



UPDATES TO THE ASSUMED PRACTICES

Proposed Policy Change

The Higher Learning Commission (HLC) Board of Trustees will consider the proposed policy changes on first reading at one of its meetings in 2023. HLC is previewing these changes to its membership for feedback prior to the Board of Trustees taking formal action to approve such revisions on first reading.

Background

Over a number of years, HLC has collected feedback from its institutions as well as knowledgeable experts in the field about dual credit offerings and the impact of HLC's faculty qualification requirements.

Initial concerns were raised related to the challenges experienced by institutions seeking to serve high school districts in underserved or rural locations where dual enrollment instructors did not meet HLC's requirements for faculty qualifications when judged solely on the basis of academic credentials. These requirements, it was said, undermined opportunities for underserved students' access to higher education and the benefit from cost-savings associated with such programs. In 2018, HLC provided all institutions that applied a five-year extension to put in place professional development plans that would allow their dual credit offerings to come into compliance with the requirements of Assumed Practice B.2.b. That extension will expire on **September 1, 2025**.

HLC has solicited direct and targeted feedback from the Midwestern Higher Education Compact (MHEC), the National Association of Concurrent Enrollment Programs (NACEP) and faculty involved in scholarly research on the topic. In 2022, HLC also solicited feedback from its membership over several months.

The results informed the proposed revisions to the Assumed Practices appearing below. The major goal of these changes is to eliminate any restrictive impact of HLC's requirements on student access to dual credit programs in underserved or rural areas, while ensuring that safeguards for academic quality are maintained. This goal is achieved by including the following features in the revised policy:

1. Emphasizing that an institution can deem its faculty qualified on the basis of academic credentials, equivalent experience or some combination thereof;
2. Taking into account substantial progress toward academic credentials in addition to achievement of such credentials, and creating parity between teaching assistants and dual credit instructors who are similarly situated in this regard;
3. Emphasizing that institutions must have a reliable process for determining whether their faculty, and anyone else to whom the institution assigns responsibility for teaching its students, are minimally qualified; and
4. Distinguishing between when quality assurance of instruction is necessary because of the institution's responsibility to its own students, and when quality assurance is only necessary to adhere to established HLC expectations related to transfer and ascribing college credit.

If the Board approves the following changes on first reading, they will be circulated to the membership for additional comment. Staff will review any comments and determine whether changes approved on first reading should be further amended or modified. These proposed changes would then return to the Board on second reading.

Feedback Invited

HLC asks member institutions to review the proposed changes and respond to the following prompt:

With reference to the following policy draft that informs how HLC evaluates institutional compliance with faculty qualifications, please comment on what sorts of guidance in our policies will be most helpful as institutions determine their measures, processes, documentation, and transparent approaches associated with the following:

- 1) “**equivalent experience**” as an alternative for, or supplement to, academic credentials;
- 2) “**significant progress towards degree**” for faculty pursuing required academic credentials; and
- 3) “**periodic evaluation of faculty**” by an institution to ensure they are appropriately qualified.

HLC recognizes that institutions already have these concepts well-defined and have exercised their professional judgment to determine appropriate evaluation processes for their own faculty. Your responses to this prompt will inform HLC's efforts to advance guidance appropriate to this specific context.

Please submit your response to dualcredit@hlcommission.org by February 15, 2023.

Proposed Policy Change

Wording that was deleted or revised is shown as strikethrough (~~old wording~~); new language, whether through addition or revision, is shown in bold (**new wording**). Wording that was moved is shown with a double underline in its new location (moved to) and a double strikethrough in its previous location (~~~~moved from~~~~).

Policy Title: Assumed Practices

Number: CRRT.B.10.020

Foundational to the Criteria and Core Components is a set of practices shared by institutions of higher education in the United States. Unlike the Criteria for Accreditation, these Assumed Practices are (1) generally matters to be determined as facts, rather than matters requiring professional judgment and (2) not expected to vary by institutional mission or context. Every institution is expected to be in compliance with all Assumed Practices at all times.

