



Seeking Accreditation with HLC and a Review of HLC's Requirements

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Andrew Lootens-White
Vice President of Accreditation Relations

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Session Overview

- About HLC and HLC's Approach
- The Two Processes for Seeking HLC Accreditation
- A Deeper Dive: The Accelerated Process
 - Eligibility, key steps, requirements, and timelines involved with seeking HLC accreditation
- HLC's Criteria for Accreditation & Related Requirements



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HLC Mission and Vision

Advance the common good through quality assurance of higher education as the leader in equitable, transformative and trusted accreditation in the service of students and member institutions.

HLC will be the champion of quality higher education by working proactively in support of students, institutions and their communities.



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HLC's Guiding Values

1. Focus on student learning
2. Education as a public purpose
3. Education for a diverse, technological, globally connected world
4. A culture of continuous improvement
5. Evidence-based institutional learning and self-presentation
6. Integrity, transparency, and ethical behavior or practice
7. Governance for the well-being of the institution
8. Planning and management of resources to ensure institutional sustainability
9. Mission-centered evaluation
10. Accreditation through peer review

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By Your Side at Every Step

- Focus on Institutional Mission
- One-of-a-Kind Support
 - Dedicated Staff Liaison
 - Advanced Technology Systems
 - Transparent and Scalable Processes
- Focus on Responsiveness and Agility
- Focus on Institutional and Student Success
- Vibrant and Diverse Peer Corps
- Institutional Improvement and Professional Development Opportunities



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By Your Side: Substantive Change

- Decision-Makers for different types of decisions
 - HLC's Board (3 times per year)
 - Institutional Actions Council (every 6 weeks)
- Screening webforms for certificates and programs
- Customized applications for each subchange type
- Track progress via HLC's *Canopy* portal (self-serve)
- Consultation with VPs for Accreditation Relationship
- Professional support staff specialize in various accreditation processes, and cross-trained
- Desk Reviews, Peer Review Panels, On-Site Visits



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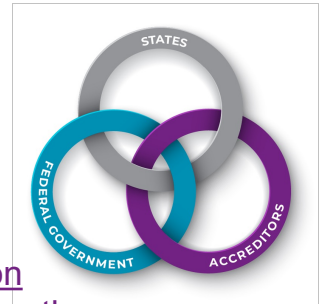
By Your Side: The Program Integrity Triad

- Members of the Triad:
 - States
 - Federal Government
 - Accreditors
- The college or university's mission is central to HLC's accreditation and assurance of academic quality. In determining whether institutions meet HLC requirements, HLC considers the institution's mission. An accredited institution demonstrates how it meets HLC requirements through a mission-reflective lens.



By Your Side: The Program Integrity Triad

- Should any of HLC's requirements overlap with requirements from other members of the Triad, HLC works with the other Triad members to identify these situations and limit the burden on the institution.
- HLC does not prescribe how a member institution meets HLC's requirements. If a requirement of another entity of the Triad may appear to limit an institution's ability to meet HLC's requirements in a particular manner, an institution has the flexibility within HLC's requirements to identify other ways to demonstrate it meets HLC's requirements.



HLC serves nearly 1,000 member institutions; those institutions are evaluated regularly and, when HLC requirements are met, their accreditations are reaffirmed.

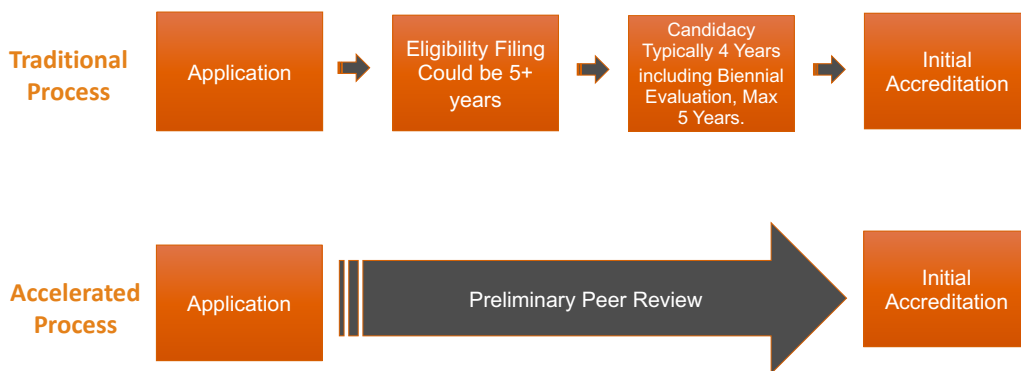
Institutions not already members of HLC may seek accreditation with HLC through one of two processes, both of which are designed to ensure that institutions meet HLC's Criteria for Accreditation and other HLC requirements.



