

May 9, 2024

SUBMITTED VIA THE FEDERAL eRULEMAKING PORTAL

James Kvaal
Under Secretary
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Mr. Kvaal:

On behalf of the Higher Learning Commission (HLC), I would like to share our response to the U.S. Department of Education's Request for Information Regarding Developing a Postsecondary Student Success Award Program for Institutions of Higher Education dated April 25, 2024.

We strive to be a thought leader in higher education during these dynamic times, so HLC appreciates the goals of this project. HLC has been working for more than 10 years to understand and identify the combination of factors at an institution that lead to student success as evidenced by our numerous [white papers](#) on the topic. All our efforts have made one thing clear: to ensure the quality of educational offerings, it is imperative for an institution to know its students – their intent for their educational pursuits when they enter, performance while enrolled, and experiences after ending their studies. Accreditors seek to work across the Triad and with our institutions to support the success of students and to assure all stakeholders of the value of quality higher education.

I hope the following comments help to provide some of the insight you seek.

Strategic Planning

[Outcomes](#) are directly woven into HLC's 2025 Strategic Plan EVOLVE, which stands for Equity, Vision, Outcomes, Leadership, Value, and Engagement. To that end, HLC has undertaken the following initiative.

Student Success Project

HLC has launched a multi-phase benchmarking project to improve its ability to track student success outcomes at its member institutions. The goals of this project are to:

- Identify concerns that require institutional attention or HLC follow-up.
- Identify opportunities for HLC to support institutions.
- Increase transparency with students and other stakeholders.

In [Phase 1](#) of this project, HLC will analyze institutional performance related to three student success measures: first-year retention rate, graduation rate within 150% of normal time, and completion and transfer rate at eight years after entry to college. This year, HLC will fine-tune its benchmarks by engaging directly with the institutions that presently fall below them, deepen its understanding of institutions that struggle with student success, and assure the advancement of quality improvement strategies among these institutions.

In Phase 2 of this project, HLC will move beyond educational outcomes to analyses of post-college labor market and economic outcomes. These measures may include post-graduation employment rates, median earnings, federal loan repayment, and median total debt after graduation. In this second phase, HLC will strive to address the growing calls for accountability that have called into question the value of college, while still supporting its member institutions, their differing missions, and their widely varying student populations. As stated, the aim of this two-part project is to support institutional success, while assuring performance, accountability, and greater transparency for students and the wider public.

Additional efforts and initiatives include the following.

Student Success Academy

All HLC member institutions are invited to participate in the [Student Success Academy](#). Founded in 2018, the Academy is a multi-year institutional improvement program that aims to move institutions away from reactive, initiative-based solutions to performance gaps toward developing data-informed strategies for addressing systemic barriers to student success. Through critical introspection, institutions learn more about the student populations they serve; the efficacy of the initiatives and mechanisms in place to support their success; the effects of the institution's policies and procedures on the student experience and equity; and the level of engagement and leadership needed to improve outcomes.

Revisions to the HLC Criteria for Accreditation

HLC reviewed its [Criteria for Accreditation](#) to determine needed improvements with a focus on quality assurance through a student-centered lens. This resulted in the [proposed changes](#) that were approved on first reading by HLC's Board of Trustees. HLC added a new "Institutional Mission" section expanding upon HLC's longstanding concept that an institution is expected to demonstrate how it meets the Criteria through a mission-reflective lens that defines the students served. Additionally, two Criterion on Teaching and Learning were consolidated into a single Criterion titled "Teaching and Learning for Student Success." This change provides a more coherent framework for institutions to holistically demonstrate improvement in their student outcomes.

Credential Lab

HLC continues to be a partner to propel our institutions through a variety of innovative value-adds including a recently launched quality assurance project to bring clarity to the proliferation of credentials called the [Credential Lab](#). An innovation hub, the Credential Lab supports learners, employers, and institutions in navigating the complex and growing ecosystem of

alternative postsecondary credentials and the emerging marketplace of non-traditional providers. The Credential Lab demonstrates HLC's commitment to assuring quality across these new forms of credentialing options and guiding participating colleges and universities through processes for responsible innovation.

As stated in your request for information, higher education results in a more productive citizenry and economy. HLC endeavors to work with you and the other members of the Triad to devise, design, implement, assess, and spotlight great practices that help students flourish.

Should you have any questions or desire to discuss, please contact me at president@hlcommission.org.

Sincerely,

A handwritten signature in black ink that reads "Barbara Gellman-Danley". The signature is written in a cursive style with a large initial 'B'.

Barbara Gellman-Danley
President