

# Open Pathway Evaluative Activities

## 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 October 31, 2024.

### Background

During the past year, HLC has reviewed our Pathway processes to identify ways to streamline evaluative processes, enable additional flexibility and innovation as aligned with an institution’s mission, and prioritize student success. The review was prompted by our recent initiative on differential accreditation and ongoing work related to student success. Based on this evaluation, HLC is proposing a modification to the evaluative activities associated with the Open Pathway for some institutions.

Currently, all institutions on the Open Pathway complete three evaluative activities during the 10-year accreditation cycle:

- Mid-cycle Assurance Review in Year 4
- Quality Initiative project during Years 5–9
- Comprehensive evaluation for Reaffirmation of Accreditation in Year 10

Under the proposed new approach for evaluative activities on the Open Pathway, certain institutions on the Open Pathway would be eligible to choose to complete an additional Quality Initiative, focused on student success, in lieu of a mid-cycle Assurance Review. An eligible institution would be able to make this choice following its Year 10 comprehensive evaluation for reaffirmation at the same time that it selects its Pathway for its next accreditation cycle.

An institution would be eligible to choose to complete a Student Success Quality Initiative, rather than participate in a mid-cycle Assurance Review, if it meets all of the following conditions:

1. The institution has not been placed on Notice by HLC within the past 10 years.
2. The institution is not assigned any monitoring following its comprehensive evaluation for reaffirmation of accreditation in Year 10 of its previous accreditation cycle.
3. The institution is deemed eligible to choose between the Standard Pathway and the Open Pathway and selects the Open Pathway.

The Student Success Quality Initiative would be completed during Years 1–4 of the accreditation cycle. It would follow a similar process as the current Quality Initiative, with a proposal and report submitted to HLC for review.

All Open Pathway institutions would still complete a Quality Initiative (now known as the Open Quality Initiative) during Years 5–9 of the accreditation cycle. The Open Quality Initiative can be on any topic of the institution’s choosing, including student success.

The proposed policy changes would establish the new Student Success Quality Initiative as an option for eligible institutions on the Open Pathway. The proposed changes would also clarify certain other practices related to the Standard and Open Pathways. If the Board adopts the changes on second reading at its February 2025 meeting, the revisions will be effective September 1, 2025.

## Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on February 27–28, 2025. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by January 20, 2025.

## 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:** Pathways and Related Process Requirements

**Number:** INST.C.10.005

### Pathways Overview

HLC offers multiple accreditation pathways, each of which is defined by a distinct schedule and series of evaluative activities for its institutions. ~~Nevertheless, a~~ **All** pathways are framed around the Criteria for Accreditation as their evaluative basis. HLC may design and approve additional pathways at any time with advance notice to its membership of any associated entrance requirements. ~~Each pathway shall allow participating institutions to fulfill the procedural requirements necessary to maintain accreditation.~~

Candidate institutions and accredited institutions that are on ~~p~~**Probation**, under a Show-Cause Order, or ~~for~~ **which there is a pending appeal following a** withdrawal action shall not participate in any pathway while ~~in~~

on such status and shall instead participate in evaluation activities specifically outlined in ~~the HLC policy~~ **policies** applicable to such status.

~~Considerations in Determining Initial~~ **Eligibility to Choose a** Pathway Assignments and Subsequent Changes

**Institutions that are awarded initial accreditation are placed on the Standard Pathway.**

**Institutions that are removed from Probation or a Show-Cause Order are placed on the Standard Pathway.**

**An institution that has been assigned a focused visit will be placed on the Standard Pathway, unless the focused visit is assigned in relation to an approved Change of Control, Structure or Organization.**

HLC shall weigh multiple considerations in determining ~~an initial pathway assignment appropriate for each institution in relation to the history of the institution's accreditation relationship with HLC~~ **whether an institution is eligible to choose a pathway**. These discretionary considerations include the length and record of the institution's accreditation relationship with HLC, which could include interim monitoring, frequency of substantive change and change of control requests, sanctions, Show-Cause Orders, adverse actions, **demonstrated effort on any Quality Initiatives**, and any other information HLC deems relevant.

