



## MINIMUM SIZE OF CHANGE PANELS

### 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 February 25–26, 2021.

#### Background

The proposed policy change would provide additional flexibility in composing peer reviewer panels to evaluate substantive change requests. The revision would establish a minimum of two (rather than three) peer reviewers to align with anticipated practice in certain contexts. The change is expected to benefit member institutions by improving processing of substantive change requests.

#### Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on June 24–25, 2021. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by May 21, 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**).

**Policy Title: Review of Substantive Change**

**Number: INST.F.20.050**

The review process for requests for approving those substantive changes that require HLC APPROVAL as detailed in HLC policies shall primarily be determined in the following two ways: (1) each member institution shall be assigned a designation by HLC according to its experience and maturity in offering new educational programs and new methods of delivery, including offering distance and correspondence education; (2) HLC shall determine the complexity of the specific proposed changes being requested for approval.

An institution requesting prior approval of a substantive change shall present appropriate application information seeking approval of the change according to HLC's change review protocols. Generally, such materials shall be reviewed by HLC according to the provisions of this section; however, certain types of change may require additional review provisions as provided herein.

As determined by the designation of the institution and the complexity of the change, and unless otherwise stated herein, the change request will be reviewed by one of the following: a Change Panel, a Change Visit or a Desk Review, each of which is described below.

With the exception of changes submitted under INST.F.20.030 Non-Substantive Changes in the Accreditation Relationship Between an Institution and HLC - Notification, all change requests will be presented for final review and approval by an HLC decision-making body recognized by the U.S. Department of Education. Changes will be effective on or after the date of the action of that body. In no case will such approval be retroactive.

**Change of Control, Structure or Organization.** The review process for requests for changes identified as subject to HLC's Change of Control, Structure or Organization policy will be reviewed in accordance with separate associated procedures found in HLC's policies regarding Change of Control, Structure or Organization.

**Review of a Campus.** Institutions seeking HLC approval of a main campus or branch campus that houses a full range of instruction as well as administrative and support services shall provide a business plan for the new campus that specifies the following:

1. the educational programs to be offered at the campus;
2. the projected revenues, expenditures and cash flow at the campus; and
3. the operational, management, and physical resources at the campus.

Within six months of the date the campus matriculates students and offers instruction, HLC will conduct a campus visit.

**Review of Additional Locations.** The review process for additional locations offering 50% or more of an academic program shall be determined in the following two ways: (1) each member institution shall be assigned a designation by HLC according to its experience and maturity in offering new additional locations; (2) HLC shall determine the complexity of the specific proposed changes being requested for approval. Such review shall include consideration of the institution's fiscal and administrative capacity to operate that

location. The only exception shall be for institutions approved for access to the Notification Program for Additional Locations, as defined in this policy.

Within six months of the date an institution matriculates students and begins instruction at any of its first three new additional locations, HLC will conduct an on-site evaluation visit to that additional location.

**Notification Program for Additional Locations.** Institutions that have previously received approval from HLC to initiate at least three additional locations may seek access to the Notification Program for Additional Locations. Such access shall reflect HLC's determination that the institution has a proven record of educational and administrative oversight of such locations and has the capacity to extend that oversight to new additional locations. An institution's request for initial access to the Notification Program will be granted only after the institution has been reviewed by a Change Visit or other review for other additional locations resulting in a written report that documents the institution's compliance with appropriate requirements as outlined in this policy. Staff may act to remove an institution temporarily or permanently from the Notification Program in the following circumstances: (1) when an institution's capacity to provide appropriate oversight over its existing or future additional locations has been called into question; (2) when it has been placed on sanction or Show-Cause; or (3) when it has had its accreditation withdrawn even though such action may be stayed while pending appeal or other proceeding.

An institution with access to the Notification Program for Additional Locations will be able to open new additional locations as defined in the institution's Statement of Accreditation Status after notifying HLC prior to initiating any new additional locations and receiving an acknowledgment that HLC has added the new additional location to its database.

