

**BOARD OF HIGHER EDUCATION
REQUEST FOR BOARD ACTION**

NO.: BHE 23-14

BOARD DATE: October 18, 2022

**NEW INSTITUTION APPLICATION OF THE AMERICAN UNIVERSITY OF GREECE TO
AWARD DEGREES**

MOVED: The Board of Higher Education (BHE) hereby conditionally approves the Articles of Incorporation of **THE AMERICAN UNIVERSITY OF GREECE** with the authority to award the following degrees:

Bachelor of Science in Accounting with Finance
Bachelor of Science in Biomedical Sciences
Bachelor of Science in Cybersecurity and Networks
Bachelor of Science in Entrepreneurship Management
Bachelor of Science in Environmental Studies
Bachelor of Science in Finance
Bachelor of Science in Human Resources Management
Bachelor of Science in Information Technology
Bachelor of Science in International Business
Bachelor of Science in International Tourism & Hospitality
Management
Bachelor of Science in Logistics and Supply Chain Management
Bachelor of Science in Management
Bachelor of Science in Management Information Systems
Bachelor of Science in Marketing
Bachelor of Science in Shipping Management
Bachelor of Science in Sports Management

Bachelor of Arts in Art History
Bachelor of Arts in Cinema Studies
Bachelor of Arts in Communication
Bachelor of Arts in Economics
Bachelor of Arts in English
Bachelor of Arts in Graphic Design
Bachelor of Arts in History
Bachelor of Arts in International Relations and European Affairs
Bachelor of Arts in Music
Bachelor of Arts in Philosophy
Bachelor of Arts in Psychology
Bachelor of Arts in Sociology

Bachelor of Arts in Theatre Arts
Bachelor of Arts in Visual Arts

Master in Business Administration
Master in Business Administration in Financial Services
Master in Business Administration in Shipping
Executive Master in Business Administration

Master of Science in Business for Lawyers
Master of Science in Counseling Psychology and Psychotherapy
Master of Science in Data Science
Master of Science in Entrepreneurship
Master of Science in Finance
Master of Science in International Business and Management
Master of Science in International Shipping and Finance
Master of Science in Marketing
Master of Science in Organizational Psychology
Master of Science in Shipping Management
Master of Science in Strategic Human Resource Management
Master of Science in Supply Chain Management
Master of Science in Tourism Management

Master of Arts in Applied Educational Psychology
Master of Arts in Digital Communication and Social Media
Master of Arts in Strategic Communication and Public Relations
Master of Arts in Advertising Communications
Master of Arts in Teaching English to Speakers of Other Languages

Doctor of Humane Letters, Honoris Causa
Doctor of Laws, Honoris Causa
Doctor of Science, Honoris Causa

Provided further that the BHE will undertake to review, during the twelve-year period set forth in 610 CMR 2.05(5), the continued progress of the institution toward meeting and maintaining compliance with the BHE's regulations, the Visiting Committee's recommendations, the goals and representations set forth in connection with the institution's petition to the BHE, and its compliance with the following conditions:

1. For the first three years of operation, the institution shall submit to the BHE semi-annual status reports by January 15th and July 15th of each year, providing narrative and statistical information on the

institution's compliance with BHE standards and with the goals and representations set forth in connection with the institution's petition, including the institution's enrollment, finances, program and student outcomes, and other information as requested by Department staff.

2. Within the first two years of the program's operation, the Department will schedule a periodic review to monitor the institution's ongoing compliance with the Board's regulations.

The American University of Greece's conditional approval period, and the conditions imposed upon its approval, may be extended once by the Commissioner, for up to an additional three years, upon a determination by the Commissioner that the institution is not meeting or maintaining regulatory compliance and/or is not complying with the terms of the conditions.

VOTED: Motion approved and advanced to the full BHE by the Executive Committee on 10/11/2022; and adopted by the BHE on 10/18/2022.

Authority: Massachusetts General Laws Chapter 69, Section 30 et seq.; 610 CMR 2.05(5).

Contact: Cynthia Farr Brown, Ph.D., Associate Commissioner of Regulatory and Veterans Affairs

BOARD OF HIGHER EDUCATION
The American University of Greece

BACKGROUND

The American University of Greece (AUG or the University) has requested initial authorization pursuant to 610 CMR 2.05(1) from the Board of Higher Education (BHE) to operate as a post-secondary institution in the Commonwealth and offer the degrees enumerated in Appendix A. AUG will serve as the higher education academic program support organization for The American College of Greece (ACG, or the College), which is incorporated in Colorado in the U.S. and offers a range of collegiate and pre-collegiate academic programs in Athens, Greece. Since 1981, ACG has been accredited by the New England Commission on Higher Education (NECHE), and was the first European higher education institution to be accredited by a U.S. regional accreditor.

INSTITUTIONAL OVERVIEW

Located in Athens and originally founded in 1875 in Smyrna, Asia Minor by Boston women missionaries of the United Church of Christ, ACG is an independent, not-for-profit, non-sectarian, co-educational academic institution. It is distinguished as the first comprehensive European college to be accredited by a U.S. regional accreditor, the New England Commission on Higher Education (NECHE). Since its founding, the institution has sought to offer a transformative, American-style learning experience to its students while instilling the ethos “Non ministrari sed ministrare” (“Not to be served but to serve”), a dictum which continues to underpin the College’s (and the University’s) current mission, vision, and educational philosophy.

ACG is comprised of three divisions: Pierce, Deree, and Alba. Pierce provides PK-secondary-level education through its Kindergarten and Elementary (begun in fall 2022), Gymnasium (middle school), Lyceum (high school), and International Baccalaureate Diploma Program. Deree offers undergraduate education across three schools: the School of Business and Economics, the School of Liberal Arts and Sciences, and the Frances Rich School of Fine and Performing Arts, as well as graduate education at the master’s level through its School of Graduate and Professional Education (SGPE). The Alba Graduate Business School (AGBS), founded as an independent graduate business school in 1992, formed a strategic alliance with ACG in 2012 and was fully integrated into ACG during academic year 2017-18. Alba offers graduate master’s and executive business education programs.

The American University of Greece Foundation (AUGF), incorporated in Colorado as a 501(c)(3) and registered as a foreign corporation in Massachusetts, supports ACG through fundraising, investment, financial, and general management functions.

OBJECTIVES IN APPLYING

The institution has two main purposes in making this application. The first is to deal with a particular circumstance in the acceptance of ACG degrees by the nation of Greece that is tied to the Greek Constitution. The second is to help meet a strategic goal of extending and deepening the missions of both AUG and ACG to serve more students in Massachusetts, and more generally in the U.S.

Regarding the first reason for its application, under the Greek constitution (Article 16), only state (public) postsecondary institutions may offer recognized academic degrees within Greece. Those wishing to have their degrees accepted for professional employment rights must present recognized undergraduate degrees. While ACG operates as a licensed "college" under the Greek Ministry of Education, its higher education degrees are not accepted as equivalent to Greek public university degrees.

However, because Greece is a member of the European Union (EU), its government is required to recognize degrees granted in Greece by accredited international institutions located outside the country. Therefore, in order to ensure professional employment rights to graduates of its baccalaureate programs, in 2010 ACG entered into a validation agreement with the Open University of the United Kingdom (UK). Since then, the undergraduate Degree division of ACG has integrated both U.S. and UK educational practices and operated as a dual undergraduate degree granting institution, which enables the recognition of ACG's undergraduate degrees and the provision of Greek professional employment rights to its graduates. The College gives "American degrees" as recognized by its license and as accredited by NECHE, as well as "honors awards" conferred via the Open University validation agreement.

