HLC STEERING COMMITTEE

Date: Tuesday, April 16, 2013
Time: 1:30PM – 2:30PM
Location: Carrington 203

Agenda Topics **Please note that handouts will not be provided at the meeting.**

1. Approval of meeting notes from March 26, 2013.
2. Federal Compliance Packet
3. HLC Annual Meeting – Reports from all who attended the meeting.

Next meeting date: August 2013

Proposed schedule for 2013-2014:

- Summer 2013 – Break for the committee but subcommittee will work on aligning long range plan with criteria and core components.
- Fall 2013/Spring 2014 – Collection of evidence and monthly report of how we meet each criterion, QIP update
    - September – QIP update
    - October – Criterion 1
    - November – Criterion 2
    - December/January – Criterion 3
    - February – Criterion 4
    - March – Criterion 5

Monthly report will highlight the evidence and all of the good work of Missouri State. Monthly report will be published so that the campus community can comment and also add evidence that we have missed.

Assignments

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Higher Learning Commission
Federal Compliance Program

Documents Supporting the Preparation of Institutional and Team Materials to Address the Federal Compliance Requirements

This set of materials should be used by institutions preparing for and teams conducting evaluations for initial candidacy and initial or continued accreditation beginning in January 2013. The documents reflect changes in policy and process. All earlier documents and templates are now obsolete and should not be used as models for preparing team reports.

The following documents are included in this packet:

- Federal Compliance Guide (included in this pdf). This document outlines the Commission's requirements to ensure that the Commission and its affiliated institutions comply with federal regulations. It identifies applicable Commission policies and an explanation of each requirement.

- Federal Compliance Filing by Institutions (Word file-provided as a link to this pdf). This document should be used by institutions in providing evidence that they meet the federal requirements. It can be used as a template for the report supplement or as a guide to what is needed in the supplement. It includes the Worksheet for Use by Institutions on Assignment of Credit Hours and On Clock Hours.

- Federal Compliance Worksheet for Evaluation Teams (Word file-provided as a link to this pdf). This template should be used by teams in preparing the Federal Compliance appendix to the team report. It includes the Team Worksheet for Evaluating an Institution's Assignment of Credit Hours and on Clock Hours.

- Information on Contractual and Consortial Arrangements (included in this pdf). This explanatory document provides information for institutions and teams in addressing the requirement related to Title IV responsibilities.

The Higher Learning Commission's Federal Compliance Program: A Guide for Institutions and Evaluation Teams

Effective for visits beginning January 1, 2013

This document outlines the Commission's requirements to ensure that its affiliated institutions comply with federal regulations. It identifies applicable Commission policies and an explanation of each requirement. The Federal Compliance Program packet includes separate guidance for institutions in documenting compliance with the requirements and for evaluation teams in documenting whether the requirements are met.

Introduction

The Higher Learning Commission is required by the U.S. Department of Education to assure that all its member institutions are complying with the expectations of specific regulations accreditors must enforce as a part of their federal recognition. In addition, the Commission is required to review the institution's compliance with its Title IV program responsibilities. Compliance with these requirements by both institutions and the Commission is necessary to ensure that institutions accredited by the Commission are eligible for federal financial aid.

The Higher Education Opportunity Act of 2008 increased the number of statutory requirements that the Commission must ensure its accredited institutions fulfill. Further, the Department of Education continues to define and to implement these requirements through regulations effective July 1, 2010, and additional regulations effective July 1, 2011. In addition, Commission policy regarding federal compliance requirements for institutions was revised in June 2012 to make clear that institutions must meet these requirements in order to be accredited by the Commission. This document reflects those changes.

Expectations for Institutions and Peer Reviewers

The Higher Learning Commission's Federal Compliance Program follows a three-step process:

- First, institutions must address the federal requirements in the materials they submit to the Commission before a visit. "Federal Compliance Filing by Institutions" provides guidance to institutions in addressing these requirements. Applying institutions and PEAQ institutions address the Federal Compliance requirements in the self-study before the comprehensive evaluation visit. AQIP institutions address the requirements in the materials prepared for Quality Checkup Visits.

  Institutions participating in the Open or Standard Pathway can upload information relevant to Federal Compliance Requirements to the Assurance System once they gain access to that system. Institutions participating in the Open Pathway must demonstrate that they meet the Federal Compliance Requirements during the Year 10 comprehensive evaluation. Institutions

participating in the Standard Pathway must demonstrate that they meet the Federal Compliance Requirements in the Year 4 and Year 10 comprehensive evaluations.

