



COMMONWEALTH UNIVERSITY OF PENNSYLVANIA

Procedure for Third-Party Providers

Procedure Number 2-04

Commonwealth University of Pennsylvania

Approved by University Senate, 4/10/2025

Issued by President Bashar W. Hanna as Policy 2-04 on 4/21/2025

Responsible Office: Office of Institutional Effectiveness

Approved: Interim Procedure by Executive Committee November 7, 2024

1. Procedure Purpose

This procedure provides steps for implementing Commonwealth University's (CU's) Third-Party Provider Policy to assure the quality, integrity, and transparency of all activities conducted in its name, including services and programs delivered by third-party providers, as that term is defined by MSCHE. CU is responsible for the management, assessment, oversight, and support of third-party providers that deliver programs and services on its behalf. Moreover, it ensures compliance with accrediting standards and federal regulations in written arrangements and contracts with third-party providers.

2. Types of Arrangements Covered

- 2.1 The types of third-party provider arrangements covered include but are not limited to the following as stated in the MSCHE Third-Party Providers Procedures (pp.1-2):
 - 2.1.1 The delivery of student learning opportunities such as non-credit, workforce development, internships, clinical experiences, student teaching, and/or credit-bearing educational programs, as those terms are defined by MSCHE (Standard III and IV);
 - 2.1.2 Student support services such as advising, counseling, tutoring, international student management (such as English as a Second Language (ESL) support), marketing, recruitment, advertising, campus safety, food or dining services (Standard IV);
 - 2.1.3 Services for the assessment of student learning (Standard V); and
 - 2.1.4 Operational or business functions of the institution such as procurement, information technology, or human resources (Standard VI).

3. Procedure for Maintaining an Inventory

- 3.1 CU will designate Points of Contact (PoCs) for the third-party provider arrangements (e.g., written arrangements, contracts, articulation and transfer agreements, bundled services, online program managers, outsourcing, etc., as those terms are defined by MSCHE) who will:
 - 3.1.1 Maintain a complete list in a central repository with at minimum the following information for all third-party provider arrangements:
 - 3.1.1.1 Name of the third-party provider
 - 3.1.1.2 Name of educational program(s) and percent of program(s)/services/business functions provided
 - 3.1.1.3 Description of programs and/or services provided
 - 3.1.1.4 Arrangement start and end dates
 - 3.1.1.5 Means of assessment
 - 3.1.1.6 Required public disclosures
 - 3.1.2 Maintain a complete list in a central repository with at minimum the following information for all third-party provider arrangements:
 - 3.1.2.1 Name of the third-party provider
 - 3.1.2.2 Name of educational program(s) and percent of program(s)/services/business functions provided
 - 3.1.2.3 Description of programs and/or services provided
 - 3.1.2.4 Arrangement start and end dates
 - 3.1.2.5 Means of assessment
 - 3.1.2.6 Required public disclosures
- 3.2 PoCs will maintain copies of the fully executed arrangements in a central repository and provide copies in accordance with requests to comply with institutional and disciplinary accreditation requirements, which includes providing contracts in English.
- 3.3 The Office of Institutional Effectiveness will review the inventory at least once a year to ensure that it is maintained in accordance with policy and procedures.

4. Procedure for Developing and Seeking Approval of Third-Party Arrangements

- 4.1 All third-party arrangements (e.g., written arrangements, contracts, and articulation and transfer agreements) must include the following information in compliance with the *MSCHE Third-Party Providers Procedures*:
 - 4.1.1 Description of the services provided by the member institution;
 - 4.1.2 Description of the services provided by the third-party provider, including how such services will be delivered;
 - 4.1.3 Period of agreement;
 - 4.1.4 Institution that will award credit and degree(s), if applicable;
 - 4.1.5 Compensation for services by each party, including faculty;
 - 4.1.6 Terms of evaluation and conditions under which the contract may be terminated and/or renewed;
 - 4.1.7 Protections for students if the contract is terminated or amended, if applicable;
 - 4.1.8 Protections for the secure maintenance of student records, if applicable;
 - 4.1.9 Procedures for addressing grievances; and
 - 4.1.10 Venue(s) for addressing perceived breach of contract, including appropriate legal jurisdictions.
- 4.2 Per *MSCHE Third-Party Providers Procedures*, CU must maintain systematic capacity to oversee and retain oversight of the following program areas but not limited to:
 - 4.2.1 Teaching and instruction;
 - 4.2.2 Marketing, advertising, and recruitment materials;
 - 4.2.3 Admissions criteria;
 - 4.2.4 Tuition and fees;
 - 4.2.5 Enrolled student records, including measures for privacy and security of such records;
 - 4.2.6 Faculty qualifications and appointment;
 - 4.2.7 Curriculum planning and development;
 - 4.2.8 Course/program content and rigor, including any intellectual property;
 - 4.2.9 Outcomes assessment for student learning;
 - 4.2.10 Academic advising, counseling, tutoring, and support services;
 - 4.2.11 Awarding of course credit, degrees, or credentials;
 - 4.2.12 Transcripts