AUG seeks to establish itself as a university within the Commonwealth of Massachusetts so that all current and future postsecondary academic degrees (undergraduate and graduate) awarded by ACG will be granted by an educational institution recognized outside of Greece, thereby safeguarding both the professional employment and related rights of all of its postsecondary graduates, while maintaining and strengthening the institution's American identity and adhering to best U.S. educational practices.

If approved by the BHE, AUG will create a validation system and award degrees for the academic work completed at ACG, serving as the organizational vehicle for the academic quality assurance of all ACG undergraduate and graduate degree programs, and replacing the Open University validation agreement. After approval by the Board, AUG also proposes to market certain of its graduate programs now redeveloped in an online modality in Massachusetts and other U.S. states through a partnership with Higher Ed Partners Limited (HEP), an Online Program Management (OPM) organization which seeks to "increase access to top quality and affordable higher education through the online delivery of instruction and help online students succeed."

The second purpose for seeking this degree granting authority is for ACG and AUG to deepen and broaden their reach in Massachusetts and to provide additional programs and opportunities to Massachusetts residents as well as to other US students. The leadership of ACG believes the Commonwealth of Massachusetts provides some of the highest quality standards for higher

education in the nation. ACG already maintains administrative, executive offices in Boston, and the President of ACG/ AUG (David Horner), along with several employees in key leadership positions (e.g., Kelly, Morra, CFO, Sr. Vice President Finance & US Operations; Loren J. Samons II, Sr Academic Advisor; Susan Rothstein, Senior Director Finance – US; and Elizabeth Camelo, Sr. Executive Assistant Boston Office & Assistant Secretary of the Board) reside in Massachusetts. All of the staff whose work location is Massachusetts would have roles in AUG, thus giving the proposed institution physical presence in the Commonwealth as well, consistent with the Board’s physical presence policy. M.G.L. c. 69, Section 31A; 610 CMR 2.03.

More recently, and in conjunction both with this application and with its overall strategic planning, ACG has considered affiliating itself with a Boston-based institution to provide a base for enhanced programmatic operations such as exchange programming, semester and year abroad programs, and innovative degree offerings combining various instructional modalities including online and study abroad residency experiences. This planning has continued while the Department has worked with the institution to refine its application.

For example, the institution has worked or plans to work with nearly 40 Massachusetts institutions, public and independent, to provide study abroad opportunities in Greece. In fall 2022, students from the following Massachusetts institutions are currently studying abroad at ACG: Boston College, Endicott College, Lasell College, Northeastern University, Stonehill College, Westfield State University, Worcester State University. The institution is also actively designing a gap year program, “Gateway Greece,” to be actively marketed to Massachusetts residents. Also in development are expanding degree program offerings in modality (hybrid online/Greek residency pathway, degree completion program, three year degrees, etc.) to provide additional opportunities that combine the residential and place-based experience in Athens, Greece with the dynamic higher education, research, and culturally enriched environment of the greater Boston area. The institution also envisions expanded opportunities for all of its students to engage in Massachusetts by providing a summer course option to fulfill an undergraduate international experience requirement; a summer internship course in Boston to be required in certain business undergraduate majors; faculty-led educational trips in Boston for master’s level students, and expanded tuition exchange opportunities with Boston area institutions.

APPLICATION PROCESS AND AUTHORITY

In the fall of 2020, ACG made initial contact with the Department to discuss the approval process, and staff advised on the application process over the next several months. During this time there was correspondence back and forth as well as two meetings held with ACG leadership.

Massachusetts state law, as implemented by the BHE regulations, requires the BHE to act on Articles of Organization or Incorporation proposed by a college or university with the power to grant degrees. 610 CMR 2.03(1)-(2); 610 CMR 2.05(1). The BHE’s statute and regulations further provide that an institution located or doing business within the commonwealth shall not offer degrees within the commonwealth without approval of the BHE. M.G.L. c. 60, § 31A; 610 CMR 2.03(4). Institutions that have a physical presence in the Commonwealth, including administrative

offices, and offer one or more courses leading to degree fall under the BHE's jurisdiction and either need to be approved to operate in the Commonwealth under the BHE's regulations or authorized to operate here under the BHE's participation the interstate reciprocity agreement. The institution's proposal, therefore, falls under the Board's jurisdiction and all materials must be evaluated consistent with BHE's regulations. See 610 CMR 2.06(5).

The institution's application was reviewed pursuant to 610 CMR 2.06 and 2.07. The institution submitted its application, along with initial Articles of Incorporation, in May, 2021, with the final revised application received in July, 2021. A Visiting Committee (VC) was assembled and charged and a remote site visit was conducted Sept. 27 – Oct. 1, 2021. The VC report was received and transmitted to the institution on Feb. 4, 2022. The institutional response to the VC's report was received on March 31, 2022. Members of the VC reviewed and a final request for information was made on May 2, 2022. Additional meetings and correspondence with the institution have continued until the present.

MISSION, PURPOSE AND EVALUATION

The mission, shared with ACG, states that AUG seeks: To add distinctive and sustainable value to our students, Greece, American education, Hellenic heritage, and the global community through transformative teaching, scholarship and service.

Its vision states: To develop AUG (as soon as the Greek Constitution allows) as Greece's premier independent, non-profit university.

Its values are to integrate:

- American education best practices (e.g., liberal arts; holistic student development for global citizenship; sustainability; economic and social impact);
- Greece's unique intellectual and cultural heritage; and
- A campus ethos of mutual respect, inclusion, responsible action and high achievement.

The ACG Strategic Plan, called ACG 150 and approved in 2017, focuses on four core goals:

- Goal 1: Achieve high standards of performance across all educational programs and make a material difference in Greece's economy and public health.
- Goal 2: Cultivate a high performance, sustainable organizational culture based on transparency, mutual support, collegiality, and continuous improvement.
- Goal 3: Establish ACG's educational leadership position; build a culture of constituency engagement and philanthropy.
- Goal 4: Assure a comprehensive, sustainable financial and infrastructure model.

The plan forms the basis for regular reports by the President to the Board. The President's annual performance evaluation performed by the Board is based on the four ACG 150 goals. Each Executive Cabinet Officer develops annual priorities for their respective areas that align

with the plan. Alba, Deree and Pierce each has its own mission, vision, values and goals that correspond with ACG's and support their respective parts in ACG 150.

Participants at all levels of the institution are clearly aware of the strategic plan and reference goals respective to their roles. During meetings with the VC, both faculty and students regularly noted their involvement in the strategic planning process.

ACG has an organizationally embedded culture of assessment supported by systems for regular review of student learning and program effectiveness. Data is also available in areas such as student enrollment, student profiles, class-sizes, retention, admissions data, graduation rates, and job placements.

In addition, the College systematically collects and analyzes data on student achievement and feedback to improve its academic programs. This includes a regular program review cycle that drives improvement in curriculum and educational effectiveness. ACG utilizes a process of continuous improvement through a variety of means including the use of external examiners, academic reviewers, module leader reports, rubric marking schemes, information from exit surveys, post-graduation placements, and feedback from employers.

MARKET ANALYSIS AND ENROLLMENT/ FINANCIAL PROJECTIONS

As a U.S.-accredited institution of higher education in operation for close to 150 years, ACG's programs are well-established and enjoy a solid reputation in Greece and beyond. Because the establishment of AUG is part of the strategic plan of ACG, the Department and Visiting Committee examined the projected enrollments and plans for the undergraduate and graduate degree programs to be offered through ACG for which AUG is seeking authority. This included their plans to offer the institution's current MBA program in an online format to international markets, including Massachusetts.