Peer reviewers should study the requirements and submitted materials before the visit to determine whether there are any areas of concern.

- Second, the Commission expects that institutions make Federal Compliance additional supporting information available in the Resource Room during the visit (or in the Assurance System). While conducting the visit, peer reviewers should verify that the Federal Compliance information they received is accurate and complete. They should raise any questions they have with institutional representatives.

- Third, peer reviewers document that they have conducted a thorough review of the institution's compliance with federal requirements using the "Federal Compliance Worksheet for Evaluation Teams."

Assignment of Credits, Program Length, and Tuition

Commission Policy FDCR.A.10.020 – Assignment of Credits, Program Length, and Tuition

An institution shall be able to equate its learning experiences with semester or quarter credit hours using practices common to institutions of higher education, to justify the lengths of its programs in comparison to similar programs found in accredited institutions of higher education, and to justify any program-specific tuition in terms of program costs, program length, and program objectives. Affiliated institutions shall notify the Commission of any significant changes in the relationships among credits, program length, and tuition.

Assignment of Credit Hours. The institution's assignment and award of credit hours shall conform to commonly accepted practices in higher education. Those institutions seeking, or participating in, Title IV federal financial aid, shall demonstrate that they have policies determining the credit hours awarded to courses and programs in keeping with commonly-accepted practices and with the federal definition of the credit hour, as reproduced herein for reference only, and that institutions also have procedures that result in an appropriate awarding of institutional credit in conformity with the policies established by the institution.

Federal Credit Hour Definition*: A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally-established equivalency that reasonably approximates not less than:*

(1) one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or (2) at least an equivalent amount of work as required in paragraph (1) of this definition for other activities as established by an institution, including laboratory work, internships, practica, studio work, and other academic work leading toward to the award of credit hours. 34CFR 600.2 (11/1/2010)

Commission Review. The Commission shall review the assignment of credit hours, program length, and tuition in conjunction with a comprehensive evaluation for reaffirmation of accreditation during the Commission's assurance process. The Commission may sample or use other techniques to review specific institutional programs ensure that it has reviewed reliability and accuracy of the institution's assignment of credit. The Commission shall monitor, through its established monitoring processes, the resolution of any concerns identified during that evaluation with regard to the awarding of academic credit, program length, or tuition, and shall require that an institution remedy any deficiency in this regard by a date certain but not to exceed two years from the date of the action identifying the deficiency.

Commission Action for Systematic Noncompliance. In addition to taking appropriate action related to the institution's compliance with the Federal Compliance Requirements, the Commission shall notify the Secretary of Education if, following any review process identified above or through any other mechanism, the Commission finds systematic noncompliance with the Commission's policies in this section regarding the awarding of academic credit.

The Commission shall understand systematic noncompliance to mean that an institution lacks policies to determine the appropriate awarding of academic credit or that there is an awarding by an institution of institutional credit across multiple programs or divisions or affecting significant numbers of students not in conformity with the policies established by the institution or with commonly accepted practices in higher education.

Explanation of this Requirement

The Commission's intent is (1) to review an institution's policies regarding the award of credit; (2) to determine whether the institution follows those policies in practice; and (3) to determine whether the allocation of credit by the institution is in keeping with the federal definition of the credit hour and whether an institution with courses in alternative formats has and follows policies that are consistent with commonly-accepted practice in higher education.

Institutions should make sure that they have a policy at the institutional or department level that explains how credit hours are allocated to courses and programs. The policy should be in writing and take into account the federal definition of the credit hour as well as commonly accepted practice in higher education. Such policies are typically expected to distinguish the various levels of learning that the institution offers, such as graduate and undergraduate, and may distinguish among departments or disciplines. The policies should take into account such matters as practica, clinical rotations, compressed terms, and distance delivery.

Institutions with fairly standard semester or quarter systems and credit hour allocations are likely to find that looking at the institution's policy on credit hours, its catalog, and sample syllabi is the easiest approach to documenting compliance. However, institutions that provide instruction through on-line, alternative, compressed, or other formats should have policies that expressly address how that learning is determined, organized, and evaluated and how the institution goes about determining instructional equivalencies. Such institutions should consider incorporating learning objectives and actual student outcomes in allocating credit hour values.

