

# Teach-Out Toolkit

## An HLC Quality Awareness Initiative

### Introduction

HLC has witnessed an increase in the number of colleges and universities that have decided to close as well as the resulting challenges frequently confronted by students, faculty, staff members and the community.

Some member institutions that decided to close a program have successfully provided support and communication to their stakeholders, making the transition as painless as possible. Others have tried to manage more abrupt closures with minimal success.

Each institution may need to work with various agencies including, but not limited to the following: the institutional accrediting agency, U.S. Department of Education, Veterans Affairs approving agency, state authorization office, state licensing boards that require approval of school, programmatic accreditors and NC-SARA when engaging in a teach out.

It is a complex process. In an effort to help students affected by potential closures, federal regulations were changed in July 2020 to require Teach Out planning for scenarios well beyond a closing additional location or institution.

Foreseeing the potential for an increase in the number of Teach Outs, HLC collaborated with a group of institutional representatives and representatives from higher education state agencies who have been involved in teach-out situations to develop tools to help institutions prepare for and implement successful teach outs. With generous funding from Lumina Foundation, HLC convened this group to develop a Teach Out Toolkit. While use of this Toolkit is not required by HLC policy, it is highly recommended.

### Resources

HLC's Teach-Out Toolkit includes:

1. Governing Boards Contemplating a Decision that Would Require a Teach Out
2. Assisting Students When Your Institution is Required to Teach-Out Students
3. Assisting Students When Your Institution Receives Students From a Teach Out
4. State Authorizing Agency Checklist for Institutions that are Required to Teach-Out Students
5. Checklist for Institutions Receiving Teach-Out Students

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## Policy and Procedure

In June 2020, HLC updated its policy regarding [Teach Out Arrangements](#) to ensure they were consistent with Federal regulations that went into place in July.

In addition, HLC provided procedural information regarding [Provisional Plans and Teach Outs](#) that details HLC requirements and approvals necessary when participating in a teach out arrangement. On page 7 of the procedure, HLC goes beyond the policy requirements to provide information, shared by experienced institutions and other external stakeholders, on best practices leading to successful teach outs. This Toolkit is a supplemental resource created by these stakeholders to serve as an operational guide that is separate from HLC's procedural information regarding Provisional Plans and Teach Outs.

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## Quality Awareness Initiative: Creating a Teach-Out Toolkit

In 2019, the Higher Learning Commission launched several initiatives funded by the Lumina Foundation to explore new quality assurance approaches that better account for the diversity of educational intentions of today's students. One component of this initiative was HLC's Teach-Out Toolkit. The following individuals worked with HLC to develop this toolkit:

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**William Harting**, *Assistant Provost, Marian University*

**Gretchen Lohman**, *Deputy Director for Academic Affairs, Illinois Board of Education*

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### About The Higher Learning Commission

The Higher Learning Commission ([hlcommission.org](http://hlcommission.org)) accredits approximately 1,000 colleges and universities that have a home base in one of 19 states that stretch from West Virginia to Arizona. HLC is a private, nonprofit regional accrediting agency. HLC's mission is to assure and advance the quality of higher learning.

Lumina Foundation is an independent, private foundation in Indianapolis that is committed to making opportunities for learning beyond high school available to all. We envision a system that is easy to navigate, delivers fair results, and meets the nation's need for talent through a broad range of credentials. Our goal is to prepare people for informed citizenship and for success in a global economy.

# Governing Boards Contemplating a Decision that Would Require a Teach Out

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Prior to the implementation of a teach-out, there are critical considerations that should be submitted to the institution's board of trustees to ensure thorough decision-making that minimizes harm to students. Though each institution is unique and operates under circumstances shaped by the school's mission, common considerations for the board lie primarily within the realms of governance, financial obligations, human resources and personnel, and communications.