Overall student enrollment has been growing over the past five years at a higher-than-forecasted rate. While the evaluation of the VC was based on data from the 2020-2021 admission cycle, ACG reports that in fall 2021, the higher education division (Deree and AGBS) enrolled 3,595 undergraduate and 868 graduate students, representing an increase of 15% and 30% respectively, from fall 2017, continuing the growth trend reported in Fall 2020.

The increase in enrollment was accompanied by an increase in quality as determined by high school achievement. In 2020-2021, 61% of entering students graduated from high school with a grade higher than 18 on the Greek Apolyterion (secondary level degree award, with a perfect score being 20), up from 45% who entered in Fall 2016. The minimum Apolyterion grade required for regular acceptance is 14, equivalent to a 2.5 GPA on a 4.0 scale.

Deree graduate enrollment grew from 202 graduate students in fall 2017, to 339 in fall 2021. The quality of the student also improved as indicated by the average undergraduate GPA, which was 3.3 vs. 3.1 in 2016 (on a 4.0 scale). Demand for and enrollment in AGBS programs has been consistently high, with 529 graduate business students in fall 2021, up from 466 in fall 2017. The average entering GPA was 3.3 in fall 2020.

ACG's strategic plan places an increased focus on markets outside of Greece (degree-seeking and study-abroad students) with a view to enhancing diversity and culturally enriching the experiences of its student body. In 2017 ACG was approved to have some of its students eligible for US DOE Title IV Federal loans, opening new recruitment opportunities. At the undergraduate level, the number of international degree-seeking students increased by 58% between 2016 and 2022. Much of this increase is driven by demand from the US, with the number of US degree-seeking students increasing by 154% during the same period.

The online program modality for the MBA program was developed in collaboration with Higher Ed Partners (HEP), which has long experience collaborating with more than 60 universities in the US and Europe. The marketing plan was in development in collaboration with HEP at the time of application and launched this spring (2022). At this time marketing is consistent with ACG's current status as an accredited, licensed institution in Greece, and the currently enrolled students are all Greek. Should the Board approve degree-granting authority for AUG, a marketing plan will be deployed in 2023 with the objective to attract prospective students from Massachusetts. The plan will be developed with, and funded by, HEP and will utilize a range of digital media channels (social media and search advertising) as well as below-the-line activities, such as live information sessions and participation in online fairs. Marketing will be "consistent with the values and positioning of AUG as a higher education institution" as well as continuously developed in collaboration with an internal marketing team, based on ongoing market research. As the institution makes its decision regarding new programs or program types to be offered wholly or in part in Massachusetts, it will develop appropriate marketing materials that comply with the Board's regulations.

ORGANIZATION AND GOVERNANCE

AUG will be governed by a Board of Trustees of up to 37 voting members, appointed by the ACG Board and consisting of the members of the ACG Board (up to 25) plus members (up to 12) of The American University of Greece Foundation (AUGF) Board. The AUG and AUGF members overlap 100%. The officers of the AUG Board will be the same as the ACG Board. The President of ACG, AUG and AUGF will serve in the same capacity as with the ACG Board: as an *ex officio* non-voting member of the AUG Board. The Board will uphold the University's mission and sets its policies, monitors their implementation, and provides general oversight of its activities. The Board appoints and evaluates the President, who in turn hires and evaluates all other staff, or delegates that hiring and evaluation to other leadership. The Board's roles and functions will be carried out through appropriate meetings and committees.

The Visiting Committee deferred review of the organizational and governance documents to Department Legal staff. Department legal staff reviewed AUG's Articles of Organization and By Laws determined that they were compliant with the Board's regulatory requirements related to organization and governance, 610 CMR 2.07(3)(b). In particular, AUG's Articles of Organization make it clear that AUG is a supporting organization with the exclusive purpose of acting for the benefit of ACG, and further provide that its purpose will be carried out by AUG providing academic oversight of ACG and validating that ACG degrees are consistent with the Board's regulations. The organizational and governance documents also confirm that the AUG and the

ACG boards will be essentially one and the same, with the AUG board comprising all of the members of the ACG board, plus up to 12 other members appointed by the ACG board. The ACG board currently consists of 25 members, four of whom are Massachusetts residents.

<https://www.acg.edu/about-acg/office-of-the-president/the-board-of-trustees/>

PROGRAMS AND INSTRUCTION

As described above, AUG will serve as the higher education academic program support organization for ACG with the goal of creating a degree validation system that will replace the Open University agreement. Therefore, a central responsibility of the Visiting Committee was to examine the degree programs of ACG, a total of 30 baccalaureate and 22 master's degree programs through the Deree schools of Business and Economics, Liberal Arts & Sciences, Fine and Performing Arts, and Graduate and Professional Education, and the Alba Graduate Business School (AGCBS). A complete list of degree programs can be found in Appendix A. The VC assessed the institution's proposed programs offered at ACG to determine whether the institution has the ability to provide, oversee, and ensure the academic quality and integrity of the programs in accordance with 610 CMR 2.07(3)(c). The programs of study are appended to this motion as Attachment I.

VC members were assigned the review of degree programs based on their professional and academic experience. Areas of expertise among the VC included: education, the natural sciences, computer science, business, humanities, social science, management, fine and performing arts, financial management, and administration. Committee members' content expertise allowed for depth and thoroughness of evaluation to ensure high educational program standards were met or exceeded. Where VC members had questions or concerns regarding a specific discipline, they collaborated with other VC members on the assessment of the degree program.

Each member of the VC assigned to the Academic Programs standard received a caseload of programs and reviewed course descriptions, assessment criteria, required course readings, syllabi, student learning outcomes, program maps, elective courses, general education requirements, assessment measures, and other elements of each program. Lastly, content experts relied on various syllabi checklists to ensure key course elements were present.

To validate and clarify statements provided in the AUG application, VC members met with the relevant faculty and officers of the institution. Committee members questioned faculty and leadership officials regarding course content, credit hour requirements, student learning outcomes, and many other elements of each educational program. Meetings were also held with students, who indicated that they felt prepared to take on professional roles upon graduation as a result of their educational experiences at the institution.

The findings in the Program Application and Appendices provided by the institution have been verified in meetings with the relevant officers of the institution. The relevant Curriculum Committee vets the courses and programs. The VC found degree requirements to be clearly stated and course material to be consistent with those found in written materials. It also found that student learning outcomes are clearly defined and appropriate to the degrees.

The programs offered are appropriate to the mission and purpose of the institution. The degrees are logically developed, inclusive of appropriate and applicable course work and meet the goal of preparing graduates for appropriate level positions in the areas associated with the degree major, for undergraduate programs, or program outcomes, for graduate degree programs. ACG has clearly articulated student learning outcomes, at both the program and course levels, that are available on standard course syllabi and on the college website. Syllabi for each of the school's courses have clearly identified outcomes and assessment measures that coordinate systematically for degree completion in each program.

The VC also reviewed the 43-credit undergraduate General Education requirement and found it provides a balance of courses of study from arts and humanities, mathematics and the natural/physical sciences, and the social sciences. Learning outcomes for General Education are assessed regularly, and changes to the General Education program have included revisions to the writing course sequence and work to embed ethical reasoning within the writing program.

The Academic Catalog includes extensive details that include a curriculum map of where program outcomes are taught and how they are assessed. Syllabi articulate appropriate course-level outcomes that align with and contribute to meeting program outcomes.