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Seeking Accreditation With HLC: Two Processes



Preliminary Peer Review replaces the Eligibility and Candidacy stages from the traditional process



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An Institution is Eligible for the Accelerated Process if:

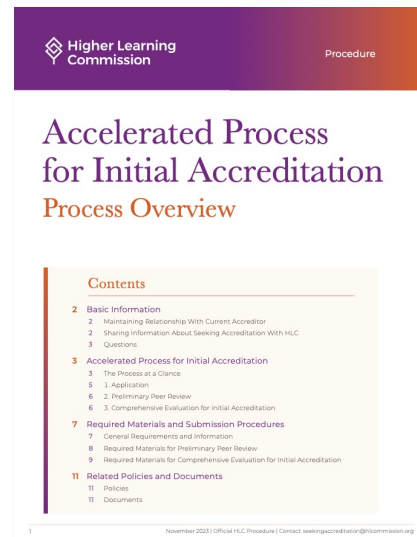
- The institution is currently institutionally accredited by (a) an accrediting agency that is recognized by the U.S. Department of Education and that is historically known as a regional accreditor or (b) by a state entity that is recognized by the U.S. Department of Education as an institutional accreditor of degree-granting institutions of higher education
- The institution, in its current form, has undergone one reaffirmation of accreditation with its current institutional accreditor. If an institution has not, in its current form, undergone one reaffirmation of accreditation with its current institutional accreditor, the institution must be able to demonstrate other indicia of continuity and stability in its accreditation history.
- The institution has not been placed on a sanction, Show-Cause Order, or other similar negative action with its current institutional accreditor for at least the past five years, and its current institutional accreditor is not currently considering placing the institution on a sanction, Show-Cause Order, or other similar negative action.

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Process Overview: Accelerated Accreditation

- There are 3 main steps to the Accelerated Process:
 - Application
 - Preliminary Peer Review
 - Comprehensive Evaluation for Initial Accreditation
- The Overview summarizes the steps in charts, then follows with detail for each.




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Step 1: The Application

- Online Application is located on HLC’s [Website](#)
 - Demographic Data
 - Application Evidence items (uploaded as single PDF)
- Application Addresses 13 items
 - Securing USDE Reasonable Cause requires **EARLY** action!
- Submit Application to HLC online
- Submit Application fee to HLC
- HLC Evaluates and Responds by letter in about 1 month


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Special Note: Reasonable Cause


Resource

Demonstrating “Reasonable Cause” to Change Accrediting Agencies

In July 2022, the U.S. Department of Education set forth guidance related to the analysis that the Department’s Office of Federal Student Aid (OFA) conducts when determining whether an institution that is requesting to change or add an accrediting agency has established “reasonable cause” to do so.

This guidance consists of:

- [Dear Colleges Letter \(DCL\) 02N-22-05](#), issued July 19, 2022
- [Dear Colleges Letter \(DCL\) 02N-22-05](#), issued July 19, 2022 (updated September 26, 2022)

HLC has assembled this resource to provide institutions with additional information that may be useful as they review the guidance and potentially submit materials to OFA in order to obtain a determination as to reasonable cause to change or add an accrediting agency. HLC is providing this resource as a courtesy to institutions. Institutions should independently review and explore federal guidance and consult with legal counsel as needed when submitting information to OFA.

According to the guidance, an institution must submit required narrative and documentation to OFA to address various items. An institution is expected to submit this information to OFA and obtain a determination from OFA regarding the question to change or add the accreditor, prior to submitting an application to a new accreditor.

Overall, OFA’s review is intended to assure that an institution is not restricting accrediting agencies to evade accountability, avoid open inquiries, or look for less rigorous standards.

In companion guidance to accreditors in July 2022, the Department also required that an accreditor that receives an application for membership from an institution that intends to change or add accreditors

must also conduct its own independent evaluation as to whether the change or addition is voluntary. HLC has incorporated in the application process the information it needs from institutions in order to conduct its own analysis. <https://www.higherlearning.com/fcc/cce/determination-seeking-accreditation.html>


OFA’s analysis consists of two parts. An institution is expected to provide extensive documentation for analysis, including Part I and all of the factors in Part II (as referenced in 02N-22-05 and 02N-22-03).

