Institutions in Year 4 of the Open Pathway undergo a virtual Assurance Review to demonstrate that they continue to be in compliance with HLC’s Criteria for Accreditation. Unique to the Open Pathway, the review differs from the comprehensive evaluation conducted in Year 10 of the pathway in that it only involves the submission and review of the institution’s Assurance Filing. The review does not include a student survey, Federal Compliance Filing, multi-campus visit, or, in most cases, an on-site visit. The institution’s Assurance Argument and Evidence File are the primary materials used to determine that the institution is in compliance with the Criteria.

This procedure document is intended to guide institutions on how best to prepare their narrative and evidence for the Year 4 Assurance Review. It also provides guidance for peer review teams on how to evaluate the institution’s materials.
Procedure for Institutions

Creating the Assurance Filing
In the Year 4 review, the institution is providing continued evidence that it complies with the Criteria for Accreditation. Given the cyclical nature of accreditation reviews, HLC’s expectation is that institutions on the Open Pathway are still in compliance with the Criteria four years after completing their Year 10 comprehensive evaluation. Therefore, when approaching the Year 4 review, the institution needs to affirm that the narrative and evidence presented at the time of the previous review is still in effect. It does so by updating HLC about the institution’s recent activities since its Year 10 comprehensive evaluation.

Updating a Cloned Year 10 Assurance Filing
HLC encourages institutions to begin preparing for their Year 4 Assurance Review by cloning their previous Assurance Argument and Evidence File from their Year 10 comprehensive evaluation in the Assurance System. This will provide a baseline narrative and evidence from which the institution may now demonstrate its ongoing commitment to maintaining compliance with the Criteria. The institution will be given the opportunity to clone its Assurance Filing after HLC takes final action on its Year 10 comprehensive evaluation. See the Assurance System User Manual for details about cloning an Assurance Filing.

After cloning the Year 10 Assurance Argument, the institution should first identify any changes that HLC has made to its Criteria since the institution’s Year 10 review and plan to adjust its narrative and evidence accordingly (HLC may make clarifying modifications to its Criteria annually, and it is required by policy to initiate a review of its Criteria, which may lead to further revisions, every five years). The institution then should review the narrative in each Core Component section to determine whether the information it provided in Year 10 is still in effect and effectively demonstrates compliance. Finally, the institution should plan to address any recommendations that the Year 10 peer review team provided in its final report. Depending on these variables, the sections of the Year 4 argument may take different forms:

- For Core Components where no significant changes have occurred since the Year 10 review took place and the peer review team did not provide recommendations, the institution may simply affirm that it is still in compliance and re-state the narrative and evidence from Year 10. As an example, an institution’s mission and student body might be unchanged since the Year 10 review occurred.

- For Core Components where the institution has new activities to report or needs to respond to recommendations from the Year 10 peer review report, it should either condense the materials presented in Year 10 and provide an update, or re-write the section entirely if the new activities warrant. For example, the institution should have ongoing activities to report related to assessment, program review, teaching and learning, and financial management. The updates should address any recommendations from the final report created by the previous peer review team and include information about new activities and accomplishments that demonstrate the institution’s continued quality improvement. All updates should be supported with new evidence.

Word Count
The length of the updates may vary considerably, depending on whether the information from Year 10 is still in effect and effectively demonstrates compliance. In creating updates, institutions should be mindful about the 35,000-word limit, which still applies to Year 4 Assurance Arguments. In many cases, it may not be necessary for an institution to duplicate in its entirety a cloned section from Year 10. Rather, in cases where adding an update to an already-lengthy cloned section might contribute to an excessive word total, institutions should condense, abridge or rewrite lengthy cloned sections before adding updates.

Personally Identifiable Information
As always, an institution should carefully consider whether documents containing personally identifiable information (PII) must be included in its Evidence File or other Assurance Filing materials. See HLC’s PII Guidelines for more information.
Topics of Possible Year 4 Updates

- New evidence of the institution’s commitment to student outcomes assessment or to changes made as a result of recently conducted program reviews, particularly if the institution reviews certain departments or programs on a rotating basis or introduced new majors, concentrations or degree programs since its comprehensive evaluation.

