curriculum is aligned with the five goals and includes 40 credit hours of course work for Marine Engineering, Marine Engineering Systems, and Marine Engineering

Shipyard Management majors. The Marine Transportation and Maritime Logistics & Security majors have 37 hours of required general education credit.

- The credit hour requirements listed above meet the MSCHE requirement for at least 30 general education credit hours for baccalaureate programs.
- Required general education courses are aligned with and support the five general education goals. General education course requirements for each major are clearly identified in the USMMA course catalog.
- Coursework in majors supports the attainment of the five general education goals as reflected in the USMMA Academic Goals Course Matrix.
- The general education course requirements for the communication and diverse global environment goals do not seem robust enough to support student attainment of these goals. Assessment results (pages 79-80 of the Self-Study Report) support this conclusion.

On July 24, 2014, the Secretary of Transportation directed USMMA to “Develop a comprehensive leadership development program that integrates academic and regimental student experiences.” To execute this directive, Superintendent Notice 2014-05 created the Leadership Development Program Working Group to “identify a program of academic and regimental leadership activities and courses that will ensure each midshipmen can fully grow and develop those attributes [leader of exemplary character] over the course of four years at the Academy.”

- Although not considered part of the general education curriculum, the Naval Science course, “Naval Leadership and Ethics,” does address leadership and ethics, both essential aspects of the USMMA mission. It is being complemented by newly-developed academic courses that address key components of leader development and will be required of all midshipmen.
- While the general education goals do not emphasize leadership and ethics, one of the Academic Division goals is as follows: “lead with integrity, competence, and high ethical standards.”

The five general education goals are assessed at least once every five years through the assessment of department and course-level goals. The Academic Outcomes Assessment Committee (AOAC) oversees and supports department and course-level assessment and includes representatives from the Dean’s Office, the Academic Center for Excellence, each academic department, the Office of the Registrar, and the Chair of the STCW Council.

- The AOAC review of department and course assessment reports is essential for developing faculty assessment expertise, creating effective assessment processes, and promoting a culture of assessment.
- In the assessment of the general education communication goal, course averages were cited as direct measures of student learning in 2014. Course averages are indirect measures as they do not adequately identify variation in grade distribution, which is essential for determining how many students are achieving desired levels of attainment.
- The assessment cycle of five years may be too long to impact deficiencies noted during the assessment of a general education goal.
- It is unclear how the general education assessment results are shared and discussed with appropriate constituents. Additionally, it is not clear how general education assessment results are used to improve student learning. There are no concrete recommendations for improvement associated with the general education assessment report from May 7, 2015.

Significant accomplishments, significant progress, or exemplary/innovative practices:

- The AOAC review of department and course-level assessment efforts and the feedback this process provides to departments and course directors is an exceptionally well-designed and

helpful process. This will ensure that effective assessment practices are used and a culture of assessment-informed improvement exists.

Non-binding findings for improvement (Suggestions):

- When USMMA creates institutional learning outcomes and a new strategic plan, it should consider engaging in a discussion about the value and contributions of the humanities to achieving the institutional mission.
- Consider adopting the “lead with integrity, competence, and high ethical standards” academic goal as a general education goal.
- Consider shortening the assessment cycle from five years to address any deficiencies identified during the assessment of a particular goal.

Recommendations:

- Develop a general education assessment process that integrates assessment results from departments and courses to determine the level of general education goal attainment and that employs direct evidence of student learning for the assessment of all goals. The process should inform efforts to improve student learning through the sharing and discussion of assessment results and identification of recommendations for improvement.
- Assess the current structure of the general education curriculum to ensure that its sequencing is effective and meaningful in the midshipmen’s overall development.
- Develop a plan for addressing noted weaknesses in the level of midshipmen attainment of Academic Division goals six (communication) and eight (diverse global environment) given that assessment results suggest that desired attainment levels for these goals are not being met.

Requirements: None

Standard 13: Related Educational Activities

The institution’s programs or activities that are characterized by particular content, focus, location, mode of delivery, or sponsorship meet appropriate standards.

In the team’s judgment, the institution meets this standard.

Summary of evidence and findings

Based on a review of the Self-Study report, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The related educational activities of the institution are detailed in the areas of basic skills, experiential learning, non-credit courses, and distance education.

The Merchant Marine Academy utilizes the indoctrination period to screen incoming students for readiness to succeed in freshman mathematics and composition courses. Students deemed underprepared are placed in academic programs to facilitate their learning those skills necessary for the program of study and therefore do not enter in a lag cohort status.

- The Merchant Marine Academy is to be commended on its procedures that identify and assist underprepared students for college study. Incoming students are given a mathematics assessment for correct placement into Calculus 1, which is required for all majors. For enrolled students who identify as underprepared, they are enrolled in an extended 3-credit calculus course that meets an additional 55 minutes per week. Regular calculus and extended calculus sections cover and test the same material.

A writing assessment is administered to enrolled students. For students whose written skills may require strengthening, there is a Pass/Fail course Litr 100 that complements the required course, Composition and Literature 1 (Litr 101). Litr 100 is an English support program that meets an additional period per week with a focus on grammar and composition skills. The course may be repeated, if necessary, and must be passed to advance to Litr. 201. Both supplemental learning courses require student attendance.

