

Interim Monitoring

Although Interim Monitoring is largely understood to require reports or visits scheduled between comprehensive evaluations, clearly worded team recommendations for institutions to document improvements related to important areas of concern, and to explicitly report the results of their corrective actions embedded as part of comprehensive evaluations or assurance reviews already scheduled, can have the same effect as a stand alone Interim Monitoring recommendation.

Recommendations for stand alone Interim Monitoring should be preserved for the clearest and most urgent of circumstances.

HLC provides these considerations for peer reviewers to use in their deliberations regarding recommendations of Interim Monitoring, and how to design the implementation of that monitoring.

Application of Interim Monitoring

The basic architecture of the Standard and Open Pathways allows for two naturally occurring opportunities for monitoring:

1. Year 10 Comprehensive Evaluation
2. Year 4 Assurance Review (Open Pathway);
Year 4 Comprehensive Evaluation (Standard Pathway)

Whenever feasible, teams should recommend embedding monitoring as part of regular reviews in an institution's accreditation cycle.

As peer reviewers and team chairs consider the assignment of Interim Monitoring, recommendations for Interim Monitoring should be for serious matters that warrant institutional action and HLC oversight before an institution's next regularly scheduled assurance review or comprehensive evaluation.

Considerations include:

1. Depth or gravity of the current challenge or concern
2. Documentation of accreditation-related deficiencies tied to a core component that connect to a team report's evidentiary statement(s)
3. Institutional history of sanctions and/or monitoring, specifically on the issue at hand
4. Institutional history in self-correcting significant challenges
5. Timing of a possible monitoring recommendation (i.e., embedded in an upcoming review, between cycle years ten and four, or years four and ten)

Team concerns must be documented in the team report with evidence that Interim Monitoring is needed. Additionally, the team needs to determine whether institutional attention in response to the team report is likely to be effective in lieu of Interim Monitoring.

Teams should first consider embedding monitoring within regularly scheduled evaluations in years four and ten to follow up on concerns. Given the abbreviated time frame, a due date for Interim Monitoring between year ten and year four should be reserved for serious concerns coupled with low confidence in an institution's capacity to adequately address the concern without HLC follow up.

Finally, when a team decides to recommend Interim Monitoring, careful consideration should be given to consolidating institutional work into the smallest number of reports (or Focused Visits or combination thereof) necessary by aligning concerns with corresponding Core Components.

Interim Report vs. Focused Visit

Once a team has determined that monitoring is required, it needs to determine the type of monitoring, either an Interim Report or a Focused Visit. The following considerations should help:

1. What is required to validate the sufficiency of the evidence? Can sufficiency be determined based solely on documentation, or will validation require verification of observable "patterns of evidence" on campus?
2. Is interaction with institutional representatives required? Is there a need to interact with institutional representatives, in order to determine the sufficiency of the evidence provided? Is there a need for dialogue? Is documentation, however sufficient, likely to be inconclusive absent these conversations?
3. Was a sanction seriously considered before deciding monitoring was more appropriate? In cases where teams/decision-makers consider assigning Notice and settle on Interim Monitoring, a Focused Visit is appropriate. Assigning a Focused Visit for serious concerns limits the tendency for teams to defer adverse recommendations to a future team. Institutions also perceive Focused Visits as a signal that there is heightened urgency around particular findings of Met with Concerns.

Any one of these factors may help the team make a final decision on the form of monitoring that is most appropriate. Regardless of which form of monitoring is assigned, the **team must provide** sufficient detail regarding the improvements that need to be demonstrated for the institution to successfully write the interim report (or Focused Visit report).

When to Bundle Reports

If the team determines multiple findings of Met with Concerns, it will also need to determine whether to "bundle" the issues in a single interim report. In deciding this, teams should consider the Three C's: Is the evidence needed to demonstrate adequate improvement for **multiple** findings of Met with Concerns likely to be:

1. Complementary; **OR**
2. Contingent upon one another; **AND**
3. Available Contemporaneously?

If the answer is "yes," a single report should be assigned with a single due date on the multiple Core Components. If the answer is "no", then all Concerns for which the answer is yes, should be bundled, and the outlier Concern(s) should be set off with a separate or concurrent Due Date, if appropriate, and in a suitable format.

"Adequate Improvement" means the evidence evaluated in an Interim Report or Focused Visit appears to be such that peer review would determine the Core Component is "Met" rather than "Met with Concerns," with the understanding that any remaining opportunities for improvement can be relegated/trusted to institutional attention. HLC relies on peer review judgment to determine how long a timeframe is required to demonstrate evidence of adequate improvement in areas of concern.

When is Interim Monitoring Required?

