



EXECUTIVE SUMMARY OF INITIAL FINDINGS

2017 REVIEW OF HLC'S CRITERIA FOR ACCREDITATION

INTRODUCTION

The Higher Learning Commission (HLC) is required by federal regulations and its own policies to initiate a substantive review of its Criteria for Accreditation every five years. Since the Criteria went into effect in January 2013, the HLC Board of Trustees has acted to incorporate minor revisions and clarifications on an annual basis as needed. In February 2017, the Board directed staff to initiate a formal review of the Criteria. Staff conducted an internal analysis, held listening sessions at the 2017 HLC Annual Conference, conducted an evaluation of the Pathways for Reaffirmation of Accreditation model, analyzed the rigor of team reports, analyzed trends across interim reporting, and administered a survey to institutions and Peer Corps members during summer 2017. This document is a high-level summary of those findings and is intended to serve as a touchstone for Board discussion, which will guide staff in their development of an alpha version of a Criteria revision for review by the Board at its February 2018 meeting.

FINDINGS

The initial findings of efforts to evaluate the HLC's Criteria for Accreditation are largely positive. The project remains on schedule and the recent survey of institutions and peer reviewers enjoyed a 24 percent individual response rate and 60 percent member institutions response rate. An overwhelming majority (80 percent) of respondents indicated that no Core Components needed any further elaboration, and 91 percent indicated that the Criteria are sufficiently rigorous to ensure quality. A summary of additional quantitative survey data is provided on page 5.

Regarding the analysis of qualitative comments from survey respondents, although most indicated satisfaction with the Criteria and Core Components as they currently are structured, several themes for improvement emerged and are consistent with comments from the conference listening session and other staff discussions and analyses. These areas for improvement and associated recommendations fell into four main categories:

> Institutions and peer reviewers need more guidance on supporting documentation.

Recommendation

Create a list or guide of commonly used evidence, include language on how institutions can “prove the negative” in situations where evidence only exists if there are problems in a certain area.

> Certain words are vague and can mean different things to different people.

Recommendation

Better define words and phrases such as diversity, broadly understood, control, understands, sufficient autonomy, appropriate to higher education, cocurricular, and good practice.

> Some redundancies exist among Core Components and should be addressed.

Recommendation

Combine or differentiate overlaps such as:

- **1.A.:** The Institution's mission is broadly understood within the institution and guides its operations.
and 5.C.1.: The institution allocates its resources in alignment with its mission and priorities.

- **1.A.:** The institution's mission is broadly understood within the institution and guides its operations.
and 1.B.: The mission is articulated publicly.
- **1.B.:** The mission is articulated publicly.
and Assumed Practice A.5.a.: The institution makes readily available to students and to the general public clear and complete information including statements of mission, vision and values.
- **1.C.:** The institution understands the relationship between its mission and the diversity of society.
and 3.B.1.: The general education program is appropriate to the mission, educational offerings, and degree levels of the institution.
and 3.B.4.: The education offered by the institution recognized the human and cultural diversity of the world in which students live and work.
- **2.C.:** The governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity.
and 5.B.: The institution's governance and administrative structures promote effective leadership and support collaborative processes that enable the institution to fulfill its mission.
- **3.C.:** The institution has the faculty and staff needed for effective, high-quality programs and student services.
and 5.A.: The institution's resource base supports its current educational programs and its plans for maintaining and strengthening their quality in the future.
- **4.A.:** The institution demonstrates responsibility for the quality of its educational programs.
and 4B: The institution demonstrates a commitment to educational achievement and improvement through ongoing assessment of student learning.
- **5.C.:** The institution engages in systematic and integrated planning.
and 5.D.: The institution works systematically to improve its performance.

- **5D:** The institution works systematically to improve its performance.
and 5.A., 5.B. and 5.C: Core Component 5.D. seems redundant with the rest of Criterion 5's Core Components. It should be clearer that this Core Component addresses the assessment of everything outside of academic affairs (which is already covered elsewhere).

➤ **Some specific issues need clarification or elaboration.**

Recommendation

Better articulate or rethink expectations of:

- **3.B.:** The institution demonstrates that the exercise of intellectual inquiry and the acquisition, application, and integration of broad learning and skills are integral to its educational programs.
- **3.E.:** The institution fulfills the claims it makes for an enriched educational environment.
- **4.A.:** The institution demonstrates responsibility for the quality of its educational programs.

Better explain the link between HLC's use of the Composite Financial Index (CFI) and Core Component **5.A.:** *The institution's resource base supports its current education programs and its plans for maintaining and strengthening their quality in the future.*

TOPICS OF SPECIAL NOTE

Observations on Differential/Risk-Based Accreditation

Based on mixed survey responses to these topics, HLC staff recommend that better definitions for differential and risk-based accreditation be created so that they are consistently understood across accreditation agencies, SHEEOs, the U.S. Department of Education, institutions, and other stakeholders. One possibility is that the Council of Regional Accreditation Commissions (C-RAC) facilitate the creation of consistent definitions.

Observations on Consumer Protection

The Criteria survey included a question to participants about consumer protection and whether it should be included in the Criteria. There was a small percentage of respondents who argued it should not be included in the Criteria.

In a separate action at its fall 2017 meeting, the Board will consider adopting on second reading a new policy (not changes to the Criteria or Assumed Practices) regarding consumer protection of students in recruitment and admissions. HLC received 14 comments during the policy comment period. The majority of the comments were cautiously supportive of the policy, while suggesting some questions or amendments. Two comments argued that the policies were duplicative or unnecessary.

UPDATED CRITERIA REVIEW SCHEDULE

ACTIVITY	WHEN
A Initial HLC staff analysis of Criteria and Core Components	Fall 2016
B Board approval to initiate formal review	February 2017
C Annual conference listening session	April 2017
D Survey of institutions and Peer Corps	Summer 2017
E Analysis of various evaluations, comments, and survey data	September 2016
F Board discussion of preliminary findings	November 2017
G Staff draft alpha version of Criteria revisions	December 2017
H Board review of alpha version of Criteria revisions	February 2018
I Release alpha version to membership and Peer Corps; collect feedback electronically and at annual conference	Spring 2018
J Analysis of alpha version comments and surveys	Summer 2018
K Staff integrate analysis of alpha version into beta version for the Board	September 2018
L Board first reading of beta version	November 2018
M Official 60-day comment period for membership	November through December 2018
N Review membership comments for beta version; create final draft	January 2019
O Second Board reading, approval and release of final version	February 2019
P Begin institutional and Peer Corps training on Criteria updates at annual conference and throughout summer	April 2019
Q Effective date for implementation of updated Criteria	Fall 2019 <i>if minor revision</i> Fall 2020 <i>if substantial revision</i>

APPENDIX

THEMES FROM STAFF CONVERSATIONS AND ANNUAL CONFERENCE LISTENING SESSION

In fall 2016, HLC staff members participated in 2 two-hour discussions to identify problematic areas with the current Criteria for Accreditation. In addition, at the 2017 HLC Annual Conference, staff facilitated a listening session in which approximately 50 individuals from member institutions participated, including some who also serve as peer reviewers. Approximately 20 substantive comments were made, many with short ensuing conversations to elaborate the concept. Most substantive comments from staff and conference participants echoed themes from the survey.

Comments from staff conversations emphasized:

- Questioning whether some Core Components are more “core” than others.
- Questioning whether we should revisit which items remain in the Criteria, which remain in Assumed Practices, and which might shift places.
- Discussing the value of differentiated accreditation.
- Identifying multiple words and phrases that need clearer, more precise definition (sound understanding, capacity, sufficiently autonomous, guides the institution’s operations, should be clear) and answering questions such as how an institution addresses its role in society, and how “regular” regular program review should be.
- Combining similar Core Components or making more clear distinctions between them.
- Permitting (or not) institutions to exempt themselves from HLC expectations based on religious or philosophical beliefs.
- Providing specificity so that evaluation team members are not tempted to rely on their own experience for the “right” way to do things such as assessment.

Comments from the annual conference listening session emphasized:

- The need to identify and reduce redundancy; streamline overlapping Core Components.
- The need to be more specific (use measurable verbs, define words such as “quality”).
- The need to broaden HLC’s conceptualization of assessment to be more inclusive of persistence and completion.

QUANTITATIVE RESULTS OF SURVEY OF INSTITUTIONS AND PEER CORPS MEMBERS

1 Survey Participants:

- N = 774 / 3,270 (24% Response Rate)
- Approximately 600 unique institutions represented (60% of HLC membership)
- 47% Accreditation Liaison Officers (ALOs)
- 12% Presidents
- 41% Peer Reviewers

2 Participants’ Pathway Representation:

- 18% AQIP
- 50% Open
- 29% Standard
- 4% N/A

3 Are there any Core Components that you believe need clarification?

- 20% Yes
- 80% No

Of the yes, the top six Core Components identified were:

- **3.E.:** The institution fulfills the claims it makes for an enriched educational environment.
- **4.A.:** The institution demonstrates responsibility for the quality of its educational programs.
- **3.C.:** The institution has the faculty and staff needed for effective, high-quality programs and student services.

- **1.C.:** The institution understands the relationship between its mission and the diversity of society.
- **4.C.:** The institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs.
- **3.B.:** The institution demonstrates that the exercise of intellectual inquiry and the acquisition, application, and integration of broad learning and skills are integral to its educational programs.

These six were mentioned by 2–5% of all respondents.

4 Do you believe there is unnecessary redundancy across the Core Components that should be addressed?

- 26% Yes
- 74% No

5 Should Core Components be weighted differently in the evaluation of institutions?

- 26% Yes
- 74% No

6 Rate your understanding of the difference between the Criteria and Assumed Practices.

- 89% Very Good or Good
- 9% Fair
- 2% Poor or Very Poor

7 Do you consider the Criteria to be sufficiently rigorous to ensure quality?

- 91% Yes
- 9% No

8 Should consumer protection expectations be incorporated into the Criteria for Accreditation?

- 33% Yes
- 67% No

9 To what extent has your institution improved as a result of HLC's accreditation processes?

- 41% It has improved a great deal
- 48% It has somewhat improved
- 8% It has improved a little
- 2% It has not improved at all

10 Should HLC adopt a differential accreditation model? Under such a model, reviews of member institutions would be differentiated based on certain institutional characteristics, such as mission, market sector (public, private not-for-profit, private for-profit) or Carnegie classifications.

- 44% Yes
- 56% No

11 Should HLC adopt a risk-based accreditation model? Under such a model, reviews of member institutions would be differentiated based on validation of various quality characteristics such as graduation rates, cost per credit, or other public markers.

- 25% Yes
- 75% No