Annually, all available program and specialization evaluation/assessment data are reviewed and analyzed resulting in a summary program/specialization report. Through a dashboard of educational quality indicators, the institution tracks key effectiveness measures using comparable U.S. institutions as benchmarks. While program- and course-level assessment varies by school, oversight of learning outcomes is consistent across the institution.

Admission

The Visiting Committee found the admissions requirements for all programs detailed and well-aligned with institutional mission and programmatic outcomes as well as mirroring requirements at like institutions.

For admission to ACG's undergraduate academic programs, applicants are evaluated based on their secondary school academic performance, proficiency in English, required letters of recommendation, and overall student profile. All applicants must possess a secondary education completion certificate such as a Greek High School "Apolyterion", or an equivalent secondary education completion, attained with a minimum cumulative index/GPA as set by the College.

Deree graduate programs admissions requirements are: a bachelor's degree or recognized equivalent from an accredited institution; a cumulative grade point average of at least 3.0 on 4.0 scale (B grade) in all prior undergraduate and any graduate level work; evidence of proficiency in the English language; and two letters of recommendation.

AGBS graduate program admissions requirements are: a bachelor's degree, as well as official transcripts and certified copies of all degrees received; completed application including three prescribed essays; evidence of proficiency in English; current employment or self-employment (for students who plan to attend part time); two letters of recommendation. GMAT scores are optional unless required by the admissions committee.

Further requirements for admission to the MBA programs are: three years of postgraduate experience for all MBA programs and a minimum of ten years substantial work experience for the Executive MBA program, of which at least three years were of management experience.

Graduation Requirements

The Visiting Committee found graduation requirements for all programs clearly explained in the academic catalogue information as well as in other institutional publications, well-aligned with institutional mission and student learning as well as program outcomes.

To graduate from all undergraduate programs, students must complete satisfactorily 121 credit hours, including Liberal Education (general education) and distribution requirements; fulfill the College's residency requirement; and attain a minimum cumulative index or GPA of 2.0 (on a 4.0 scale).

To graduate from Deree graduate programs, students must complete satisfactorily the total number of credits and any other requirements set for each degree; complete all course requirements within the time frame specified by each program; and earn a minimum cumulative index or GPA of "B" (3.0 on a 4.0 scale).

To graduate from AGBS programs student must complete all required credit requirements (including the field consulting project for the MBA); ensure their file is complete with all required documents and certificates (English language tests, GMAT, etc.) required if their admission was conditional; complete with a passing grade all the courses on which they have enrolled; and achieve a minimum cumulative index or GPA of 2.3 (on a 4.0 scale).

FACULTY

In academic year 2020-21, ACG employed 391 faculty within Deree and AGBS. At Deree, 63.83% of courses were taught by full-time faculty, while at AGBS, which traditionally relies significantly on international visiting faculty, the equivalent percentage was 38.2%. At Deree the ratio of full-time faculty to part-time faculty was 161/133, or 54.8% full-time, while at Alba the ratio of full-time to part-time faculty was 17/80, or 17.5% full-time.

As an existing institution ACG has well-developed policies and practices regarding its faculty, as well as hiring plans integrated with its overall strategic and institutional planning. The Deree *Faculty Manual* outlines personnel policies and procedures including appointments, promotion, evaluation, salary, benefits, termination, grievances, and the annual faculty performance review process. Alba has its own *Faculty Bylaws* that define faculty contracts, duties, terms of employment, remuneration, and annual evaluation.

The VC had the opportunity to meet with a large number of graduate and undergraduate faculty members, including those in leadership positions, during the remote site visit. The VC found the faculty to be committed to research and teaching and attentive to student learning and success.

As described in the application, the VC recognized that continuing to evolve a "teacher-scholar" faculty model with selective reduction of teaching loads and support for faculty may be advisable. In the fall of 2022 the institution implemented the first phase of a Faculty

Development Plan, which encouraged research and scholarship through means including reducing the teaching loads of full-time faculty by 12.5%.

STUDENT SERVICES

Information about student services and institutional policies are provided to Deree and Alba students at ACG on both the college's website and in student handbooks. All students of both Deree and Alba are governed by the same policies. Student conduct codes, rights and responsibilities as well as grievance and complaint procedures for prospective and current students are described in detail in the college catalog.

Tuition and fees, which vary depending upon program and country of origin of the student, are clearly described on the website. Financial aid at ACG includes college-funded athletic, merit and need-based scholarships, endowed merit and need-based scholarships, affiliation discounts for Pierce graduates, tuition reductions, college work-study, and certain U.S. federal loans for U.S. citizens. Information about these options and procedures for awarding financial aid other than U.S. federal loans are outlined in great detail in the Financial Aid policies and procedures manual.

Refund policies for Deree are clearly explained on the college website; the refund policies for Alba as presented were different from those at Deree and were less clear. The VC requested clarification and the institution responded by clarifying the refundability of certain charges and posting the same on its website.

All Greek students up to age 23 have full health coverage at public hospitals through IKA (the Greek social security agency) as dependents of their parents. After 23, most have their own access to the public health care system. For non-Greek students, all students need to show proof of health insurance in order to obtain their student visa.

The student record retention policy is described in the catalog. Student records are first kept in Admissions and then moved to the Registrar. The EU and Greek laws set stringent standards for the protection of personal data, and these and the records retention policies are described in the catalog. As part of its report the VC asked for clarification regarding student record retention and the College clarified that those records necessary to issue a transcript are retained indefinitely. Records connected to the Open University validation are required to be retained from the date of the graduating student's birth plus 120 years.

The Office of Student Affairs provides programs and services that enrich students' learning experience and helping shape their success so that they become intentional learners, educated decision-makers, and critical thinkers, able to add value to society as members of a global community. This includes providing an intentional learning-living experience to residential students; supporting a roster of active student organizations; study abroad and study away experiences; and an intercollegiate athletics program. The college implements a U.S. approach to personal development with the Engagement Development Plan (EDP) which features a Co-

Curricular Transcript designed to recognize extracurricular learning, leadership development, and contributions to campus and community life.

The Student Success Center is a one-stop service point for all Deree students and a referral point to most of the services offered by ACG, including the ACG Counseling Center, Student Academic Support Services, and an Educational Psychologist serves students who are experiencing difficulties within the educational setting.

ACG offers a robust Office of Career Services as well as exclusive student-alumni engagement opportunities through its ACG Connect online platform as well as a mentoring program and online webinars and webcasts on selected topics.

AGBS student supports include a common orientation experience; leadership course and 360 evaluation and coaching; and opportunities, which are expanding, for international internship and field trip experiences; and placement, preparation, and ongoing coaching for post-graduate professional opportunities.

To the extent covered by its contract with HEP, certain student support services for online programs will be covered by that organization. Other services as appropriate to the degrees being offered online – that is, at the graduate level – will be available from Alba on the same basis to distance education students. ACG has also made discrete investments in resources that benefit its online students, for example, adding funds to ensure software to support online students who have learning disabilities.

FINANCIAL RESOURCES

The Visiting Committee reviewed financial documents, reports and other information and met with members of the finance staff, all with AUG's financial stability and viability in mind. The Committee found a number of positive indicators, including the strong overall financial position of the institution and positive multi-year budget projections that predict future financial viability; adequate levels of funding to support operations, with a large portion of resources devoted to instruction; multi-year history of unqualified statements from independent auditors for the years examined; and the fact that budgets have ended with a surplus in some years, reflecting strong enrollment and careful control of expenses.

