



## CANDIDACY AND INITIAL ACCREDITATION

### Proposed Policy Change Approved on First Reading

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The Higher Learning Commission (HLC) Board of Trustees (“the Board”) approved this policy on first reading at its meeting on November 5–6, 2020.

#### Background

The proposed policy revision would update and consolidate information regarding candidacy and initial accreditation standards and processes. Significant information pertaining to seeking accreditation would be relocated from the Accreditation (INST.B.20.030) policy, which the Board approved [proposed revisions](#) to as well. Consolidating all of this information would allow institutions that are seeking accreditation with HLC to review all of the pertinent information in one location.

#### Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on February 25–26, 2021. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by January 18, 2021.

#### Proposed 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~~~~).

Policy Title: Candidacy **and Initial Accreditation**

Number: INST.B.20.020

~~Grant of Candidacy~~

~~The Board of Trustees will review an institution's application for candidacy and all related materials after the institution has undergone evaluation by a team of peer reviewers and an Institutional Actions Council hearing, as defined in Commission policy. The Board of Trustees may grant or deny candidacy.~~

Every ~~non-affiliated~~ institution seeking **accredited** status with ~~the Commission~~ HLC shall apply for and serve a period of candidacy. Such candidacy shall **typically** be for four years ~~(48 months)~~ from the date action is taken to grant candidacy to the date action is taken to grant **or deny** accreditation, with a minimum period in candidacy of at least two years ~~(24 months)~~ **2 years**, ~~but and~~ not to exceed **five years (5 years)** ~~the maximum time limits of candidacy outlined in this policy.~~

In exceptional circumstances, the Board may in its discretion waive the required candidacy period~~s~~. ~~s~~Such waiver will be based upon evidence that the institution meets all **HLC requirements** ~~the Criteria for Accreditation and has met all other requirements laid out in Commission policies related to achieving accreditation~~, but such evidence shall not obligate the granting of a waiver **of the candidacy period**.

#### Grant of Candidacy

The Board of Trustees will review an institution's application for candidacy and all related materials after the institution has undergone a comprehensive evaluation, as detailed below, evaluation by a team of peer reviewers and an Institutional Actions Council hearing, as defined by Commission policy. The Board of Trustees may grant or deny candidacy.

#### **Evaluative Framework for Achieving and Maintaining Candidacy and Continued Candidacy**

~~An institution must be judged by the Commission to have met each of the requirements of the candidacy program to merit the award of candidate for accreditation status (candidacy). The requirements of the candidacy program for granting and maintaining candidacy are as follows:~~

1. the institution meets each of the Eligibility Requirements;
2. **the institution meets each of the Assumed Practices;**
- ~~2~~ 3. the institution demonstrates ~~sufficient evidence, including evidence that the institution currently conforms with each of the Assumed Practices, to support the judgment that all of the Criteria for Accreditation and Core Components~~ can reasonably be met within four years of candidacy; and
- ~~3~~ 4. the institution meets the Federal Compliance Requirements.

~~The self-study or documentation assembled in a self-evaluative process constitutes the official application for candidacy.~~

~~During the candidacy period the Commission will ensure ongoing compliance with the Eligibility Requirements and continued progress towards achieving accreditation at the end of the candidacy period through a biennial visit.~~

~~The judgment that the institution meets the Eligibility Requirements and is likely to meet the Criteria by the end of the candidacy period is based on detailed information about all parts of the institution. Such information may be acquired through evidence provided to the Commission by the institution or acquired by the Commission from other sources prior to or during an evaluation process.~~

#### ~~Evaluative Framework for Achieving and Maintaining Candidacy~~

~~In the evaluation process, the Commission will review the institution against the requirements of the candidacy program according to the following evaluative framework.~~

~~Eligibility Requirements. The institution meets the Eligibility Requirement if the Commission determines that the Requirement is met without concerns; that is, the institution is found to meet or exceed the expectations embodied in the Requirement.~~

~~The institution does not meet the Eligibility Requirement if the Commission determines that the institution has failed to meet the Requirement in its entirety or is so deficient in one or more aspects of the Requirement that the Requirement is judged not to be met.~~

~~Criteria for Accreditation and Core Components. The institution demonstrates that it can reasonably meet the Criteria for Accreditation within the four years of candidacy if it provides emerging evidence with regard to each Criterion and Core Component and the Commission determines that the Criteria and Components are likely to be met within the candidacy period.~~

~~The institution must provide emerging evidence with regard to each Criterion in order for it to provide sufficient evidence of meeting the Criteria for Accreditation during the candidacy period.~~

~~Federal Compliance Requirements. The institution demonstrates that it meets the Federal Compliance Requirements.~~

~~The Commission will award candidacy based on the outcome of this evaluation.~~

~~Assumed Practices in the Evaluative Framework for Candidacy. An institution seeking candidate for accreditation status must explicitly demonstrate, in its required plan to meet the Criteria for Accreditation within the four years of candidacy, that it currently conforms with all of the Assumed Practices.~~

## Candidacy Cycle

The period of candidacy is four years. However, at any time during the candidacy period, subsequent to the completion of the two-year required minimum candidacy, the institution may file an application for early initial accreditation and host an on-site initial accreditation visit to evaluate the institution for this purpose. The institution will be limited to one application for early initial accreditation during the term of candidacy. In exceptional situations, the Board of Trustees at its discretion may extend candidacy to a fifth year.

## Grant of Initial Accreditation\*

The Board of Trustees will reviews an institution's application for initial accreditation and all related materials after the institution has undergone a comprehensive evaluation, as detailed below, by a team of peer reviewers and an Institutional Actions Council hearing, as defined in Commission policy. Only institutions that have completed candidacy, or been exempted from candidacy by the Board of Trustees following Commission policies on Candidacy, shall be eligible for initial accreditation. The Board of Trustees may grant or deny initial accreditation based on its determination of whether the institution meets the Eligibility Requirements, Criteria for Accreditation, Core Components, and Federal Compliance Requirements. If the Board of Trustees grants initial accreditation, it may grant such accreditation subject to interim monitoring, restrictions on institutional growth or substantive change, or other contingency.

## Early Initial Accreditation

An institution may apply request a review for early initial accreditation after two or three years of candidacy following Commission policies on candidacy. The Board of Trustees shall have the discretion to continue candidacy, instead of granting early initial accreditation, in circumstances including, but not limited to, the following: if the Board determines that one or more of the Core Components are not met or met with concerns (and thus, if a recommendation for early initial accreditation is would be conditioned on the imposition of a sanction or the scheduling of interim monitoring); or in other circumstances where the Board concludes that a continuation of candidacy, or extension of candidacy to a fifth year, is warranted.

The institution will be limited to one review for early initial accreditation during the term of candidacy.

## Evaluative Framework for Achieving Initial Accreditation

The requirements for granting initial accreditation are as follows:

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\* "Grant of Initial Accreditation" and "Early Initial Accreditation" were moved from policy INST.B.20.030, Effective Date of Accreditation Actions. See proposed revisions to that policy.

1. The institution meets each of the Eligibility Requirements.
2. The institution meets each of the Assumed Practices.
3. The institution meets the Criteria for Accreditation. In order to successfully complete a review for early initial accreditation, an institution must meet the Criteria for Accreditation with no findings of Met with Concerns.
4. The institution meets the Federal Compliance Requirements.

### Extension of Candidacy

In exceptional circumstances, the Board of Trustees may extend candidacy to a fifth year.

~~Any extension of candidacy to a fifth year shall be granted following Commission policies on extension of candidacy. Such a~~ Actions to continue candidacy, thereby denying early initial accreditation, or to extend candidacy to a fifth year, thereby denying initial accreditation, are not adverse actions and thus shall not be considered denial of status and are not subject to appeal.<sup>†</sup>

### Evaluations Related to Granting Candidacy and Initial Accreditation

Candidacy will be initiated through a comprehensive on-site evaluation and maintained through a subsequent on-site biennial evaluation **no later than** two years (2 years) after candidacy is granted to determine whether the institution **continues to meet the Eligibility Requirements and Assumed Practices, and** is making reasonable progress towards meeting ~~accreditation requirements~~ **the Criteria for Accreditation** by the end of the candidacy period, ~~including continued conformity with the Assumed Practices. Two years after this~~ **Following the** biennial evaluation, ~~or at the end of the four year candidacy period, an~~ the institution will have its **comprehensive** evaluation for initial accreditation **during the fourth year of candidacy in sufficient time for the Board to consider the outcome prior to the conclusion of the fourth year of candidacy.** If, as a result of the initial accreditation visit, the Board acts to extend the institution's candidacy for a fifth year, the institution will ~~repeat~~ **undergo a new comprehensive evaluation** ~~the visit~~ for initial accreditation ~~during that~~ **the fifth** candidacy year in sufficient time for the Board to consider the outcome of the evaluation prior to the conclusion of the fifth candidacy year.

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<sup>†</sup> This paragraph was moved from policy INST.B.20.030, Effective Date of Accreditation Actions. See proposed revisions to that policy.

## Evaluation for Initial Accreditation or Candidacy

An institution applying for **candidacy or initial accreditation** shall undergo a **Comprehensive Evaluation** by the **Commission HLC** composed of the following elements:

**Assurance Process.** The Assurance Process for an institution undergoing an evaluation for initial accreditation or candidacy has the following components:

- Assurance Filing;
- Assurance Review;
  - analysis of the Assurance Filing and of information from any on-site visit by **Commission HLC** peer reviewers culminating in a written report;
  - an on-site visit by a team of **Commission HLC** peer reviewers.

