

TITLE: Third-Party Provider Procedure

Initial Action: 4/3/2026
Board Resolution: N/A
Last Revised:
 Policy: N/A
 Procedure: 11/1/2025
Last Reviewed: 11/1/2025
Effective: 11/1/2025
Next Review: 11/1/2028
Policy Owner: Academic Affairs Division

PROCEDURE:

Third-party providers are organizations/businesses with which the College has a written arrangement and/or contract to provide ongoing services to the College or its students. The College is dedicated to ensuring the quality, integrity, and transparency of all activities conducted in its name including services and programs delivered by those third-party providers. The College shall maintain control and ownership over all activities conducted by third-party providers and shall ensure that all third-party arrangements align with the College's mission, values, and standards and must comply with applicable laws, federal and state regulations, and accreditation standards. According to the Middle States Commission on Higher Education (MSCHE) Third-Party Providers Procedures, TPPs may include but are not limited to the following types of services:

- The delivery of student learning opportunities such as non-credit workforce development training, internships, clinical experiences, and/or credit bearing educational programs.
- Student support services such as counseling, tutoring, food or dining services.
- Operational or business functions of the institution. All relationships with third-party providers must be formalized through written agreements or contracts.

Definitions:**A. Arrangements with Third-Party Providers include:**

1. Articulation Agreements
2. Written Arrangements or agreements
3. Contracts

Such arrangements are engaged by the College as a whole, and not by individual faculty or staff members.

Agreements must clearly define the terms of the arrangement, including roles, responsibilities, and performance expectations where appropriate. The College will disclose information about third-party provider relationships as required by accrediting bodies and regulatory agencies.

B. **Articulation Agreement:** An agreement between or among the College and another institution of higher education that specifies the acceptability of courses in transfer toward meeting specific degree or program requirements.

C. **Contracts:** Agreements between the College and Third-Party Providers, but for purposes of this Procedure, do not include contracts that are solely for goods, books, supplies, products, equipment, or software programs.

D. **Third-Party Providers:** An entity, institution or organization that has a Contract or Written Arrangement to provide services to the College. A Third-Party Provider is considered ineligible if it is not accredited by a United States Department of Education (USDE) recognized accreditor and is not certified to participate in Title IV programs.

E. **Transfer Agreement:** An agreement typically between the College and an institution of higher education within the same service area that specifies the conditions under which students at the College may transfer to the other higher education institution.

F. **Written Arrangement:** A Written Arrangement means an arrangement in which the College outsources some portion of one or more of its educational programs or educational business operations to a Third-Party Provider that is not accredited. These include, but are not limited to arrangements concerning:

- The delivery of student learning opportunities such as non-credit, workforce development, internships, clinical experiences, student teaching, and/or credit-bearing educational programs;
- 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, and food or dining services;
- Services for the assessment of student learning; and
- Operational or business functions of the institution such as procurement, information technology, or human resources.

Guidelines:

Review and approval of Arrangements with Third-Party Providers.

1. Review of Arrangements with Third-Party Providers will be conducted by appropriately credentialed employees of the College, in accordance with the any institutional policies or procedures relating to agreement, articulation, or contract review and approval.

2. Each Division will maintain and be responsible for a list of the Third-Party Providers in use; a schedule related to assessment/review; and results of the assessment/review.

3. The College will ascertain and obtain all internal and external approval requirements for Arrangements with Third-Party Providers that are required, including but not limited to approvals from the appropriate governing body, state or system administration, government, accrediting agencies, or other legal entities.

4. The content of the Written Arrangement, Contract, Articulation Agreement, and Transfer Agreement between the institution and the Third-Party Provider will address the following, at a minimum:

- Description of the services provided by the College;
- Description of the services provided by the Third-Party Provider, including how such services will be delivered;
- Period of the agreement;
- Institution that will award credit and degree(s), if applicable;
- Compensation for services by each party, including compensation of faculty, if any;
- Terms of evaluation and conditions under which the Arrangement may be terminated and/or renewed;
- Protections for students if Arrangement is terminated or amended, if applicable;
- Protections for the secure maintenance of student records, if applicable;
- Procedures for addressing grievances relating to such Arrangements; and
- Venue(s) for addressing perceived breach of contract, including appropriate legal jurisdiction.

B. Disclosures of Written Arrangements with Third-Party Providers

The College will provide disclosures regarding Written Arrangements as required by MSCHE when a portion of an educational program is delivered by a Third-Party Provider, via website and program publication, including the following information, at a minimum:

1. A description of the Written Arrangement, in clear, concise, student-focused language;
2. Information related to the portion of the educational program that the other entity will provide;
3. Method of delivery for the portion of the program that the College does not provide; and
4. Estimated additional costs that students may incur as a result of enrolling in a program offered through the Written Arrangement.

C. Assessments of Third-Party Providers

The College will regularly assess and evaluate Third-Party Providers and the implementation of any student learning opportunities, student support services, and/or assessment services designed, delivered, or assessed by Third-Party Providers. Assessment and evaluation of Third-Party Providers will be conducted by appropriately credentialed representatives from the College, under the direction of the appropriate Vice-President. Please reference *MSCHE Third-Party Providers Policy and Procedure and the Verification of Compliance with Applicable Regulatory Requirements Checklist, #7 regarding Written Arrangements & Third-Party Providers for Policy* regarding specifics required for compliance.