The institutional endowment/ reserves fund was valued at US \$278 million as of March 31, 2021, which has shown good returns on investment and most of which is available without donor restriction and is quasi-endowment/reserve by virtue of designation by the Board. The draw against the endowment/reserve, 3.5% annually based on a three-year rolling average, is conservative in relation to the return on investment. ACG has historically operated without debt and owns all of its buildings and grounds. (Note: The 2021/22 acquisition and development of the 27-acre, 170,000 sq. ft. East Campus to provide for the launch of the Pierce Kindergarten and Elementary School and the construction of a 99-bed undergraduate residence hall included \$23M of bank debt financing.)

The VC made recommendations that were addressed by the institution in its response to the VC report, including providing more detailed information on financial procedures, controls, and separation of duties and indications of contingency planning.

Because a significant portion of its revenue is derived from tuition and fees, the Visiting Committee paid particular attention to ACG's enrollment planning and trends. Over the past five years, and while the economic conditions were mostly unfavorable in Greece, ACG was able to increase the enrollment of its students across all divisions. Although ACG is a primarily tuition-dependent institution, its fundraising efforts have been growing steadily, and funds have increased from \$383,665 in FY2009 to \$5.12 million in FY2019. As a result, its net assets grew from \$238,937,905 (ACG) and \$4,182,053 (Alba) in FY 2015, to a combined \$272,498,259 in FY 2020.

The five-year consolidated operating budget prepared in response to VC recommendations is presented in Appendix B. The budget shows as balanced through FY2024, with new profitability after that point as revenue flows from all sources increase.

PUBLIC DISCLOSURE

610 CMR 2.07(3)(g) outlines specific information that the college must provide in printed or electronic form and certain prohibited actions relating to advertising, recruiting, sales, collection, financial policies and other matters. The intent of these provisions is to assure that students and prospective students receive accurate, comprehensive, consumer-oriented information so they can make informed decisions about attending AUG.

The first component of this standard addresses the basic information the institution is to provide to potential and enrolled students. The VC accessed many ACG documents through the institution's website or through its Blackboard portal and found that AUG and ACG information was compliant with this portion of the standard.

During the remote site visit the VC was informed that ACG, in conjunction with its online program manager HEP, intended to begin advertising its online programs in both Greece and the US as early as November of 2021. Since BHE degree-granting authorization will not be in place by that time, any promotion of AUG online programs at that time would violate this provision of the standard. 610 CMR2.07(3)(g)(2). Immediately upon conclusion of the site visit, ACG leadership was advised to change its online and other information about marketing of the new online programs and the institution complied completely and quickly to this request.

PHYSICAL RESOURCES

The Board's regulations require that physical facilities of an institution comply with health and safety requirements of the community, state, and federal government; that the classrooms are sufficient in size, number and in equipment to meet all requirements of the institution's course of study; and that laboratories are appropriately equipped to the level of instruction in the courses offered. The VC evaluated ACG facilities for compliance with this standard because, while AUG is the entity that seeks degree-granting authority from the BHE, ACG will deliver the actual programs.

The VC conducted a remote site visit. Information about the physical campus locations in Athens, including classrooms, dormitories, library, theatre, specialized facilities for fine arts, athletics, etc. was provided together with photographs and a virtual tour. ACG has two

campuses that total 64 acres. The Main Campus, located in an eastern suburb of Athens, covers approximately 60 acres and has been under development since 1968. It contains facilities for Deree as well as for Pierce. The Downtown Campus, which houses the Alba Graduate Business School, is located near the center of Athens. ACG has four student residential facilities within a short walking distance of the Main Campus. These have a capacity to house approximately 400 students, primarily international.

ACG recently acquired a new property in Spata, an eastern suburb of Athens, where it has now developed an East Campus. Initially, this campus houses ACG's Kindergarten and Elementary School programs. Eventually the Pierce high school will move to this new campus, which will free up space on Main Campus for Deree academic programs and faculty offices.

Financial and investment administration occurs in facilities located in Boston. As this space supports only administrative functions, neither students nor faculty have reason to access it. Therefore, the space was not reviewed for regulatory compliance.

The VC concluded that while local (Greek) standards regarding occupancy, safety, accessibility, etc. were met based on the information provided, they deferred to the Department and legal counsel as to whether AUG would need to demonstrate that the Massachusetts or U.S. federal standards were met. Upon review, as well as further development of the application and its supporting documentation, staff advised that the Athens campus is subject to local (community) building code and physical health and safety requirements, and as such the campus must maintain compliance with those local community and state/ federal standards. Department staff further took note of the fact that the institution has been accredited without sanction by NECHE for 41 years, that NECHE conducts regular site visits at least once every 10 years, and that the Board's regulations allow for Department staff's participation in NECHE site visits or review of NECHE site visit reports to substitute for a periodic site visit. 610 CMR 2.00.

The Department took under advisement the recommendation of the VC that a physical site visit be conducted at a time to be determined, which is within the Board's purview as a periodic inspection that can be conducted within the first twelve years of operation under Board approval.

LIBRARY AND INFORMATION RESOURCES

The Visiting Team reviewed the Library and IT Strategic Plans and ACG's NECHE Interim Report and met with the Dean of Libraries and the Director of Information Resource Management to verify that ACG meets this standard.

ACG Libraries include four units – John S. Bailey Library, Alba Library, Pierce Library and ACG Archives and Special Collections – serving diverse constituencies of their respective schools. The libraries continue to move to increasing digital formats including a transition of all journals to online format, launched in 2016. Information literacy outcomes are embedded in writing courses, and the library staff are regularly involved with faculty in the writing program.

Information Technology is led by the Information Resource Management unit. In response to the pandemic, new IT resources were mobilized quickly to support the learning process and online teaching that included Lecture Capture Systems, Remote Teaching Systems, Remote

Proctoring, and other online learning resources. Faculty, staff, and students praised the IT responses to the sudden move to fully online courses and remote work necessitated by the COVID-19 pandemic.

Based on its review the VC believes the Library supports the research, curricular, and informational needs of students, faculty, staff, and administration for all degree programs.

DISCRIMINATION AND OTHER LAWS, RULES AND REGULATIONS

The VC found that AUG met the standards of 610 CMR 2.07(3)(j) related to the prohibition that institutions engage in illegal discrimination in admissions practices or employment policies and requested further confirmation and assurances from AUG related to the applicability of the Board's broad regulation that requires an institution to comply with all local state and federal requirements. Legal counsel for AUG submitted a statement of legal compliance confirming compliance with current laws, as they apply to their Athens' campus and to enrolled U.S. citizens participating in their programmatic offerings. Further, to the extent that AUG pursues establishing a physical campus in Massachusetts in the future, legal counsel for AUG confirmed that they will develop plans to ensure that such physical facilities and the programmatic offerings on those facilities are in compliance with local, state and federal laws.

ACCREDITATION

ACG is accredited without sanction by NECHE, as indicated above. The Alba MBA is also accredited by the Association of MBAs (AMBA), and the Alba graduate degrees in Finance and Human Resources Management are accredited by EFMD Global. Alba is a member of the Association to Advance Collegiate Schools of Business (AACSB) and is a current candidate for accreditation by that body.

EXTERNAL REVIEW AND THE INSTITUTION'S RESPONSES

The Visiting Committee members appointed for the institution and their affiliations at the time of the visit were:

Nancy Niemi, Ph.D. (Chair)

Provost and Vice President for Academic Affairs
University of Maryland Eastern Shores

Maria Altobello, Ed.D., MBA

Vice President of Academic and Student Affairs
Laboure College of Healthcare

Marty Green, Ph.D., MPA

Associate Professor
Franklin Pierce University

Lisa Ijiri, Ph.D.