## Considerations on Governance

### Policy

Have policies in place to guide financial and administrative decisions as it relates to program closure, departmental closure, additional location closure, branch campus closure and institutional closure, including:

- Policy regarding the general types of data an institution would use to help drive decisions (grounded in state and federal regulations, accreditation needs, etc.)
- Policy regarding how the institution will meet Title IV responsibilities
- Policy regarding how the institution will meet the state authorizing body's responsibilities
- Policy regarding compliance with accreditation standards ensuring that the institution continues to meet accreditation standards before the end of accreditation period

### Decision Making

- Identify and analyze data that provide a rationale for the decision to close the institution, branch campus, additional location, department or to end a program, prior to all students being able to complete their studies
- Articulate a well-developed rationale for the decision
- Use available institutional evidence to build the case for the decision
- Collaborate with stakeholders in decision making
- Set up a steering-committee to lead the work

- Have a clear, robust and well documented management plan in place that:
  - determines when closure/teach-out is an option
  - includes relevant, timely, valid, reliable and accurate data to review
  - includes a timeline for the teach out/closure
  - differentiates between the Board's and CEO's role in the collaborative effort
  - establishes ongoing communication between Board and CEO
- Determine if the Board is meeting its legal and fiduciary responsibilities
  - This determination will be different for different types of institutions in terms of responsibility to taxpayers, boards, private investors, donors, etc.
- Determine how shared governance will be engaged in decision making (with regard to closure)
  - Form a cross-functional workgroup (to help in execution of process)
  - Provide oversight of the establishment of contracts (sometimes referred to as Memoranda of Understanding) with partners
  - Be apprised of potential partners and nature of negotiations
  - Provide approval of contracts and agreements developed

### Direct Board Oversight

Consider the following questions regarding the Board's oversight in the teach-out process:

- What is the Board's role in the process?
- What is the role of the Board to set the strategy that steers this process?
- Are the appropriate teach-out and/or closure processes being followed as required by the U.S. Department of Education, state agencies and licensing boards, accrediting agencies and other organizations?
- Are financial contracts and other financial decisions consistent with institutional risk management policy?

- How is the CEO engaged with the Board on strategy and challenges?
- Are appropriate good governance practices being followed?
- Does the Board have opportunity to provide constructive criticism or a dissenting opinion?

## Considerations on Financial Obligations

### Financial Stability

- Who will provide oversight to ensure the institution remains stable during the teach-out period? (Departmental, ad hoc committee/workgroup, etc.)

### Fair and Ethical Behavior

- Who will provide oversight of adherence to established policies and processes within the institution to ensure fair and ethical behavior and integrity in financial, academic, human resources and auxiliary functions?
- How will internal accountability for such adherence be assured?

### Operational and Endowment Funds

- Who will ensure sound financial decisions are being made with regard to operational and endowment funds?
- How will financial decisions be made related to operational and endowment funds?

## Human Resources and Personnel

- Determine if/how faculty and staff will be transferred, reduced or managed through other arrangements
- Close out of contracts, transfer of personnel, reassignment of personnel, terminal contracts
- Address unemployment claims of employees
- Engage with and address union considerations

## Communications Plan

The implementation of a communications plan that keeps the appropriate agencies, students and other institutional stakeholders informed throughout the teach out is critical to the success of the process. A thorough communications plan that includes the elements below, centered on the unique timeline of the specific institutional closure and teach out, should be developed for consideration by the board of trustees.

### Phase I

1. Notification to state agencies, licensing agencies, accrediting agencies, federal agencies (Title IV) regarding closure or teach out
2. Notification to state approval agencies, i.e., agencies such as NC-SARA
3. Notification to internal constituencies
4. Notification to external constituencies, including funding agencies, alumni, donors and stakeholders
5. Notify local government, state representatives and governor's office

### Phase II

1. Notification of program/institutional closure to any current partner institutions (e.g., existing articulation agreements)
2. Notification to collaborative programs

### Phase III

1. Public notice of closing
2. Press release to media
3. Post on college website and other publications
4. Include Question and Answers and number/department on-campus to contact
5. Post on College's social media outlets

# Guidance for Assisting Students

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While teach out scenarios are difficult for institutions of higher education and take a toll on all members of their campus communities, the effect of program or institutional closures is especially harmful for students. Closing and receiving institutions should establish communication plans and specific transitional processes that consider the full scope of resources needed to adequately support students. Students affected by program or institutional closures will need assistance with their academic transition as well as with their emotional, financial and logistical transitions as they seek teach out, transfer, or other pathways forward.