Moreover, HLC may exercise discretion in determining an appropriate pathway for ~~an~~ institutions based on the distinct needs and contributions of various institutional missions, models and approaches within higher education.

The HLC Board of Trustees or the Institutional Actions Council may at its discretion move an institution from any pathway to the Standard Pathway at any time during its accreditation cycle if: (1) the institution fails to fulfill the requirements of its pathway; (2) serious concerns arise about the institution's capacity to continue to meet the Criteria for Accreditation, ~~or the~~ Federal Compliance Requirements, or Assumed Practices; or (3) the institution needs to be monitored more closely through the processes of the Standard Pathway for any reason, including but not limited to a recent Change of Control, Structure or Organization.

Due Process Requirements Related to Pathway Assignments

A decision renewing an institution's assignment to a pathway, or determining an institution's eligibility ~~for a different~~ **to choose a pathway, or determining an institution's eligibility to choose between evaluative activities within a pathway** shall ~~always~~ take place ~~at~~ **following a comprehensive evaluation for** reaffirmation of accreditation **at the conclusion of the institution's accreditation cycle**, ~~and may not take place at other times~~ unless otherwise permitted by ~~these~~ **HLC** policies. All pathway determinations shall be made by formal decision of the Board of Trustees or Institutional Actions Council as applicable ~~and shall be subject~~

~~to all HLC requirements related to the pathway as well as to HLC's decision-making process. Such decisions shall indicate the academic year of the next comprehensive evaluation for reaffirmation of accreditation in the institution's accreditation cycle for that pathway.~~

An institution shall receive notice of any recommendation for pathway assignment or change, **or of any recommendation related to eligibility to choose between evaluative activities within a pathway**, prior to the formal decision placing it on a such pathway. ~~Except for pathways assignments or changes made at the discretion of the Board of Trustees,~~ **The institution shall have an opportunity to respond to such recommendations prior to the decision being made by the Board of Trustees or the IAC.** After a pathway assignment **or a decision regarding an institution's eligibility to choose between evaluative activities within a pathway** has been made, it is not subject to additional review or change except at the discretion of HLC.

### Standard Pathway

~~All~~ **An** institutions on the Standard Pathway shall participate in a ~~ten~~ **10**-year accreditation cycle.

~~An institution on the Standard Pathway institution shall undergo~~ **generally participate in the following evaluative activities as part of the Standard Pathway:**

1. ~~a~~ **A** comprehensive evaluation in ~~years four and ten~~ **Year 4** of each ~~the~~ accreditation cycle.
2. **A** comprehensive evaluation for reaffirmation of accreditation in **Year 10** of the accreditation cycle.

~~Such an institution shall have its accreditation reaffirmed once during each accreditation cycle, concurrent with its comprehensive evaluation in year ten, unless it received~~ **In some instances, as provided in HLC policy, an institution on the Standard Pathway shall instead participate in a comprehensive evaluation for reaffirmation of accreditation twice during its accreditation cycle, in Year 4 and Year 10. This includes an institution placed on the Standard Pathway following initial accreditation, was removed from removal of Probation, or was removed from removal of a Show-Cause Order after its most recent comprehensive evaluation.**

~~An institution placed on the Standard Pathway as a result of being granted initial accreditation shall have its accreditation reaffirmed twice during its initial ten-year accreditation cycle, concurrent with its comprehensive evaluations in years four and ten. An institution that gained its accreditation through the accelerated initial accreditation process may choose a different pathway following its reaffirmation of accreditation in year four of its initial ten-year accreditation cycle.~~

~~An institution placed on the Standard Pathway after being removed from Probation or Show-Cause shall have its accreditation reaffirmed twice during its subsequent accreditation cycle, concurrent with comprehensive evaluations in years four and ten.~~

Subsequent to reaffirmation in ~~Year ten~~ **Year 10**, an HLC decision-making body will either renew the institution's assignment to the Standard Pathway, **or** declare it eligible to choose ~~another a P~~ **another a P** pathway ~~or, in the case of an institution placed on Probation or subject to a Show Cause Order, remove such institution from its pathway.~~

**An institution that gained its initial accreditation through the accelerated initial accreditation process may choose a different pathway following its comprehensive evaluation for reaffirmation of accreditation in Year 4 of its initial 10-year accreditation cycle.**

Any institution on the Standard Pathway that is declared eligible to choose another ~~P~~ **P** pathway may select that pathway subsequent to reaffirmation provided it files a letter of acceptance within a limited timeframe as required by the requirements of the pathway being sought. ~~Such~~ **An institution on the Standard Pathway that is declared eligible to choose another pathway** may also choose to remain on the Standard Pathway.

#### Process Requirements Specific to the Standard Pathway

An institution on the Standard Pathway shall demonstrate institutional improvement through an approach integrated with and focused on **compliance with** the Criteria for Accreditation. In addition, an institution on the Standard Pathway shall demonstrate that it has taken specific steps to make reasonable progress in resolving any concerns resulting from the previous comprehensive evaluation or raised by HLC during the period between evaluations.

#### Open Pathway

~~All~~ **An** institutions on the Open Pathway shall participate in a ~~ten~~ **10**-year accreditation cycle.

An institution on the Open Pathway shall **participate in the following evaluative activities as part of the Open Pathway:**

1. **Either (a) ~~undergo an virtual~~ Assurance Review in ~~Year four~~ **Year 4** of the accreditation cycle or (b) a Quality Initiative from Year 1 to Year 4 of the accreditation cycle. An institution will be deemed eligible to choose between these options according to requirements set forth by HLC.**
2. **A Quality Initiative from Year 5 to Year 9 of the accreditation cycle.**
3. ~~and an on-site~~ **A comprehensive evaluation for reaffirmation of accreditation in ~~Year ten~~ **Year 10** of each the accreditation cycle. Such an institution shall have its accreditation reaffirmed once every ~~ten~~ years, concurrent with its comprehensive evaluation in year ~~ten~~.**

~~Reaffirmation shall be contingent on the institution having undergone an Assurance Review in year four of the accreditation cycle and a comprehensive evaluation in year ten of the cycle through processes that assure~~

~~the higher education community and the public that the institution remains accredited and exhibits significant momentum and focus on continuing improvement through the completion of a Quality Initiative.~~

~~At~~ **Subsequent to reaffirmation in Year 10, an HLC decision-making body will determine either assign the institution to the Standard Pathway or declare it eligible to choose another pathway whether to renew the institution's eligibility to choose its pathway.**

Process Requirements Specific to the Open Pathway

An institution on the Open Pathway will participate in one or more Quality Initiatives through which it demonstrates an ongoing commitment to improving its quality.

Quality Initiative Proposal. ~~After year four and prior to year ten of its accreditation cycle, an institution on the Open Pathway shall conduct a Quality Initiative through which it demonstrates an ongoing commitment to improving its quality.~~ **For each Quality Initiative,** ~~T~~the institution shall submit a Quality Initiative Proposal that shall be reviewed and approved by a panel of HLC peer reviewers.

Quality Initiative Report. **For each Quality Initiative,** ~~T~~the institution shall submit a Quality Initiative Report explaining the results of the initiative **that shall be reviewed and approved by peer reviewers.** ~~and shall, no later than the end of year nine of its accreditation cycle, submit the Report to HLC for review. A panel of peer reviewers shall review the Report.~~ The ~~panel~~ **peer reviewers** shall determine whether the institution has met certain expectations for the Quality Initiative and provide a recommendation.

The ~~panel's~~ **peer reviewer's** determination **for each Quality Initiative that the institution completes during the accreditation cycle** will be sent to the appropriate decision-making body with the written report resulting from the comprehensive evaluation for reaffirmation of accreditation ~~to the appropriate decision making body.~~