



## ROUTINE MONITORING AND DATA COLLECTION

### 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 revisions are intended to reflect [proposed changes to policies related to staff authority](#) that the Board also approved at its November meeting. The proposed revisions would also update the policy to reflect current HLC processes and procedures while leaving flexibility for continuous improvements.

#### 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**).

Policy Title: Routine Monitoring and Data Collection

Number: INST.F.10.010

**Monitoring on Pathways.** An institution on the Standard or Open Pathway may be required to file one or more interim reports. An institution on the Standard Pathway may be required to host one or more focused visits. Such monitoring shall be appropriate in circumstances where the team has concluded that ~~the Commission~~ **HLC** should review the institution’s progress in addressing a serious issue at the institution, the resolution of which is relevant to the institution’s future compliance with, or improvement regarding, the Criteria for Accreditation. ~~Commission~~ **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 related to monitoring but provide particularized advice and assistance where appropriate to ~~Commission~~ HLC staff or evaluation team members.

**Other Monitoring.** An institution, regardless of its pathway, is always subject to monitoring in the form of interim reports or focused evaluations related to review by ~~the Commission~~ HLC of the following: financial and non-financial indicators; a change of control, structure or organization transaction; substantive change; complaints; conformity with Assumed Practices; or other ~~Commission~~ HLC investigation or review.

**Process for Requiring Monitoring.** An evaluation team or staff may recommend that an institution be required to file an interim report or host a focused on-site evaluation on one or more topics. **The President may also act to require routine monitoring in a manner consistent with policy on Staff Authority COMM.B.10.020. Following review of routine monitoring conducted by peer reviewers or with external assistance from individuals with appropriate expertise employed by HLC.** An appropriate decision-making body, or ~~Commission~~ HLC staff where allowed by ~~Commission~~ HLC policy, shall determine whether the monitoring is appropriate for the institution, and, if so, shall act to approve such monitoring.

For an institution that is being considered for initial accreditation, such monitoring shall be appropriate in conjunction with the grant of initial accreditation only when the monitoring is with regard to a discrete issue and 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.

**Interim Reports.** An institution shall submit a required interim report according to the due date established in the action calling for the interim report. ~~Staff will~~ **HLC may designate staff, or other individuals with appropriate expertise, to review and prepare a written analysis of all reports and may to act on behalf of the** ~~Commission~~ HLC to accept the report or require additional reports on the same or related topic or may recommend to ~~the Commission's~~ HLC's decision-making bodies that further monitoring, including new interim reports or focused visits, as appropriate to the institution's Pathway assignment, be required on the same topics identified in the action or on other topics.

**Focused Visits.** An institution ~~on the Standard Pathway~~ **that is assigned a focused visit shall host a such** focused visit according to the date established in the action calling for the focused visit. The institution shall submit a focused report to ~~the Commission~~ HLC prior to the evaluation on the topics identified in that action prior to the focused visit. ~~Commission~~ HLC staff may expand the focus of the evaluation where appropriate to review additional topics of concern to ~~the Commission~~ HLC. The focused visit shall be

conducted by a team of ~~Commission~~ HLC Peer Reviewers appointed by ~~Commission~~ HLC staff. The length of the focused visit shall be one and one-half days, but ~~the Commission~~ 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.

The focused visit team will prepare a written report addressing the topics of concern identified in the action calling for the focused visit and any areas of concern raised by ~~Commission~~ HLC staff and identifying deficiencies, if any, at the institution. The focused visit team report shall include a recommendation for ~~Commission~~ HLC action either accepting the institution's focused report or calling for additional monitoring, sanction, Show-Cause Order or withdrawal of accreditation. The institution shall have the opportunity to file a written response to the focused visit report prior to a decision-making body acting on the report. Focused visit reports will be considered through ~~the Commission's~~ HLC's regular review and decision-making processes.

#### Data Reporting From Affiliated Institutions

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

#### Institutional Contact for Data Reporting

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

#### ~~Commission~~ HLC Follow-Up to Institutional Data

In reviewing and analyzing institutional data, ~~the Commission~~ HLC will look at relationships among a variety of indicators and other information in any given year or over several years. If those relationships suggest that the organization may be experiencing problems or very rapid change, ~~the Commission~~ HLC will ask the

organization to submit an explanation of the data. In particular, ~~the Commission~~ **HLC** will ask institutions that were identified through review of information about student achievement for more information about student academic achievement at those institutions. ~~The Commission~~ **HLC** staff may forward data, and any explanation or other information provided by the institution, to a ~~Financial or Non-Financial Panel~~ **peer review panel** for further review. If ~~non-financial~~ data, particularly enrollment information, and any other information submitted by the institution, are indicative of problems, rapid change, significant growth, or require validation, ~~the Commission~~ **HLC** staff may call for an on-site evaluation as soon as possible; require that an institution address concerns arising from these data in the next evaluation process; or recommend to the Institutional Actions Council additional institutional monitoring through any process provided for in ~~Commission~~ **HLC** policy and procedure.

### Monitoring of Student Enrollment Growth

~~The Commission~~ **HLC** will monitor enrollment growth through institutional annual data reporting and will monitor on an ongoing basis growth in enrollment and programs at those institutions that have significant enrollment growth as defined in ~~Commission~~ **HLC** procedures. ~~The Commission~~ **HLC** will ask institutions that have been identified through the annual data reporting process as having significant enrollment growth to provide information about enrollment growth at the program level. ~~The Commission~~ **HLC** may take follow-up action.

### Surveying of Students

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

### Policy Number Key

*Section INST: Institutional Processes*

*Chapter F: Maintenance and Monitoring*

*Part 10: Routine Monitoring*

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*Last Revised: June 2020*

*First Adopted: November 1999, February 2003, February 2007*

*Revision History: February 2001, February 2007, February 2009, February 2010, November 2010, June 2012, November 2012, April 2013, February 2014, June 2014, November 2018, June 2020*

*Notes: Policies combined November 2012 – 3.6, 3.6(a), 1.3, 1.3(a), 1.3(b), 1.3(c)*

*Related Policies:*