

CHANGE PANEL PROTOCOL FOR PEER REVIEWERS

Role and Operation of the Change Panel

A change panel typically consists of three peer reviewers drawn from designated standing panels for specific types of institutional changes. Change reviewers on these standing panels are selected for their expertise related to the nature of the change and those trained in conducting change reviews. The role of the change panel is to review and recommend approval or denial of substantive changes requested by institutions. This protocol and the Change Panel Report guide the change panel to ensure consistency across panels and with HLC's policies.

Of the three individuals on a panel, one individual is named as the panel chair with the further task of completing and submitting a Change Panel Report to HLC. Typically, a single panel receives three applications at a time and is given four weeks to complete its work on the applications. If the panel needs more time, the panel chair may request an extension explaining the reason for the extra time.

Operationally, the panel chair schedules a conference call with the panel members for a discussion of the applications. The panel will either make a recommendation for an application or will decide that some focused information is necessary before a recommendation can be made. In the latter event, the panel chair requests the information from the applying institution, disseminates it to the other panel members, and sets a time and method for reaching a recommendation. In the event that the panel chair requests further information from the institution, he or she should set a deadline for the institution to send that information allowing enough time for the panel to complete the review on time. If the contact person identified on the form does not respond to the chair, the panel chair should contact HLC for additional contact information. When a recommendation is reached, the chair completes the Change Panel Report, answering all applicable questions. The panel chair must ensure that all parts of the panel report are completed as appropriate before submitting the report, along with a copy of the additional information received from the institution, to HLC.

Options for Recommendations

A change panel must choose from among the following four options for recommendation:

1. Approve Request
2. Approve Modified Request
3. Deny Request
4. None of the above, with a call for change visit

These options are chosen with the following understandings:

1. A recommendation for approval with modification means that the panel recommends an approval different from that sought by the institution. For example, if an institution has proposed three new programs and the panel judges that only one of them meets HLC's requirements, a recommendation for approval of that single program represents a recommendation of approval with modification. Note: Some substantive change requests, such as those for distance and correspondence education, have limited options for modification due to the nature of the approval.
2. If approval or approval with modification is chosen, then the panel must be sure that issues documented on the Change Panel Report are sufficiently settled to justify that recommendation. If there are still significant matters not settled (even after further information provided by the institution has been reviewed by the panel), then neither form of approval should be chosen and the change should be denied. In rare cases where evidence on a key issue is found to require review on site, the panel may call for a change visit.

Monitoring

While a change panel can recommend that monitoring (a monitoring report or a focused visit) be attached to a recommendation for approval or for approval with modification, it should occur rarely. Recommended monitoring demonstrates a lack of confidence in the institution's capacity for or commitment to proper implementation of the proposed change. If there is such a lack of confidence, especially if the panel thinks the recommendation should entail a monitoring report or a focused visit, then the change should be denied.

On rare occasion, monitoring may be directed at developments that cannot be known until later. For example, a reasonably sound but inexperienced institution proposes a large new location based on projections of rapid population growth in the area of the new location. If the panel is uncertain about this projection but believes the institution can successfully open the location and operate it for two years, the panel may choose to recommend a monitoring report looking at operations and enrollment.

In other circumstances, an institution may not be able to deliver on an aspect of the application until after the request has been approved. For instance, if the institution needs to hire faculty to execute a proposed program, the institution may not want (and cannot be expected) to hire someone until the program request is approved. In such cases, requiring the institution to follow-up with HLC confirming the hire of said individual(s) would be appropriate.

Under no circumstances may a change panel recommend approval or approval with modification while pointing out issues that must be resolved before the change can go forward.

Cautions about Change Panel Reports

1. Make sure the panel report is filled out adequately. The most frequent omissions occur with the "X" indicator in the rating columns and with narrative responses that are too short in "Evidence" for Items 6a-e of Part A.

Narrative responses are effective when they are evidence-based and evaluative, when they substantiate the panel's conclusions and recommendations, and when they are directly related to the elements being evaluated.

Also, complete Part A, Questions 4 and 5 only if the change request is about contractual/consortial arrangements or competency-based education, respectively. Otherwise, check "not applicable" and move to subsequent questions.

2. Make sure the recommendations are consistent with the evidence. Panels should not recommend full approval on items that are deficient or not sufficiently settled. Panels should not be afraid to say no.
3. Make sure the panel reviews relevant outstanding monitoring, if any, on the Institutional Status and Requirements (ISR) report and comments from the staff liaison on the Change Routing and Review Form (CRRF).

4. Make sure to review documentation of required approvals. The panel should not accept an institution's claim that it has them or that it does not need them. It is not sufficient that approval has been requested. If questions arise about this matter, the panel chair should contact the change staff at HLC.
5. The panel fails to get clarification of a limited character and instead recommends approval contingent on HLC getting the clarification.
6. Make sure to ask for evidence that the panel determines is missing. Do not assume that it doesn't exist. Get confirmation.
7. If the panel believes it cannot reach a judgment without extensive additional information, it should recommend denial or call for a change visit. It should not ask for extensive additional information.
8. When a request has multiple facets and not all of them merit approval, make sure the panel recommends approval with modification limiting the request to only what merits approval. (Do not recommend full approval with monitoring or deny change request when one facet is acceptable.)
9. Make sure when recommending monitoring to allow the institution time to respond effectively. Do not recommend follow-up that is to be completed in close proximity to the time of panel review.
10. Make sure the team writes stipulations or recommendations that are consistent with HLC policy. For example, for requests involving distance delivery, the team should not recommend approval with a limitation conflicting with HLC's distance delivery levels. Such limitations are permitted only in relation to the new degree levels or in response to outstanding monitoring.

Other Things to Know

1. Reviewers should save the Office365 username and password because they will be using it for every round of review.
2. All additional information received from the institution must be submitted along with the Change Panel Report. Submit the report in Word and the additional information in a single PDF document.
3. A panel usually reviews three requests, but occasionally that number will vary.
4. Honorarium is only paid after the Change Panel Report has been processed. Checks are usually sent the following Wednesday. If a reviewer does not receive the check within two weeks after the panel report has been submitted, he or she should contact HLC.
5. After the panel has completed its work, reviewers should retain the materials for a few months but then discard all materials thereafter.

Process following Submission of the Panel Report

Following submission of the panel report, HLC staff checks the report for clarity, completeness, and consistency with HLC's policies. In the event of any questions or concerns, the panel chair will be contacted for resolution by the panel and resubmission. Once the panel report clears staff review, the institution is notified and invited to submit an institutional response. HLC then submits the panel report, the original change application, any supporting materials, and the institutional response to the Institutional Actions Council (IAC) for review and action.

The IAC may uphold or change the recommendation of the panel. If the panel recommends denial of a request and that recommendation is upheld by the IAC, the institution must wait at least six months to submit a new application. The six-month waiting period normally begins with the institution's receipt of the panel recommendation (if the institution does not contest the recommendation in its response) or with the IAC decision (if the institution contests the recommendation in its response). However, in some cases, the IAC may uphold the panel's recommendation of denial but waive the six-month waiting period before re-application. In other circumstances, the IAC may decide to have the original application reviewed a second

time by a different panel if the institution has provided information that significantly alters the nature or context of the case.

Questions?

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