Clinical Professor and Senior Advisor to the Dean
Boston University – Wheelock School

Donald Jeffrey (Jeff) Lokey, M.A.

Chair, Undergraduate Management Programs
Cambridge College

Diane Scott, MBA

Associate Professor
Massachusetts College of Liberal Arts

Andrew Soll, MBA, MM

Vice President for Finance and Facilities/CFO, (retired)
Salem State University

Elizabeth True, Ed.D.

Vice President for Student Affairs and Enrollment Management
Maine Maritime Academy

Review Process

After an initial review of all documents, the Committee made a remote site visit on September 27 to October 1, 2021.

During the remote site visit the Committee obtained information from meetings with a number of faculty, staff and leadership. Appendix C

The Committee requested additional documents during and after the site visit which ACG provided in a timely manner.

The Visiting Committee assessed the institution's compliance with 610 CMR 2.07(3) and its overall readiness to offer the proposed degree. The Committee reviewed all of the documents presented in the original application as well as conversations and presentations conducted during the site visit to prepare its initial report. The Committee submitted its report on December 3, 2021 and following further work to clarify the recommendations and suggestions being made, Department staff conveyed the revised report to ACG on behalf of AUG on February 4, 2022.

As of its reports on February 4, 2022, the Visiting Committee found AUG **met** the following standards:

- One. Mission, Planning and Evaluation**
- Three. Programs and Instruction**
- Four. Faculty**
- Eleven. Accreditation**

The Committee found AUG **partially met** the following standards:

- Five. Student Services**

- Six. Financial Resources**
- Seven. Public Disclosure**
- Eight. Physical Resources**
- Nine. Library and Information Resources**
- Ten. Discrimination**
- Eleven. Other Laws, Rules, and Regulations**

The Committee could not make a determination about compliance with the following standard:

Two. Organization and Governance

A list of the recommendations and suggestions made by the Visiting Committee in its report is attached to this motion. Appendix D.

American University of Greece Response

Even before receiving the report and based on exit meeting information and conversations during the site visit, ACG leadership and staff began working to address the Committee's concerns. ACG on behalf of AUG responded formally to the Visiting Committee report on March 31, 2022. Department staff carefully reviewed that response and the documentation included. ACG leadership and Department staff continued to work to refine the overall application, supporting documents, and plans for the institution. Many of the points raised by the Committee were resolved relatively quickly; a few required more substantive discussion and work to resolve. A second round of reply and response concluded with a further submission from ACG received on May 6, 2022. All recommendations made by the Visiting Committee have been addressed by the institution, as well as recommendations made by staff in the course of review.

Public Comment

The required public comment period opened on September 28, 2022 and will be concluded on October 18, 2022.

STAFF ANALYSIS AND RECOMMENDATION

Staff has thoroughly reviewed all documents submitted with the petition for degree granting authority, the Visiting Committee report and recommendations, and the petitioner's responses to those reports, and has met and corresponded with the petitioners several times since the site visit. Staff find that the proposal meets the requirements outlined in 610 CMR 2.07. Recommendation is for approval of the University's Articles to be able to offer the degrees enumerated in Appendix A

Appendix A: American University of Greece Degree Programs

Bachelor of Science in Accounting with Finance
Bachelor of Science in Biomedical Sciences
Bachelor of Science in Cybersecurity and Networks
Bachelor of Science in Entrepreneurship Management
Bachelor of Science in Environmental Studies
Bachelor of Science in Finance
Bachelor of Science in Human Resources Management
Bachelor of Science in Information Technology
Bachelor of Science in International Business
Bachelor of Science in International Tourism & Hospitality Management
Bachelor of Science in Logistics and Supply Chain Management
Bachelor of Science in Management
Bachelor of Science in Management Information Systems
Bachelor of Science in Marketing
Bachelor of Science in Shipping Management
Bachelor of Science in Sports Management

Bachelor of Arts in Art History
Bachelor of Arts in Cinema Studies
Bachelor of Arts in Communication
Bachelor of Arts in Economics
Bachelor of Arts in English
Bachelor of Arts in Graphic Design
Bachelor of Arts in History
Bachelor of Arts in International Relations and European Affairs
Bachelor of Arts in Music
Bachelor of Arts in Philosophy
Bachelor of Arts in Psychology
Bachelor of Arts in Sociology
Bachelor of Arts in Theatre Arts
Bachelor of Arts in Visual Arts

Master in Business Administration
Master in Business Administration in Financial Services
Master in Business Administration in Shipping
Executive Master in Business Administration

Master of Science in Business for Lawyers
Master of Science in Counseling Psychology and Psychotherapy
Master of Science in Data Science
Master of Science in Entrepreneurship

Master of Science in Finance
Master of Science in International Business and Management
Master of Science in International Shipping and Finance
Master of Science in Marketing
Master of Science in Organizational Psychology
Master of Science in Shipping Management
Master of Science in Strategic Human Resource Management
Master of Science in Supply Chain Management
Master of Science in Tourism Management

Master of Arts in Applied Educational Psychology
Master of Arts in Digital Communication and Social Media
Master of Arts in Strategic Communication and Public Relations
Master of Arts in Advertising Communications
Master of Arts in Teaching English to Speakers of Other Languages

Doctor of Humane Letters, Honoris Causa
Doctor of Laws, Honoris Causa
Doctor of Science, Honoris Causa

**Appendix B: American University of Greece Consolidated Five Year
Financial Summary
May 2022**

	FY 2022 Reforecast	FY2023	FY2024	FY2025	FY2026	FY2027
All Division Enrollment	6,053	6,962	7,162	7,420	7,630	7,700
Revenue						
Endowment Draw	9,266,412 €	10,820,888 €	10,037,761 €	10,715,462 €	11,990,893 €	11,519,840 €
Expendable Fundraising	375,000 €	370,000 €	410,000 €	490,000 €	540,000 €	560,000 €
Gross Tuition & Fee Revenue	49,077,637 €	59,462,500 €	62,468,934 €	65,934,604 €	69,114,026 €	71,206,434 €
Financial Aid	8,876,500 €	9,413,600 €	9,770,146 €	10,307,220 €	10,771,550 €	11,001,950 €
Net Tuition & Fee Revenue	40,201,137 €	50,048,900 €	52,698,789 €	55,627,384 €	58,342,476 €	60,204,484 €
Other Revenue	1,250,000 €	1,230,000 €	1,300,000 €	1,350,000 €	1,400,000 €	1,420,000 €
Total Net Revenue	51,092,549 €	62,469,788 €	64,446,550 €	68,182,846 €	72,273,369 €	73,704,324 €
Expenses						
Instruction	20,823,974 €	26,414,732 €	27,930,597 €	28,657,113 €	29,285,030 €	29,723,933 €
Research	2,364,104 €	2,476,058 €	2,495,238 €	2,580,127 €	2,656,779 €	2,702,062 €
Academic Support	6,631,371 €	8,265,688 €	8,340,816 €	8,542,014 €	8,707,722 €	8,824,564 €
Institutional Support	9,275,354 €	10,770,821 €	10,863,134 €	11,166,654 €	11,427,950 €	11,597,471 €
Student Services	8,246,679 €	9,957,490 €	10,045,723 €	10,304,922 €	10,523,004 €	10,670,786 €
Public Service	186,382 €	195,208 €	196,720 €	203,412 €	209,456 €	213,026 €
Auxiliary Operations	653,971 €	684,940 €	869,472 €	907,816 €	944,290 €	972,505 €
Loan Financing	201,713 €	1,004,850 €	1,004,850 €	1,429,329 €	3,071,222 €	2,987,485 €
Total Operating Expenses	48,383,548 €	59,769,788 €	61,746,549 €	63,791,386 €	66,825,453 €	67,691,833 €
Capital Expenditures	2,709,000 €	2,700,000 €	2,700,000 €	2,700,000 €	2,700,000 €	2,700,000 €
Total Operating and Capital Expenditures	51,092,548 €	62,469,788 €	64,446,549 €	66,491,386 €	69,525,453 €	70,391,833 €
AUG/ACG (Lower Division) Net Margin	1 €	0 €	0 €	1,691,460 €	2,747,917 €	3,312,491 €