For entering students who do not fully meet minimum admission requirements, options such as a 12 month preparatory program at the New Mexico Military Academy offer the opportunity for appointment upon successful completion of the program. This option is an opportunity for veterans who have been away from formal schooling for over two years. [Self-Study pg 46, College Catalog pg. 94, 96] The Committee of Academic Standards & Teaching has reviewed the transfer of credits from this program, which permits student to be exempted from these courses. Additional summer school courses are available to enrolled students to overcome academic deficiencies and progress with their course of study. [*On-site interview*]

The Mission of the Merchant Marine Academy is intertwined with its experiential learning program of the Sea Year.

- The Sea Year combines sea time, sea projects relating to the student's major, and an internship. USMMA deck and engine license programs have been certified in compliance with USCG STCW (Standards of Training, Certification, and Watchkeeping) regulations through July 31, 2018 [EDR: *STCW 2010 Approval*]. The assessment of sea time learning objectives conform to USCG standards. Sea projects [EDR *Sample Sea Project*] are measured through STCW requirements and a written project.

Although no formal certificate programs are offered at USMMA, the Academy is commended for its efforts in offering additional elective courses for students to earn supplementary USCG endorsements.

Leadership is an integral component of the Academy's mission and strategic plan, and creation of a leadership development program has been directed by the Secretary of Transportation.

- Since the Self-Study was written, the introduction of non-credit offerings in a newly designed Leadership Development Program has evolved to include two courses (3 credits total) for all midshipmen. The program will integrate established activities across curricula and from the Regiment with the two leadership courses. The combination of course work and activities will enable midshipmen to earn an additional license endorsement upon graduation. The Leadership and Management Skills Committee developed and presented syllabi for approval at the February

Faculty Forum meeting. The faculty approved the courses for implementation during the Fall 2016 trimester. [*On-site interview*]

The Academy offers an online Master of Science in Marine Engineering. This program takes its directive from the strategic plan “to define the role of graduate studies.”

- This program is designed for working engineers to enhance one’s professional education while still working. There is no onsite parallel program. The program complements and enhances undergraduate engineering programs and adheres to the institution’s mission and goals. Programs goals and learning outcomes are clearly articulated on the institution’s website and in the College Catalog. Student identity verification is in compliance with federal mandates and is outlined in documentation [*App 8-6*]. The program incorporates limited on-campus sessions for some courses. The catalog program description includes timetables for degree completion and the website posts anticipated classes for the entire academic year. Both features demonstrate program coherence. [*EDR: MMarE program review*] The program is self-funded through tuition and a grant. There are scholarships from the Society of Naval Architects and Marine Engineers to assist students with tuition expenses. Prior to the start of the program, new students are directed to take the Blackboard orientation course on working in an online environment and Go-to-Meeting setups. Faculty who develop courses either have online platform experience in Blackboard or complete Blackboard training to better design courses to enhance teaching and learning in an online environment. [*On-site interview*]

Significant accomplishments, significant progress, or exemplary/innovative practices:

- The USMMA’s related educational offerings stay true to the institution’s mission and strategic plan.
- The inclusion of limited residency laboratory exercises within the online Master’s is notable and enhances the student identity verification procedures and creates a cohort team.

Non-binding findings for improvement (Suggestions):

- Opportunities to develop and measure leadership growth exist within the regiment, the program of physical education and team sports, and the Sea Year. Consider pursuing these opportunities through an integrated institutional effort.
- Consider including a question on leadership development in the next alumni survey.
- If the Master’s program intends to attract more students, in particular students from other undergraduate institutions, more detail is needed to articulate instructional support and resources for online learning. This item is missing from published materials.
- A description of the technical instruction and support needed for online learning needs to be articulated in the MMarE program literature before students apply for admission.

Recommendations

- The Leadership Working Group must develop program learning objectives that measure development as a continuum of assessment points from arrival through graduation. These learning objectives should be in place before the new courses are offered.

Requirements: None

Standard 14: Assessment of Student Learning

Assessment of student learning demonstrates that, at graduation, or other appropriate points, the institution's students have knowledge, skills, and competencies consistent with institutional and appropriate higher education goals.

In the team's judgment, the institution meets this standard.

Summary of evidence and findings

Based on a review of the Self-Study, other institutional documents, and interviews with faculty, staff, administration, students, and others, the team developed the following conclusions relative to this standard:

The institution has an assessment process that is outlined in the draft Institutional Effectiveness Handbook. This is supplemented by a course assessment process that is outlined in Dean's Memoranda 005 and 006 (see Appendix to Chapter 9). Program outcomes are clearly linked to the mission of the Academy. There is a hierarchy of Academic Division (AD) goals with department goals mapped to the AD goals. Within each department, courses are mapped to department goals (student learning outcomes). Program Review documents support the alignment [Appendix 9.2]. The Learning Goal Matrix lends support to the linkage between AD goals, department goals, and course student learning outcomes. [EDR: *Academic Goals Course Matrix*]

The draft Institutional Effectiveness Handbook was issued by the previous Director of Institutional Assessment in November of 2015. It is a comprehensive document outlining institutional effectiveness, planning, and assessment processes. There is an annual timetable of activities to plan and implement assessment of institutional effectiveness.