Access to the Notification Program for Additional Locations will be granted only to institutions that meet the following criteria:

1. accreditation by HLC for at least 10 consecutive years with no record of any action during that period for Probation, Show-Cause, or monitoring of issues related to the quality of instruction or to the oversight of existing additional locations or campuses. An institution that has been on Notice for issues unrelated to the quality of instruction or oversight of additional locations or campuses and was approved for the Notification program prior to being placed on Notice may seek readmission to the Notification program after the next comprehensive evaluation or after a period of four years, whichever is longer; if the Notice was related to the quality of the institution's off-campus instruction or related issues, the institution may not reapply until it has completed the ten years of good standing required for access to the Notification Program for Additional Locations.

2. demonstrated success in overseeing more than three locations;
3. no other HLC or other legal restrictions on additional locations and/or programs offered off campus; and
4. appropriate systems at the institution to ensure quality control of locations that include clearly identified academic controls; regular evaluation by the institution of its locations; a pattern of adequate faculty, facilities, resources, and academic/support systems; financial stability; and long-range planning for future expansion.

Continued institutional eligibility for access to the Notification Program for Additional Locations will be reviewed at least every five years, typically in conjunction with the comprehensive evaluation and the multi-location visit.

An institution with access to the Notification Program for Additional Locations that undergoes a Change of Control, Structure or Organization as defined in HLC policy will no longer be eligible for the Notification Program until such time as it demonstrates at the time of the next comprehensive evaluation after the transaction is approved by HLC that it continues to meet the requirements for inclusion in the program.

#### Substantive Change Review Process Structure

**Change Panel.** A Change Panel shall consist of ~~three~~ **two or more** peer reviewers who shall review applications for approval of substantive change submitted by institutions.

The Change Panel may seek additional information from the institution if such information is being sought to explain or clarify the materials provided by the institution in its application for change.

The Change Panel may recommend that the change be denied or that it be approved with or without additional monitoring as appropriate. Such recommendation will then be forwarded to an appropriate HLC decision-making body. The institution shall be given an opportunity to review the recommendation and provide an institutional response prior to consideration by the decision-making body.

Alternatively, the Change Panel may recommend that the change be further evaluated by an on-site evaluation team, either by a Change Visit or by a previously scheduled focused or comprehensive evaluation.

**Change Visit.** A Change Visit shall consist of a team of two or more peer reviewers designated by HLC who shall review applications for approval of substantive change submitted by institutions.

The Change Visit team may recommend that the change be denied or that it be approved, with or without additional monitoring as appropriate. Such a recommendation will then be forwarded to an appropriate HLC decision-making body. The institution shall be given an opportunity to review the recommendation and provide an institutional response prior to consideration by the decision-making body.

**Desk Review.** A Desk Review shall consist of a review of a proposed institutional change conducted by HLC staff. The staff member may recommend that the change be denied or that it be approved, with or without additional monitoring as appropriate. The Desk Review will result in a recommendation for approval of substantive change to an appropriate HLC decision-making body.

#### Policy Number Key

*Section INST: Institutional Processes*

*Chapter F: Maintenance and Monitoring*

*Part 20: Intermittent Monitoring*

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*Last Revised: November 2020*

*First Adopted: November 1999, June 2010*

*Revision History: November 1999, June 2009, June 2011, June 2012, November 2012, February 2014, June 2020, November 2020*

*Notes: Policies combined November 2012 – 3.2(b)1.1, 3.2(b)1.2, 3.2(b)1.3, 3.2(b)1.4, 3.2(b)1.4a, 3.2(b)1.4b, 3.2(b)1.4c, 3.2(b)1.4d, 3.2(b)1.4e, 3.2(b)1.5, 3.2(b)2, 3.2(b)2.1, 3.2(b)2.2, 3.2(b)2.3*

*Related Policies: INST.B.20.030 Accreditation*