Appendix C: Persons Interviewed During the Site Visit

Faculty and Staff

David Horner, President

Gabriel Alexopoulos, Controller

Artemis Anastasiadou, Assistant Professor, Program Coordinator, Cinema Studies

Effie Anastasiou, Assistant Professor, Program Coordinator, Accounting and Finance

Stella Apostolaki, Assistant Professor, Program Coordinator, Environmental Studies

Melenia Arouh, Associate Professor, Department Head, Communication

Panagiotis Asimakopoulos, Assistant Professor, Department Head, Finance

Panos Avramidis, Associate Professor of Finance and Quantitative Methods

Kostas Axarloglou, Executive Dean of the Alba Graduate Business School

Evi Baralou, Academic Director of the MSc in Tourism Management

George Batsakis, Associate Professor of International Business, Academic Director, MSc in IBM

Christopher Brellis, Associate Lecturer, Program Coordinator, Graphic Design

Claudia Carydis, Vice President of Public Affairs

Tatiana Chalkidou, Assistant Professor, Teaching Tier; Department Head, International Tourism and Hospitality

Vivi Consta, Registrar and Dean of Academic Administration

Anna Constantatos, Assistant Professor, Accounting, Economics and Finance

Katerina Diamantaki, Assistant Professor, Communication

Evi Dilaveri, Associate Lecturer and Writing Program Coordinator

Dionysis Dionysiou, Associate Professor of Organization and Management, Academic Director, MSc. in Strategic HRM

Dimitris Doulos, Professor, Program Coordinator, Economics

Christina Drakonakis, Associate Dean of Students, Student Affairs

Maria Edipidi, Director of International Enrollment and Student Services

Lila Efstathiadi, Director, AGBS Academic Programs

Spiros Gangas, Associate Professor, Sociology

Christina Giakoumaki, Assistant Professor, Graduate Program Coordinator, MA in Digital Communication and Social Media

Effie Halivopoulou, Assistant Professor, Department Head, Visual Arts and Art History

Meni Ilkos, Assistant Professor, Department Head, English

Mari Janikian, Assistant Professor, Graduate Program Coordinator, MA in Applied Educational Psychology

Leslie Jones, Assistant Professor, Department Head, Music and Music Performance

Andreas Kakouris, Associate Professor, Program Coordinator, Logistics and Supply Chain Management

Lucy Kanatsouli, Dean of Enrollment and Students

Argyro Kefala, Associate Professor, Graduate Program Coordinator, Strategic Communication and PR

Antonis Klidas, Associate Professor, Department Head, International Business
Elena Koltsaki, Affiliate Professor, Lawyer-Mediator, Academic Director of MS in Business for Lawyers
Christos Koritos, Associate Professor of Marketing, Academic Director of MS Marketing
Peter Korovessis, Director of IRM
Zoe Kourounakou, Director, AGBS International Office
Areti Krepapa, Dean of the School of Graduate & Professional Education
Valia Kritikou, Executive Director – Business Affairs and Financial Assistance & Planning
George Kyparissiadis, Assistant Professor, Graduate Program Coordinator, MA in Advertising
Olivia Kyriakidou, Assistant Professor, Graduate Program Coordinator, MS in Organizational Psychology
Kyriakos Kyriakopoulos, Professor of Strategy and Marketing, Academic Director of Executive MBA, Academic Director of Eurobank – ALBA MBA in Financial Services
Antigone Kyrousi, Assistant Professor, Marketing
Nikos Lampas, Assistant Professor, Program Coordinator, IR and EA
Iliana Lazana, Senior Vice President of Administration
Stella Leivadi, Assistant Professor, Program Coordinator, Sports Management
Jane Mandalios, Assistant Professor, Graduate Program Coordinator, MA in TESOL
Helen Maragou, Dean of the School of Liberal Arts & Sciences
Stella Mariou, AGBS, Quality Director
Daniel McCormac, Assistant Professor, Communication
Kyriaki Metinidou, Associate Lecturer II, Program Coordinator, HRM
Georgia Miliopoulou, Associate Professor, Communication
Anastasia Misseyani, Associate Professor, Science and Mathematics
Maria Moragiani, Director, AGBS Career and Alumni
Kelly Morra, Senior Vice President and Chief Financial Officer
Metaxia Papageorgiou, Associate Lecturer, Department Head, History
Paraskevi Papadopoulou, Professor, Department Head, Biomedical Sciences
Ioanna Papapavlou, Senior Manager, ACG Art Collection
Lena Pateraki, Assistant Professor, Department Head, Psychology
Ioanna Patsioti, Professor, Department Head, Philosophy
Athanasios Patsiotis, Assistant Professor, Teaching Tier, Department Head, Marketing
Marina Perantonaki, Senior Manager, Career Services
Angeliki Pollali, Associate Professor, Art History
Susan Rothstein, Senior Director, Finance US
Jay Samons, Senior Vice President and Chief Academic Officer
Nassos Sopilis, Director, Art and Design Studios
Vasileia Stefanou, Assistant Professor, MIS
Irene Tabaki, Director of Technical Services
Kostas Tasoulis, Associate Professor, Human Resource Management
Olga Thomadaki, Assistant Professor, Psychology
Katerina Thomas, Dean of the Frances Rich School of Fine & Performing Arts
Alison Townley, Vice President of Institutional Advancement
Nikoletta Trahoulia, Professor, Program Coordinator, Art History

Annie Triantafyllou, Dean of the School of Business & Economics
Androniki Triantafylli, Associate Professor in the Practice of Accounting
Vicky Tseron, Dean of Libraries
Vangelis Tsioumas, Assistant Professor, Department Head, Shipping Management,
Kostas Tzioumis, Associate Professor of Finance, Academic Director of MS in Finance
Jenny Vagianou, Assistant Professor, Department Head, IT
George Vardoulis, Assistant Professor, Program Coordinator, Cybersecurity and Networks
Emmanuel Varouhas, Associate Professor, Department Head MIS
Dimitrios Vogiatzis, Assistant Professor, Graduate Program Coordinator, MS in Data Science
Argyris Volis, Assistant Professor
Spiros Vougiou, Director Shipping Programs
Eleni Voursoura, Assistant Professor, Graduate Program Coordinator, MS in Counseling
Psychology
Katerina Voutsina, Assistant Professor, Program Coordinator, Entrepreneurship Management
Athanasios Vovolis, Department Head, Theatre Arts
Tim Ward, Associate Lecturer, Music
Chryssa Zachou, Assistant Professor, Department Head, Sociology
Stefanos Zarkos, Associate Dean of Academic Programs, Associate Professor, in the Practice of
Finance

Appendix D: Recommendations from the Visiting Committee Report

STANDARD ONE: MISSION, PLANNING, AND EVALUATION

Suggestion:

Reevaluate the Deree undergraduate programs as the Open University agreement is terminated and taught out to consider the student learning outcomes assessment process to be used in the future.