Team Determination	Interim Monitoring Required	Notes
Institutional Attention Needed	No	Observing an opportunity for improvement may legitimately be relegated to “institutional attention” without the necessity for HLC follow-up.
Criteria “Met with Concerns”	Yes	Interim Monitoring is required when any Core Component is found to be Met with Concerns. While such a finding represents general compliance with the Core Component, it signals that a) certain improvements arising from a particular Concern are necessary to fully meet the Core Component AND that b) HLC follow-up is indispensable to ensure the improvement is made. The presence of both elements triggers the monitoring and for that reason the term “Concern” may be considered a term of art in this context.
Criteria “Not Met”	No	See Sanctions.
Assumed Practice(s) “Not Met”	Yes	Interim Monitoring is required when any Assumed Practice is found to be Not Met (assuming all Core Components are either Met or Met with Concerns). Since Assumed Practices are not specifically evaluated for accredited institutions, a review of Assumed Practices may be triggered by a Core Component finding of Not Met. Monitoring assigned to address Assumed Practices is generally due within three months of the date of action.
Sanctions	No	If a sanction has been recommended (Notice, Probation, Withdrawal), no Interim Monitoring would typically be assigned. A sanction usually subsumes any Interim Monitoring. Only the Board may determine that an interim report is warranted before the visit associated with the sanction occurs, but only in certain cases.
Federal Compliance “HLC follow-up required”	Yes	Expectations for monitoring related to Federal Compliance should be set forth on the Summary Page of the team report.
Significant concern NOT explicitly tied to a Core Component	Contact Liaison	Contact the institution’s liaison to discuss significant concerns that appear to fall outside of HLC’s Criteria for Accreditation.

Considerations for Setting a Due Date for Monitoring

Once a team has determined that monitoring is required and the form of that monitoring, it must then consider the time required to address the issue:

1. If monitoring has been **assigned by the reaffirmation team**, the team should **default to embedding its recommendation** in the mid-cycle review unless:
 - a. the gravity/urgency of the concern is such that evidence of improvement before the next scheduled evaluation is required (if “a” is not met then Interim Monitoring should be embedded to reduce burden to the institution); **AND**
 - b. peer reviewers are confident that evidence of “adequate improvement” (as defined in this document) can be available by the assigned due date. **Both factors, a and b, must be met.** (If factor “b” is not met, the institution will likely continue a schedule of monitoring on the topic, whether embedded or not.)

For example, assessment evidence is usually time-consuming to gather, so if 4.B is met with concerns at the time of reaffirmation, consideration of the two factors above would suggest that regardless of the gravity of the concern, if HLC is not likely to see evidence of adequate improvement in 2 years, the monitoring should be embedded in Year 4.

On the other hand, if Core Components 2.A and 5.B were met with concerns because of what appeared to be deficiencies in internal controls and policies related to finance, a Focused Visit (because interaction would likely be required to determine sufficiency of the evidence) could reasonably be assigned between reaffirmation and the mid-cycle evaluation.

1. If the monitoring is **assigned by the mid-cycle review team, default to assigning stand-alone Interim Monitoring** before reaffirmation if:
 - a. the gravity/urgency of the concern is such that evidence of improvement before the next scheduled evaluation is required (if “a” is not met then Interim Monitoring should be embedded to reduce burden to the institution); **AND**

- b. peer reviewers are confident that evidence of “adequate improvement” (defined on page 2) **can** be available by the assigned due date. Both factors a and b must be met.

This should result in stand-alone monitoring events occurring more frequently between mid-cycle and reaffirmation, rather than the reverse.

2. When **timeframes** are identified for Interim Monitoring rather than specific **due dates**, time should be counted from the date of anticipated final action on the team’s recommendation by an HLC decision-making body (IAC or Board), not the date of the team visit.
 - a. Interim Reports can be required no sooner than three months after the date of action.
 - b. Focused Visits can be required no sooner than six months after the date of action.
 - c. Timeframe recommendations for Focused Visits should be written to be completed “no later than” a specific identified date.
 - d. Timeframes for Interim Monitoring assigned at mid-cycle cannot extend beyond the date of reaffirmation.



Guiding Questions for Team Consideration of Interim Monitoring

Once a team has decided to assign monitoring, the following questions may help the team design the type of monitoring, consider how to bundle monitoring report topics, and determine a due date.

Interim Report vs. Focused Visit

Positive responses signal that a Focused Visit is more appropriate.

- Was Notice seriously considered during the team's decision-making process?
- Will HLC/institutional interaction be required to follow up on concerns?
- Will HLC need to see on-campus patterns of evidence?

Embedded Monitoring vs. Stand-alone Monitoring and Due Dates

- Is evidence of a "course correction" required before the next regularly scheduled review?
- Can evidence of any expected improvement(s) be available prior to the next scheduled review?
- Does the improvement needed (e.g. assessment results) require a longer timeframe to allow for substantive and measurable progress on the part of the institution?

Bundling Multiple Core Components in a Single Monitoring Report

Where a number of Core Components are "Met with Concerns":

- Are the issues found in one Core Component related or complementary to any other Core Component (e.g. if there are issues with program review in Core Component 4.A, does it relate to strategy, planning and budgeting in Core Component 5.C)?
- Does the improvement of any one Core Component need to occur prior to the remediation of another?
- Can evidence for expected improvement be available for all cited Core Components at the same point of time?

General Questions about Assigning Monitoring

- Has the team provided sufficient details for the institution to understand the issue(s) and the required improvement(s)?
- Are the expectations for the monitoring clear and measurable, i.e. will both the institution and HLC understand if the institution has met those expectations?
- If there are multiple issues, are the reports presented in chronological order (not Criterion order)? Has the team built the monitoring so that it "flows" clearly and guides the institution forward?