The institution should be able to demonstrate that it assigns credit hours to courses in a reasonable and systematic way, taking into consideration the instructional time provided to students and typically in the semester/trimester hour or quarter hour format following an institutional policy. Degree programs should have overall credit hour requirements. These credit hour assignments and degree program requirements should fit within the range of good practice currently in higher education in the United States.

In addition, the institution should set tuition consistently across degree programs. If tuition differs for a particular program or programs, the institution should be able to justify that difference based on costs for offering that degree, the length of the program, or the objectives of the program.

Should the institution plan to make any significant change to credit hour assignments or degree program requirements, the institution is required to seek Commission approval prior to making those changes. The institution should review the *Change in Clock or Credit Hour* application on the Commission's web site for more information.

Related Commission Requirements: Core Component 3.A, 3.B; Assumed Practice B.1.

Institutional Records of Student Complaints

Commission Policy FDCR.A.10.030 – Institutional Records of Student Complaints

An institution shall make available an account of the student complaints it has received, its processing of those complaints, and how that processing comports with the institution's policies and procedures on the handling of grievances or complaints.

Explanation of this Requirement

The institution is free to design a complaint tracking process that best fits its needs. Whatever approach the institution takes, the institution should show that it has in a timely manner received, tracked, and processed student complaints filed since the last comprehensive evaluation or other evaluation in which the Commission formally reviewed the institution's federal compliance information (e.g., show-cause evaluation, certain advisory visits, etc.)

Moreover, the institution should be able to demonstrate that it identifies and learns from the information provided in student complaints. The institution and team may also receive recent other student complaints prior to the evaluation visit provided by the Commission.

Related Commission Requirements: Core Component 2.A; Assumed Practice A.3, A.4.

Publication of Transfer Policies

Commission Policy FDCR.A.10.040 - Publication of Transfer Policies

Each institution shall determine its own policies and procedures for accepting transfer credits, including credits from accredited and non-accredited institutions, from foreign institutions, and from institutions which grant credit for experiential learning and for non-traditional adult learner programs in conformity with any expectations in the Commission's Assumed Practices. An institution's periodic review of its transfer policies and procedures should include evaluation of their clarity to those who administer them, to the students who follow them, and to employers and other stakeholders. It should also include the consistency of their interpretation and application throughout the institution, as well as their responsiveness to new types of learning opportunities outside institutions of higher education.

An institution shall demonstrate that it has transfer policies that are publicly disclosed and that such policies include a statement of criteria established by the institution regarding transfer of credit earned at another institution.

Explanation of this Requirement

The institution must disclose its transfer policies to students and to the public. Its policies should contain information about the criteria the institution uses to make transfer of credit decisions. In addition, its transfer policies must also meet the requirements for the description of transfer policies outlined in 34 CFR §668.43(a)(11), which is reproduced here for reference.

(11) A description of the transfer of credit policies established by the institution which must include a statement of the institution's current transfer of credit policies that includes, at a minimum—
(i) Any established criteria the institution uses regarding the transfer of credit earned at another institution; and
(ii) A list of institutions with which the institution has established an articulation agreement.

Related Commission Requirements: Core Component 2.A; Assumed Practice A.5.D.

Practices for Verification of Student Identity

Commission Policy FDCR.A.10.050 – Practices for Verification of Student Identity

An institution offering distance education or correspondence education, as specified in the federal definitions reproduced herein solely for reference, shall have processes through which the institution establishes that the student who registers in the distance education or correspondence education courses or programs is the same student who participates in and completes and receives the academic credit.

Definitions:
Distance education/course means education that uses one or more of the {following} technologies (i) to deliver instruction to students who are separated from the instructor: and (ii) to support regular and substantive interaction between the students and the instructor, synchronously or asynchronously. The technologies used may include: (i) the internet; (ii) one way and two way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; (iii) audioconferencing; or (iv) videocassettes, DVDs, and CD-Roms, if the videocassettes, DVDs or CDRoms are used in conjunction with any of the technologies listed in clauses (i) through (iii).

