



## STUDENT ACHIEVEMENT AND OTHER DATA REPORTING

### 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, 2022.

#### Background

Consistent with federal regulations and its own policies, HLC is committed to ensuring that institutions provide transparent, complete and accurate student achievement information to their students and the public.

The proposed policy revisions related to student achievement are intended to:

1. Identify what data must be disclosed by all institutions;
2. Take into account the relevance of mission-specific data in the context of student achievement;
3. Conform language in policy with instructions appearing in Federal Compliance materials as well as instructions for HLC’s Institutional Update; and
4. Reinforce HLC’s expectations that underperforming institutions will develop effective strategies to continuously improve.

Additional clarifying revisions are included related to institutional disclosures of accreditation status, providing third-party comments to institutions and peer reviewers, and monitoring enrollment growth for institutions that experience significant enrollment shifts based on instructional modalities.

#### Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on June 23–24, 2022. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by May 20, 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**).

Policy Title: Public Information

Number: FDCR.A.10.070

### Required Information for Students and the Public

An institution demonstrates that it makes available to students and the public fair, accurate and complete information in catalogs, student handbooks, and other publications that include, at a minimum, information about the institution's calendar, grading, admissions, academic program requirements, tuition and fees, and refund policies.

### Information About Student Achievement

An institution's ~~information website~~ for students and the public shall include a **webpage containing (or linking to) accurate** information regarding student achievement. ~~This information shall include student retention rates, completion rates or other information appropriate for the mission of the institution and its goals for students.~~ **The institution must disclose data that address the broad variety of its student populations and programs, including at the undergraduate and graduate levels as applicable. This information must include, at a minimum, retention, completion, required state licensure exam pass data, and data about the institution's students after transfer or graduation (such as continuing education, job placement and earnings). The institution must also accurately disclose which student populations are excluded from the data.**

The data may also include information appropriate for the mission of the institution and its goals for all students.

If an institution uses student job placement data in any marketing or recruitment content, it must also publicly disclose these data on its website along with information necessary to substantiate the truthfulness of its marketing and recruitment materials. All student achievement information must be presented in plain language with any technical terms defined and the institution's methodology for compiling the data included.

## Advertising and Recruiting Materials and Other Public Information

An institution's public information including its advertising and recruiting materials shall evidence the same fairness and accuracy HLC expects in an institution's catalog and other documents for students.

## Disclosure of Accreditation Status

If the institution chooses to reference its accreditation status in advertising and recruiting materials or other document or location, such as its website, that disclosure will accurately explain its status with HLC and the academic programs, locations and other institutional activities included in its accreditation. This obligation includes accurately disclosing when an action affecting its accreditation status has been taken by any other institutional or programmatic accrediting body. Institutions under HLC sanction **or a Show-Cause Order** shall comply with additional disclosure requirements pertaining to the applicable sanction **or Show-Cause Order** as described elsewhere in these policies and as required by HLC's Board of Trustees.

The institution will accompany any reference to accreditation status with information on how to contact HLC. It shall provide HLC's address and telephone number, or it may use HLC's website address in lieu of this information. Electronic materials shall use HLC's mark of accreditation status. HLC reserves the right to issue a public statement or Public Disclosure Notice (PDN) correcting any incorrect or misleading information HLC determines that an institution has publicized about its accreditation status, recent actions by HLC or other information.

## Public Opportunity to Comment

HLC ~~shall seek~~ **will provide** comment from third parties about **an institutions to such institution and the peer review team evaluating it at the time of being evaluated through a comprehensive evaluation based on its procedures.**

## Policy Number Key

*Section FDCR: Policies Required by Federal Regulation*

*Chapter A: Federal Compliance*

*Part 10: General*

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*Last Revised: November 2020*

*First Adopted: August 1990, February 1996, and June 2012*

*Revision History: Adopted August 1990, revised August 1996, effective September 1996, renumbered February*

2010, revised and renumbered June 2012, October 2014; revised June 2019, effective September 1, 2019; revised November 2020

Notes: Policies combined November 2012 – 4.0(f), 4.0(g), 4.0(j). In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”

Related Policies:

## 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 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 or other HLC requirements.

**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 HLC of the following: financial and non-financial indicators; a change of control, structure or organization transaction; substantive change; complaints; compliance with other HLC requirements, including Federal Compliance Requirements and the Assumed Practices; or other 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, an appropriate decision-making body, or HLC staff where allowed by HLC policy, shall determine whether the monitoring is appropriate for the institution, and, if so, shall act to approve such monitoring.

**Interim Reports.** An institution shall submit a required interim report according to the due date established in the action calling for the interim report. HLC may designate staff to review and prepare a written analysis of all reports and to act on behalf of HLC to accept the report or require additional reports on the same or related topic or may recommend to 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 that is assigned a focused visit shall host such focused visit according to the date established in the action calling for the focused visit. The institution shall submit a focused report to HLC prior to the evaluation on the topics identified in that action prior to the focused visit. HLC staff may expand the focus of the evaluation where appropriate to review additional topics of concern to HLC. The focused visit shall be conducted by a team of HLC peer reviewers appointed by HLC staff. The length of the focused 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.

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 HLC staff and identifying deficiencies, if any, at the institution. The focused visit team report shall include a recommendation for 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 HLC's regular review and decision-making processes.

### Data Reporting From Member Institutions

All member institutions will complete data reports for HLC; such reporting will occur annually as well as periodically. 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 member 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 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 institution provides accurate and consistent information, each member institution identifies an Accreditation Liaison Officer (ALO) who will bear administrative responsibility for submitting the report in a timely manner. HLC training will be available for those liaisons.

## HLC Follow-Up to Institutional Data

In reviewing and analyzing institutional data, 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~~ **institution** may be experiencing problems **meeting HLC requirements** or very rapid change, HLC will ask the ~~organization~~ **institution** to submit an explanation of the data. In particular, HLC will ask institutions ~~it identifies that were identified~~ through review of information about student achievement ~~for more to provide~~ information about **their strategy for improvement student academic achievement at those institutions**. HLC staff may forward **institutional** data, and any explanation or other information provided by the institution, to a peer review panel for further review. Such panel may conduct its review in a scheduled meeting or by any means that allows for synchronous or asynchronous communication. If data submitted by an institution, particularly enrollment information, financial indicators based on financial ratios, or any other additional information required by a peer review panel, are indicative of problems **meeting HLC requirements**, rapid change, significant growth, or **otherwise** require validation, such peer review panel or 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 HLC policy and procedure.

## Monitoring of Student Enrollment Growth

HLC will monitor enrollment growth through institutional annual data reporting and will monitor on an ongoing basis growth in enrollment at those institutions that ~~have experience~~ significant enrollment growth as defined in HLC procedures **or appear to have significant shifts in enrollment based on instructional modalities**. 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. HLC may take follow-up action.

## Surveying of Students

HLC may survey students of an institution to gather information about their experience at the institution prior to a comprehensive evaluation at the institution scheduled by HLC. HLC will provide aggregate data resulting from the survey to the institution under review and the evaluation team prior to the 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 HLC prior to the comprehensive evaluation.

Policy Number Key

*Section INST: Institutional Processes*

*Chapter F: Maintenance and Monitoring*

*Part 10: Routine Monitoring*

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*Last Revised: February 2022*

*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, November 2020, February 2021, February 2022*

*Notes: Policies combined November 2012 – 3.6, 3.6(a), 1.3, 1.3(a), 1.3(b), 1.3(c). In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”*

*Related Policies:*