- The process of academic assessment, first at the course level and then on the program level, is guided by the Academic Outcome Assessment Committee (AOAC). The AOAC has representatives from the various departments and reports directly to the Academic Dean. Outcome assessments are maintained in WEAVEonline, which is a web based solution to capture, manage, and track academic and administrative assessment information [Institutional Effectiveness Handbook, pg. 14]. The annual report focuses on one academic division goal at the course level across disciplines. The reports include assessment practices to build a culture of assessment and suggestions to department heads to further integrate results and the department level. [EDR: Ch.9]. On site interviews reveal that the AOAC would like a change in Dean's memoranda to allow them to expand their assessment activities to programmatic assessment. Annual reports are forwarded to the Dean and Department Heads [EDR: Ch. 9]. Department Heads disseminate the annual reports to their faculty, who have an opportunity to discuss the annual report at the Faculty Forum.
- Within the program review documents there is evidence of defining both direct and indirect measures used to assess student learning in most departments [EDR: Program Review]. End of course grades were cited as direct measures of learning in 2014 to assess the Humanities Goal. This type of reporting limits the action item to 'additional instruction or practice' when the benchmark is not met and 'no action' when the benchmark is met.
- The MMarE program lacks a formal assessment plan. The design of the program adheres to ABET standards where applicable and is reflected in the composition of the core course

requirement. There is evidence of assessment at the course level. At this point, there is no external peer review of the program, which has awarded degrees since 2009.

- There is no direct evidence of any review or evaluation of the assessment process at this time.
- There is little evidence of campus-wide sharing of assessment results and discussion across disciplines. Results are shared within silos: Academic Dean, Department Heads, Faculty, and not across silos.
- Assessment of student learning is emerging, but not yet proficient. The process is in place, and every department has made at least one pass at review. The Draft Institutional Effectiveness Handbook, because it has not been fully implemented and because the Director of Institutional Assessment has departed, has not created a coherent and effective framework for integrating assessment across the institution.

Significant accomplishments, significant progress, or exemplary/innovative practices

- The annual review of assessment practices by the AOAC is noteworthy in that the reviewers represent all departments and is a shared activity. The tone is collegial, informs stakeholders of best assessment practices, and it offers praise and suggestions.
- The Marine Transportation department is commended for its foresight in seeking a review of their revised program from the American Society of Transportation and Logistics (AST&L). As the number of US-flag ships decreases, shipping opportunities will lessen. The academic side of the major must remain strong and needs to be assessed.

Non-binding findings for improvement (Suggestions):

- Work with agencies to administer surveys regularly, as these are indirect measures of assessment. Correlate perceptions with direct assessment findings.
- Consider assessing all objectives of a course once every 3 years, rather than one objective per year. This will provide a broader perspective for the assessment of learning in the entire course. It will also provide a timeframe to work on action items.
- The metric used in many instances (i.e. % passing) as an indicator of having met a student learning objective lacks sensitivity to differentiate between those students who fully meet or approach the standard. Review and revise with less dependence on final grades.
- Work to differentiate between license aspects of assessment and academic components. There seems to be an overemphasis on assessing the license component of the institution goal ‘to serve immediately as a Merchant Marine officer.’

Recommendations:

- An integrated campus-wide plan of assessment of student learning at the graduate and undergraduate level needs to be fully implemented in a systematic and sustained manner over time.

Requirements: None

VI. Summary of Recommendations for Continuing Compliance & Requirements and Conclusion

Summary:

Standard 1: Mission and Goals

Recommendations:

- That the institution undertake a collaborative strategic planning process, developed with the direct involvement of the institution's community, including faculty, staff, and midshipmen, to refine and develop its mission, goals and performance measures for 2018 and beyond.
- The resulting strategic plan should include institutional-level learning outcomes and relevant performance measures that can be realistically used to assess the institution's effectiveness in meeting its mission and goals.

Standard 2: Planning, Resource Allocation, and Institutional Renewal

Requirements:

- The institution must demonstrate resource allocation decisions that are directly linked to mission and goal achievement at the institutional and unit level, including Human Resources, Financial, and Procurement.

Standard 3: Institutional Resources

Recommendations:

- The Capital Improvement Program (CIP) and the Information Technology Department require more formal and direct integration with the Academy's mission and strategic plan.

Requirements:

- The institution does not have access to its approved annual budget in a manner that supports the effective, efficient, and timely use of financial resources at the institution level. The Secretary of Transportation must initiate and lead an effort to ensure statutory and regulatory change is made by Congress so that the annual budget is available to the institution at the start of the fiscal year.
- The Superintendent does not currently have direct control over the hiring process for faculty and staff. The Superintendent must have the authority and responsibility, assigned or delegated from DOT and/or MARAD as appropriate, to ensure adequate faculty, staff, and administration to support the institution's mission and outcomes expectations.

Standard 4: Leadership and Governance

Requirements:

- The Superintendent does not currently have direct control over the institutional functions of personnel hiring, financial planning and management, and procurement. The Superintendent must have the means, authority, and responsibility, assigned or delegated from DOT and/or MARAD as appropriate, over the institutional functions of personnel hiring, financial planning and management, and procurement required to effectively and efficiently accomplish the Academy's mission.

Standard 5: Administration

Recommendations:

- The Superintendent, along with the Deputy Superintendent and the Academic Dean, should

initiate meetings with midshipmen to learn about their experiences on campus and their concerns in both student-life and academics areas.

- A periodic review (every 2 years) of the administrative structure should be put in place. The review should be directed at assessing the effectiveness of the administrators as well as the administrative procedures in place. Mechanisms for reacting to lessons learned from the review should also be instituted.

Requirements:

- The Director of Institutional Assessment, Director of Admissions, Academic Dean, Chief Financial Officer, Human Resources Officer, and other key administrator positions are all currently vacant or occupied by interim staff. While some of these positions, such as the Academic Dean, are filled on an interim basis with highly qualified, skilled and dedicated individuals, the Academy must move forward with permanently filling these critical positions with administrative leaders who possess the appropriate skills, credentials, and training.

Standard 6: Integrity

Recommendations:

- The Commandant should continue to work with Company Officers to ensure that there is fair, equitable, and impartial treatment of midshipmen across companies for disciplinary issues.
- The policies regarding communicating with outside entities should be spelled out and disseminated widely in order to strengthen the sense of academic freedom on campus.
- Develop specific means to enhance communication at all levels, especially in having institutional policies known so that there is a prevailing sense of mutual respect and commitment to the institutional mission.

Standard 7: Institutional Assessment

Recommendations:

- Develop institutional learning outcomes that integrate and synchronize the efforts of the institution to develop midshipmen.
- Fully implement an institutional assessment process that is systematic, organized, and sustained and that clearly identifies progress on strategic goal/objective attainment through the development of performance measures that are clearly and purposefully related to the goals/objectives they are assessing so that they can inform institutional decisions. The process should include a method of sharing and discussing assessment results with appropriate constituents and a process for using assessment results to improve institutional effectiveness.
- All divisions, units, and programs should fully implement assessment processes that provide them the information they need to identify how well they are achieving their goals and/or objectives as well as actions to improve. The results of division, unit, and program assessment should inform institutional assessment.

Standard 9: Student Admissions and Retention

Recommendations:

- The Academy must establish a mandated training program for all employees that nurtures understanding, prevention, remediation, and eradication of current incidences of sexual assault and harassment, and stalking.

- The Academy must make every effort to disseminate information on sexual assault and sexual harassment policies, prevention mechanisms, important term definitions, available campus resources via every available medium from Course Catalog through website to flyers and frequent face-to-face and online training.

Requirements:

- To improve the safety and climate of respect that all midshipmen encounter during the Sea Year experience, the institution must take demonstrable steps in preparation for and upon return from the Sea Year experience.
- The pervasiveness of sexual harassment on campus must be addressed as a pressing and substantial concern that has fostered a hostile environment for many cohorts of midshipmen. The institution must implement specific steps to build a climate of mutual respect and trust among midshipmen, faculty, and staff with respect to sexual assault and sexual harassment.

Standard 10: Faculty

Recommendations:

- The institution should vigorously pursue relief from the “travel cap” imposed by OMB; faculty scholarly and professional development is a “mission critical” requirement of the profession both for faculty at USMMA and elsewhere within higher education across the nation, and it should be articulated as such.
- The institution should study higher education best practices regarding effective recruiting and hiring practices of faculty and staff. The current HR processes internal to USMMA are both ineffective and inefficient, and USMMA leadership must work to streamline these local HR processes by creating process improvements that will result in the hiring of highly qualified faculty and staff with minimal delays in filling all positions.
- The institution should study higher education best practices regarding the support and implementation of a faculty sabbatical/professional development program (including the underlying philosophical principles that justify such programs) that will provide better support for the continuous scholarly and professional development of the faculty.

Standard 12: General Education

Recommendations:

- Develop a general education assessment process that integrates assessment results from departments and courses to determine the level of general education goal attainment and that employs direct evidence of student learning for the assessment of all goals. The process should inform efforts to improve student learning through the sharing and discussion of assessment results and identification of recommendations for improvement.
- Assess the current structure of the general education curriculum to ensure that its sequencing is effective and meaningful in the midshipmen’s overall development.
- Develop a plan for addressing noted weaknesses in the level of midshipmen attainment of Academic Division goals six (communication) and eight (diverse global environment) given that assessment results suggest that desired attainment levels for these goals are not being met.

Standard 13: Related Educational Activities

Recommendations:

- The Leadership Working Group must develop program learning objectives that measure development as a continuum of assessment points from arrival through graduation. These learning objectives should be in place before the new courses are offered.

Standard 14: Assessment of Student Learning

Recommendations:

- An integrated campus-wide plan of assessment of student learning at the graduate and undergraduate level needs to be fully implemented in a systematic and sustained manner over time.

Conclusion:

Thanks to the USMMA faculty and staff, the visit was extremely well-organized. USMMA was very cooperative making faculty, staff, Advisory Board members, and MARAD representatives available for numerous interviews and meetings. When the team requested any further information not in the Self-Study Report or supplemental documentation, the faculty and staff were quick to comply. We hope that the institution will be open to the ideas contained in this report, all of which are offered in the spirit of collegiality and peer review. As a reminder, the next steps in the evaluation process are as follows:

- The institution replies to the team report in a written response addressed to the Commission;
- The team chair submits a confidential brief to the Commission, summarizing the team report and conveying the team's proposal for accreditation action;
- The Commission staff and the Commission's Committee on Evaluation Reports carefully review the institutional Self-Study document, the evaluation team report, the institution's formal response, and the chair's brief to formulate a proposed action to the Commission; and
- The full Commission, after considering information gained in the preceding steps, takes formal accreditation action and notifies the institution.