The following list includes some considerations for faculty, administrators and students across the phases of institutional or program closure: pre-closure, during closure and post-closure. Those timeframes are defined below.

The guidelines are organized first by considerations for institutions that are experiencing closure, followed by the same for institutions receiving students from closed institutions or programs. The following is not presented as a complete or exhaustive list of considerations, but one that may be useful.

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**Pre-Closure:** The timeframe when it becomes evident that the institution is in a critical phase of financial failure or other pressure with the expectation that it will become necessary to discontinue instruction and close student enrollment. This phase may include communications to the board, faculty, staff and students to notify that change is likely to occur in the near future.

**During Closure:** The timeframe in which the institution has notified HLC, state authorizing bodies, the U.S. Department of Education and/or other accrediting bodies that within a short time frame it will cease to operate a portion of or all of its operations. The institution has published this information publicly.

The receiving institution has received approval or is in the process of receiving approval to become a teach-out or transfer institution by HLC, state authorizing bodies, the U.S. Department of Education and/or other accrediting bodies.

**Post-Closure:** The timeframe after the institution has notified its accreditors, state and the U.S. Department of Education that it is moving to cease operations with a published timeline. Internal stakeholders have been notified. All communications have been distributed. Transfer fairs have concluded. Students have transferred or are still seeking transfer.

## Closing Institutions/Programs Pre-Closure

### Encourage students to:

- Attend class and focus on making continuous progress as long as permitted
- Ask questions to clarify rumors
- Order transcripts as soon as rumors are evident and then again after instruction has completed.

### Work with faculty to:

- Faculty continue to teach class and provide student advisement
- Faculty play a significant role in receiving and addressing questions from students to clarify rumors and confirm information
- Through advisement, faculty can and should emphasize the need for students to secure official transcripts and other official academic information (training, clinical logs, financial aid, student account records, etc.)
- Through advisement, faculty may be able to assist students who are considering potential teach-out options

### Share with administrators:

- On a continuum of urgency, communicate with the institution's faculty, staff and students. Communication should be clear that change/closure is likely to occur and include the timeline for closure or other major changes to the organization's operational status.
- Submit Provisional plans/agreements for HLC approval, and share with state and programmatic accreditors with campus community as early as possible.
- Create student communication plan that address the following:
  - Designated point of contact at the closing institution where students can direct all questions
  - The dates of open meetings where information will be disseminated
  - The date of closure and implications for students' coursework if it occurs mid-term
  - The status of the students' federal financial aid and other federal funding programs (Title IV, Veterans benefits, institutional scholarships, third-party payments or loans, etc.)

- If student financial aid has been disrupted, provide information about these topics:
  - Student assistance programs and resources regarding mental health care, child-care, financial advisement, and legal counsel
  - Programs to address food insecurity: SNAP, food stamps and food pantries
  - Financial advisement resources on federal aid, scholarships, third-party billing, etc.
  - Unemployment insurance, if applicable
- The availability of teach-out institutions and transfer institutions and definitions for these terms
- The timeline, place, date and list of institutions attending transfer fairs on the site of the physical campus, if applicable
- Instructions for requesting official transcripts and other official records (training, externships or practicums) both prior to and beyond the closure date
- Specific information regarding implications for student federal funding; a list of student rights; contact information for the U.S. Department of Education, state authorizing agency, and other relevant accreditors/authorizing bodies
- Create an employee communication plan that includes:
  - Timeline for closure in relation to students
  - Expectations of last day of work and last paycheck and expectations for changes to employee benefits
  - Directions for employees to secure an official transcript if they are alumni of the closing institution
- Create a faculty communication plan that includes the items above as well as an outline of the duties and responsibilities to students and ensures that advising plans and expected timelines are being met

Confirm the role of Authorizing Bodies (State Higher Education Offices, Institutional Accreditors and Programmatic Accreditors):

- Securing or ensuring security of an official list of active students and an official transcript for each
- Securing official list of alumni and former students and an official transcript for each
- Ensuring that the institution has a records retention agreement in place with another entity