Correspondence education/course means: (1) Education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. (2) Interaction between the instructor and the student is not regular and substantive, and is primarily initiated by the student. (3) Correspondence courses are typically self-paced. (4) Correspondence education is not distance education. 34CFR 602.3 (11/1/2010)

Institutional Practices. In verifying the identify of students who participate in class or coursework the institution may make use of a variety of methods at the option of the institution, including but not limited to: (1) secure login and pass code; (2) proctored examinations; and (3) new or other technologies and practices that are effective in verifying the identity of students. Such methods must have reasonable and appropriate safeguards to protect student privacy. Institutions must notify students at the time of registration or enrollment of any projected additional student charges associated with the verification of student identity such as separate fees charged by proctoring services, etc.

Commission Review. The Commission will review an institution's student identity verification protocols when an institution requests permission to add programs in distance delivery as well as during a comprehensive evaluation. The Commission will also require that institutions submit information about student identity verification protocols on the Commission's Institutional Update.

Explanation of this Requirement

Institutions must verify the identity of students who participate in courses or programs provided through distance or correspondence education. The institution may use a variety of approaches to verify student identity, which may include (1) secure login and pass code; (2) proctored examinations; and (3) new or other technologies and practices that are effective in verifying the identity of students. Additionally, if the method by which the institution verifies student identity will incur a cost to the student (such as a fee for a proctored exam) the institution must disclose that cost to the student at the time of registration or enrollment. The institution must also demonstrate that it is making reasonable efforts to protect student privacy in verifying student identity. *Note that the definitions of distance and correspondence education for the purpose of verifying student identity are the federal definitions and are quoted in the Commission policy for reference.*

Related Commission Requirements: Core Component 2.A.

Title IV Program Responsibilities

Commission Policy FDCR.A.10.060 – Title IV Program Responsibilities

An institution shall demonstrate that it complies if required with the Title IV program responsibility requirements of the Higher Education Reauthorization Act as most recently amended. Therefore, institutions will provide for Commission review any documents concerning the institution's program responsibilities under Title IV of the Act, including any results of financial or compliance audits and program reviews, audits reports by the Office of Inspector General of the U.S. Department of Education, and any other information related to its fulfillment of its Title IV responsibilities.

Default rate. An institution shall make reasonable efforts to ensure that its students do not take on excessive debt either through federal or private loans. An institution shall also demonstrate that it is appropriately fulfilling its Title IV responsibilities to manage its student loan program, to minimize student default on such loans, and to provide accurate information to the U.S. Department of Education when required in conjunction with its loan program. Therefore, an institution will submit to the Commission information about its participation in federal and private loan programs as well as its three-year Title IV default rates and any default reduction plans provided to the U.S. Department of Education.

Explanation of this Requirement

The institution is expected to provide the Commission with information regarding each of the components listed below:

1. General Program Responsibilities
2. Financial Responsibility Requirements
3. Default Rates
4. Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures
5. Student Right to Know
6. Satisfactory Academic Progress and Attendance Policies
7. Contractual Relationships
8. Consortial Relationships

The institution staff compiling this information should work with the financial aid office and the chief financial officer or comptroller.

Required Information for Students and the Public

Commission Policy FDCR.A.10.070 – Public Information: 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.

Explanation of this Requirement

Institutions should disclose certain information to students and members of the public in publications that are readily available to these constituents and in clear language.

Related Commission Requirements: Core Component 2.A, 2.B; Assumed Practice A.5.

Advertising and Recruitment Materials and Other Public Information

Commission Policy FDCR.A.10.070 – Public Information: 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 the Commission expects in an institution's catalog and other documents for students.

Disclosure of Affiliation Status. If the institution chooses to reference its accreditation status in advertising and recruiting materials or other document or location, that disclosure will accurately explain its status with the Commission and the academic programs, locations and other institutional activities included in its accreditation.

It will accompany that reference with information on how to contact the Commission. It shall provide the Commission's address and telephone number or it may use the Commission's web site address in lieu of this information. Electronic materials shall use the Commission's collective membership mark.

The Commission reserves the right to issue a public statement or Public Disclosure Notice (PDN) correcting any incorrect or misleading information the Commission determines that an institution has publicized about its accreditation status, recent actions by the Commission or other information.

Explanation of this Requirement

An institution must provide clear and accurate information in its advertising and recruiting materials, including information about its relationship with the Commission and other accrediting agencies. In any place where the institution discloses its relationship with the Commission, the institution must also provide contact information for the Commission. Institutions must use the Commission's Mark of Affiliation in at least one place on their web sites.