**Enclosure 1 to the MSCHE Team Report for the United States Merchant Marine Academy
Verification of Institutional Compliance with Accreditation-Relevant Federal Regulations
(follows on next page)**

Verification of Compliance with Accreditation-Relevant Federal Regulations Reviewer's Report Template

Peer Reviewers will review each item identified in the guide, *Verification of Compliance with Accreditation-Relevant Regulations* along with the institution's report on the same and document their findings in the appropriate spaces below. Reviewers should expect institutions to address these requirements with brief narrative responses and provide supporting documentation, where necessary. Generally, if the reviewer finds in the course of this review that there are substantive issues related to the institution's ability to fulfill the standards, such issues should be raised in appropriate sections of the Team Report or PRR Report.

Institution: US Merchant Marine Academy **Reviewer:** Pamela Brown, PhD, PE

Date: January 31, 2016

Summary of Findings:

Has the institution documented all eight areas of compliance Yes No

Areas for Additional Review (if any):

<i>Compliance Categories</i>	<i>Areas Requiring Additional Action</i>
Student Identity Verification in Distance and Correspondence Education	
Transfer of Credit Policies and Articulation Agreements	
Title IV Program Responsibilities	
Institutional Records of Student Complaints	
Required Information for Students and the Public	
Standing with State and Other Accrediting Agencies	
Contractual Relationships	
Assignment of Credit Hours	

Student Identity Verification in Distance and Correspondence Education

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
<p>1. What methods are used by the institution to verify the student's identity?</p> <p>In your professional judgment, are these methods adequate and effective?</p>	<p>The policy for student identity verification is outlined in Dean's Memorandum 217, included in the report.</p>	<p>Distance education courses are offered only in the graduate Master's in Marine Education (MMarE) program. The program requires each student to provide a notarized copy of a government-issued identification and social security card in order to verify identity. Once done the student is given access to the USMMA network. During course work one or more of the following methods are used to verify the student's identity:</p> <ul style="list-style-type: none"> A. An individual secure login and password: B. Proctored Examinations administered using the academy's online Learning Management System (LMS). Unless an exemption is pre-approved by the academic dean, the instructor shall administer exams that are only accessible at a predetermined time, with completion within a specific period of time. C. Faculty teaching online courses are responsible for employing pedagogical and related practices that are effective in verifying student identity. D. Third party vendors or other technology advances that provide robust identity verification may be used as an option. <p>In my professional judgement these methods are adequate and effective.</p>

<p>2. What is the procedure for protecting the privacy of students enrolled in distance or correspondence education courses?</p> <p>In your professional judgment, is the procedure adequate and effective?</p>	<p>Narrative in Verification of Compliance report and Dean’s Memorandum 217 describe the procedures for protecting the privacy of students enrolled in distance courses.</p>	<p>To protect privacy student records are maintained in accordance with appropriate articles of the Code of Federal Regulations and the US Department of Transportation administrative orders.</p> <p>This includes restricting all communications with students, including granting of access to student records and emergency resetting of student passwords, through verified email accounts.</p> <p>In my professional judgement these methods are adequate and effective.</p>
<p>3. What is the procedure for notifying students regarding any additional charges associated with identity verification?</p> <p>In your professional judgment, is the procedure adequate and effective?</p> <p>Does the institution notify students at the time of registration or enrollment of any projected additional student charges associated with the verification of student identity, such as a separate fee charged by a proctoring service?</p>	<p>Dean’s Memorandum 217 indicates there are no charges associated with identity verification in distance courses.</p>	<p>There are no fees associated with the verification of student identity for distance learning courses at USMMA. Hence institutional notification is not applicable.</p> <p>In my professional judgement this procedure is adequate and effective.</p>

<p>4. What office is responsible for ensuring policies are consistently applied?</p>	<p>Dean’s Memorandum 217 indicates the Department of Information Technology is responsible for consistent application of security policies including student identity verification.</p>	<p>The Department of Information Technology responsible for consistent application of network security policies.</p>
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Transfer of Credit Policies and Articulation Agreements

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
<p>1. Describe the policy and procedures for making decisions about the transfer of credit earned at other institutions.</p> <p>Do the policies and procedures include all modes of delivery?</p> <p>In your professional judgment, are the policies and procedures adequate and effective?</p>	<p>Verification of Compliance report narrative describes the undergraduate transfer credit policy, which is also found on the USMMA website: https://www.usmma.edu/sites/usmma.edu/files/docs/LoggingIn2017_0.pdf</p> <p>The MMarE Program Catalog excerpt provided describes the transfer credit policy for the graduate program. The catalog can be found at: https://cms.usmma.edu/sites/usmma.edu/files/docs/MMarE%20Catalog%202015-16AY_0.pdf</p>	<p>The USMMA undergraduate program has a four-year residency requirement and does not transfer credits earned at other institutions. College level work taken prior to entering may be substituted for a required course as an exemption, after review by the academic department and registrar, but grades and credits are not credited.</p> <p>In the graduate program equivalent courses taken elsewhere within 5 years with a grade of “B” or better (3.0 on a 4.0 scale) will be considered for transfer. Transfer credit must be approved by the MMarE Program Director, and require copies of the catalog description of the course and the course syllabus. A sample of course work must be submitted. A maximum of two (2) courses will be permitted.</p> <p>In my professional judgment, policies and procedures adequate and effective.</p>