**Assurance Filing.** An institution hosting a **Comprehensive Evaluation** for **candidacy or initial accreditation** shall submit the following information assembled through a self-evaluative or self-study process:

1. evidence of meeting the Eligibility Requirements;
2. evidence of meeting the Assumed Practices;
3. for candidacy, evidence that the institution can reasonably meet of conformity with the Assumed Practices and a carefully articulated plan and timetable showing how the institution will meet fully each of the Criteria for Accreditation and Core Components within the period of candidacy;
- 2 4. for initial accreditation, evidence **that the institution meets the Criteria for Accreditation, which may include findings of met with concerns of conformity with the Assumed Practices and meeting the Criteria for Accreditation and Core Components, or for candidacy, evidence of the degree to which the institution meets the Criteria for Accreditation and Core Components;**
- 3 ~~3. for candidacy, evidence of conformity with the Assumed Practices and a carefully articulated plan and timetable showing how the institution will meet fully each of the Criteria for Accreditation and Core Components within the period of candidacy;~~
- 4 5. evidence of meeting the Federal Compliance Requirements;
- 5 6. branch campus evaluation information, **if applicable;** and
- 6 7. any addenda requested by the team during the evaluation process.

In addition, the **Commission HLC** shall supply information including but not limited to the Eligibility Process analysis, official correspondence, public comments, previous evaluation team reports and action

letters, if any, information from the institution's accreditation file with other recognized accrediting agencies, and any other information ~~the Commission~~ HLC deems appropriate.

~~Comprehensive Evaluation~~ **Assurance Review**. A team of peer reviewers, selected by Commission staff following Commission procedures, shall review an institution's Assurance Filing and related materials. The team shall then conduct an on-site visit to the institution's main campus, its branch campuses, and such other institutional locations as shall be determined by the Commission based on its policies and procedures and to verify where appropriate evidence provided by the institution; for institutions that offer only distance or correspondence education, the team shall conduct its on-site visit to the institution's administrative offices but may include other institutional locations. The length of the visit shall be ~~three~~ **one and a half** days, but the Commission shall retain discretion to lengthen or shorten the visit or require that team members conduct additional on-site visits to the institution's facilities ~~as a part of a particular Comprehensive Evaluation~~ to examine specific issues. ~~The President of the Commission shall determine whether the institutional liaison or other Commission staff member will accompany the initial accreditation or candidacy visit team.~~

**Analysis and Written Report**. Commission peer reviewers shall conduct an analysis of the information generated by the Assurance Review and shall prepare a detailed written report that outlines the team's findings related to the institution's meeting either the requirements for initial accreditation or for candidacy, including but not limited to, requirements related to assessment of student learning. The report shall identify strengths and challenges or deficiencies for the institution, and shall make a recommendation related to granting initial accreditation or granting candidacy.

**Recommendations Arising from Evaluations for Candidacy or Initial Accreditation or Candidacy**. The team of Commission peer reviewers conducting a ~~Comprehensive Evaluation for~~ **candidacy or** initial accreditation ~~or candidacy~~ shall in its written report make a recommendation for ~~Commission~~ HLC action to complete the review. That recommendation shall be as follows:

For candidacy, the team shall recommend whether to grant or deny candidacy based on the requirements and evaluative framework detailed in this policy. The team shall not recommend monitoring but may identify discrete issues to be addressed by the institution by the time of its biennial evaluation where such identification does not call into the question the institution's compliance with the Eligibility Requirements, in which case, the institution will not be granted candidacy.

For initial accreditation, the team shall recommend whether to grant **or deny** initial accreditation., ~~and~~ **If recommending that the Board grant initial accreditation, other than early initial accreditation, the team**

may recommend whether to require limited interim monitoring. ~~on a discrete issue where such monitoring does not call into the question the institution's compliance with the Criteria for Accreditation, in which case, the institution will not be granted Initial Accreditation. Alternatively, the team may recommend denying initial accreditation.~~ **In If recommending that the Board denying accreditation,** the team will also recommend whether to extend candidacy if the institution continues to meet the requirements, and is within the time limits, for candidacy or to withdraw candidacy if the institution does not meet the requirements for candidacy ~~or has reached the time limitations on candidacy.~~

~~For candidacy, the team shall recommend whether to grant candidacy. The team shall not recommend monitoring but may identify discrete issues to be addressed by the institution by the time of its biennial evaluation where such identification does not call into the question the institution's compliance with the Eligibility Requirements, in which case, the institution will not be granted candidacy.~~

These recommendations, along with the team's written report, shall be forwarded to ~~a Commission decision-making body~~ **the Institutional Actions Council and then the Board of Trustees** for review and action.

