



## PROCESSES FOR REAFFIRMATION OF ACCREDITATION

### 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 4–5, 2021.

#### Background

The proposed policy changes would reorganize, consolidate and clarify policies related to processes for Reaffirmation of Accreditation. The changes would also codify certain HLC practices already associated with the review of the Criteria for Accreditation within the Standard and Open Pathways.

Three significant proposed revisions relate to what reaffirmation of accreditation represents. HLC policy currently states that reaffirmation signifies that the institution continues to meet the Criteria for Accreditation, the Assumed Practices and the Federal Compliance Requirements. The first proposed revision would redefine reaffirmation to mean that the institution may retain its accreditation and, separately, that HLC has confirmed the institution continues to have legal authority to offer degrees. This shift is significant for purposes of both institutions’ and the public’s understanding of what reaffirmation of accreditation represents.

The revised meaning of reaffirmation would require that the maximum timeframe for reaffirmation be extended to accommodate the maximum timeframe for continuous noncompliance with HLC’s Criteria for Accreditation. Thus, the second proposed revision would extend the maximum timeframe for reaffirmation from 11 to 13 years. Finally, the third revision would create a standalone policy that describes the key aspects of evaluative activities required of all institutions.

## Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on February 24–25, 2022. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by February 7, 2022.

## 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: Substantive Requirements for Reaffirmation of Accreditation**  
**Number: INST.C.10.010**

Each institution shall have its accreditation reaffirmed by formal action of HLC according to its decision-making policies. The basis for reaffirmation shall be ~~evidence that the institution meets the Criteria for Accreditation and Federal Compliance Requirements~~ **HLC's determination that the institution may retain its accreditation and has legal authority to operate as an institution of higher education.** ~~Reaffirmation Cycle~~ **Generally, Reaffirmation shall occur not more than ten years from the date of the last formal HLC action reaffirming accreditation.** ~~For an institution that received initial accreditation after its most recent comprehensive evaluation, reaffirmation shall occur not more than four years after the initial accreditation action.~~ **For an institution that was removed from probation or show-cause, reaffirmation shall occur no more than four years after probation or show-cause is removed, except that institutions that should have been reaffirmed in year ten of their cycle but were found out of compliance instead will first be reaffirmed upon removal of probation or show-cause.** Should the reaffirmation action take place in the spring or fall following the required date for reaffirmation, such action shall be considered to have met the requirements of this policy provided that the evaluation visit takes place no later than ten, or, where applicable, four, years from the date of the last reaffirmation action.

The cycle for reaffirmation may be ~~less~~ **fewer** than ten years for institutions that ~~participate in or are assigned~~ **required** by HLC to ~~processes that require~~ **participate in** more frequent **comprehensive evaluations for reaffirmation of accreditation.**

An institution may file a formal request for an extension of its reaffirmation process, provided that it ~~has~~ **articulates** a compelling reason for seeking such extension and it is not ~~under~~ **on** sanction, ~~or~~ **under a show-cause order** with, or pending withdrawal by, HLC or any other recognized accrediting agency.

An institution must file such ~~a~~ **an extension** request with sufficient time for a decision to be made prior to the ~~expiration of an institution's current reaffirmation period~~ **conclusion of the academic year in which the reaffirmation was scheduled**. ~~Such request will be considered and acted on through HLC's decision-making processes.~~ The extension shall be no more than one year beyond the institution's regular cycle as established by the terms of the reaffirmation process in which it participates. The maximum cycle permitted under this policy is ~~eleven (11)~~ **thirteen (13)** years.

### **Procedural Requirements for Reaffirmation**

~~Prior to every formal HLC action reaffirming the accreditation of an institution that institution and HLC shall have participated in a process that includes the following components:~~

- ~~• self-study activities at the institution that result in submission to HLC of evidence that the institution meets the Criteria for Accreditation and the Federal Compliance Requirements; and, in the same or different submission as required by the process in which the institution participates, evidence of continuing improvement at the institution;~~
- ~~• visit to the institution by a team of HLC Peer Reviewers for the purpose of gathering additional information to determine whether the institution meets the Criteria for Accreditation and the Federal Compliance Requirements and to verify whether appropriate evidence has been provided by the institution;~~
- ~~• analysis by HLC Peer Reviewers of the evidence provided by the institution and the additional information gathered during the visit;~~
- ~~• written report prepared by HLC Peer Reviewers documenting their conclusions regarding whether the institution meets the Criteria for Accreditation and the Federal Compliance Requirements, including but not limited to, requirements related to assessment of student learning, and, in the same or a different report as required by the process in which the institution participates, conclusions regarding continuous improvement and identifying deficiencies, if any, at the institution;~~
- ~~• an opportunity for an institution to provide a written response prior to HLC action following procedures outlined by HLC.~~