<p>2. Is the policy for transfer of credit readily available on the institution’s website or in other relevant publications?</p>	<p>The undergraduate transfer credit policy is found on the USMMA website: https://www.usmma.edu/sites/usmma.edu/files/docs/LoggingIn2017_0.pdf</p> <p>The MMarE Program Catalog excerpt provided describes the transfer credit policy for the graduate program. The catalog is found at: https://cms.usmma.edu/sites/usmma.edu/files/docs/MMarE%20Catalog%202015-16AY_0.pdf</p>	<p>The policies for transfer of credit readily available on the institution’s website</p>
<p>3. What criteria have been established by the institution regarding transfer of credit earned at another institution of higher education?</p>	<p>The undergraduate transfer credit policy is found on the USMMA website: https://www.usmma.edu/sites/usmma.edu/files/docs/LoggingIn2017_0.pdf</p> <p>The MMarE Program Catalog excerpt provided describes the transfer credit policy for the graduate program. The catalog is found at: https://cms.usmma.edu/sites/usmma.edu/files/docs/MMarE%20Catalog%202015-16AY_0.pdf</p>	<p>USMMA does not transfer undergraduate credits earned at other institutions. Equivalent college level work taken prior to entering the MMA may be substituted for a required course after review for equivalency by the academic department and registrar</p> <p>Equivalent courses taken elsewhere within 5 years with a grade of “B” or better (3.0 on a 4.0 scale) will be considered for transfer. Transfer credit must be approved by the MMarE Program Director, and require copies of the catalog description of the course and the course syllabus. A sample of course work must be submitted. A maximum of two (2) courses will be permitted.</p>

		For transfer credit in the graduate program the course must be equivalent to a MMarE program course. The transfer proposal must be approved by the MMarE Program Director
4. Does the institution publish a readily accessible list of institutions with which the institution has established an articulation agreement? Is this list available on the website or in other publications?	<p>The undergraduate transfer credit policy is found on the USMMA website: https://www.usmma.edu/sites/usmma.edu/files/docs/LoggingIn2017_0.pdf</p> <p>The MMarE Program Catalog excerpt provided describes the transfer credit policy for the graduate program. The catalog is found at: https://cms.usmma.edu/sites/usmma.edu/files/docs/MMarE%20Catalog%202015-16AY_0.pdf</p>	<p>USMMA does not have articulation agreements as the undergraduate program does not allow transfer credit.</p> <p>Graduate courses are evaluated on a case-by-case basis and must be approved by the Program Director.</p>

Title IV Program Responsibilities

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
<p>1. What is the institution's cohort default rate for the past three years?</p> <p>Is this rate within the federal limit?</p>	<p>2011 Three-Year Official Cohort Default Rate Notification Letter, attached to Verification of Compliance Report</p>	<p>2011 Three-Year Cohort Default Rate: 2.4%</p> <p>FY 2010 Three-Year Cohort Default Rate: 1.0%</p> <p>This rate is within the federal limit.</p>

<p>2. Are there any significant pending litigation issues with respect to financial aid activities, in regard to the cohort default rate?</p>	<p>2011 Three-Year Official Cohort Default Rate Notification Letter, attached to Verification of Compliance Report and indicated no problems.</p>	<p>The Academy has not been issued any specific compliance reports.</p>
<p>3. Do the independent audits of the institution’s financial aid programs (A-133) document any significant non-compliance issues? If so, summarize these issues.</p> <p>Describe the institution’s corrective action plan for the weaknesses or deficiencies documented.</p>	<p>The last three publicly available reports (2014-15, 2013-14, 2012-13) are attached to the Verification of Compliance report and indicate no problems.</p>	<p>No significant issues.</p> <p>As a subdivision of the U.S. Maritime Administration of the United States Department of Transportation, the financial results of the United States Merchant Marine Academy are included in the higher level financial statements of those organizations. Consequently the Academy does not submit its audits in the A-133 form. Audit reports are submitted annually to the Department of Education. For all three years: “In our opinion, United States Merchant Marine Academy complied, in all material respects, with the aforementioned requirements for the year ended June 30, 2013.”</p>
<p>4. Describe any limitations, suspensions, or termination actions that the U.S. Department of Education has taken.</p>	<p>The last three publicly available reports (2014-15, 2013-14, 2012-13) are attached to the Verification of Compliance report and indicate no problems.</p>	<p>Not Applicable</p>