Because institutions are assumed to be adhering to the Assumed Practices on an ongoing basis, peer review teams will not review their compliance with these requirements except as follows:

1. When an institution is seeking HLC accreditation, and has not yet been granted initial accreditation by the Board of Trustees, the institution must provide evidence of its compliance with all the Assumed Practices as part of any reports to gain and maintain candidacy, and to gain initial accreditation.
2. When the Board of Trustees has placed an institution on the sanction of Probation and has cited the institution for being out of compliance with one or more Assumed Practices, the institution must provide evidence of its compliance with the cited Assumed Practices as part of its report to have Probation removed.
3. When the Board of Trustees has placed an institution under a Show-Cause Order the institution must provide evidence of its compliance with all the Assumed Practices as part of its report to have the Show-Cause Order removed.
4. When an accredited institution's compliance with one or more Criteria for Accreditation raises questions concerning its compliance with related Assumed Practices, the institution must be prepared to provide evidence that it is in compliance with such related Assumed Practices.
5. When otherwise required by HLC as circumstances warrant.

An institution determined not to be in compliance with any Assumed Practice, even if in compliance with all other HLC requirements, may be subject to monitoring, Probation, a Show-Cause Order, or an adverse action, as defined by HLC policy based on the gravity of the finding as measured by (a) in the case of Probation, the extent to which a substantial remediation period is necessary to address such non-compliance or; (b) in the case of a Show-Cause Order or adverse action, the extent to which the very existence of the finding suggests that the institution should not remain accredited.

A. Integrity: Ethical and Responsible Conduct

1. The institution has a conflict of interest policy that ensures that the governing board and the senior administrative personnel act in the best interest of the institution.
2. The institution has ethics policies for faculty and staff regarding conflict of interest, nepotism, recruitment and admissions, financial aid, privacy of personal information, and contracting.
3. The institution provides its students, administrators, faculty, and staff with policies and procedures informing them of their rights and responsibilities within the institution.
4. The institution establishes and publicizes clear procedures for receiving complaints from students and other constituencies, responding to complaints in a timely manner, and analyzing complaints to improve its processes. The institution does not retaliate against those who raise complaints.
5. The institution makes readily available to students and to the general public clear and complete information including:
 - a. statements of mission, vision, and values
 - b. full descriptions of the requirements for its programs, including all pre-requisite courses
 - c. requirements for admission both to the institution and to particular programs or majors
 - d. its policies on acceptance of transfer credit, including how the institution applies such credit to its degree requirements. (Except for courses articulated through transfer policies or institutional agreements, the institution makes no promises to prospective students regarding the acceptance of credit awarded by examination, credit for prior learning, or credit for transfer until the institution has conducted an evaluation of such students' credits in accordance with its transfer policies.)
 - e. all student costs, including tuition, fees, training, and incidentals; its financial aid policies, practices, and requirements; and its policy on refunds
 - f. policies regarding academic good standing, probation, and dismissal; residency or enrollment requirements (if any)

- g. a full list of its instructors and their ~~academic credentials~~ **qualifications (whether such qualifications have been determined by an instructor’s achievement of, or significant progress toward, academic credentials, equivalent experience, or some combination thereof).**
 - h. its relationship with any parent organization (corporation, hospital, or church, or other entity that owns the institution) and any external providers of its instruction.
6. The institution assures that all data it makes public are accurate and complete, including those reporting on student achievement of learning and student persistence, retention, and completion.
 7. The institution portrays clearly and accurately to the public its current status with the Higher Learning Commission and with any other institutional, specialized, and professional accreditation agencies.
 - a. An institution offering programs that require specialized accreditation or recognition by a state licensing board or other entity in order for its students to be certified or to sit for the licensing examination in states where its students reside either has the appropriate accreditation and recognition or discloses publicly and clearly the consequences to the students of the lack thereof. The institution makes clear to students the distinction between institutional and specialized or program accreditation and the relationships between licensure and the various types of accreditation.
 - b. An institution offering programs eligible for specialized accreditation at multiple locations discloses the accreditation status and recognition of the program by state licensing boards at each location.
 - c. An institution that provides a program that prepares students for a licensure, certification, or other qualifying examination publicly discloses its pass rate on that examination, unless such information is not available to the institution.
 8. The governing board and its executive committee, if it has one, include some “public” members. Public members have no significant administrative position or any ownership interest in any of the following: the institution itself; a company that does substantial business with the institution; a company or organization with which the institution has a substantial partnership; a parent, ultimate parent, affiliate, or subsidiary corporation; an investment group or firm substantially involved with one of the above organizations. All publicly-elected members or members appointed by publicly elected individuals or bodies (governors, elected legislative bodies) are public members.¹

