

Monitoring Recommendations

Considerations for Peer Reviewers

When a peer review team identifies an issue at an institution that is relevant to the institution's compliance with HLC requirements, the team may recommend monitoring on that issue. In these cases, the team must carefully consider the type of monitoring necessary and the timeframe in which it should be completed. HLC provides the following considerations for reviewers to use in their deliberations.

When to Recommend Monitoring

When determining whether to recommend monitoring, peer reviewers should consider the following:

1. Depth or gravity of the current challenge or concern.
2. Documentation of accreditation-related deficiencies tied to the Criteria for Accreditation or other HLC requirements.

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 or stand-alone monitoring between Pathway reviews).

Team concerns must be documented in the team report with evidence that monitoring is needed for each applicable HLC requirement. Additionally, the team needs to determine whether institutional attention in response to the team report is likely to be effective in lieu of monitoring.

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. Peer reviewers should consider the following questions:

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 in order to determine the sufficiency of the evidence? 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 or decisionmakers consider a Notice sanction and settle on 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 that an HLC requirement is 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) and demonstrate that it meets the applicable HLC requirements without concerns.

Focused Visits and Pathway Assignments: Per HLC policy, if an institution on the Open Pathway is assigned a focused visit, the institution will be placed on the Standard Pathway.

Monitoring Due Dates

Once a team has determined that monitoring is required and the form of that monitoring, it must then consider the time required for the institution to address the issue. If the team is recommending one or more interim reports, it must determine whether the report should be stand-alone or embedded in the next scheduled Pathway review.

When to Recommend Embedded or Stand-Alone Interim Reports

When recommending an interim report, teams should first consider embedding the report within regularly scheduled Pathway evaluations to follow up on concerns. Whenever feasible, teams should recommend that an interim report be embedded as part of regular reviews in an institution’s accreditation cycle.

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

- Comprehensive evaluation for Reaffirmation of Accreditation in Year 10
- Mid-cycle Assurance Review (Open Pathway) or comprehensive evaluation (Standard Pathway) in Year 4

The team should recommend a stand-alone interim report only for matters that meet both of the following conditions:

1. Institutional action and HLC oversight are required before an institution’s next Pathway evaluation; **and**
2. The institution can demonstrate within a shorter period of time that it meets the applicable HLC requirements without concerns.

For example, if a team conducting a Year 10 comprehensive evaluation determines Core Component 4.B is met with concerns, the team should consider the fact that assessment evidence is usually time-consuming to gather. Regardless of the gravity of the concern, if HLC is not likely to see evidence of adequate improvement in two years, the interim report should be embedded in the institution’s mid-cycle evaluation in Year 4.

On the other hand, if the team determines Core Component 2.B is met with concerns because of what appear to be deficiencies in the institution's process for communicating with students about changes to program requirements, a stand-alone interim report could reasonably be assigned before the mid-cycle evaluation.

Timeframes for Focused Visits or Stand-Alone Interim Reports

When timeframes are identified for monitoring rather than specific due dates, time should be considered from the date of anticipated final action on the team's recommendation by an HLC decision-making body (Institutional Actions Council or Board of Trustees), not the date of the team visit.

Teams should follow these general timeframes when recommending due dates for monitoring:

- Interim reports can be required no sooner than three months after the date of action.
- Focused visits can be required no sooner than six months after the date of action.
- Timeframe recommendations for focused visits should be written to be completed "no later than" a specific date.
- Timeframes for monitoring cannot extend beyond the date of the institution's next Pathway evaluation.

When to Bundle Monitoring Topics

When a team decides to recommend monitoring, careful consideration should be given to consolidating institutional work into the smallest number of interim reports or focused visits (or combination thereof) necessary.

For example, if the team identifies multiple HLC requirements that require monitoring, it will need to determine whether to "bundle" the monitoring regarding the various HLC requirements in a single interim report (or focused visit) or to assign more than one interim report and/or focused visit. In deciding this, teams should consider the Three C's:

Is the evidence needed to demonstrate that the institution meets the applicable HLC requirements without concerns likely to be:

1. **Complementary** to one another?
2. **Contingent** upon one another?
3. Available **contemporaneously**?

If the answer is "yes" for all of the concerns related to multiple HLC requirements, then the monitoring should be bundled into a single report or focused visit on multiple HLC requirements. If the answer is "no," the outlier HLC requirements should be set off with a separate or concurrent due date, if appropriate, and in a suitable format.



When is Monitoring Required?

| Determination | Monitoring Required | Notes |
|--|---------------------------|---|
| Criteria “met,” but 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” and Notice is not recommended | Yes | Monitoring is required when any Core Component is found to be met with concerns and the team does not recommend the sanction of Notice. 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 required to ensure the improvement is made. |
| Criteria “not met” | No | See Sanctions, Show-Cause Orders or Adverse Actions. |
| Assumed Practice(s) “not met” and sanction, Show-Cause Order or adverse action is not recommended | Yes | Monitoring is required when any Assumed Practice is found to be not met and the team is not recommending a sanction, Show-Cause Order or adverse action. Since Assumed Practices are not typically evaluated for accredited institutions, a review of Assumed Practices may be triggered by a Core Component finding of not met. |
| Federal Compliance “not met” and sanction, Show-Cause Order or adverse action is not recommended | Yes | Monitoring is required when any Federal Compliance Requirement is found to be not met and the team is not recommending a sanction, Show-Cause Order or adverse action. |
| Sanctions, Show-Cause Orders or Adverse Actions | No | If a sanction (Notice, Probation), Show-Cause Order or adverse action has been recommended, no monitoring should be recommended. HLC’s Board of Trustees may determine that an interim report is warranted before a visit associated with a sanction occurs, but only in certain cases. |
| Significant concern NOT explicitly tied to a Core Component or other HLC requirement | Contact HLC Staff Liaison | Contact the institution’s HLC staff liaison to discuss significant concerns that appear to fall outside of HLC’s Criteria for Accreditation or other requirements. |

Guiding Questions for Team Consideration of Monitoring

Once a team has decided to recommend monitoring, the following questions may help the team decide the type of monitoring, consider how to bundle monitoring 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 deliberations?
- Will HLC/institutional interaction be required to follow up on concerns?

Embedded vs. Stand-Alone Interim Reports

- Is evidence of a “course correction” required before the next regularly scheduled review?
- Does the improvement needed (e.g. assessment results) require a longer timeframe to allow for evidence of adequate improvement on the part of the institution?

Bundling Multiple Concerns in a Single Interim Report or Focused Visit

Is the evidence required to demonstrate that the institution meets the applicable HLC requirements without concerns:

- **Complementary** to one another: Are the issues found in one HLC requirement related or complementary to any other requirement (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)?
- **Contingent** upon one another: Does the improvement of any one HLC requirement need to occur prior to the remediation of another?
- Available **contemporaneously**: Can evidence of compliance with all cited HLC requirements be available at the same point of time?

Positive responses to **all** the questions above signal that bundling multiple concerns into a single report or visit is appropriate.

General Questions About Recommending 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?
- Has the team identified the applicable HLC requirements associated with the monitoring?
- If there are multiple reports and/or visits, are they presented in chronological order (not Criterion order)? Has the team built the monitoring so that it flows clearly and guides the institution forward?