Related Commission Requirements: Core Component 2.A, 2.B; Assumed Practice A.7. Obligation of Affiliation 9.

Review of Student Outcome Data

Commission Policy FDCR.A.10.080 – Review of Student Outcome Data

An institution shall demonstrate that, wherever applicable to its programs, its consideration of outcome data in evaluating the success of its students and its programs includes course completion, job placement, and licensing examination information.

Explanation of this Requirement

Institutions must demonstrate that they collect and review information about how students perform in courses in a program and whether, subsequent to the successful completion of the program, students are able to obtain employment in the field in which they studied or pass required licensing exams. Institutions must also demonstrate that they use this information to determine whether they are successful in meeting their missions and educational objectives.

Related Commission Requirements: Core Component 4.A.6, 4.B.2, 4.C; Assumed Practice C.6.C.7.

Standing with State and Other Accrediting Agencies

Commission Policy FDCR.A.10.090 – Standing with State and Other Accrediting Agencies

An institution has a responsibility to remain in good standing with each state in which it is authorized or licensed as well as with any other institutional or programmatic accrediting agency recognized by the U.S. Department of Education by which it is accredited or pre-accredited up to the point that it voluntarily withdraws from such relationships. An institution shall fairly represent to the Commission and to the public its history or current or previous status with other institutional or programmatic accrediting bodies and with each state in which it is authorized or licensed.

An institution shall disclose to the Commission any pending or final state actions that affects the institution's legal status or authority to grant degrees or offer programs and any pending or final actions by an accrediting agency to withdraw accredited or pre-accredited status, impose a sanction or deny an application for such status. Such disclosure shall take place at the time of the action by the other entity and on the Commission's Institutional Update as well as in preparation for a comprehensive evaluation by the Commission.

Commission Review. If another such accrediting agency or if a state has taken any of these actions, the Commission will undertake a prompt review of the institution and the related action.

With regard to an applying institution, the Commission, through its decision-making processes and subject to the limitations in the Eligibility Requirements, will carefully weigh these matters in reaching its own decision to grant candidacy or accreditation. If it chooses to grant candidacy or initial accreditation to such an institution, it will provide the Secretary of Education a written explanation of why that action is appropriate within thirty days of taking the action.

With regard to an accredited institution, the Commission will determine whether additional review or Commission action, including sanction or withdrawal of accreditation, is appropriate. The Commission may undertake its review in any way provided for in Commission policy.

Explanation of this Requirement

An institution must disclose to the Commission its relationship with any other specialized, professional or institutional accreditor and with all governing or coordinating bodies in states in which the institution may have a presence. Information about those relationships should inform Commission reviewers in evaluating the institution's capacity to meet the Criteria for Accreditation.

Related Commission Requirements: Assumed Practice A.7, C.4.

Public Notification of Opportunity to Comment

Commission Policy FDCR.A.10.070 – Public Information: Public Notification of Opportunity to Comment

The Commission shall seek comment from third parties about institutions being evaluated for accreditation or candidacy. As part of the comprehensive evaluation, institutions shall publicize the forthcoming evaluation in accordance with established Commission procedures regarding content, dissemination, and timing.

Explanation of this Requirement

The Commission seeks public comments on institutions as part of its comprehensive evaluations and Quality Checkup Visits. The institution is responsible for publishing notice about the visit to its constituents and instructing constituents that they can send comments to the Commission. Commission staff will collect the comments and forward them to the leadership of the institution and the evaluation team. The comments are intended to encourage participation in the accreditation activity from multiple constituents and typically form only a basis for further inquiry about appropriate issues from the team. Decisions made by the team should rest on information gained from the visit itself.

Information on Contractual and Consortial Arrangements

Contractual Arrangements

Commission Policy 3.2(a).10 requires that an accredited or candidate institution notify the Commission and seek prior approval if the institution initiates a contractual arrangement in which the institution outsources some portion of its educational programs to:

(1) an unaccredited institution,
(2) an institution that is not accredited by an accreditor recognized by the U.S. Department of Education, or
(3) a corporation or other entity.

An institution that intends to enter into a contract with one of the above types of organizations for any goods or services related to outsourcing academic program(s) or that has entered into such an arrangement since July 1, 2010, should complete a screening form so that the Commission can determine whether the contractual arrangement requires Commission approval. The screening form is available on the Commission's Web site. If the contractual arrangement involves a clinical component, the institution should complete the screening form so the Commission can determine whether further approval is needed.