STANDARD TWO: ORGANIZATION AND GOVERNANCE

Compliance Status:

While it is clear that the entity applying for degree-granting authority is the AUG, the VC did not receive sufficient information to fully evaluate compliance with Standard Two, such as AUG's bylaws, articles of incorporation, and other organizational documents. As such, compliance with Standard Two has not been demonstrated.

STANDARD THREE: PROGRAMS AND INSTRUCTION

Suggestions:

- Ensure that regular, full-time faculty are responsible for assuring that decisions in the process of pursuing and developing new partnerships and curricula are made with integrity and rigor.
- Review degree program requirements when Open University requirements are no longer in place to consider where revisions would be appropriate to offer the possibility of more elective courses that might allow students to explore a broader range of areas of inquiry.

STANDARD FOUR: FACULTY

Suggestions:

- Review the faculty workload particularly as it relates to ACG's institutional mission, focus, and aspirations
- Review the hiring plan to continue to increase the percentage of full-time faculty teaching Alba courses to enhance the quality of the Alba program.

STANDARD FIVE: STUDENT SERVICES

Recommendations:

- Board regulations at 610 CMR (2.07(3)(e)(6) require students records to be maintained. While a timeframe isn't specified, retention for one year would not be considered

adequate for a US institution. Consult industry standards, perhaps through AACRAO, and show evidence that ACG has adopted or will adopt (with timeline) a standard more in line with prevailing U.S. standards for student record retention.

- Provide information as to how to provide the necessary/required student support services to students as the institution expands online course delivery. This will require additional staff time and may need to be offered at times of day beyond the current Athens work day schedule. Such student service provision may be embedded in the HEP agreement, or may need to be added to that agreement or to other standard procedures of existing ACG functions, or a combination. Evidence that these services are being added or augmented needs to be provided in the institution's response to this report.

Suggestions:

- Consider carefully the need for increased academic and student support services – especially professional tutors trained in learning disabilities. In addition, to comply with US ADA requirements regarding physical resource accessibility, consider what additional resources will be needed to provide reasonable accommodations for students with physical disabilities.
- Review with legal counsel the institution's status relative to U.S. and Massachusetts requirements such as the ADA, Title IX, Clery, etc. and develop plans for achieving the necessary compliance.

STANDARD SIX: FINANCIAL RESOURCES

Recommendations

- The VC believes AUG demonstrates sufficient financial stability to continue to meet this standard. However, the institution is entering into a new venture in the offering of online programs to a broad geographic market. How well the programs will be received in the competitive marketplace of online programs is untested. For this reason, the VC recommends that the DHE require AUG to submit five-year consolidated financial projections based on several different sets of assumptions relating to enrollment levels in the existing divisions and the new online offerings. Allocations should be broken out by functional areas. These projections should be provided within 60 days of receipt of this report by ACG. In addition, provide further information on the following areas identified above:
 - How the ACG Board designates the use(s) for the endowment, or whether the AUGF Board provides this oversight; whether the endowment is held by AUGF; and a description of the relationship of the Foundation related to the institutional endowment.

- As most of the current endowment was funded by operating reserves from a now-discontinued division of ACG, how does the institution envision further endowment growth or other income generation?
- Provide evidence of adequate breadth of staff expertise to assure that all national, state and local regulations and reporting requirements are met.
- Provide evidence of contingency planning sufficient to mitigate known or reasonably apparent risks to the present and future financial stability of ACG and AUG.

Suggestions:

- Develop a more diverse revenue stream, possibly including grants, contributions from a diverse donor base or other sources of income, to assist in meeting financial viability standards into the future.
- Develop a manual of accounting and financial policies and procedures. Review how administrative tasks will be accomplished, what systems will be employed, how records will be retained and safeguarded, and what safeguards can be put in place to provide adequate separation of duties and protection against fraud and abuse while meeting all external regulatory and reporting requirements.
- Present budgets by functional program classification to clarify the levels of resources allocated for instruction, research, academic support, student services, student activities, administration, etc. This could be done for each division of the institution and then consolidated into a comprehensive budget.
- Prepare studies and models to provide evidence of student demand for the proposed programs.
- Carefully analyze the competitive environment, especially for broadly marketed online programs, to determine the level of student demand for such programs and to assist in establishing optimal tuition price points, financial aid levels, etc.
- Consider how to safeguard the interests of students if there should be a need in the future to curtail operations, either of the institution or of certain programs within, and develop contingency plans accordingly.

STANDARD SEVEN: PUBLIC DISCLOSURE

Recommendations:

- AUG should defer any planned announcement or other publicity about its online programs until such time as the BHE has authorized the institution to award such degrees.

- Ensure the institution’s non-discrimination policy aligns with Massachusetts state law.
- Review, clarify and reflect in publications tuition and fee information and refund policy at Alba. At minimum, the refund policy must mirror the way in which tuition and fees are charged (on a program basis) so that the revised policy may be evaluated as to whether it is fair and equitable under 610 CMR 2.0 standards.

Suggestions:

- Review with legal counsel the institution’s policies and practices regarding the protection of student privacy, including provisions for notification of parents, guardians, and homes/sending institutions.
- Publish the “Student Right to Know” document on its web site, including campus crime statistics as required by the Jeanne Clery Act if required to comply with US federal laws, rules and regulations.
- Develop a net price calculator and make it available to prospective students to assist them in estimating the actual cost of attendance at AUG in comparison with other institutions. US federal regulations require colleges to make a net price calculator available. The requirement for such should be reviewed with legal counsel. However, AUG should consider adding such a calculator to its web site even if it is determined not to be required.

STANDARD EIGHT: PHYSICAL RESOURCES

Recommendations:

- Give careful consideration, including legal review, to determine which, if any, Massachusetts building, fire/life safety, accessibility and other laws, codes, rules and regulations apply to ACG’s operation under the proposed authority to be granted to AUG.
- Arrange an in-person site visit to ACG when possible, to better evaluate the facilities in the context of applicable laws, codes and regulations.
- Consider how to incorporate technology to support students with disabilities enrolled in online courses. The provision of support services to such students should be addressed under the Student Services standard (see Recommendation in that standard).
- Analyze the space available at ACG in accordance with functional space classifications. Such data should be used to monitor classroom utilization to evaluate the degree of compliance with the classroom requirement of this standard.
- Evaluate the Pierce and planned Spata facilities for the impact of the cost of their operation and maintenance on the AUG budget.

Suggestions:

- Address safety issues in the science labs and visual art studios to an appropriate extent, regardless of code applicability.

- Provide technology, such as individual student computer workstations in the library, in adequate numbers relative to enrollment and student demand.
- Improve accessibility provisions regardless of the determination of the applicability of the ADA. These should consider not only mobility impairments, but vision and hearing as well.

STANDARD NINE: LIBRARY AND INFORMATION RESOURCES

Recommendation:

- Assure that the library and information resources have the capacity to sustain service levels in light of the institution's plans for growth, especially the added areas of General Education and to support proposed online programs curriculum, and update the budget accordingly. Respond to the Department with this information within 60 days of receipt of this report.

STANDARDS TEN THROUGH TWELVE: DISCRIMINATION; OTHER LAWS, RULES AND REGULATIONS; AND ACCREDITATION

Recommendation:

Review the existing anti-discrimination and other policies for compliance with current Massachusetts state law and regulations. Revise policies as needed and resubmit to the Department for a final determination.