9. The governing board has the authority to approve the annual budget and to engage and dismiss the chief executive officer.¹
10. The institution remains in compliance at all times with all applicable laws, including laws related to authorization of educational activities and consumer protection wherever it does business.
11. The institution documents outsourcing of all services in written agreements, including agreements with parent or affiliated organizations.
12. The institution takes responsibility for the ethical and responsible behavior of its contractual partners in relation to actions taken on its behalf.

¹ Institutions operating under federal control and authorized by Congress are exempt from these requirements. These institutions must have a public board that includes representation by individuals who do not have a current or previous employment or other relationship with the federal government or any military entity. This public board has a significant role in setting policy, reviewing the institution's finances, reviewing and approving major institutional priorities, and overseeing the academic programs of the institution.

B. Teaching and Learning: Quality, Resources, and Support

1. Programs, Courses, and Credits

- a. The institution conforms to commonly accepted minimum program length: 60 semester credits for associate's degrees, 120 semester credits for bachelor's degrees, and 30 semester credits beyond the bachelor's for master's degrees. Any variation from these minima must be explained and justified.
- b. The institution maintains structures or practices that ensure the coherence and quality of the programs for which it awards a degree. Typically institutions will require that at minimum 30 of the 120 credits earned for the bachelor's degree and 15 of the 60 credits for the associate's degree be credits earned at the institution itself, through arrangements with other accredited institutions, or through contractual relationships approved by HLC. Any variation from the typical minima must be explained and justified.
- c. The institution's policy and practice assure that at least 50% of courses applied to a graduate program are courses designed for graduate work, rather than undergraduate courses credited toward a graduate degree. (Cf. Criterion 3.A.1 and 2.)
(An institution may allow well-prepared advanced students to substitute its graduate courses for required or elective courses in an undergraduate degree program and then subsequently count those same courses as fulfilling graduate requirements in a related graduate program that the

institution offers. In “4+1” or “2+3” programs, at least 50% of the credits allocated for the master’s degree – usually 15 of 30 – must be for courses designed for graduate work.)

- d. The institution adheres to policies on student academic load per term that reflect reasonable expectations for successful learning and course completion.
- e. Courses that carry academic credit toward college-level credentials have content and rigor appropriate to higher education.
- f. The institution has a process for ensuring that all courses transferred and applied toward degree requirements demonstrate equivalence with its own courses required for that degree or are of equivalent rigor.
- g. The institution has a clear policy on the maximum allowable credit for prior learning as a reasonable proportion of the credits required to complete the student’s program. Credit awarded for prior learning is documented, evaluated, and appropriate for the level of degree awarded. (Note that this requirement does not apply to courses transferred from other institutions.)
- h. The institution maintains a minimum requirement for general education for all of its undergraduate programs whether through a traditional practice of distributed curricula (15 semester credits for AAS degrees, 24 for AS or AA degrees, and 30 for bachelor’s degrees) or through integrated, embedded, interdisciplinary, or other accepted models that demonstrate a minimum requirement equivalent to the distributed model. Any variation is explained and justified.

2. Faculty Roles and Qualifications

- a. ~~Qualified faculty members are identified primarily by credentials, but other factors, including but not limited to equivalent experience, may be considered by the institution in determining whether a faculty member is qualified.~~ **The institution exercises authority and control over the hiring and assignment of its faculty. The institution establishes and maintains a reliable process to determine that such faculty are minimally qualified, whether based on the achievement of academic credentials, significant progress toward such credentials, equivalent experience, or some combination thereof. The institution’s obligation in this regard extends to all third parties to which it assigns the responsibility of instruction. (The institution has an obligation to periodically evaluate instructor qualifications under such circumstances).**
- b. **Instructors deemed qualified solely on the basis of academic credentials (excluding for this requirement, teaching assistants enrolled in a graduate program and supervised by faculty; and**

high school dual credit instructors progressing toward such credentials or otherwise actively collaborating with higher education faculty) possess an academic degree relevant to what they are teaching and at least one level above the level at which they teach, except in programs for terminal degrees or when equivalent experience is established. In terminal degree programs, faculty members possess the same level of degree. ~~When faculty members are employed based on equivalent experience, the institution defines a minimum threshold of experience and an evaluation process that is used in the appointment process.~~