- Securing clinical training documents, including patient files and equipment
- Working with teach-out institutions to better understand the size and scope of students needing teach outs by program (this is important to help understand capacity issues)

## Closing Institutions/Programs During Closure

### Encourage students to:

- Complete outstanding coursework
- Make copies of their portal information, if possible
- Request official transcripts, as well as training and externship files, before and after final coursework
- Request copy of student account balance
- Secure copies of federal aid status with balances
- Secure mental health support, food benefits, and child-care, if necessary
- Transition to alternative housing, if needed
- Attend transfer fair; consider many options for transfer; do not apply only to first option
- Attend open house; recruitment events at potential receiving institutions
- Compare options for transfer, cost, and accreditation status of each option
- Submit applications to potential receiving institutions; negotiate tuition rate and financial packages

### Work with faculty to:

- If possible, program heads should meet with counterparts at local receiving institutions to write curriculum map for transferring/teach-out students
- Continue to reassure students
- Attend job fairs (these can correspond to the transfer fairs as receiving institutions may need faculty and staff from closing programs/institutions)
- Attend transfer fairs to better understand student transfer options to the extent possible
- Attend open meetings about expectations for last date of work; last paycheck; status of retirement benefits; etc.
- Work with specialized/programmatic accrediting bodies and licensing boards to ensure teach-out students are accommodated according to accreditation and/or licensing standards

## Closing Institutions/Programs Post-Closure

### Students should:

- Students have either transferred or requested discharge of federal loans

### Faculty and Staff should:

- Faculty and staff have finished employment with closing institution and have repositioned themselves to seek other employment.

### Administrators should:

- Work with Registrar and faculty to understand how teach-out students will be credentialed (e.g. special designation on transcripts)
- Work with Institutional Research to ensure appropriate tracking of data for teach-out students

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## Receiving Institution | Pre-Closure

### Work with faculty and staff to:

- Continue teaching class
- Begin asking questions to clarify rumors
- Consider if theirs is a program that can/should accept these teach-out students

### Help Administrators to:

- Obtain faculty “buy-in” by seeking partnerships to provide equity to all populations of students and clarify the nature of a teach out (i.e. fewer credits to complete degree; possibility of reduced tuition rate, etc.)
- Gather staff “buy-in;” clarify that admission, financial aid, training, etc. will have increased workloads for a period of time
- Seek internal approvals to approach accreditors and external approving bodies to participate as a teach-out receiving institution.
- Request approval for participation in teach out (institutional, state, programmatic accreditors, U.S. Department of Education, if needed)
- Work with U.S. Department of Education, state authorizing body and institutional and programmatic accreditors to ensure all mechanisms and tracking are set up to be a receiving institution
- Deploy communication plans
- Schedule transfer fairs
- Assure the availability and preservation of student academic and training records, HR records, legal documentation, etc.

- If possible and as applicable, submit appropriate plans and agreements to state authorizing body, institutional accreditor(s), programmatic accreditors and U.S. Department of Education
- Work with financial aid administrators to ensure loans are being discharged as appropriate and new aid is being processed as appropriate

## Receiving Institution | During Closure

### Encourage Students to:

- Find out dates and times of transfer fairs and engage with program faculty, admission and student support services personnel

### Ask Faculty to:

- If possible, program heads meet with program head of closing institutions to write curriculum map for transferring and teach-out students
- Continue to reassure current students
- Attend prospective student open house(s), new student orientation, receive questions and begin building relationships with new students
- Meet with current students, enlist their leadership in supporting incoming teach-out and transfer students

### Administrators can:

- Write teach-out and or transfer plans and share with accreditors and state higher education bodies
- Assess program equivalencies, work with faculty department heads to take the lead on writing program crosswalks, and share program crosswalks with students
- Share program crosswalks with relevant programmatic accreditors and seek written approval, if necessary
- Deploy communication plans to students and employees
- Find out dates and times of transfer fairs — program faculty, admission, student support services should attend
- Contact closing institution/program to identify correct point of contact and process for students to secure academic and training records and for faculty to secure HR records and transcripts (if faculty are alums), legal documentation, etc.
- Consider stipends for faculty/staff affected by significant workload increases

