



SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS  
COMMISSION ON COLLEGES

October 13, 2017

Dr. Linda A. Livingstone  
President  
Baylor University  
One Bear Place #97096  
Waco, TX 76798-7096

Dear Dr. Livingstone:

Thank you for the hospitality and helpfulness extended to the Committee during its recent visit to Baylor University, on October 1-4, 2017. Enclosed is the final report prepared by the Committee.

The report represents the professional judgment of the Special Committee made in accordance with the *Principles of Accreditation: Foundations for Quality Enhancement* and subject to review by the Commission on Colleges and its standing review committees—the Committees on Compliance and Reports. Some parts of the report are directly related to the requirements of the *Principles*, while others may represent advisory comments offered by the visiting committee in a spirit of helpfulness.

The SACSCOC Board of Trustees meet officially in June and in December. Final decisions on accreditation are made public following each meeting. The report of the committee which visited your institution will be reviewed in **December 2017**.

Since there were no recommendations, there is no requirement to respond. However, should you wish to send in a response, please submit **five copies** of your written response to my attention at the office of the Commission on Colleges on or before **Monday, November 13, 2017**.

An institution may release its visiting committee report; however, release of this report in its entirety or in part must be accompanied by the following statement: "The findings of this visiting committee represent a preliminary assessment of the institution at this time; final action on the report rests with the Commission on Colleges." If the institution releases part of its report, that part must contain a note stating: "A copy of the entire report can be obtained from the institution."

Please express my sincere appreciation to all members of your faculty and staff for their cooperation and assistance during the review process. As you develop your responses to the report, please feel free to call upon me if I can be of any assistance.

Sincerely,

Dr. Barry D. Goldstein  
Vice President

Enclosures

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**Southern Association of Colleges and Schools  
Commission on Colleges**

**REPORT OF THE SPECIAL COMMITTEE**

**Statement Regarding the Report**

*The Commission on Colleges will make its determination on the accreditation of an institution based on the findings contained in this committee report, the institution's response to issues contained in the report, other assessments relevant to the review, and application of the Commission's policies and procedures. Final interpretation of the Principles of Accreditation and final action on the accreditation status of the institution rest with the Commission on Colleges.*

**Name of the Institution:** Baylor University  
**Date of the Review:** October 2-4, 2017  
**COC Staff Member:** Dr. Barry Goldstein  
**Chair of the Committee:** Msgr. Franklyn Casale  
President  
St. Thomas University  
Miami Gardens, FL

The findings of this visiting committee represent a preliminary assessment of the institution at this time; final action on the report rests with the Commission on Colleges.

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

This visit results from the SACSCOC Board of Trustees review of unsolicited information regarding Baylor's on-going compliance with several Principles related to the sexual assaults on campus, coming from a report in the Chronicle of Higher Education May 26, 2016. The Chronicle of Higher Education cited the independent report by Pepper Hamilton LLC. It raised questions about Baylor University's ongoing compliance with the Principles of Accreditation; particularly in the area of administrative control of athletics and the safety and security of the campus. As a result, Baylor University was requested to submit the Pepper Hamilton LL report for review by SACSCOC.

The Baylor Board of Regents had released a 13-page "Finding of Fact" and a 10-page "Recommendations" document which the Chronicle was referencing. The institution submitted those two documents and provided additional information for context.

After review of the "Baylor University Board of Regents Findings of Fact," the "Pepper Hamilton LLP Baylor University Report of External and Independent Review Recommendations," along with the additional information provided for context, it was determined that there was evidence of significant accreditation-related issues based on factual information. The issues that raised concerns included the appropriateness of student support services; the competency and experience of administrative officers; enforcement of personnel appointment policies; the Chief Executive Officer's ("CEO") control of intercollegiate athletics; institutional admission policies; the qualifications of student affairs and services staff; the provision of a healthy, safe, and secure environment; adequate physical facilities; the adequacy of procedures for addressing student complaints and compliance with SACSCOC policies. As a result, the institution was requested to prepare a report that explains and documents the extent of its compliance with several standards of the Principles of Accreditation.

Reviewing the report, the SACSCOC Board decided that the institution should be placed on warning and a special committee be authorized to review the following Principles of Accreditation: CR 2.10 (Student services), CS 3.2.11 (Control of Athletics) and CS 3.11.2 (Institutional environment).

The Special Committee was on-site at Baylor University from October 2-4, 2017, and conducted a thorough review of student services, athletics and the overall institutional environment.