## Processes for Reaffirmation

~~Each accredited institution in good standing with HLC shall reaffirm and maintain its accredited status by participating in evaluation processes that: (1) document that it meets HLC's Criteria for Accreditation and the Federal Compliance Requirements, (2) demonstrate a focus on institutional improvement, and (3) fulfill HLC's procedural requirements for reaffirming and maintaining accreditation. These evaluation processes shall be known as accreditation pathways. The pathways are: Standard and Open. HLC may approve other pathways. Each pathway shall include a series of evaluative activities that HLC determines to be appropriate for that pathway provided that each pathway allows an institution to fulfill the procedural requirements necessary to maintain accreditation. In any pathway HLC staff may seek external assistance from peer reviewers or individuals with appropriate expertise who do not participate as peer reviewers in the evaluation process but provide particularized advice and assistance where appropriate to HLC staff or evaluation team members.~~

~~Institutions not yet accredited by HLC as well as accredited institutions that are on probation, under show cause, or pending withdrawal action shall participate in evaluation activities specifically outlined in HLC policy applicable to such designation and shall not participate in a pathway.~~

## Entrance Requirements for Each Pathway

~~HLC shall determine the entrance requirements for each pathway in relation to the institution's history with HLC. These requirements shall include the length of its accreditation with HLC, as well as such factors as interim monitoring, substantive change and change of control requests, sanctions, show cause orders, adverse actions, and any other information HLC deems relevant. In addition, HLC may exercise discretion in determining an appropriate pathway for an institution.~~

## Assignment to a Pathway

~~Subsequent to granting of initial accreditation and after removal of probation or show cause, institutions shall be limited to the Standard Pathway for a minimum of ten years until such time as they shall meet the entrance requirements for a different pathway and make appropriate application to enter such pathway. An institution undergoing approval of a change of control, structure or organization or removal from notice may be subject to limitation to the Standard Pathway. A pathways assignment shall be made by the Board of Trustees in making these accrediting decisions.~~

~~A decision renewing an institution's assignment to a pathway or determining an institution's eligibility for a different pathway shall always take place at reaffirmation of accreditation and may take place at other times as~~

~~established by the procedures of the pathway or HLC policy. A pathway determination after initial accreditation, a continuation of eligibility for a pathway, and any change of pathway shall be a formal decision by HLC and shall be subject to all HLC requirements related to the pathway as well as to HLC's decision-making process. Such decision shall also indicate the date of the next Assurance Review or comprehensive evaluation and the institution's placement in the cycle for that pathway.~~

~~An institution shall receive notice of a recommended pathway assignment prior to the formal decision placing it on a pathway. In cases where the Pathway assignment is not based on entrance requirements for the Pathway but on HLC discretion and exempting any pathways assignments made at the discretion of the Board of Trustees related to sanction or other actions assigned to the Board, the institution shall have an opportunity to respond prior to the assignment being made through HLC's decision-making process. After a pathway assignment has been made, it is subject to additional review or change only at the discretion of HLC.~~

## Change of Pathways by HLC

~~HLC may at its discretion move an institution from one Pathway to another 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 (3) the institution needs to be monitored more closely through the processes of the Standard Pathway.~~

~~All other changes in pathways will occur subsequent to reaffirmation of accreditation. (Note that assignment to a pathway following HLC policy is not a change of a pathway.).~~

### Policy Number Key

Section INST: Institutional Processes

Chapter C: Process for Reaffirmation of Accreditation

Part 10: Substantive Requirements for Reaffirmation of Accreditation

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Last Revised: November 2018

First Adopted: June 2012

Revision History: November 2012, November 2018

Notes: Policies combined November 2012 - 1A.1.1, 1A1.2, IA.1.3, 1A.1.4, 1A.1.5, 1A.1.6, 1A.1.7. In February 2021, references to the Higher Learning Commission as "the Commission" were replaced with the term "HLC."

Related Policies: **INST.C.10.005 Pathways and Related Process Requirements**

Policy Title: **Pathways and Related Process Requirements for Each Pathway**  
Number: INST.C.10.02005 \*

## 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, all pathways are framed around the Criteria for Accreditation as their evaluative basis. HLC may design and approve other additional pathways at any time with advance notice to its membership of any associated entrance requirements. Each pathway shall include ~~ries of evaluative activities that HLC determines to be appropriate for that pathway provided that each pathway allows an~~ participating institutions to fulfill the procedural requirements necessary to maintain accreditation.

Institutions not yet accredited by HLC as well as Candidate institutions and accredited institutions that are on probation, under a show-cause order, or pending withdrawal action shall not participate in any pathway while in such status and shall instead participate in evaluation activities specifically outlined in HLC policy applicable to such designation and shall not participate in a pathway status.

## Considerations in Determining Initial Pathway Assignments and Subsequent Changes

HLC shall determine the entrance requirements for each weigh multiple considerations in determining an initial pathway assignment appropriate for each institution in relation to the history of the institution's history accreditation relationship with HLC. These requirements shall discretionary considerations include the length and record of it's ~~the institution's accreditation relationship with HLC, as well as such factors as~~ which could include interim monitoring, frequency of substantive change and change of control requests, sanctions, show-cause orders, adverse actions, and any other information HLC deems relevant.

In addition ~~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.

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\* Please note this policy will be renumbered so that it is the first policy in HLC's Policy Book to address the Pathways for Reaffirmation of Accreditation, followed by INST.C.10.010 - Substantive Requirements for Reaffirmation of Accreditation. That new sequence is not reflected in this resolution to maintain visibility of all proposed changes.

The HLC Board of Trustees or the Institutional Actions Council may at its discretion move an institution from one Pathway to another 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 pathway shall always take place at reaffirmation of accreditation and may not take place at other times as established by the procedures of the pathway or HLC policy unless otherwise permitted by these policies. All pathway determinations after initial accreditation, a continuation of eligibility for a pathway, and any change of pathway shall be a made by formal decision by HLC 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 also indicate the date of the next Assurance Review or academic year of the next comprehensive evaluation for reaffirmation of accreditation and the institution's placement in the institution's accreditation cycle for that pathway.

An institution shall receive notice of a recommended any recommendation for pathway assignment or change prior to the formal decision placing it on a such pathway. In cases where the Pathway assignment is not based on entrance requirements for the Pathway but on HLC discretion and exempting any Except for pathways assignments or changes made at the discretion of the Board of Trustees related to sanction or other actions assigned to the Board, the institution shall have an opportunity to respond to such recommendations prior to the assignment decision being made through HLC's decision-making process. After a pathway assignment has been made, it is not subject to additional review or change only except at the discretion of HLC.

## **Standard Pathway**

~~All~~ **All institutions on the Standard Pathway shall participate in a ten-year accreditation cycle. A Standard Pathway institution shall undergo a comprehensive evaluation in years four and ten of each accreditation cycle. Such an institution shall have its accreditation reaffirmed every ten years except for an institution that has once during each accreditation cycle, concurrent with its comprehensive evaluation in year ten, unless it received initial accreditation, was removed from probation, or was removed from show-cause after its most recent comprehensive evaluation. Subsequent to initial accreditation, reaffirmation shall occur not more than**

~~four years after the initial accreditation action. Reaffirmation for all other institutions on the Standard Pathway shall be contingent on the institution having undergone comprehensive evaluations in years four and ten of the cycle through a process that assures the higher education community and the public that the institution continues to meet the Criteria for Accreditation and Federal Compliance Requirements, and that the institution demonstrates a focus on continuing improvement.~~

**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, an HLC decision-making body will also either renew the institution's assignment to the Standard Pathway, or declare it eligible to choose another Pathway or, in the case of an institution placed on probation or subject to a Show-Cause Order, remove such institution from its pathway. Renewal of assignment to the Standard Pathway will be contingent on the institution demonstrating that it meets the Criteria for Accreditation and the Federal Compliance Requirements, and not receiving an action involving show-cause, probation, or withdrawal.~~

Any institution on the Standard Pathway that is declared eligible to choose another Pathway may ~~move to~~ 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. ~~The~~ Such institution may also choose to remain on the Standard Pathway.

#### Process Elements Requirements Specific to the Standard Pathway

An institution on the Standard Pathway shall demonstrate institutional improvement through an approach integrated with and focused on the Criteria for Accreditation. In addition, an institution on the Standard Pathway shall demonstrate that it has ~~made~~ 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 institutions on the Open Pathway shall participate in a ten-year accreditation cycle. An institution on the Open Pathway shall undergo a virtual Assurance Review in year four and an on-site comprehensive evaluation in year ten of each 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 ~~continues to meet the Criteria for Accreditation and the Federal Compliance Requirements,~~ remains accredited and demonstrates a exhibits significant momentum and focus on continuing improvement through the completion of a Quality Initiative.

At reaffirmation, HLC will determine whether to renew the institution's eligibility for the Open Pathway. ~~An institution may lose eligibility for the Open Pathway if serious concerns arise about the institution's capacity to continue to meet the Criteria for Accreditation and Federal Compliance Requirements; the institution needs to be monitored more closely through the processes of the Standard Pathway; or the institution does not fulfill the requirements of the Open Pathway, including those of the Quality Initiative.~~

### Process Elements Requirements Specific to the Open Pathway

Quality Initiative Proposal. After year four and prior to year ten of its accreditation cycle, ~~Aan~~ institution on the Open Pathway shall conduct ~~after year four and prior to year ten of its reaffirmation cycle~~ a Quality Initiative through which it demonstrates an ongoing commitment to improving its quality. The institution shall ~~select a topic for the~~ submit a Quality Initiative Proposal that shall be reviewed and approved by a panel of HLC ~~Ppeer Rreviewers.~~

~~Review of the Quality Initiative Report.~~ The institution shall ~~compile~~ submit a Quality Initiative ~~R~~Report explaining the results of the initiative and shall, no later than the end of year nine of its ~~reaffirmation~~ accreditation cycle, submit ~~it~~ the Report to HLC for review. A panel of ~~Ppeer Rreviewers~~ shall review the Quality Initiative Report. The panel shall determine whether the institution has met ~~the stated~~ certain expectations for the Quality Initiative and provide a recommendation. ~~The panel will complete a form explaining its findings.~~

The form panel's determination will be sent with the written report resulting from the comprehensive evaluation in year ten for reaffirmation of accreditation to the Institutional Actions Council appropriate decision-making body.

## ~~Process Elements Common to Open and Standard Pathway~~

~~Assurance Review. Institutions in the Open and Standard Pathways shall participate in an Assurance Review that has the following components:~~

- ~~• Assurance Filing by the institution;~~
- ~~• Review by the Assurance Review team composed of HLC Peer Reviewers appointed by HLC staff in accordance with team selection procedures; such review shall include analysis of the Assurance Filing as well as of information from any on-site visit conducted to institutions on the Standard Pathway or to institutions on the Open Pathway in year ten or in year four where specifically required by the Assurance Review team;~~
- ~~• Written report prepared by the Assurance Review team that outlines the team's findings related to the institution's meeting the Criteria for Accreditation and identifies any strengths and challenges or deficiencies;~~

~~The Assurance Review for an institution with distance or correspondence education shall include a specific focus on these forms of delivery.~~

~~Assurance Filing. The Assurance Filing shall be housed on HLC's web-based platform, known as the Assurance System, and composed of the following parts: (1) information submitted by the institution to document evidence of meeting, and of any institutional improvement related to, the Criteria for Accreditation, which shall consist of an Assurance Argument, Evidence File, and any addenda required by the evaluation team or HLC staff to the above information; and (2) information supplied by HLC including but not limited to summary data from the institution's recent Institutional Update, records related to evaluation visits, official actions and correspondence, public comments, results of HLC-sponsored student surveys, complaints, and any other information HLC deems appropriate.~~

~~For comprehensive evaluations, the Assurance Filing shall also address the Federal Compliance Requirements and, if applicable, provide information for branch campus evaluation.~~

~~Comprehensive Evaluation. An institution on the Standard Pathway and an institution in year ten of the Open Pathway shall undergo a comprehensive evaluation, which shall consist of the Assurance Review with an on-site visit. In addition to reviewing the Assurance Filing and related materials, the Assurance Review team~~

~~shall also visit the institution's main campus and other institutional locations as determined by HLC based on its policies and procedures. 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, if any, in the on-site visit. The President of HLC shall determine whether the liaison or other HLC staff member will accompany any visit related to an Assurance Review.~~

~~The length of the visit shall be one and one-half days, but HLC may lengthen or shorten the visit or require that team members conduct additional on-site visits to the institution's facilities to examine specific issues.~~

~~In a comprehensive evaluation, the team's report will include any findings from the on-site visit, the multi-campus evaluation, if applicable, and the review of compliance with Federal Compliance Requirements.~~

~~**Other Visits.** When HLC is conducting an Assurance Review for an institution in year 4 of the Open Pathway, an on-site visit will not be required; however, a team may call for an on-site visit to gather additional information not available electronically or to conduct further review of specific issues arising from the Assurance Review. In addition, if the team is considering a sanction or withdrawal, it must call for an on-site visit.~~

~~**Multi-Campus Evaluation.** When an institution that has multiple branch campuses undergoes a comprehensive evaluation, HLC will send one or more HLC Peer Reviewers to visit the institution's branch campuses. The Peer Reviewer may, but is not required to, be a member of the Assurance Review team. Such branch campus visits may precede or follow HLC's comprehensive evaluation visit to the institution's main campus. HLC will determine the campuses to be included in the branch campus visit, but the focus of the visit will be on branch campuses not recently visited by HLC. The Peer Reviewer visiting the branch campus will complete a form outlining findings arising from the visit. The purpose of this form shall be to inform the comprehensive evaluation team regarding the quality of the institution's branch campuses. The Peer Reviewer will make no formal recommendation, and there will be no formal HLC action arising from the branch campus evaluation visit.~~

### ~~Process Elements Specific to the Open Pathway~~

~~**Quality Initiative.** An institution on the Open Pathway shall conduct after year four and prior to year ten of its reaffirmation cycle a Quality Initiative through which it demonstrates an ongoing commitment to improving its quality. The institution shall select a topic for the Initiative that shall be reviewed and approved by a panel of HLC Peer Reviewers. The institution shall compile a report explaining the results of the initiative and, no later than year nine of its reaffirmation cycle, submit it to HLC for review.~~

~~Review of the Quality Initiative Report. A panel of Peer Reviewers shall review the Quality Initiative Report. The panel shall determine whether the institution has met the stated expectations for the Quality Initiative. The panel will complete a form explaining its findings.~~

~~The form will be sent with the written report resulting from the comprehensive evaluation in year ten to the Institutional Actions Council.~~

#### ~~Process Elements Specific to the Standard Pathway~~

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

#### Policy Number Key

Section INST: Institutional Processes

Chapter C: Process for Reaffirmation of Accreditation

Part 10: Substantive Requirements for Reaffirmation of Accreditation

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Last Revised: November 2018

First Adopted: June 2012

Revision History: November 2012, June 2014, November 2018

Notes: Policies combined in November 2012 - 1A.2.1, 1A.2.2, 1A.2.3, 1A.2.4, 1A.2.5. In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”

Related Policies: **COMM.B.10.010 Staff Role and Responsibility, INST.C.10.010 Substantive Requirements for Reaffirmation of Accreditation, INST.B.20.032 Accelerated Process for Initial Accreditation, INST.E.20.010 Probation, INST.E.30.010 Show-Cause (Procedural Order)**

# Policy Title: Process Requirements Leading to HLC Action for Reaffirmation Following Reviews of the Criteria for Accreditation

Number: INST.C.10.030

## Recommendations Arising From Pathways for Reaffirmation for HLC Action Based on Reviews of the Criteria for Accreditation

The team of HLC Peer Reviewers conducting either a comprehensive evaluation or Assurance Review a review of the Criteria for Accreditation, whether in the Standard Pathway or the Open Pathway shall, in its written report make a recommendation for HLC action to complete the review, except after a mid-cycle Assurance Review in the Open Pathway wherein all Criteria for Accreditation have been satisfied without any need for monitoring.

~~For comprehensive evaluations~~ In all other cases, the team shall recommend whether to reaffirm continue the institution's accreditation and whether to require may, based on its evaluation of the evidence, indicate whether routine interim monitoring, if needed, as available on the institution's pathway is warranted under HLC policy. For Assurance Reviews, the team shall recommend whether to continue the institution in its current cycle and whether to require any interim monitoring as available on the institution's pathway. Any ~~The~~ team may also recommend that evidence warrants the imposition of a sanction, the issuance of a Show-Cause Order, or withdrawal of accreditation.

In exceptional circumstances, a team may extend the mid-cycle Assurance Review in Year 4 to require a visit to explore uncertainties in the evidence that cannot be resolved at a distance. If the Year 4 review team calls for such a visit, the team conveys to the institution the reasons for the required visit, including any additional evidence required, and identifies any individuals or groups with which the team will meet during the visit.

These resulting recommendations, along with the each team's written report and the institution's responses, shall be forwarded to an HLC decision-making body for review and action.

## Recommendations for HLC Action for Reaffirmation of Accreditation

Similarly, the team conducting a comprehensive evaluation for reaffirmation of accreditation shall in its written report make a recommendation for HLC action. The team shall recommend whether to reaffirm the institution's accreditation and, based on its evaluation of the evidence, may indicate whether routine interim monitoring is warranted under HLC policy. The team may also determine that, while the

institution's accreditation should be reaffirmed based on a determination that the institution should retain its accreditation and will have legal authority to operate as an institution of higher education, the imposition of a sanction or issuance of a Show-Cause Order is warranted. Finally, the team may recommend that an institution's accreditation not be reaffirmed but rather, that probation be imposed, a Show-Cause Order be issued or that accreditation be withdrawn.

## ~~Institutional Responses to Recommendations Arising From Pathways for Reaffirmation~~

~~An institution shall have the opportunity to provide a written response to the written report of a comprehensive evaluation or Assurance Review following HLC policies for the provision of institutional responses. In all cases involving a response to comprehensive evaluation, Assurance Review, or other visit, an institution shall have at least two weeks to prepare and submit an institutional response to the team report prior to review and action through HLC's decision-making processes.~~

### Policy Number Key

Section INST: Institutional Processes

Chapter C: Process for Reaffirmation of Accreditation

Part 10: Substantive Requirements for Reaffirmation of Accreditation

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Last Revised: June 2020

First Adopted: June 2012

Revision History: June 2014, November 2018, June 2020

Notes: Policies combined November 2012 – 1A.3.1, 1A.3.2. In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”

Related Policies:

Policy Title: ~~Institutional Data for HLC Teams~~ **Evaluative Activities**  
**Applicable to All Institutions**

Number: INST.C.20.010

Assurance Review. Institutions in the Open and Standard Pathways shall participate in an Assurance Reviews that has have the following components:

- Assurance Filing prepared by the institution;
- Review conducted by the Assurance Review team composed of HLC Peer Reviewers appointed by HLC staff in accordance with team selection procedures; such review shall include analysis of the Assurance Filing as well as of information from any on-site visit conducted to institutions on the Standard Pathway or to institutions on the Open Pathway in year ten or in year four where specifically required and in year ten by the Assurance Review team;
- Written report prepared by the Assurance Review team peer reviewers that outlines the team's findings related to whether the institution's meeting meets the Criteria for Accreditation and identifies any strengths and challenges or deficiencies.
- The All Assurance Reviews for an institutions with distance or correspondence education shall include a specific focus on these forms of delivery attention to the institution's responsibility for assuring the quality of its academic offerings, regardless of location, modality and involvement of third parties.

Assurance Filing. The Assurance Filing shall be housed on HLC's web-based platform, known as the Assurance System, and composed of the following parts: (1) information submitted by the institution to document evidence of meeting, and of any institutional improvement related to, the Criteria for Accreditation, which shall consist of an Assurance Argument, hyperlinking specific evidence contained in an Evidence File, and any addenda required by the evaluation team or HLC staff to the above information; and (2) information to be supplied by HLC related to the institution's accreditation relationship since its most recent comprehensive evaluation, including but not limited to: summary data from the institution's recent Institutional Updates, records related to prior HLC evaluations visits, official actions and official correspondence, public any third-party comments received in anticipation of the evaluation, and the results of HLC-sponsored student surveys excluding Personally Identifiable Information (PII); and (3) other information HLC deems appropriate, including but not limited to, complaints requiring further review, and any other information received by HLC deems appropriate from any other recognized accreditor or U.S. government or state higher education agency.