Part I: A confirmation that the institution has not in the previous 24 months had its accreditation withdrawn, revoked, or otherwise terminated for cause or been subject to a probation or equivalent, show cause order, or suspension.

Part II: An analysis as to whether there is reasonable cause for the institution’s request to change or add the accreditor. Based on the 2022 guidance and previous determination letters, HLC’s understanding is that the factors that OFA will consider as part of this analysis include:

1. Whether the proposed change involves an accreditor that is itself subject to Departmental action
2. The institution’s history of past compliance with the requirements of its current institutional accreditor, programmatic accreditors, and other oversight agencies, such as state authorization agencies and the Department
3. Whether the change will strengthen institutional quality

December 2022 | Official HLC Resource | Questions? weaving@higherlearning.com


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Step 2: The Preliminary Peer Review

- A fee is due to begin this step
- Access to HLC's Canopy system to provides:
 - Summary-level narrative addressing HLC's 4 Criteria for Accreditation, with hyperlinks to PDF evidence
 - Three Completed Forms:
 - Institutional Data Form
 - Compliance with Eligibility Requirements Form
 - Compliance with Assumed Practices Form
- Accelerated Process *Supplemental Guide*



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Step 2: The Preliminary Peer Review (cont.)

- Evaluated by a peer reviewer panel over 4 weeks
- Occurs asynchronously; no on-campus visit
- Evaluation Standard:
 - Is there sufficient evidence such that the institution appears likely to meet HLC requirements and is prepared to host a comprehensive evaluation for initial accreditation?*
- This step concludes with a determination that allows the institution to proceed (or not)
- Institution is assigned an HLC Staff Liaison



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Step 3: The Comprehensive Evaluation for Initial Accreditation

- Institution begins planning for on-campus evaluation
- Scheduled about 9 months in advance
- Institution submits in HLC's Canopy system:
 - Full Assurance Argument (at Core Component level) addressing HLC's Criteria for Accreditation with hyperlinks to PDF evidence
 - Three Updated Forms:
 - Institutional Data Form
 - Compliance with Eligibility Requirements Form
 - Compliance with Assumed Practices Form
 - Federal Compliance Filing
 - Multi-Campus Visit Report (if applicable)



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Step 3: The Comprehensive Evaluation for Initial Accreditation (cont.)

- Team of 5 to 7 peer reviewers are onsite for 1 ½ days
- Team gains access to material 4 weeks prior ("lock date")
- Due Process
- Institution provides an Institutional Response to team report
 - IAC Hearing (in-person)
 - Institution provides an Institutional Response to IAC Hearing report
 - HLC Board takes final action on the award of initial accreditation; initially placed on Standard Pathway
- HLC invoices you for this in accordance with the Dues & Fees schedule



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Accreditation Process



PREPARATION

Institution participates
in assurance activities



EVALUATION

Peer reviewers evaluate
and make recommendations
*Due process includes
institutional response*



DECISION MAKING

Institutional Actions
Council (IAC) or Board of
Trustees take final action

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Additional Information

- The preceding slides are summaries of each step
- Full information is within and linked from the Overview for the Accelerated Process for Initial Accreditation
- Pages 7 – 11 of Overview include additional:
 - Submission guidance
 - Detail about Preliminary Peer Review and Comprehensive Evaluation for Initial Accreditation
 - Links to related Policies and Documents
- HLC offers Sample full Assurance Arguments on website

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Elements of HLC Accreditation

- **Eligibility Requirements**
 - ✓ demonstrate eligibility for seeking accredited status
- **Assumed Practices**
 - ✓ matters of fact rather than judgment, unlikely to vary by mission
 - ✓ Foundational, basic assumptions
- **Criteria for Accreditation**
 - ✓ central to demonstrating quality
- **Federal Compliance**
 - ✓ ensuring compliance with federal regulations



Elements of Accreditation: Eligibility Requirements

Eligibility Requirements

- Describe the legal, operational and financial requirements an institution must meet to be eligible for HLC membership
- Demonstrate eligibility for seeking accredited status
- Answers the question: *Is the institution “eligible”?*



Form

Compliance With Eligibility Requirements

Institutions are required to demonstrate that they meet the Eligibility Requirements at various points in the process of seeking accreditation with HLC. Institutions may also, in accordance with HLC policy, sometimes be required to write specifically to the Eligibility Requirements once accredited.