<p>5. Describe any fines, letters of credit, or heightened monitoring arising from the U.S. Department of Education actions or reviews.</p>	<p>The last three publicly available reports (2014-15, 2013-14, 2012-13) are attached to the Verification of Compliance report and indicate no problems..</p>	<p>Not Applicable</p>
<p>6. Review the documentation on the composite ratios. Are these ratios at consistent levels recommended by the U.S. Department of Education?</p>	<p>The last three publicly available reports (2014-15, 2013-14, 2012-13) are attached to the Verification of Compliance report and indicate that composite ratios are not computed..</p>	<p>Not Applicable (Composite ratios are not computed for federal institutions.)</p>
<p>7. Based on the information provided by the institution, is there any evidence to suggest that the institution is failing to meet its Title IV program responsibilities?</p>	<p>The last three publicly available reports (2014-15, 2013-14, 2012-13) are attached to the Verification of Compliance report and indicate no problems.</p>	<p>There is no evidence to suggest that the institution is failing to meet its Title IV program responsibilities.</p>

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
<p>1. What policies and methods are used by the institution to handle student complaints and the tracking of the documentation?</p>	<p>Review of Academic Policy Handbook (academic complaints)</p> <p>Superintendent’s Instructions, 2012-08 and 2013-04 (discrimination and harassment).</p>	<p>Grade appeals follow a series of deadlines. Unless there are extenuating circumstances, a student must first speak to instructor. If no resolution then the student speaks to the Department Head, then the Academic Dean and finally completes Grade Grievance. If there are related complaints they may be compiled and reviewed together. A revised grade form is sent to the Registrar with copies to the student and instructor.</p> <p>USMMA regularly schedules training to minimize incidents of discrimination and harassment.</p>
<p>2. What process is in place to ensure complaints are reviewed and resolved in a timely manner?</p>	<p>Review of Academic Policy Handbook (academic complaints)</p> <p>Superintendent’s Instructions, 2012-08 and 2013-04 (discrimination and harassment).</p>	<p>Steps in the grade appeal process follow a series of deadlines. Outcomes require notification of the student and instructor by a published deadline.</p> <p>Victims of discrimination and harassment are urged to file complaints as soon as possible. The superintendent must be notified within 24 hours of the assault. There is frequent training on policies and procedures for students, faculty, staff, first responders, victim advocates and the sexual assault response coordinator.</p>

<p>3. Is there a pattern of student complaints that raises concerns?</p>	<p>Narrative in Verification of Compliance Report indicating that no grade adjudication requests were made in the past five academic years.</p> <p>Attached list of sexual assault and harassment complaints in 2010-2015.</p>	<p>No academic complaints (grade adjudication requests) were made in the previous five academic years.</p> <p>Three students filed a complaint of discrimination/harassment in the past five years. Charges were substantiated and the officer was suspended and the employment contract was not renewed.</p> <p>Over the past 5 years there were a total of 14 sexually assault and 3 sexual harassment (dismissed) complaints. This number does raise some concerns.</p>
<p>4. Has the institution shown that it uses the documentation to make improvements and enhancements to the quality of the institution as a whole?</p>	<p>Review of Academic Policy Handbook (academic complaints)</p> <p>Superintendent’s Instructions, 2012-08 and 2013-04 (discrimination and harassment).</p> <p>Narrative in Verification of Compliance Report indicating that no grade adjudication requests were made in the past five academic years.</p> <p>Attached list of sexual assault and harassment complaints in 2010-2015.</p>	<p>The document suggests that the institution has implemented training to address student complaints, maintains records of events and their outcomes, evaluate patterns and to make improvements to enhance the quality of the institution as a whole.</p>

Institutional Record of Student Complaints

Required Information for Students and the Public

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
<p>1. Does the institution appropriately document and publish the required information? Is the information reasonably accessible to the public from the home page of the website or in alternative publications?</p>	<p>The USMMA Course Catalog is available at https://www.usmma.edu/leadership/academic-dean/2015-2016-usmma-catalog</p> <p>The Logging In Book, can be found at https://www.usmma.edu/admissions/logging-class-2019</p> <p>The catalog for the graduate program in Master of Science in Marine Engineering (MMarE) is available at https://www.usmma.edu/academics/graduate-program</p>	<p>The course catalog and Logging In Book accessed through links provided in the report are on the college website and are available to students and the public. They provide information on the USMMA calendar, grading admissions, academic program requirements tuition and fees and refund policies.</p>
<p>2. For each of the reported topics, review the methods, policies, and procedures that the institution has documented. Are these methods, policies, and procedures reasonable for their purpose?</p>	<p>The Student Right to Know webpage is located at https://www.usmma.edu/about/leadership/general-information</p> <p>Relevant academic policies are in the “Academic Policies and Procedures” section of the catalog.</p> <p>Graduate program requirements are found in the graduate catalog.</p>	<p>Provided information on the Student Right to Know URL included: Overall and graduation and completion rates for the student body disaggregated by gender, ethnicity, the cost of attendance, accrediting agencies include MSCHE and ABET, policies on study abroad enrollment, policies on the refund and return of Title IV funds and a description of facilities. In order to graduate from the Academy, a student must sit for and pass the examination for the US Coast Guard third mate or third assistant engineer license. Pass rate is 100%</p>

