



# EVALUATIONS OF THE CRITERIA FOR ACCREDITATION DURING THE COVID-19 PANDEMIC

## Information for Institutions and Peer Reviewers for Evaluations Beginning September 2020

Given the impact that the COVID-19 pandemic crisis is having on member institutions, HLC has developed a resource to assist institutions affected by this crisis and peer review teams evaluating them. Team chairs should also continue to rely on the HLC staff liaison for the institution for guidance and support during the review process.

### INSTITUTIONAL COVID-19 RESPONSE

Each institution should prepare for an HLC comprehensive evaluation or assurance review as it would under normal circumstances. In addition, for reviews taking place between September 1, 2020, and August 31, 2021, the institution is asked to prepare a [COVID-19 Response form](#).

This form allows the institution to describe the planning it has undertaken during the pandemic; describe the changes or adjustments it has made to academic and co-curricular programs during this time; describe any enrollment and financial irregularities; write to any other changes in processes, procedures or structures at the institution relevant to HLC's Criteria for Accreditation; and finally describe the institution's plan for the immediate and longer-term future.

Institutions will upload the COVID-19 Response in the forms tab in the Assurance System. Peer reviewers

will review it during the course of their evaluation and the form will become part of the institution's permanent record.

With the institution's COVID-19 Response separate from other institutional documentation, peer reviewers will be able to differentiate between the institution's typical practices and the temporary adjustments necessary during the pandemic.

### PEER REVIEW WHILE INSTI- TUTIONS ARE AFFECTED BY COVID-19

The peer review team will evaluate whether or not an institution has demonstrated that it meets HLC's Criteria for Accreditation and, if not, consider the broader context and impact of the institution's need to respond to the pandemic on its compliance with the Criteria.

As part of this analysis, the team will review if the institution's history indicates an ongoing pattern of related compliance issues within the Criteria for Accreditation, such as financial, operational, teaching and learning, governance, planning, and assessment issues, or whether the institution's present challenges are uncharacteristic and temporary in nature due to the pandemic.

If teams determine that the present challenges represent an extension of an ongoing pattern of related compliance issues, such that the relevant Criteria for Accreditation are indeed either met with concerns or not met, they should proceed with recommending follow-up, as appropriate based on the [evaluative framework associated with the Criteria for Accreditation](#).

If the team determines that the institution is enduring uncharacteristic difficulties, and the institution has substantial plans for sustaining its core functions while addressing such challenges, then so long as the institution is still in compliance with the Criteria for Accreditation, the team may legitimately determine that institutional attention, rather than interim monitoring or a sanction, is likely to be more effective, consistent with current HLC practice (See [Interim Monitoring: Considerations for Peer Review](#)) and as a result the relevant Core Component will be deemed “Met.”

If the institution is enduring uncharacteristic difficulties and has inadequate plans to address the challenges, then the team should discuss its analysis with the institution’s HLC staff liaison to confirm a suitable approach for remediation in accordance with HLC evaluative frameworks and policies.

## **PROVIDE INSTITUTIONAL CONTEXT IN THE TEAM REPORT**

The value of the “Institutional Context” section of a peer review report provides readers and institutional stakeholders with a brief, factual overview, and outlines from a broad perspective the challenges and opportunities that the institution encountered in the interval since the last HLC review took place. For example, teams typically use this space to indicate the history, student body and location of the institution; to note leadership changes; and to state whether the institution’s financial organization is centralized or decentralized. In general, the long arc that characterizes such commentary should be preserved to acknowledge the long duration of “normal operations” that has taken place since the last review.

Owing to the disruption of the COVID-19 pandemic, the “Institutional Context” is also the appropriate place to describe, in general terms, how the institution, its personnel and the campus community is responding to these challenges. A broad overview of this kind will help set the stage for the focused

commentary that follows in the sections reserved for each Core Component.