The institution was extremely responsive to every request of the committee, produced all the documentation that was required, and was very cordial with the many meetings with the committee. The committee thanks Dr. Wesley Null for his overall competence in guiding the committee through the visit and in the preparations made which were extremely comfortable and accommodating.

## Part II. Assessment of Compliance

### A. Assessment of Compliance with Section 1: The Principle of Integrity

#### 1.1 The institution operates with integrity in all matters. (Integrity)

Comment:

The Committee found that the institution operated with integrity and has responded to all requests with clarity and truthfulness.

### B. Assessment of Compliance with Section 2: Core Requirements

#### 2.10 The institution provides student support programs, services, and activities consistent with its mission that are intended to promote student learning and enhance the development of its students. (Student Support Services)

Comment:

The university has developed intentional and purposeful strategies to address student support services related to Title IX. The institution streamlined processes and systems to engage the entire university community. Some of the main campus partners include: University Police Department, Health Services Center, Title IX Office, Counseling Center, Division of Student Life and the Division of Academic Affairs. A review of the university's intended outcomes for Title IX student support illustrates a focus on compassion, confidentiality and consistency for all students involved.

The Special Committee consistently found clear communication being shared with students in prevention and response to Title IX issues. Students, faculty and staff participate in annual training through online modules and in-person workshops. Additionally, the Title IX team works directly with campus partners through the Case Management Team to customize training and presentations to special populations. Examples of these include the work being done through the Office of Academic Initiatives (within Student Life), Campus Living & Learning, Global Engagement, and New Student Programs. It may be helpful to consider how consistent messages about caring and safety can be shared in a redundant way beyond Orientation, for example, intentional programming throughout the year based on other key workshops to reiterate important themes and resources.

Staff are competent and well-trained to address Title IX reports. The Title IX Case Management Team made up of representatives from across the campus meet weekly to ensure accurate and consistent communication. A clear investment in Title IX is illustrated through additional staff and necessary technology to assist in managing information. For example, a Training & Prevention Specialist works directly in the Title IX Office focused on programming and education. The Training & Prevention Specialist also advises the Title IX Student Advisory Council and supports the It's On Us Baylor initiative. It may be helpful to consider how the Title IX Prevention Specialist is working in collaboration with larger Wellness Prevention efforts (and the Director of Wellness) to send the broader message of Prevention. Transparency in current cases similar to Clery Act may help people understand issues better.

Students are directly involved in supporting the awareness of Title IX and the steps necessary to make a report. Students help lead the It's On Us Baylor initiative in conjunction with the Title IX Office in the fall semester. Additionally, students serve as peer support in mental health connecting students to the Counseling Center. Students shared the impact of Green Dot and Bystander Intervention training as tangible strategies they are actively learning. The institution might want to consider hosting an It's On Us Baylor mandatory event at the beginning of the spring semester as well.

The Special Committee for Baylor interviewed several groups throughout our on-campus visit, which support student support services. These included student representatives from Title IX Student Advisory Council, It's On Us Baylor, Student Athlete Advisory Committee, Student Organizations, Greek Life, New Student Programs, Graduate Student Association, Student Regent, Baylor Chamber of Commerce, Community Leaders from Campus Living & Learning, and Baylor Activities Council. We also met with the following staff during our on-campus visit: President's Senior Leadership Executive Committee including Vice President for Student Life, CARE Team, Title IX Case Management Team, Title IX Department, New Student Programs, Academic Initiatives, Student Conduct Office, Athletics Department and Coaches, Academic Deans, Faculty Senate Executive Committee, Baylor University Police Department, Student Life, Counseling Center, and Health Center. These meetings provided evidence of the institution's awareness and action in Title IX.

The Special Committee toured specific facilities that provide direct student support services. In addition to the general tour of campus, the Committee specifically visited the Student Life Center, which houses Office of the Vice President for Student Life, Campus Recreation, Counseling Center and Health Center. The Committee also toured two newly created spaces: satellite Dutton Counseling Center and the Baylor Addiction Recovery.Center. These visits provided evidence of the institution's investment in physical spaces to support student services.