		<p>The website also indicates that the United States Merchant Marine Academy can also provide student with the requirements and procedures for officially withdrawing from the school. Services to students with disabilities are not applicable due to minimum physical and mental standards set for midshipmen.</p> <p>Graduation rates from 2002 to 2013 ranged from 68% to 80%.</p> <p>Reviewed methods, policies, and procedures seem reasonable for their purpose.</p>
<p>1. Do the institutional documents provide accurate, timely and appropriately detailed information to the current and prospective students and the public about its accreditation status?</p>	<p>The Academy’s accreditation status is available on the Academy’s website (https://www.usmma.edu/about/leadership/accreditation), and in the Course Catalogs and in the provided promotional materials</p>	<p>Yes, the institutional documents provide accurate, timely and appropriately detailed information to the current and prospective students and the public about its accreditation status. USMMA is accredited by the Middle States Commission on Higher Education (MSCHE), 3624 Market Street, Philadelphia, PA 19104, (267) 284-5000, http://www.msche.org.</p> <p>The Marine Engineering Systems and Shipyard Management programs are accredited by the Engineering Accreditation Commission (EAC) of ABET, Inc., http://www.abet.org.</p>

Standing with State and other Accrediting Agencies

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
1. Does the information note any accreditation issues related to accrediting agencies during the past five years?	Verification of Compliance narrative.	None
2. Does the information from states and countries document any issues during the past five years?	Verification of Compliance narrative.	None.

Contractual Relationships

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
1. Does the institutional documentation ensure that the institution is responsible for any activities conducted in its name?	Verification of Compliance narrative	The Unites States Merchant Marine Academy has no contractual arrangements specified in 34 CFR 602.22(a)(2)(vii)
2. Does the institution's documentation raise any concerns with the contractual arrangements? If so, note accordingly.	Verification of Compliance narrative	None.

Assignment of Credit Hours

<i>RECOMMENDED REVIEW</i>	<i>EVIDENCE</i>	<i>FINDINGS</i>
<p>1. Are the institution's policy/procedures reasonable when compared with the federal definition and MSCHE Credit Hour policy?</p> <p>Is there evidence that the institution's assignment of credit hours falls within the range of commonly accepted practice in higher education?</p>	<p>The policy for credit hour assignment is established by the Academic Dean and described in Dean's Memorandum 264.</p> <p>The attached Catalog and the Curriculum Matrices provide evidence that they are applied within commonly accepted practice.</p>	<p>The Academy applies the criterion that a semester credit hour is an academic unit earned for fifteen 50-minute sessions of classroom instruction with a normal expectation of two hours of outside study for each class session.</p> <p>Reviewed policies/procedures seemed reasonable compared with the federal definition and MSCHE credit hour policy and within commonly accepted practice.</p>
<p>2. Do the institution's policy and procedures for assigning credit hours - which may be written at the level of the institution, department, or school and which may be differentiated by degree level and/or delivery format – address all types of courses and programs offered by the institution?</p>	<p>Dean's Memorandum 206.</p>	<p>Courses are initially reviewed for appropriate assignment of credit hours by the Curriculum Committee of the Faculty Forum with the Registrar's concurrence, and approved by the Superintendent</p>
<p>3. Do the institution's policies and procedures address the amount of instructional time and out-of-classroom time that is typically expected of students with regard to the number of credit hours earned?</p>	<p>Verification of Compliance narrative</p>	<p>The Academy applies the criterion that a semester credit hour is an academic unit earned for fifteen 50-minute sessions of classroom instruction with a normal expectation of two hours of outside study for each class session.</p> <p>Courses at the Academy that do not adhere to the federal definition of credit hour are non-residence undergraduate courses and courses in the graduate program.</p>

		Non-residence undergraduate courses at the Academy are sea projects and internships. As for in-residence courses, their approval and credit hour assignment is centrally controlled.
<p>4. For institutions with courses and programs that do not adhere to the federal definition of credit hour, how do the institution's policies and procedures equate credit hour assignment with intended learning outcomes that the typical student could reasonably achieve in the time frame allotted?</p>	<p>Verification of Compliance narrative. Evidence that Cal Maritime and SUNY Maritime have equivalent programs.</p>	<p>Sea projects (courses designated as EPRJ, HPRH, and NPRJ) are independent study courses completed by students while at sea. Credit hours are assigned based on the complexity of the work required with the assumption of three hours per week per term spent on a 1-credit project. Students are expected to work on their project three hours per day which agrees with the average of 7 credit hours per a term at sea. Students do not receive credit for time spent working as members of the ship's crew; this part of their time at sea serves to satisfy U.S. Coast Guard requirements for licensure. Similar courses offered at state maritime academies also have credit hours assigned based on complexity of the project, with duration of the cruise playing a secondary role;</p>
<p>5. Is there sufficient evidence that the institution applies and monitors its own policies and procedures and that credit hour assignments are accurate and reliable across the full range of institutional offerings?</p>	<p>Dean's Memorandum 206 and 264. The Catalog and the Curriculum Matrices Verification of Compliance narrative. Evidence that Cal Maritime and SUNY Maritime have equivalent programs.</p>	<p>There is sufficient evidence that the institution applies and monitors its own policies and procedures and that credit hour assignments are accurate and reliable across the full range of institutional offerings.</p>

Additional Overall Comments from Reviewer:

The reviewer wants to commend the USMMA for submitting such a well written and comprehensive verification of compliance report.

Over the past 5 years there were a total of 14 sexually assault and 3 sexual harassment (dismissed) complaints. This number does raise some concerns.