~~Institutional Responses to Recommendations Arising from Evaluations for Initial Accreditation or Candidacy.~~ The institution shall have the opportunity to provide a written response to the written report of a ~~Comprehensive or Assurance Review~~ **comprehensive evaluation** following ~~Commission~~ **HLC** policies for the provision of institutional responses.

### Biennial Visit

An institution in candidacy shall host an on-site evaluation after the first two years of candidacy. In preparation for the visit the institution and ~~the Commission~~ **HLC** shall provide information to update the Assurance Filing assembled at the time the institution was evaluated for candidacy.

**On-site Visit.** A team of peer reviewers, selected by ~~Commission~~ **HLC** staff following ~~Commission~~ **HLC** procedures, shall review the updated Assurance Filing and related materials and shall then conduct an on-site visit to the institution's main campus or, for institutions that offer only distance or correspondence education, its administrative offices, and such other institutional locations as shall be determined by ~~the Commission~~ **HLC** based on its policies and procedures. The length of the visit shall be one and a half days, but ~~the Commission~~ **HLC** shall retain discretion to lengthen or shorten the visit or require that team members conduct additional on-site visits to the institution's facilities to examine specific issues.

**Report and Recommendation from a Biennial Visit.** The team shall prepare a written report that outlines the team's findings related to the institution's progress in completing its candidacy plan and meeting the



Criteria for Accreditation within the four years of candidacy. If the institution is not making reasonable progress or there is evidence that the institution does not meet the Eligibility Requirements or ~~conforms to the~~ Assumed Practices, the team shall recommend withdrawal of candidacy. The report and recommendation shall be forwarded to an ~~Commission~~ HLC decision-making body for review and action.

~~Institutional Responses to Recommendations Arising From a Biennial Visit.~~ The institution shall have the opportunity to provide a written response to the written report of a ~~Comprehensive or Assurance Review~~ **biennial visit** following ~~Commission~~ HLC policies for the provision of institutional responses.

#### Withdrawal of Application for Candidacy

An institution may withdraw its application for candidacy at any time prior to a decision on that application by the Board of Trustees. The legally designated governing body of the institution must approve the withdrawal. If an institution that has withdrawn its application for candidacy seeks status again with ~~the Commission~~ HLC at a later time, it must wait at least one year from its withdrawal and then begin with the Eligibility Process. ~~Commission~~ HLC records of this application and its evaluation, and any other ~~Commission~~ HLC records related to the institution, shall be available to ~~Commission~~ HLC staff and ~~Peer~~ Reviewers evaluating the institution in all subsequent reviews.

#### Withdrawal of Application for Initial Accreditation

An institution may withdraw its application for initial accreditation at any time prior to a decision on that application by the Board of Trustees. The legally designated governing body of the institution must approve the withdrawal.

If an institution is nine months or ~~less~~ **fewer** from the end of its four-year term of candidacy when it withdraws its application, such withdrawal shall also constitute voluntary withdrawal from **candidacy** status with ~~the Commission~~ HLC. If an institution that has withdrawn its application for initial accreditation in these circumstances seeks ~~Commission~~ HLC status at a later time, it must wait at least one year from its withdrawal and seek candidacy by initiating the Eligibility Process.

If an institution is more than nine months from the end of its four-year term of candidacy when it withdraws its application for initial accreditation, it may request continued candidacy instead. If it withdraws its application before or during the initial accreditation visit, after receiving the team report, or after receiving a recommendation from the Institutional Actions Council Hearing, and the team or Hearing Committee raised no issues that call into question the institution's compliance with the requirements of the candidacy program, the institution may continue in its original four-year candidacy subject to action for continued candidacy by

the Institutional Actions Council. If either the team or the Hearing Committee raised issues related to the institution's compliance with the requirements of the candidacy program, ~~the Commission's HLC's~~ Board of Trustees must take action regarding the ~~ongoing~~ **continued** candidacy of the institution.

~~Commission HLC~~ records of this application and its evaluation, and any other ~~Commission HLC~~ records related to the institution, shall be available to ~~Commission HLC~~ staff and ~~Peer Reviewers~~ evaluating the institution in all subsequent reviews.

## Policy Number Key

*Section INST: Institutional Processes*

*Chapter B: Requirements for Achieving and Maintaining Affiliation*

*Part 20: Defining the Affiliated Entity*

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*Last Revised: November 2012*

*First Adopted: August 1992 and August 1987*

*Revision History: revised August 1996, effective September 1996, revised February 1998. Revised Criteria for Candidacy adopted February 2003, effective May 1, 2003, revised February 2007, revised February 2010, revised June 2011, revised February 2012, effective January 2013, revised November 2013.*

*Notes: Policies combined November 2012 – 1.1(a), 1.1(b), 1.1(b)1, 1.1(b)2, 1.4, 2013 – 1.1(b)1.3, 1.1(c), 1.1(c)1.*

*Related Policies: INST.G.10.020 Official Records*