Instructions

Provide narrative and required supporting evidence, demonstrating how the institution meets each of the Eligibility Requirements. If a particular aspect of the Eligibility Requirement or item of evidence is not relevant to the institution, explain why. If a particular aspect of the narrative or item of evidence is relevant to more than one Eligibility Requirement, include cross-references to previous narrative or evidence. The institution may also cross-reference relevant information provided in the Institutional Data Form, if applicable.

The Compliance With Eligibility Requirements Form and supporting evidence should be provided as two separate PDF files. Please provide regular PDF files, rather than Adobe Acrobat PDF Portfolios. The PDF of the supporting evidence should be paginated, bookmarked and searchable with internal document links that allow for ease of review. Zoom level. Click to open the Zoom dialog box. seeking accreditation with HLC should follow the general process of reviewing peer review documents detailed in the Eligibility Process and Candidacy or the Accelerated Process for Initial Accreditation overview documents. (For institutions completing the Compliance With Eligibility Requirements Form as part of a process in the Assurance System, peer reviewers will access the Compliance With Eligibility Requirements documents through the Forms tab. There is no need to provide a link to these documents in the narrative of the Assurance Argument.)

Submission Instructions

Eligibility Filing: Submit this form and supporting evidence, along with the Institutional Data Form, at www.hlc.com/submit. Select "Eligibility" from the list of submission options.

Comprehensive Evaluation, Biennial Evaluation or Preliminary Peer Review: Upload the form and supporting evidence to the Forms tab of the Assurance System.

Audience: Institutions
Published: November 2014 © Higher Learning Commission

Process: Review of Eligibility Requirements Form
Contact: www@hlc.com
Page 1

Elements of Accreditation: Assumed Practices

Higher Learning Commission Form

Evidence of Compliance With the Assumed Practices

Foundational to the Criteria and Core Components is a set of practices shared by institutions of higher education in the United States. Unlike the Criteria for Accreditation, these Assumed Practices are (1) generally matters to be determined as facts, rather than matters requiring professional judgment and (2) not expected to vary by institutional mission or context. Every institution is expected to be in compliance with all Assumed Practices at all times.

The Assumed Practices are organized into four areas: (A) Integrity, Ethical and Responsible Conduct; (B) Teaching and Learning, Quality, Resources, and Support; (C) Teaching and Learning, Evaluation and Improvement; and (D) Resources, Planning, and Institutional Effectiveness. These areas link the Assumed Practices to their respective Criteria.

Institutions will be required to affirmatively demonstrate their compliance with the Assumed Practices at particular times. These times include, for example, institutions seeking candidacy, institutions seeking initial accreditation and accredited institutions on Show-Cause.

Instructions

Provide a detailed explanation demonstrating how the institution meets each of the Assumed Practices. The institution may include additional evidence that is directly related to and supports explanations provided in this form. If a particular item is relevant to more than one Assumed Practice, include cross-references to previous narrative or evidence. The institution may also cross-reference relevant information provided in the Institutional Data Form, if applicable.

Upload the completed form and supporting documentation as two separate PDF files to the Forms tab of the Assurance System. Please provide regular PDF files, rather than Adobe Acrobat PDF Portfolios. The PDF of the supporting documentation should be paginated, bookmarked and searchable with internal document links that allow for ease of movement across chapters, sections and subsections. Institutions seeking accreditation with HLC should follow the general guidelines for submitting required materials that are detailed in the *Eligibility Process and Candidacy* or the *Accelerated Process for Initial Accreditation* overview documents. Their reviewers will be able to access the Compliance With Assumed Practices documents through the Forms Tab. There is no need to provide a link to these documents in the narrative of the Assurance Argument.)

Revision: September 2024
 Previous Version of Assumed Practices Form: November 2014 © Higher Learning Commission
 Contact: assumedpractices@hlc.com

Assumed Practices

- Foundational to the Criteria for Accreditation is a set of Assumed Practices that are not expected to vary by mission or context.
- Focus on matters of fact rather than judgment, unlikely to vary by mission.

Elements of Accreditation: Criteria for Accreditation

Criteria for Accreditation

The Criteria for Accreditation are HLC's standards of quality.

Higher Learning Commission Policy

Revised Criteria for Accreditation and Assumed Practices

Policy Changes Adopted on Second Reading

The Higher Learning Commission (HLC) Board of Trustees ("the Board") adopted the following policy changes on second reading at its meeting on June 27, 2024. The revised policies will go into effect on September 1, 2025.