- Meet with current students and enlist their leadership in facilitating the teach out including their participation in leading prospective student open house(s), new student orientation, and ongoing student support once teach-out students have enrolled.
- Create prospective student communication plan to include:
  - Contact information for a points of contact at the receiving institution where students can direct all questions
  - The dates, location, times of prospective student open houses where teach-out and transfer students will receive information about the teach-out or transfer opportunities at the receiving institution
  - The status of the students' federal financial aid and other federal funding programs (Title IV, Veterans benefits, institutional scholarships, third-party payments or loans, etc.) including the dates of applications, disbursements, etc.
  - A specific explanation of the implications for the students federal funding; a list of student rights; contact information for the U.S. Department of Education
  - The definition of teach-out and transfer institutions and what these terms mean for the students
  - The timeline, place, date, and list of transfer fairs on the site of the closing campus if there is one
  - Instructions on how to get an official transcript and other official records (training, externship or practicum)
  - A clear explanation of the application process, exceptions to admissions requirements, if any, and related deadlines
  - Availability of student life resources available through the receiving institution, outside organizations, or other local institutions
- Identify institutional and community-based student support resources for services such as:
  - Student EAP Assistance programs (mental health care, financial advisement, legal counsel, etc.,) Example: ComPsych
  - Programs to address food insecurity: SNAP, food pantries
  - Financial advisement regarding federal aid, scholarships, third-party billing, etc.

- Legal counsel
- Financial assistance and available scholarships
- Unemployment insurance, if applicable
- Temporary housing
- Child-care resources

## Receiving Institution | Post-Closure

### Encourage Students to:

- Begin the process of becoming acclimated to new learning environment
- Participate in advising sessions
- Attend new student orientation programs
- Attend programming available to connect with the institution, its students, and its engagement activities

### Faculty and Staff should:

- Monitor teach-out and transfer students each term to understand persistence, social integration, effects of closure as it may have created ongoing financial, emotional, academic disruption that requires ongoing support

### Administrators should:

- Create repository for documentation of all phases of teach-out that includes:
  - Approvals from institutional, programmatic, and state authorizing agencies
  - Ongoing reporting that may be required by institutional, programmatic, and state authorizing agencies
  - Term by term and annual persistence and completion data for teach-out and transfer students as it relates to that of total student program data
  - List of teach-out and transfer students and their individual cross-over, curriculum agreement with final transcript for each as they complete
  - Student service resources to ensure students receive as much support as possible.
- Thoroughly monitor student progress
- Honor graduates at commencement



# State Authorizing Agency Checklist for Institution Closure

Participating in the teach-out process as a receiving institution is a complex undertaking and requires organization and planning at all operational levels. Ensuring the protection and success of students is of the utmost importance. This checklist was designed, in collaboration with state authorizing agencies, to identify activities that may need to be completed in the event of a closure. Institutions should check with the appropriate state agency(s) to determine what is required.

## Potential Notice Requirements to a State Authorization Office:

- Send official notice of the closure to Higher Learning Commission, programmatic accreditors, the Veterans Affairs approving agency, state authorization agency, state licensing boards that require approval of school, and NC-SARA and upload any required documentation for these entities.
- Provide Provisional Plans for currently enrolled students who have not completed their program or course of instruction. Also provide details regarding arrangements for transferring students to another approved institution. All teach-out agreements must demonstrate equitable treatment of students and provide avenues for students to complete their degree programs within a reasonable period of time. Include all transfer agreements and provide a copy of the letter notifying the accrediting agency. Teach-out plans should prioritize students that have less than one year until completion.

Note: Institutions on Heightened Cash Monitoring are not eligible to serve as a teach-out partner.

- Post an institutional closure website within 24 hours of the announcement with relevant information for students regarding teach-out plans, student meetings, advising assistance, financial aid questions, transfer fairs, and state regulatory and agency contact information. Include links to the U.S. Department of Education's information webpage for students on Closed School Discharge and Borrower Defense for federal student loans. Provide the URL to the state agency and accreditors.
- Remove all admission links and processes from website. Place notice on admissions website that the school is no longer accepting new applications

for admissions. Refund admission fees to students that have applied but have not matriculated.