**C. Assessment of Compliance with Section 3: Comprehensive Standards**

- 3.2.11** The institution's chief executive officer has ultimate responsibility for, and exercises appropriate administrative and fiscal control over, the institution's intercollegiate athletics program. **(Control of intercollegiate athletics)**

Comment:

Baylor has taken significant steps toward ensuring that the CEO has control of all athletics. Changes in leadership, adjustments in Board oversight, the development of positions such as the Chief Compliance Officer, and efforts to change their culture (including the development of consequences for individuals who do not report misconduct) all contribute to a much clearer line of authority for the President to manage.

Specifically, the Board of Regents disbanded their Athletics Committee and gave board oversight of Athletics and Title IX to the appropriate standing committees such as Compliance and Regulatory Affairs and Academic Affairs. They also approved the hiring of a Chief Compliance Office (new position) who reports directly to the CEO. All of this ensuring that the CEO has better control over athletics.

Finally, the Athletic Director reports directly to the President and meets on a regular basis with the President. The Chief Compliance Officer, the Senior Associate Athletics Director for Compliance and the vice president for Governance and Risk have monthly meetings with the President, exclusive of the Athletic Director, which provides a consistent opportunity for leadership to maintain awareness, address situations before they rise to crisis, and allow reporting without fear of repercussions.

- 3.11.2** The institution takes reasonable steps to provide a healthy, safe, and secure environment for all members of the campus community. **(Institutional environment)**

Comment:

As outlined in the Baylor University monitoring report, the institution has developed and implemented strategies to address student health, safety, and security. They have established programs to provide compliance with Title IX and Clery through increased staffing, additional facilities and an institutional commitment to compliance. The desired outcomes for changes to the institutional environment indicate an intention to improve compliance with policies through effective communication and clear responsibilities.

The Title IX office is well staffed and trained to respond to incidents. They are positioned to provide training to all parties at the institution and have developed relationships with constituent parties throughout the university.

Education of the students, faculty and staff of the university with respect to Title IX compliance includes an online course prior to or at matriculation for all new and transfer students, followed by an "Its on Us" presentation near the very beginning of the semester. Students are reminded of their training through their Canvas login each semester and must acknowledge the reminder in order to register. Informal interviews with students indicate general awareness of the Title IX, reporting opportunities and who can serve as a confidential resource. Faculty and staff training is performed on an annual basis through an online course, and interviews with the staff of athletics, and the academic deans indicate it is well received.

Counseling and mental health staffing and facilities have been increased. According to Director of Counseling Services, the university has 1 counselor per 768 students, and saw 68% increase in the utilization of the services. Baylor has recently added an addiction and recovery center for drugs and alcohol. Students report understanding the role and opportunity that counseling and health centers provide.

Reporting of possible issues has been centralized through the Report IT website, available to all constituents. The website provides reporting for many different areas in addition to Title IX. Interviews with students, faculty and staff indicate an awareness of the website.

The Baylor Police force has instituted additional training for its augmented force in excess of state requirements, including specific training on Title IX, the Clery Act and sexual assault. The hiring of a former secret service agent as associate vice president for public safety and security has led to the development of best practices for the Baylor Police Department, a memorandum of understanding with the Waco police force is in place and technology that allows communication with all of the public safety groups in the area has been implemented. Baylor police force has also expanded the patrol area to include off campus sites that include large populations of students in recognition that off-campus areas may be sites that require monitoring.

Finally, the institution claimed in their monitoring report that they have implemented all 105 recommendations from the 2016 Pepper Hamilton external audit. The special committee received a new report from the external auditor's dated October 2, 2017. This report stated that all 105 recommendations have been implemented. The special committee reviewed the report and met with administrators, faculty, students and staff to verify that, in fact, all 105 recommendations have been implemented.

**Part III. Observations and Comments**



## APPENDIX A

### Roster of the Special Committee

Rev. Msgr. Franklyn M. Casale-Chair  
President  
St. Thomas University  
Miami Gardens, FL

Dr. F. King Alexander  
President and Chancellor  
Louisiana State University and A&M College  
Baton Rouge, LA

Dr. Allison H. Crume  
Associate Vice President for Student Affairs  
Florida State University  
Tallahassee, FL

Dr. Jeffrey D. Hugdahl  
Professor of Chemistry / Faculty Athletes Representative  
Mercer University  
Macon, GA

#### SACSCOC Staff Representative

Dr. Barry D. Goldstein  
Vice President  
Commission on Colleges

**APPENDIX B**

**Off-Campus Sites or Distance Learning Programs  
Evaluated as Part of the Special Committee Review**

Not Applicable

**APPENDIX C**

**List of Recommendations Cited  
in the Report of the Special Committee**

None