- 4.3 CU will meet internal and external approval requirements for third-party arrangements including but not limited to those set forth by the State System, government, MSCHE, or other legal entities. MSCHE requires prior approval in accordance with the *Substantive Change Policy, Procedures, and Guidelines* for all domestic and international arrangements where the third-party provider or non-accredited entity delivers 25 percent or more of an educational program. Prior approvals are required for written arrangements wherein less than 25 percent of a credit bearing educational program is provided by a third-party provider.

5. Procedure for Review and Evaluation

- 5.1 PoCs, divisional vice presidents, and other responsible personnel will establish a means to assess or evaluate the third-party arrangements and ensure that information is included on the inventory, develop and implement appropriate assessment instruments (e.g., surveys, student feedback, rubrics, on-time completion of work, etc.); review assessment results; and take appropriate action. These steps should be documented and the information available upon request.
- 5.2 The Office of Institutional Effectiveness serves as a resource to assist with the assessment process and will review the inventory at least annually to ensure all steps are completed.

6. Procedure for Public Disclosures

- 6.1 CU will ensure the accuracy of information and comply with required public disclosures of information as stipulated in the *MSCHE Third Party Provider Procedures*:
- 6.1.1 The institution must maintain oversight of marketing, advertising, and recruitment.
- 6.1.2 Disclosures must be in clear, concise, student-focused language.
- 6.1.3 The role and titles of staff from third-party providers must be accurately represented.
- 6.1.4 Written arrangements or contracts that outsource marketing, recruitment, and advertising to third-party providers will receive intense scrutiny to ensure the institution maintains control of how the program or service is represented.
- 6.1.5 If there is the appearance of misrepresentation or mischaracterization of the relationship with the third-party provider, the role of the third-party provider and/or any services that they may provide, the Commission may take any action available to it in accordance with Accreditation Actions Policy and Procedures.
- 6.2 Public disclosures will include the following information, at a minimum:
- 6.2.1 A description of the written arrangement, in clear, concise, student-focused language;
- 6.2.2 Information related to the portion of the educational program that the other entity will provide;
- 6.2.3 Method of delivery for the portion of the program that the institution does not provide;

- 6.2.4 Estimated additional costs that students may incur as a result of enrolling in a program offered through the written arrangement.

7. Related Information

7.1. Related Policies:

- 7.1.1. MSCHE Third-Party Providers Policy
- 7.1.2. MSCHE Substantive Change Policy
- 7.1.3. [BOG Policy 1998-04-A Procurement of Goods, Services, Supplies, and Construction](#)
- 7.1.4. [BOG Policy 2010-01-A Expenditures of Public Funds](#)

7.2. Related Procedures:

- 7.2.1. MSCHE Third-Party Providers Procedures
- 7.2.2. MSCHE Substantive Change Procedures
- 7.2.3. MSCHE Substantive Change Guidelines
- 7.2.4. [PASSHE Procedure/Standard Number 2020-48 Shared Services](#)
- 7.2.5. [PASSHE Procedure/Standard Number 2011-07 Expenditures of Public Funds Guidelines, Standards, and Limits](#)

7.3. Related Forms:

- 7.3.1. CU Third-Party Provider Inventory Template

8. Responsible Office and Contact

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- 8.1. **Responsible Office:** Office of Institutional Effectiveness
- 8.2. **Procedure Approved by:** Vice President for Administration
- 8.3. **Contact Information:** Associate Vice President for Institutional Effectiveness
- 8.4. **Email:** cmyers@commonwealthu.edu
- 8.5. **Telephone:** 570.484.2274

9. Procedure History

- 9.1. **Procedure History:** Issued as a new procedure on November 7, 2024
- 9.2. **Procedure Update/Review Summary:** "N/A"