- Provide the name, email, address, and phone number of the person responsible for managing the closure and at least one additional back-up person.
- Create an institutional team to address the checklist and closure requirements and help transition students, faculty, and staff in the best way possible.
- Provide the name, email, address, and phone number of the person responsible and legally authorized by the institution to serve as the registrar to assist with transcript issues post institutional closure. Provide information on how this individual will make transcript updates and will have access to transcript files to make these updates.
- Provide a list of names and contact information for those student services personnel assisting with the closure (i.e., advising, financial aid, etc.), in case of a need for a referral.
- Provide a list of students affected, and anticipated decisions regarding graduation, transfer, or teach out for each student (name, student I.D., classification, number of hours earned and hours remaining, expected graduation date, veteran status, email, phone number, program of study, last date of attendance, and federal aid amounts). The last date of attendance is necessary for mid-term closures. (Note: This is a potential state requirement. HLC does not accept documents containing personally identifiable information for its purposes.)
- Provide a list of any specialized accreditation held by the institution or programs requiring licensure.
- Provide a plan for the advising services offered to students (meetings, dates, agenda, etc.).
- Provide a plan for student financial and billing concerns, prior to closure. Provide a plan for resolving open loan periods for students prior to closure or prior to a student transferring to a new institution.
- Furnish copies of all accrediting agency approvals. Furnish copies of any accreditation changes within 10 days of notification from the accreditor.
- Furnish copies of the communication plan that includes the proposed timeline and methods for

notifying students of the teach-out plan, including any students who may be on approved leaves of absence, as well as to faculty, staff, and other institutional constituents. At a minimum, best practice recommends providing two transfer options and one teach-out agreement per academic program.

- Upon closure, post an official closure notice for students, with the effective date, on the institutional URL and provide to the state agency.
- Work with your business office on closing out all financial obligations or research, especially for federal and state grants.

## Academic Records/Other

- Provide detailed information on how all original or legible true copies of the institution's academic records will be permanently kept, which shall include, at a minimum, the academic records of each former student that is traditionally provided on an academic transcript, such as, but not limited to, courses taken, terms, grades, and other such information.
- Notify all previous and currently enrolled students of the closing institution of where documentation required for licensure will be kept and how the educational verification for those training records will be certified post closure.
- Convert all paper records to digital records at the time of closure.
- Release all academic and financial holds on students prior to closure.
- Notify all previous and currently enrolled students of which institution or entity will become the custodian of all academic records for the closing school (please provide a copy of this communication). The state agency maintains a list of closed degree-granting institutions for which academic records are available.
- Notify the state agency, Department of Education, and Higher Learning Commission of where all records are located as well as appropriate contact information.

- Issue written legal authorization to the state agency for access to all facilities where academic records are stored prior to closure.
- Provide electronic copies of syllabi for all courses offered for the past five years.
- Provide electronic copies of all academic catalogs for the past ten years.
- Provide a plan for distribution of 1098-T forms for students and employees, post closure.
- Provide copies of student ledgers/student account statements to the state agency.

## Notice to Students/Faculty/Staff

- Contact all impacted students and faculty at least 90 days before closure/teach out. Contact can be through email, phone call, and class visits.
- Create a communication platform for student and faculty questions through dedicated email, hotline, website, etc. Hotline should be no more than 180 students to one hotline professional.
- Create FAQ that outlines (1) possible teach out locations, (2) possible transfer universities, (3) transcripts and other records, (4) right to cease enrollment.
- Provide students with federal loans an additional email and letter overviewing federal loan student disclosures.
- Create social media statement with details regarding closure, student options and FAQs.
- Provide institutional spokesperson contact information to the state agency.
- Provide a copy of the press release and other campus communications regarding the closure.

## U.S. Department of Education

- For institutions participating in federal aid, contact the relevant Federal Student Aid Schools Participation Division. Once received, the notice will be forwarded to the appropriate contact handling closures at that time.