- New activities, events or expansion plans that are connected to the institution’s strategic plan or campus facilities master plan, in response to new initiatives or projects funded through extramural sources or Trustees’ support, or that meet the needs of new student groups or cohorts.

- Assessment of the value of new educational technologies and innovations in student learning, support activities, residential life, or off-campus activities.

- The appointment of new faculty members and staff in relation to the institution’s strategic plan and academic priorities, departmental organization, research activities, funding opportunities or programmatic directions.

- New activities related to civic engagement, community-based learning, apprenticeships, internships or service learning opportunities.

- An evaluation of the academic foundations laid by seed grants or extramural funding or made possible by new enrollment management successes or priorities that enable new growth opportunities across departments, schools or campus.

- Information related to any embedded monitoring that may have been assigned through a previous evaluation.

What to Expect During the Review

As in the Year 10 comprehensive evaluation, the institution will be given a lock date for the Assurance System, which is its deadline for completing its Assurance Filing. After that date, the institution will no longer be able to edit its Assurance Argument and Evidence File, and the peer review team will start its review.

Because Year 4 Assurance Reviews do not typically involve an on-site visit, the team may request conference calls with senior administrators at the institution. They may also request additional documents from the institution, which would be uploaded to the Addendum section of the Assurance System. The institution’s Accreditation Liaison Officer (ALO) should be available to the team chair by phone or email during the review period and notify senior administrators and others on campus of the possible need to fulfill requests from the team during its review.

In rare instances, the team may determine that an on-site visit is necessary to further explore the evidence provided. For example, a team may request an on-site visit if issues are identified that cannot be resolved at a distance or if a sanction is being considered. If such a request is made, HLC works with the team and the institution to schedule the visit.

Procedure for Peer Reviewers

Team Composition

Typically, Assurance Review teams will be comprised of five HLC peer reviewers, regardless of institutional size or complexity. Whenever possible, HLC staff will recruit one team member from the institution’s previous Year 10 comprehensive evaluation to serve on
the Year 4 team. This approach will contribute toward communicating a longitudinal understanding of the institution to the full review team.

**Reviewing the Assurance Filing**

The team will receive access to the institution’s Assurance Filing shortly after the institution has locked its materials in the Assurance System. The team will evaluate the institution on its continued compliance with the Criteria for Accreditation. The chief expectation of the peer review team is to confirm the institution is maintaining its compliance with the Criteria.

In reviewing the institutional materials, the team should evaluate each section and, in particular, focus on the Year 4 updates provided by the institution for each Core Component. As stated above, reviewers should ensure the institution has addressed any areas needing improvement that were identified by the previous review team, including embedded monitoring. The team should rely primarily on the Assurance Argument and documents provided in the Evidence File to make this judgment. Teams should only request additional documentation in rare cases.

Within four to six weeks after the institution’s lock date, the peer review team will complete a draft of its report and the institution will be given a chance to review the draft for errors of fact. Once factual errors are corrected, the report is deemed “final.”

### After the Team Report Has Been Submitted

If the peer review team finds that all Criteria are met and does not recommend monitoring, HLC shares the final report with the institution. In such cases, no institutional response is solicited from the institution, and the team report is shared with the Institutional Actions Council (IAC), along with the institution’s Assurance Filing, as an “item of information.” Because an official action is not taken in these cases, the institution will receive a letter of acknowledgement rather than an action letter.

If the peer review team does recommend monitoring, sanction, Show-Cause Order or adverse action, the recommendation will be reviewed in accordance with HLC’s decision-making process. The institution will be given an opportunity to submit an official response to the team report. An HLC decision-making body will review the team report, institutional materials and institutional response and take final action.

The decision-making body will also determine the institution's eligibility to remain on the Open Pathway. Per HLC policy, an institution that is assigned interim monitoring in the form of a focused visit will be removed from the Open Pathway.

### Questions?

Contact the institution's HLC staff liaison.