

Student Success Outcomes: Data Collection & Indicator Follow-Up

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 February 27, 2025.

Background

As part of its Routine Monitoring and Data Collection policy, HLC maintains an annual process of collecting information from member institutions through the [Institutional Update](#). As appropriate, HLC follows up on information that institutions provide in the Institutional Update through a process focused on specific financial and non-financial risk indicators.

Beginning in 2024, HLC launched a multi-phase project to improve the agency’s ability to track student success outcomes at member institutions. In Phase 1 of the project, HLC expanded the [risk indicator process](#) to include student success indicators based on three educational outcome measures reported to IPEDS:

- First-year retention rate
- Graduation rate within 150% of normal time
- Completion and transfer rate at 8 years after entry to college

The adopted policy changes establish the basis for modifying the risk indicator process to include the student success indicators. See [Student Success Indicators](#) and the [March 2025 Leaflet](#) for details about the process related to student success indicators and next steps in its implementation.

HLC circulated these policy changes to the membership and other interested parties after the Board’s October 2024 meeting. Some comments were received and reviewed by staff. None of the external comments resulted in changes to the proposed policy language. However, HLC staff made minor edits to further clarify aspects of the policy.

HLC also wishes to acknowledge an issue raised by several commentors regarding HLC’s planned use of certain IPEDS data as part of the process related to student success outcomes. Among other things,

commentors indicated that IPEDS data does not sufficiently reflect the diversity of missions and student populations across HLC's membership.

Importantly, the process related to student success outcomes will be a multi-layered process that takes into account the varying missions, student bodies and contexts of member institutions in establishing benchmarks such that similarly positioned institutions are compared.

Even more, for institutions where concerns are identified, HLC's process will seek additional clarification and supplemental information to further inform our analysis.

After exploring several data sources during the research phase of this project, HLC ultimately decided to incorporate IPEDS data because such data is the most widely and consistently available data across HLC's membership. Additionally, because IPEDS data is also publicly available, HLC will be able to reduce members' time and reporting burden by collecting this information, as opposed to requiring additional institutional submissions.

Ultimately, HLC's student success indicator process will be transparent, consistent and allow for ample consideration of different institutional missions.

Implementation

This policy is effective immediately.

Adopted 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~~~~). Changes between first and second reading, other than minor editing, are indicated in italics (*new wording*, *old wording*).

These revisions have been made on HLC's website at hlcommission.org/policies.

Policy Title: Routine Monitoring and Data Collection

Number: INST.F.10.010

Monitoring shall be appropriate in circumstances where HLC has concluded that it should review the institution's progress in addressing a serious issue at the institution, the resolution of which is relevant to the institution's compliance with, or improvement regarding, HLC requirements.

Monitoring on Pathways. An institution on the Standard or Open Pathway may be required to file one or more interim reports. An institution on the Standard Pathway may be required to host one or more focused visits. Other than a focused visit following an approved Change of Control, Structure or Organization, an institution on the Open Pathway that is assigned a focused visit will be moved to the Standard Pathway.

Process for Requiring Monitoring. An evaluation team or HLC staff may recommend that an institution be assigned monitoring in the form of filing one or more interim reports or hosting one or more-focused visits related to one or more HLC requirements. Following review of the recommendation, and any institutional response, if applicable, an appropriate decision-making body, or HLC staff where allowed by HLC policy, shall determine whether the monitoring is appropriate for the institution, and, if so, shall act to assign such monitoring.

The ~~HLC~~ President may also otherwise act to require monitoring as consistent with HLC policies.

Interim Reports. An institution shall submit any required interim report(s) according to the due date(s) established in the action calling for the interim report(s). Prior to the institution submitting the interim report(s), HLC staff may act to expand the focus of the report(s) to review additional related topics or HLC staff may recommend to a decision-making body that the focus of the interim report(s) be expanded to add new topics.

HLC may designate staff to review and prepare a written analysis of interim reports. Upon review of an interim report, HLC staff may either (1) accept the report or require one or more additional interim report(s) on the same or related topic; or (2) recommend that an HLC decision-making body require further monitoring, including one or more additional interim reports on different topics, or one or more focused visits on the same, related or new topics.

Focused Visits. An institution that is assigned a focused visit shall host such focused visit according to the date established in the action calling for the focused visit. The institution shall submit a focused report to HLC on the topics identified in that action prior to the focused visit. Prior to the focused visit, HLC staff may, with reasonable notice to the institution, act to expand the focus of the focused visit to review additional related topics or new topics.

The focused visit shall be conducted by a team of HLC peer reviewers. The length of the focused visit shall typically be one and a half days. HLC may adjust the length of the visit or require that team members conduct additional on-site visits to the institution's facilities to examine specific issues.