- c. **When faculty members are deemed qualified solely on the basis of academic credentials, the institution's Faculty teaching faculty who teach** general education courses, or other non-occupational courses, hold a master's degree or higher in the discipline or subfield. If a faculty member holds a master's degree or higher in a discipline or subfield other than that in which he or she is teaching, that faculty member should have completed a minimum of 18 graduate credit hours in the discipline or subfield in which they teach. **The institution may also deem such faculty qualified on other bases as noted below.**
- d. When faculty members are employed based **deemed qualified on the basis of equivalent experience, the institution defines a minimum threshold of experience and recognized achievement and is able to demonstrate an evaluation process that is used in the appointment process.**
- b. e. Instructors teaching in graduate programs should hold the terminal degree determined by the discipline and have a record of research, scholarship or achievement appropriate for the graduate program.
- e. f. Instructors teaching at the doctoral level have a record of recognized scholarship, creative endeavor, or achievement in practice commensurate with doctoral expectations.
- e. g. Faculty participate substantially in:
 - i. oversight of the curriculum **offered**—its development, **vetting** and implementation, academic substance, currency, and relevance for internal and external constituencies;
 - ii. assurance of consistency in the level and quality of instruction and in the expectations of student performance;
 - iii. establishment of the academic qualifications for **any instructional personnel providing instruction on the institution's behalf (whether such qualifications have been**

determined by an instructor's achievement of or significant progress toward academic credentials, equivalent experience, or some combination thereof);

- iv. analysis of data and appropriate action on assessment of student learning and program completion.

3. Support Services

- a. Financial aid advising clearly and comprehensively reviews students' eligibility for financial assistance and assists students in a full understanding of their debt and its consequences.
- b. The institution maintains timely and accurate transcript and records services.

C. Teaching and Learning: Evaluation and Improvement

1. Instructors (excluding for this requirement teaching assistants enrolled in a graduate program and supervised by faculty) have the authority for the assignment of ~~grades~~ **any measures of student achievement**. (This requirement allows for collective responsibility, as **for example** when a faculty committee has the authority to override a grade on appeal.)
2. **With regard to instruction that occurred prior to a prospective student's matriculation, and where the institution exercised no control over such instruction, the institution adheres to its established transfer policies and HLC expectations regarding ascription of credit. (The institution has no obligation to validate instructor qualifications under such circumstances and is therefore not evaluated on that basis).**
- ~~2.~~ 3. The institution refrains from the transcription of credit from other institutions or providers that it will not apply to its own programs.
- ~~3.~~ 4. The institution has formal and current written agreements for managing any internships and clinical placements included in its programs.
- ~~4.~~ 5. A predominantly or solely single-purpose institution in fields that require licensure for practice is also accredited by or is actively in the process of applying to a relevant accreditor for each field, as sufficient for licensure, if such a recognized accreditor exists.
- ~~5.~~ 6. Instructors communicate course requirements to students in writing and in a timely manner.
- ~~6.~~ 7. Institutional data on assessment of student learning are accurate and address the full range of students who enroll.
- ~~7.~~ 8. Institutional data on student retention, persistence, and completion are accurate and address the full range of students who enroll.

Policy Number Key

Section CRRT: Criteria and Requirements

Chapter B: Criteria for Accreditation

Part 10: General

Last Revised: February 2022

First Adopted: February 2012

Revision History: June 2013, June 2014, June 2016, September 2017, November 2020, June 2021, February 2022

Notes: Institutions that received HLC extensions to bring their dual credit faculty into compliance with Assumed Practice B.2. are responsible to do so before such extensions have expired. In all other respects, the current Assumed Practices apply to such institutions. In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”