# Checklist for Receiving Institutions

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Participating in the teach-out process as a receiving institution is a complex undertaking and requires organization and planning at all operational levels. Ensuring the protection and success of both incoming and current students is of the utmost importance. This checklist is designed to aid receiving institutions through the preparation and implementation of such a transition.

## Preparatory Work/Considerations

- Ascertain whether the closing institution is a “match” for your institution (mission, programs, students, financial considerations, etc.).
- Create a financial plan to cover the costs of taking on additional students.
- Identify required approval processes across the higher education regulatory Triad, including U.S. Department of Education, state authorization entity, institutional accreditor, programmatic accreditor(s), state approving agency for Veterans benefits, and SEVP.
- Form an internal working team (recommend at least registrar, academic administrator, financial aid officer, admissions/student accounts officer, student affairs officer, academic advisor, academic counselor, representatives for special populations, marketing/ communications/ public relations officer, IT officer, HR officer, business office representatives).
- Set schedule of teach-out specific check-in meetings with internal stakeholders, state agencies and accreditors. For example: three meetings per week for 1.5 hours.
- Participate in transfer fairs or host transfer fairs on campus for students.
- Identify teach out vs. transfer programs, prepare and distribute appropriate documentation for each (e.g., degree maps, crosswalks).
- Create teach-out agreement(s) with closing institutions that meet HLC requirements.
- Determine if any policy waivers are necessary (accreditor policy or internal, receiving-institutional policies).
- Determine financial aid/net price being offered to students from closing school. Consider matching closing institution’s tuition, fees, scholarships, etc.
- Create a communication plan for the closing institution’s students, faculty and staff.

- Create a communication plan for current students, faculty and staff.

## Students

- Deliver an orientation appropriate to the incoming students.
- Arrange for support services as needed, including mental health counseling, financial aid counseling, health insurance, homelessness resources, food insecurity resources, job placement, transportation day care. Communicate plan to transfer students.
- Collect Satisfactory Academic Progress (SAP) and student conduct history of incoming students.

## Faculty

- Identify faculty credential differences, especially if you will employ the closing institution’s faculty as part of the teach out or transfer agreements (HR Policies, Position descriptions).
- Train current faculty regarding teach out and transfer agreements (prepare for what to expect, how policies may need to be modified (e.g., residency waivers, policy modifications), if needed, and what how to assist students’ transition).

## Curriculum/Articulation

- Gather closing-school’s syllabi, catalogs, assessment rubrics/materials, if available, and other materials to aid in the articulation of courses.
- Establish advanced standing policies specific to this teach out or transfer agreement, if appropriate (for example transfer, teach out, advanced standing)
- Create a testing protocol for incoming students for technical and professional skills, especially when the closing institution’s coursework varies in nature, level, scope from your institution.

## Records

- Collect FERPA releases, if needed, and any other releases for personally identifiable information (PII).
- Determine if you will become the custodian of the closing institution’s records.
- If so, secure ownership of the full set of student records, collect all existing transcript paper stock and diploma stock from the closing institution. Collect all transcripts/records whether or not the student has any holds on their record (financial or otherwise).

- If not, secure appropriate permanent access to the student records, appropriate to the nature of the relationship being established.
- Determine whether you will waive admissions application fees or help students with transcript fees.
- Understand the applicable policies of the closing institution (for example, grading, records retention, exceptions, notations, etc.).
- If the institution closes mid-term, plan for handling Incomplete grades.
- Determine how acceptance of credits will impact SAP calculations at your institution.
- Establish and apply a policy for student transfer and transfer credits when student:
- Was awarded credit from other schools (i.e., will you accept the closing institution's transcript, or will official transcripts from other schools be required).

- Was awarded credit as part of an articulation/consortium/contractual relationship.
- Has ACE credits, including military.
- Has credit on the closing institution's record for an experiential learning portfolio.

## Tuition and Fees

- Gain access to and collect student financial aid, ledger, and related data.
- Create a policy for tuition and fee adjustments.

## Financial Aid

- Provide a list of documents needed to process financial aid to students.
- Coordinate with the closing-school's financial aid office to close out loan periods of students at the closing school.