For comprehensive evaluations for reaffirmation of accreditation, the Assurance Filing shall also address the Federal Compliance Requirements and, if applicable, provide information for branch campus evaluation, complete the requirements of a Multi-Campus Visit.

Comprehensive Evaluation. An institution on the Standard Pathway and an institution in year ten of the Open Pathway shall undergo a comprehensive evaluation, which shall consist of the Assurance Review with an on-site visit. In addition to reviewing the Assurance Filing and related materials, the Assurance Review team shall also visit to the institution's main campus and other institutional locations as determined by HLC based on its HLC policies and procedures. 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, if any, in the on-site visit. The President of HLC shall determine whether the liaison or other HLC staff member will accompany any visit related to an Assurance Review.

The length of the visit shall be one and one half days, but HLC will establish general parameters for the direction of its visits but may lengthen or shorten the any particular visit with advance notice to an institution or require that team members conduct additional on-site visits to the institution's facilities to examine specific issues.

In a comprehensive evaluation, the team's report will include any findings from the on-site visit, the multi-campus evaluation, if applicable, and the review of compliance with Federal Compliance Requirements, if applicable.

Other Visits. When HLC is conducting an Assurance Review for an institution in year 4 of the Open Pathway, an on-site visit will not be required; however, a team may call for an on-site visit to gather additional information evidence not available electronically or to conduct further review of specific issues arising from the Assurance Review. In addition, if the team is considering recommending a sanction, the issuance of a Show-Cause Order or withdrawal of accreditation, it must call for an on-site visit to validate its findings prior to any such recommendation being made.

Multi-Campus Evaluation. When an institution that has multiple one or more branch campuses undergoes a comprehensive evaluation, HLC will send one or more HLC Peer Reviewers to visit the institution's branch campuses. The Peer Reviewer may, but is not required to, be a member of the Assurance Review comprehensive evaluation team. Such branch campus visits may precede or follow HLC's comprehensive evaluation visit to the institution's main campus. HLC will determine the campuses to be included in the branch campus visit, but the focus of the visit will be on branch campuses not recently visited by HLC. The

~~Peer Reviewer visiting the branch campus will complete a form outlining~~ **provide a summary of findings arising from the visit. The purpose of this form summary shall be to inform the comprehensive evaluation team regarding the quality of the institution's branch campuses. The Peer Reviewer will make no formal recommendation, and there will be no formal HLC action arising from the branch campus evaluation visit.**

Prior to any on-site visit, HLC will provide the **peer review** team with a record of the institutional indicators that have been submitted by the institution ~~over the years since the last on-site visit~~ **as well as its recent history of monitoring, if any.**

~~Prior to a comprehensive evaluation culminating in reaffirmation of accreditation or prior to other HLC evaluation where HLC determines it to be appropriate, HLC may also provide aggregate data collected from a survey administered to students by HLC~~ **In addition, HLC will forward to the team and the institution, any public comments received in anticipation of the institution's evaluation.**

~~The institution will provide other information required by HLC on site or in Assurance Argument materials.~~

## Institutional Responses to Recommendations Arising From Pathways for Reaffirmation

An institution shall have the opportunity to provide a written response to the ~~written team report of~~ **for a comprehensive evaluation or Assurance Review following HLC policies for the provision of institutional responses. In all cases involving a response to comprehensive evaluation, Assurance Review, or other visit, an institution shall have at least two weeks to prepare and submit an institutional response to the team report prior to review and action through HLC's decision-making processes.**

### Policy Number Key

Section INST: Institutional Processes

Chapter C: Process for Reaffirmation of Accreditation

Part 20: Institutional Data

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Last Revised: November 2018

First Adopted:

Revision History: February 2014, June 2014, November 2018

Notes: Former policy number 1.3(d). In February 2021, references to the Higher Learning Commission as "the Commission" were replaced with the term "HLC."

Related Policies: INST.F.10.010 Routine Monitoring & Data Collection, COMM.A.10.030 Complaints and Other Information regarding Member Institutions, COMM.C.10.020 Relation With Other Recognized Accrediting Agencies, COMM.C.10.030, Relation With the U.S. Government, State Higher Education Agencies and Other State Offices