Types of Contractual Arrangements Excluded from Seeking Commission Approval

The institution should not complete the screening form if any of the following apply:

- All of the contractual partners providing goods or services related to academic programs are institutions accredited by agencies recognized by the U. S. Department of Education. Such arrangements may require prior approval as a consortial rather than a contractual arrangement. Refer to the Consortial Arrangements Application (www.ncahlc.org).
- The contract is for goods and services, such as food services and parking lot management, that support the college but are unrelated to the provision of academic programs (degree programs and certificate programs that carry college credit).
- The accredited or candidate institution offers the goods or services to another party. Note that if the other party is an accredited or candidate for accreditation with HLC, that party may need to seek approval for the arrangement.
- The contractual partner provides an internship that does not include a formal instructional component.
- The contractual partner provides **only** books or supplies supporting the academic program or equipment or a platform for Internet-based instruction.
- The contract between the contractual partner and the institution provides only for the articulation or transfer of courses that are transcribed as transfer credit on the students' transcripts and not the outsourcing of courses carrying academic credit from the institution.

Consortial Arrangements

Higher Learning Commission (HLC) policies outline when institutions need to notify the Commission about consortial arrangements and when they need to seek approval of these arrangements. (See policy 3.2(a) and page two of this document.)

Characteristics of Consortial Arrangements

A consortial arrangement is one in which an HLC-accredited institution develops an agreement with an institution or group of institutions, i.e., the consortial party(ies), through which the consortial party(ies) agree to provide some portion of one or more educational programs offered by the HLC-accredited institution. The agreement may be a written contract or letter of agreement or other document or it may be an oral agreement between the parties.

To be considered a consortium, the party(ies) must be two or more institutions accredited by agencies recognized by the U.S. Department of Education. (See the previous section on **Contractual Arrangements** for agreements with organizations that do not meet this definition. Foreign institutions are typically not accredited by an accrediting agency recognized by the U.S. Department of Education even though such institutions often have arrangements with other institutions that are accredited by such agencies. Therefore, they are considered contractual parties.)

The consortial arrangement may affect one or more Title IV-Eligible certificate or degree programs. The consortial party provides some portion of the educational program, which may include developing syllabi or courseware, providing academic resources, developing instructional design, or delivering instruction face-to-face or through a platform provided by the consortial party.

Arrangements that require Commission notification or approval **do not include:**

- Articulation agreements through which the institution agrees to admit students and accept transfer credits previously earned or completed by those students with the other party to the articulation agreement, 2+2, clinical or internship arrangements unless the other party provides instruction.
- Contracts that are solely for a delivery platform and do not include courseware, academic content, etc.

Reporting and Seeking Approval of Consortial Arrangements

Institutions have a responsibility to ensure that the Commission is properly informed about and has approved consortial arrangements. The Commission understands the percentages that determine whether an institution must notify or seek approval from the Commission for a consortial arrangement to mean the following:

- If a student can access 50% or more of the credits in a degree or certificate program from consortia institutions versus the institution that enrolls the student and awards the degree, the consortial arrangement must have prior approval from the Commission.
- If a student can access 25% - 49% of the credits in a degree or certificate program from consortia institutions versus the institution that enrolls the student and awards the degree, the institution must notify the Commission of the consortial arrangement.

Changes identified as **requiring Commission notification** are included in the institution's accreditation provided that the institution provides timely notification to the Commission through the Annual Institutional Data Update

and other data reporting instruments established by the Commission according to a schedule established by the Commission.

When to Use the Substantive Change Application Form for Consortial Arrangements

Consortial arrangements identified as **requiring prior Commission approval** prior to implementation shall be included in the institution's accreditation only after the Commission has reviewed the change and has formally acted to approve the change. The institution initiates its change request using the Change Application Form for Consortial Arrangements provided on the Commission's Web site.

If all of the institutions participating in the consortium are accredited by the Higher Learning Commission, the institutions are invited to submit a consolidated application form. Each institution in the arrangement should specify percentage of the credits it offers with respect to each degree program available through the consortial relationship. Those institutions requiring approval will receive formal approval whereas those institutions needing to notify the Commission will have satisfied their obligation.