The focused visit team will prepare a written report addressing the topics identified in the actions calling for the focused visit, any additional related topics or new topics raised by HLC staff, or other topics identified

by the team. The focused visit team report shall include a recommendation for HLC action either accepting the institution's focused report or calling for additional monitoring, sanction, Show-Cause Order or withdrawal of accreditation. The institution shall have the opportunity to file a written response to the focused visit report prior to a decision-making body acting on the report.

Data Reporting From Member Institutions

All member institutions will complete data reports for HLC. ~~Such reporting will occur annually, and may also occur as well as periodically, as otherwise required by HLC. HLC, with oversight as appropriate from the Board of Trustees,~~ will determine the contents of this reporting to assure **(1)** that it addresses potential or developing ~~problems~~ **concerns** with an institution's **stability and** compliance with ~~accrediting~~ **HLC** requirements ~~and institutional stability, as well as~~ **and (2)** that it **adequately** solicits updated information on the scope of activities of each member institution. Data required from each institution will include, at minimum, annual financial information, headcount and enrollment **information, measures and information** related to **student success outcomes, including** student achievement, ~~and other indicators~~. The data reporting will provide HLC with sufficient information to understand and respond to significant shifts in an institution's capacity ~~and/or~~ scope of educational activities.

Institutional Contact for Data Reporting

~~To assure that the institution provides accurate and consistent information, each member institution identifies an Accreditation Liaison Officer (ALO) who will bear administrative responsibility for submitting the report in a timely manner. HLC training will be available for those liaisons.~~

HLC Follow-Up to Institutional Data

HLC will establish and maintain procedures to follow-up with institutions regarding institutional data as necessary. This institutional data ~~could~~ includes data that the institution provides to HLC or other data that HLC has regarding the institution, including data regarding the institution that is otherwise available from public sources.

In reviewing and analyzing institutional data, HLC will look at relationships among a variety of **established risk indicators in the institutional data**, and other information, in any given year or over several years. If those relationships suggest ~~that the institution may be experiencing problems meeting~~ **concerns with the institution's stability, such as experiencing very rapid change, or concerns with the institution's compliance with HLC requirements or very rapid change**, HLC will ask the institution to submit an explanation of the data, **including, as appropriate,** ~~In particular, HLC will ask institutions it identifies through review of information about student achievement to provide information about their strategy~~ **the institution's strategies**

for improvement. HLC staff may require that ~~institutional data~~, **this explanation** and any ~~explanation or~~ other information provided by the institution, be forwarded to a peer ~~review panel reviewers~~ or HLC staff for further review. ~~Such panel may conduct its review in a scheduled meeting or by any means that allows for synchronous or asynchronous communication.~~

Upon review, the peer ~~review panel reviewers~~ or HLC staff may accept the ~~report~~ **explanation provided.**

If **institutional data** ~~submitted by an institution, particularly enrollment information, financial indicators based on financial ratios, or any other additional information required by a peer review panel, are indicative of problems meeting~~ **indicate concerns with the institution's compliance with HLC requirements**, ~~rapid change, significant growth,~~ or otherwise require **further** validation, the peer ~~review panel reviewers~~ or HLC staff may recommend ~~additional~~ **monitoring on specific HLC requirements, as related to the institutional data**, to an HLC decision-making body or the *HLC President* may otherwise assign monitoring as consistent with HLC policy.

Monitoring of Student Enrollment Growth

HLC will monitor enrollment growth through institutional annual data reporting and will monitor on an ongoing basis growth in enrollment at those institutions that experience significant enrollment growth as defined in HLC procedures or appear to have significant shifts in enrollment based on instructional modalities. HLC will ask institutions that have been identified through the annual data reporting process as having significant enrollment growth to provide information about enrollment growth at the program level. HLC may take follow-up action.

Surveying of Students

HLC may survey students of an institution to gather information about their experience at the institution prior to a comprehensive evaluation at the institution scheduled by HLC. HLC will provide aggregate data resulting from the survey to the institution under review and the evaluation team prior to the comprehensive evaluation. The institution will have an opportunity to provide additional information or other data in response to the student survey data to the evaluation team and HLC prior to the comprehensive evaluation.

Policy History

Last Revised: February 2025

First Adopted: November 1999, February 2003, February 2007

Revision History: February 2001, February 2007, February 2009, February 2010, November 2010, June 2012, November 2012, April 2013, February 2014, June 2014, November 2018, June 2020, November 2020, February 2021, February 2022, June 2022, February 2024, February 2025

Notes: Policies combined November 2012 - 3.6, 3.6(a), 1.3, 1.3(a), 1.3(b), 1.3(c). In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”

~~Policy Title: Review of Student Outcome Data
Number: FDCR.A.10.080~~

~~An institution shall demonstrate that, wherever applicable to its programs, its consideration of outcome data in evaluating the success of its students and its programs includes course completion, job placement, and licensing examination information.~~

~~Policy History~~

~~Last Revised:~~

~~First Adopted: June 2012~~

~~Revision History:~~

~~Notes: Former policy number 4.0(h). In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”~~