## **PROVIDE A HELPFUL TONE IN THE TEAM REPORT**

The goal of the team report’s tone on this issue is to engage institutional leaders, staff, and faculty in discussions about how they are facing and addressing various challenges fostered by the pandemic—not to make them defensive or send any message that the reviewers or HLC are unaware of the current situation. Reviewers should emphasize that they are raising questions and issues to understand how and to what degree the institution is prepared to weather uncertain and potentially difficult conditions as a result of the pandemic and maintain their compliance with HLC requirements.

It is reasonable for reviewers to sympathize with the institution because of the risks it faces while simultaneously determining that the institution needs to clarify and strengthen the strategies it is employing now, and in the future, to sustain its programs and operations, students and staff.

Reviewers should refrain from providing advice based on their own experiences, or from giving the impression that they have the answers or that HLC has specific, preferred, or mandated solutions for the myriad of challenges institutions are facing. Reviewers must remain open-minded about institutions’ planning efforts, keeping in mind that these efforts, and the resulting strategies and solutions that institutions adopt, will be based on each institution’s mission, governance structure, resources, and regular planning processes.

## **PROVIDE ANY CONCERNS IN THE TEAM REPORT; BE JUDICIOUS WHEN ASSIGNING MONITORING**

To the extent related to HLC requirements, the team report should identify any concerns regarding both short- and long-term effects of the pandemic on an institution’s ability to sustain its teaching or operational functions. The team report also should distinguish between compliance concerns, and the inability to make a final determination based on limited information (for example, in the context of a virtual review).

Consistent with current HLC guidance, recommendations for monitoring should be for serious matters that warrant not only institutional action, but also HLC oversight before an institution's next regularly scheduled Assurance Review or comprehensive evaluation. Monitoring may not be appropriate or productive in situations where it is clear that (1) the institution is taking reasonable steps to address any concerns identified by the team, including financial, educational, operational, student support, and personnel issues; (2) the institution did not have a significant history of monitoring in the past (as in consecutive cycles of monitoring on the same issue[s], or any issue related to a recent HLC sanction); and (3) consistent with HLC requirements, the institution is planning for the future, both during and beyond the COVID-19 pandemic.

As always, reviewers should consult with the institution's HLC staff liaison if the team has questions about how to deal with institutional issues that it confronts in the course of its evaluation. Reviewers are also strongly encouraged to consult with the institution's HLC staff liaison if the team believes a sanction recommendation is warranted.

## HELPFUL QUESTIONS FOR CONVERSATIONS REGARDING COVID-19

HLC provides these questions as illustrative suggestions for peer reviewers to explore institutional responses to COVID-19. Peer reviewers will employ open-ended questions to prompt discussions with institutional representatives. Following those conversations, the peer reviewers will write the team report to document the institution's regular practices, capture what has changed as a result of the institution's pandemic response and determine the institution's plan for the future. Teams are not required to ask these questions during their evaluation.

### Criterion 1. Mission

- If any programs and/or services have needed to be put on hiatus or completely cut, what evidence can the institution present to demonstrate that attention has been paid to align such decisions with the institution's mission?
- If programs and/or services are to be expanded as a response to the pandemic, what evidence can the institution present to demonstrate that attention

has been paid to align such decisions with the institution's mission?

- How was the institution able to meet its commitment to the public good during the pandemic? What new practices emerged that will be part of the institution's commitment going forward?
- How did the institution promote civic engagement during the pandemic? What new practices emerged that will be part of the institution's practices going forward?
- Given the greater exposure of the existing educational inequities during the pandemic, how has the institution altered its recruitment, enrollment and support strategies to better serve those students who are under-served by higher education?

### Criterion 2. Integrity: Ethical and Responsible Conduct

- If the institution made the move to all-online delivery of curriculum during the pandemic, were there any additional contractual relationships developed to help the institution do so?
- Were there any contracts related to the academic programs and/or their delivery that needed to be canceled? Why and to what effect?
- Did the institution alter any of its existing policies or procedures (e.g. admissions, grading, registration, and so on) to respond to the pandemic? What were they? Does the institution anticipate changing them back once the crisis has passed or will it continue to utilize them? Why?
- How does the institution protect academic freedom and/or freedom of expression both in policy and practice during the pandemic?
- Did the institution need temporarily to alter any of its budgeting strategies, and if so, in what way?
- How did the institution approach communication to students with transparency when so little was immediately predictable about ongoing academic functions? Any lessons that the institution will take from this for communication going forward?
- How did the institution handle co- or extra-curricular activities for students during the pandemic? Cultural events? Athletics? Student clubs?

- What are the ways in which the Board of Trustees (or Board of Governors) has continued to act in order to stay abreast of the campus’s financial situation?

**Criterion 3. Teaching and Learning: Quality, Resources, and Support**

- With the pandemic’s disruption, how have faculty stayed current in their academic disciplines and responsive to changes that have occurred in the research or practical applications of those disciplines?
- If the institution pivoted primarily or exclusively to online learning in Spring 2020, how did it maintain program quality and academic learning goals in the new educational platform? How did the institutions’ various populations (i.e. faculty, staff, students) cope with these sudden changes? Were these elements true across different levels of instruction (e.g., graduate programs; dual-credit programs)?
- How did the institution’s general education program respond to the pandemic disruption, and what elements will it keep in place once the crisis abates and the campus returns to “normal”?
- After adjusting to the pandemic, was the institution’s faculty, administration, and staff well equipped to respond to student needs, in terms of providing high-quality academic programs and student support services? If not, how did the institution respond accordingly? In addition, how has the institution adjusted to plan adequately in these areas for the future, both in terms of returning to “normal operations” and in relation to future risk management?
- Did the disruption caused by the pandemic reveal opportunities to improve the institution’s formal systems that support students’ learning resource needs, promote full accessibility to all campus learning resources or sustain the emotional and physical wellbeing of the campus community? If so, how have resources been allocated or what steps have been taken to address these matters in the future?

**Criterion 4. Teaching and Learning: Evaluation and Improvement**

- Did the COVID-19 pandemic disrupt the institution’s ability to assess the quality of programming?

For example, was the program review process disrupted and if so, how? Has the institution been able to return to normal program review? If not, why not and how is the institution ensuring program quality during this time?

- How has the on-going student assessment changed since the COVID-19 disruption? Has there been a change in student assessment processes? For example, did the institution cease student assessment activities during the pandemic? If not, did it yield different results? For example, based on the shift in course delivery to distance education was the data different than before the disruption? Has cocurricular assessment changed since the pandemic began? If so, how?
- How has institutional assessment of the curriculum changed due to the COVID-19 disruption? Has the institution been able to use assessment data during this time to make changes in the curriculum?
- How have retention, persistence and completion initiatives been impacted by the pandemic? Has the institution been able to pursue the initiatives that were previously in place during this time? Has the institution seen a change in the retention, persistence and completion data that has been collected during the crisis? If so, what are those changes?

**Criterion 5. Institutional Effectiveness, Resources, and Planning**

- How has the COVID-19 disruption affected enrollments for Academic Year 2020-21? What impact has that increase/decline had on the institution’s budget for Academic Year 2020-21?
- What is the likelihood that the state (or other funding agency) will be unable to provide the funds the institution was allocated and budgeted to receive? How big a decline in tax revenues due to lowered property assessments does the district expect? To what degree are lowered sales and incomes taxes straining the budgets of the city and state?
- What measures is the institution taking to address budgetary issues for the current fiscal year?
- What emergency policies or procedures (e.g., financial exigency, reduction-in-force) has the

institution invoked because of COVID-19? What interim steps has the institution taken to deal with temporary financial shortfalls, such as freezing vacant positions, imposing across-the-board budget cuts, delaying salary increases, and requiring employees to take unpaid days off? How long does the institution expect these temporary steps to last?

- How have the changes affected the budgets for educational programs, student support services, and co-curricular programming? (Institutions could include information about new investments in technology or classroom facilities to facilitate social distancing; changes in tuition revenue based on

enrollments in various units; changes in budgeted expenses or revenue related to suspension of clinical education; reduced revenue from athletic or cultural events; budget changes due to longer or shorter staff hours in service offices, etc.)

## **QUESTIONS?**

Contact the institution's HLC staff liaison for more information.