



RULES REGARDING PRIOR PEER REVIEWER EVALUATION AND IAC DECISION-MAKING ACTIVITY

Policy Change Adopted on Second Reading

The Higher Learning Commission (HLC) Board of Trustees (“the Board”) adopted this policy on second reading at its meeting on November 3, 2022.

Background

HLC’s policies include requirements indicating when peer reviewers may be assigned to an evaluation of an institution after having previously participated in an evaluation or HLC Academy activity involving the same institution. The adopted policy changes set similar requirements for members of the Institutional Actions Council (IAC). The changes also indicate when peer reviewers and IAC members may be assigned to an evaluation or decision-making activity regarding an institution after having previously participated in a decision-making activity involving the same institution.

HLC circulated these policy changes to the membership and other interested parties after the Board’s June 2022 meeting. No comments were received warranting changes in language. However, staff identified an additional change that would clarify how the rules apply to Trustees who return to the Peer Corps following their service on the Board.

Implementation

This policy is effective immediately.

Adopted Policy

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**). Changes between first and second reading, other than

minor editing, are indicated in italics (*new wording deleted after first reading, old wording restored after first reading*). These revisions have been made on HLC's website at hlcommission.org/policies.

Policy Title: Institutional Actions Council

Number: INST.D.20.010

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Conflict of Interest

HLC expects that all IAC members will act with objectivity and without conflict of interest when participating in IAC activities.

HLC will not knowingly allow any IAC member to participate in discussions, recommendations, or actions where the IAC member has a conflict of interest that may cause the IAC member to lack objectivity, that may result in the appearance of bias, or that may otherwise call into question the integrity, fairness, or credibility of IAC processes.

IAC members will periodically be required to confirm their agreement to abide by the conflict of interest and objectivity requirements for IAC members set forth by HLC.

IAC members will also periodically be required to disclose specific circumstances that may result in a conflict of interest. IAC members are expected to promptly update these disclosures, including during an Institutional Actions Council Meeting Committee or Institutional Actions Council Hearing Committee, as needed.

Any conflicts of interest or other recusals will be noted in minutes, as applicable.

Previous HLC Evaluation Activities

An IAC member who participated as a peer reviewer in a comprehensive evaluation of an institution shall not participate in IAC decision-making activity regarding that institution for a period of ten years.

An IAC member who participated in an IAC Hearing regarding an institution shall not participate in IAC decision-making activity regarding that institution for a period of ten years.

With the exception of where deemed appropriate by HLC staff, for example, for continuity purposes, an IAC member who participated as a peer reviewer in an HLC panel or evaluative activity other than a comprehensive evaluation, in IAC decision-making activity, or in an Academy assignment may not participate in IAC decision-making activity regarding that institution for a period of three years.

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Policy Number Key

Section INST: Institutional Processes

Chapter D: Decision-Making Bodies and Process

Part 20: Institutional Actions Council

Last Revised: November 2022

First Adopted: June 2011

Revision History: April 2013, June 2014, November 2019, June 2020, November 2020, June 2021, June 2022, November 2022

Notes: Policies combined November 2012 - 2.2(d)1.2, 2.2(d)1.2a, 2.2(d)1.2b, 2.2(d)1.2b1, 2.2(d)1.2b2. In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”

Related Policies: INST.D.40.010 Institutional Actions Council Processes

Policy Title: Peer Corps Members on HLC Evaluation Activities

Number: PEER.A.10.050

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With the exception of allowing for one peer reviewer from a reaffirmation visit to be placed on the following ~~mid-cycle~~ **Standard or Open Pathway Year 4 review** team for the purpose of improved historical context for the ~~mid-cycle~~ review, HLC staff shall not assign a peer reviewer who participated in an HLC comprehensive ~~reaffirmation~~ evaluation **or an IAC Hearing** to another evaluative assignment at that same institution for a period of ten years.

With the exception of where deemed appropriate ~~for continuity purposes~~ by HLC staff, **for example, for continuity purposes**, a peer reviewer who participated in an HLC panel or ~~other~~ evaluative activity ~~not involving reaffirmation~~ **other than a comprehensive evaluation**, in an *HLC IAC* decision-making ~~body activity~~, or in an Academy assignment may not be assigned to another evaluative ~~or decision-making~~ assignment ~~at or~~ regarding that same institution for a period of three years. ...

Policy Number Key

Section PEER: Commitment to Peer Review

Chapter A: Policies Applicable to All Peer Reviewers

Part 10: General

Last Revised: November 2022

First Adopted: February 1994

Revision History: October 2003, November 2012, June 2018, February 2020, June 2021, November 2022

Notes: Former policy number 6.7, 6.8. In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”

Related Policies: