

**Notes from 21-23 October 2015 HLC training**  
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In October 2105, I attended training to become an HLC peer reviewer.<sup>1</sup> This document summarizes much of what I learned. While my training was from the viewpoint of a peer reviewer, I hope that this memo will help people at CSU-Pueblo prepare the institution for reaccreditation by HLC. As part of the training, I was given a large document titled *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*, and I have often cited that document below. Where I could find equivalent information on the HLC website, I have included those links in the list of References at the end of this document. I am also willing to provide copies of excerpts from the training document.

“Institutional accreditation assesses the capacity of an institution to assure its own quality and expects it to produce evidence that it does so.”<sup>2</sup>

### **Criteria**

The five Criteria

1. Mission,
2. Integrity: Ethical and Responsible Conduct,
3. Teaching and Learning: Quality, Resources, and Support,
4. Teaching and Learning: Evaluation and Improvement, and
5. Resources, Planning, and Institutional Effectiveness

are broken into Core Components (labeled 1.A., etc.) and then into Subcomponents. To be accredited, the institution must present evidence in its Assurance Argument to show that each Core Component is met. Subcomponents are addressed if applicable to that institution. The Assurance Argument and all supporting evidence are submitted electronically.

The criteria are central to demonstrating quality, but the Guiding Values,<sup>3</sup> Assumed Practices,<sup>4</sup> and Obligations of Affiliation<sup>5</sup> are other elements of Accreditation.

Revisions to the Assumed Practices include changes that will be implemented on 1 September, 2017, concerning certain aspects of the expectations regarding faculty qualifications. On October 1, 2015, HLC issued new guidelines on this topic; see “Determining Qualified Faculty: Guidelines for Institutions and Peer Reviewers.” During an institution’s comprehensive evaluation, faculty qualifications are considered in relation to Criterion 3, even if the associated Assumed Practice is not under review. Revised language in the Assumed Practices include the following three excerpts:

Qualified faculty members are identified primarily by credentials, but other factors, including but not limited to equivalent experience, may be considered by the institution in determining whether a faculty member is qualified.

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<sup>1</sup> I thank the Office of Academic Affairs for partial support of my expenses for attending this training.

<sup>2</sup> Page 174, “Evaluating the Criteria for Accreditation: Met or Not Met?”

<sup>3</sup> The Criteria for Accreditation: Guiding Values. <https://www.hlcommission.org/Criteria-Eligibility-and-Candidacy/guiding-values-new-criteria-for-accreditation.html>

<sup>4</sup> Policy Title: Assumed Practices, <http://policy.hlcommission.org/Policies/assumed-practices.html>.

<sup>5</sup> Policy Title: Obligations of Affiliation, <http://policy.hlcommission.org/Requirements-for-Affiliation/obligations-of-affiliation.html>.

Faculty teaching general education courses, or other non-occupational courses hold a master's degree or higher in the discipline or subfield. If a faculty member holds a master's degree in a discipline or subfield other than that in which he or she is teaching, that faculty member should have completed a minimum of 18 graduate credit hours in the discipline or subfield in which they teach.

Instructors teaching in graduate programs should hold the terminal degree determined by the discipline and have a record of research, scholarship or achievement appropriate for the graduate program.<sup>6</sup>

The University must also complete a Federal Compliance Filing, which is reviewed by HLC staff who inform the peer review team of the results. The team chair typically handles Federal Compliance, but it can be assigned to a team member as well. Federal Compliance includes

- assignment of credits (“Institutions should make sure that they have a policy at the institutional or department level that explains how credit hours allocated to courses and programs.”<sup>7</sup>), program length, and tuition,
- institutional records of student complaints,
- publication of transfer policies,
- practices for verification of student identity (for institutions offering distance education or correspondence education),
- Title IV requirements (for public disclosure of information such as default rates and campus crime statistics),
- advertising and recruitment materials and other public information,
- standing with state and other accrediting agencies, and
- public notification of opportunity to comment.

### **The Assurance Argument and the role of evidence**

Meeting the criteria requires providing *evidence* that each criterion is met. For example, the university might state that it follows a certain policy for handling student complaints, but evidence must be provided that the policy is actually followed. For each Core Component, the Assurance Argument should present a clear and logical argument, should address the core component and applicable subcomponents, and should present evidence. Evidence is evaluated on quality, not on quantity. Examples of evidence for each Core Component are available in “Sample Evidence for Criteria.” In evaluating evidence, the reviewer should answer questions like:

- “How is evidence connected to criteria and context?”
- What are the implications of this evidence for the stability or future of the institution?
- Why is the evidence meaningful?”<sup>8</sup>

The team assigns criteria to team members. Everyone reads the full Assurance Argument and related evidence. Team members review in depth the arguments and note evidence present and evidence missing and needed for their assigned Criteria and Core Components. For each Core Component, the team members record their analysis, questions to ask, and who to ask. See “Criteria and Core Components, Evidence Present and Needed.”

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<sup>6</sup> Pages 272-273, “Assumed Practices.”

<sup>7</sup> Page 240, “Federal Compliance Program.”

<sup>8</sup> Page 179, “Writing to the Criteria.”

The team has several phone conference calls before the visit. The team identifies areas of focus or improvement, questions for focus group meetings, and additional documents and information needed from the institution.

### **The Student Opinion Survey**

About eight weeks before the visit, HLC asks the university to share a survey link with all students; the link is open for 10 days. Aggregate data are provided to the team and are also shared with the institution one month before the visit. The institution can provide information or other data in response to the survey data prior to the visit.

### **The visit**

The team arrives on Sunday and departs after noon on Wednesday. The team is on campus all day Monday and the morning of Tuesday. They remain (but work at the hotel) for Tuesday afternoon and Wednesday morning to write the report.

The team schedules three types of meetings; some may occur in parallel, with different team members running the different meetings:

- Customary – meetings with the leadership of the university as a group, the board of trustees, and the Assurance Argument and Evidence team, a review of facilities, and an exit meeting, usually with the president.
- Focus Groups – three or four meetings on areas identified by the team for in depth examination and attended by people who are invited. These meetings focus on issues the team identified from reviewing the Assurance Argument and the evidence. Examples are planning and evaluation, enrollment and finances, and student persistence and completion.
- Open Forums – three meetings, one each on criteria 1 and 2, criteria 3 and 4, and criterion 5. These are open to all constituents (faculty, staff, administrators, students, and others). The intent is to validate the evidence in the Assurance Argument and to ascertain how well the institution understands itself and where it is going. “These discussions are intended to be listening sessions that engage the participants with questions, encourage candid commentary, and probe for participant opinions, observations, and evidence in relationship to the Criteria.”<sup>9</sup> Pages 126 through 140 of “Sample Approach to Open Forum Discussions” have guiding questions for each criterion. For example, “It is evident from the college’s university’s Assurance Filing that ‘the institution’ has a clear understanding of its mission, vision, and values. How do you see the mission playing out in your daily lives? What do you see as the strongest evidence that the institution knows and follows its mission?”

In these meetings, the team verifies and clarifies evidence in the Assurance Argument, seeks additional context, understanding, and example of evidence, and listens. Questions should be framed to elicit evidence, for example, “I read that .... Can you explain how that works?” The team does not meet with students in a group, but rather relies on the survey.

If the institution has branch campuses or locations, team members are assigned to visit and compile a short report. The whole team discusses the report, evaluating the institution’s capacity to maintain quality in its extended operations.

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<sup>9</sup> Page 135, “Sample Approach to Open Forum Discussions.”

### **The team report**

The team members discuss their findings and build consensus. Team members must be open minded; an institution might not meet a criterion the way the team member would, but may still meet it. The team report is based on the Assurance Argument, evidence, and the visit. For each subcomponent of each criterion, a team member writes a statement which includes context, evidence, and judgment, as shown in this example:

According to its mission statement, Neverland University is dedicated to the quality of student life and the centrality of student learning. The Assurance Argument states that Neverland support this mission through cocurricular opportunities that complement instructional programs. Evidence from the list of 2013-2014 activities and attendance numbers showed that Neverland provides a wide range of activities in which many students participate. In the focus group discussion, faculty indicated these activities are viewed by faculty as complementing instructional programs. The team concludes that the cocurricular opportunities are a strength of Neverland's commitment to Criterion 3E.

Another example:

Since the announcement of GPU Vision 2020, the University has demonstrated significant strides in managing its financial condition through short- and long-term financial planning. The evidence revealed that three years of annual cost reductions, largely in non-academic areas, have totaled \$4.8 million. Further, monthly financial statements are prepared to monitor financial conditions, financial relationships with affiliates have been restructured, and a long-range financial plan has been developed that proposes restructuring GPU's indebtedness. The plan's resource base shows current and future capacity for sustaining educational programs and supporting and strengthening their quality in the future.<sup>10</sup>

### **Meeting the criteria**

If an institution has the capacity to make the needed improvement, the criterion is considered Met. The criterion is Met with Concerns, if "the institution may not be aware of the issue, has not developed a sufficient plan to address the issue, or may not have the wherewithal, capacity or inclination to improve."<sup>11</sup> In that case, the intervention of the HLC commission is needed to ensure that the needed improvement will be done.

If a criterion is met, "Teams may take note of any *opportunities for improvement*, but these are not 'concerns' if the institution

- Is aware of these opportunities,
- May have identified them in their documents, and
- Has a plan or process to implement improvement."<sup>12</sup>

Also,

If there are multiple issues that indicate deep, systemic problems at the institution or the evidence is so lacking that it fails to demonstrate that the institution fulfills the Core Component, the team will indicate that the Core Component is "Not Met" and recommend a sanction or withdrawal of accreditation.<sup>13</sup>

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<sup>10</sup> Page 180, "Writing to the Criteria.

<sup>11</sup> Page 142, "Guidelines for Standard and Open Pathway Comprehensive Evaluations."

<sup>12</sup> Page 170, "Evaluating the Criteria for Accreditation: Met or Not Met?"

<sup>13</sup> Page 142, "Guidelines for Standard and Open Pathway Comprehensive Evaluations."

The team has to understand the institution’s mission and apply the criteria in the context of the mission.

The criteria are deliberately called “criteria” not “standards” to promote the idea that these are not minimum standards to be met; rather, the institution should be continually improving. Also, the institutions are diverse, and criteria can still be applied to all of them, while standards cannot.

### **Quality Initiative Report**

The Quality Initiative (QI) falls entirely outside the Assurance Process. The QI Report is reviewed by different peer reviewers than those who read the Assurance Argument and participate in the visit.

The Commission encourages institutions to use the Quality Initiative to take risks, innovate, take on a tough challenge, or pursue a yet unproven strategy or hypothesis. Thus failure of an initiative to achieve its goals is acceptable. An institution may learn much from such failure. What is not acceptable is failure of the institution to pursue the initiative with genuine effort. Genuineness of effort, not success of the initiative, constitutes the focus of the Quality Initiative review and serves as its sole point of evaluation.<sup>14</sup>

### **Dual credit**

If an institution gives college credit for course that also receive high school credit, the team should examine five critical elements:

1. Faculty credentials and qualifications, orientation, and training (Criterion 3),
2. Rigor of courses or programs and curricular standards (Criterion 4),
3. Expectations for student learning and learning outcomes (Criterion 4),
4. Access to learning resources for students and faculty (Criterion 3 and 4), and
5. Institutional monitoring, oversight, and transparency (Criteria 2, 3, and 4).<sup>15</sup>

### **Institutional change policy**

“Institutions will apply for and obtain prior approval for the following changes:

- New Program
- Certificate Program
- Competency-based education programs
- Clock or Credit Hour
- Branch Campuses and Additional Locations
- Distance and Correspondence education
- Contractual Arrangements
- Consortial Arrangements
- Mission or Student Body
- Length of Term Affecting Allocation of Credit.”<sup>16</sup>

### **Distance and correspondence education**

Distance delivery includes both correspondence education and distance education, using federal definitions. In correspondence education, the institution provides material by mail or electronic transmission, “interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the students,” and the course is typically self-paced.

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<sup>14</sup> Page 355, “Open Pathway Quality Initiative.”

<sup>15</sup> Pages 266-267, “Dual Credit.”

<sup>16</sup> Institutional Change and Accreditation Status, <https://www.hlcommission.org/Monitoring/institutional-change.html>.

Correspondence education is not distance education. Distance education uses one or more types of technology (1. the internet, 2. one-way and two-way broadcast, 3. audio conferencing, and 4. DVDs, etc. if used in conjunction with any of the other three technologies already listed) “to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously.”<sup>17</sup>

A distance-delivered *course* has all or the vast majority (typically 75% or more) of the instruction via these methods. A distance delivered *program* is a program in which 50% or more of the courses can be taken as distance-delivered courses.

An institution is categorized separately for permission to offer distance education and for permission to offer correspondence education, with each form of distance delivery categorized in one of four levels of approval:

1. Not approved,
2. Approval limited to courses,
3. Approval for courses and one program, or
4. Approval for courses and programs.

In its 2005 accreditation reaffirmation letter, HLC approved CSU-Pueblo to offer the BS degrees in Social Science, Sociology, and Sociology/Criminology via correspondence.<sup>18</sup> At that time, HLC did not use the four levels listed above, but rather had to approve the addition of distance delivery for each program. I think that, with the change to the use of the four levels, this 2005 letter has the effect that CSU-Pueblo is approved to offer correspondence education courses and programs (level 4 for correspondence education), but not to offer distance education courses and programs (level one for distance education). CSU-Pueblo has “Approval for courses and programs” for correspondence education and “Not approved” for distance education.

While the training I attended was very well done, I am still a novice at HLC accreditation. I have tried to be accurate in this memo and I hope that it contains no errors. I am happy to try to answer any questions.

## References

- “Assumed Practices,” pages 269-274, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015.*
- “Criteria and Core Components, Evidence Present and Needed,” pages 201-211, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015.*
- “Determining Qualified Faculty: Guidelines for Institutions and Peer Reviewers.” A link is available at <https://www.hlcommission.org/Document-Library/determining-qualified-faculty.html>.
- “Dual Credit,” pages 265-267, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015.*
- “Evaluating the Criteria for Accreditation: Met or Not Met?” pages 169-174, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015.*

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<sup>17</sup> Page 309, “Reviewing Distance Delivery during Comprehensive Evaluations and Comprehensive Quality Reviews.” These definitions are also available at <https://www.hlcommission.org/Monitoring/distance-delivery.html>.

<sup>18</sup> See [http://www.csupueblo.edu/HLCA/Documents/HLCApproval\\_20feb06.pdf](http://www.csupueblo.edu/HLCA/Documents/HLCApproval_20feb06.pdf).

- “Federal Compliance Program,” pages 237-246, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*. Guidelines for Standard and Open Pathway Comprehensive Evaluations, pages 141-144, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*.
- Higher Learning Commission 2015 Resource Guide, [http://download.hlcommission.org/ResourceGuide\\_2015\\_INF.pdf](http://download.hlcommission.org/ResourceGuide_2015_INF.pdf)
- “Open Pathway Quality Initiative,” pages 355-356, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*.
- “Policy Title: Assumed Practices.” <http://policy.hlcommission.org/Policies/assumed-practices.html>.
- “Policy Title: Obligations of Affiliation.” <http://policy.hlcommission.org/Requirements-for-Affiliation/obligations-of-affiliation.html>.
- “Reviewing Distance Delivery during Comprehensive Evaluations and Comprehensive Quality Reviews,” pages 309-312, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*.
- “Sample Approach to Open Forum Discussions,” pages 135-140, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*.
- “Sample Evidence for Criteria,” pages 185-200, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*.
- “Student Opinion Survey Overview and Sample Report.” A link is available at <https://www.hlcommission.org/Pathways/student-survey.html>.
- “The Criteria for Accreditation: Guiding Values.” <https://www.hlcommission.org/Criteria-Eligibility-and-Candidacy/guiding-values-new-criteria-for-accreditation.html>
- “Writing to the Criteria,” pages 175-182, *Standard and Open Pathways Training for Peer Reviewers, October 21-23, 2015*.