Contents

- Summary of Adopted Changes.....
- Member Feedback and Policy Changes Between First and Second Reading.....
- Resources for Institutions and Their Reviewers.....
- Definitions of Terminology in the Criteria and Assumed Practices.....
- Crosswalk Between the Revised and Current Criteria.....
- Resources Coming Soon.....
- Timeline for Implementation.....
- Adopted Policy Changes.....
 - Revised Criteria for Accreditation Without Markup.....
 - Revised Criteria for Accreditation With Markup.....
 - Revised Assumed Practices Without Markup.....
 - Revised Assumed Practices With Markup.....
 - Revised Evaluative Framework for the HLC Criteria.....

Approved HLC Policy Change - Revised Criteria for Accreditation and Assumed Practices | Jan 2024

Higher Learning Commission Resource

Providing Evidence for the Criteria for Accreditation

Updated for Criteria for Accreditation Effective September 1, 2025

Contents

1. Differing Expressions of Accountability
2. How to Use This Document
3. Identifying Evidence
4. Common Types of Evidence Provided by Institutions
5. Sources of Evidence, Depending Upon Mission and Institutional Type
6. Criterion 1: Mission
7. Criterion 2: Integrity, Ethical and Responsible Conduct
8. Criterion 3: Teaching and Learning for Student Success
9. Criterion 4: Sustainability: Institutional Effectiveness, Resources and Planning

September 2024 | HLC Resource | Contact: accr@hlc.com

Criteria for Accreditation

2020	2025
1. Mission	1. Mission
2. Ethical and Responsible Conduct	2. Integrity: Ethical and Responsible Conduct
3. Teaching & Learning: Quality, Resources & Support	3. Teaching & Learning for Student Success
4. Teaching & Learning: Evaluation & Improvement	
5. Institutional Effectiveness, Resources and Planning	4. Sustainability: Institutional Effectiveness, Resources and Planning

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Elements of Accreditation: Federal Compliance

Federal Compliance

- As a federally recognized accreditor, HLC is responsible for verifying that member institutions comply with certain federal regulations.
- Reviewed during Comprehensive Evaluations.

Higher Learning Commission Procedure

Federal Compliance Overview

Effective for Federal Compliance Reviews beginning September 1, 2024

In order to maintain its federal recognition by the U.S. Department of Education, the Higher Learning Commission (HLC) assures that all member institutions are complying with the expectations of specific federal regulations including, when applicable, Title IV program responsibilities.

Compliance with these requirements by both institutions and HLC is necessary to ensure that institutions that participate in Title IV HEA programs remain eligible for federal financial aid. Such compliance also represents a reinforcement of certain important quality assurance goals. HLC policy regarding Federal Compliance requires institutions to meet these requirements in order to gain candidacy, gain initial accreditation and to remain accredited.

Based on feedback from the membership and the House of Representatives and in cooperation with representatives from the U.S. Department of Education, HLC significantly streamlined the Federal Compliance process in September 2019. The current process eliminates requirements related to areas that are already reviewed as part of other HLC requirements and processes and highlights the areas where information is required only for Federal Compliance.

Recent Updates

- In June 2024 and February 2025, HLC's Board of Trustees adopted changes to the following policies related to Federal Compliance requirements:
 - [Publication of Transfer Policies \(FDCA 10.040\)](#)
 - [Regulatory Practices for Verification of Student Search and Enrollment of Student Enrollees \(FDCA 10.050\)](#)
- [Public Information \(FDCA 10.020\)](#)
- [Fraud and Abuse \(FDCA 10.030\)](#)
- [Reporting, Detection and Remedial Effort \(FDCA 10.030\)](#)

Reminders

- Distance Education institutions are not required to submit a Federal Compliance Filing for their Year 4 comprehensive evaluation unless they are newly accredited or recently removed from Probation or Suspend Status.
- HLC policy nevertheless permits a Federal Compliance Review to be conducted at any time as circumstances may warrant.
- HLC will request institutions to be able to demonstrate Carnegie Unit equivalency in their assignment of credit hours. However, HLC will no longer

February 2025 | Official HLC Procedure | Contact: accreditation@commission.org

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Session Recap

- About HLC and HLC's Approach
- The Accelerated Process For Seeking Accreditation
 - Eligibility, key steps, requirements, and timelines involved with seeking HLC accreditation
- Criteria for Accreditation and Related Requirements

THANK YOU!

Questions | Answers | Discussion