



CONTINUOUS IMPROVEMENT OF THE SUBSTANTIVE CHANGE PROCESS

Case for Change

The current substantive change process does not maximize efficiency for HLC or the institutions served. Some of the concerns with the current process are listed below:

- The change form and requested information may be repetitive and/or confusing.
- The one-size-fits-all approach represents a conservative solution protecting HLC and enrolled students from imprudent institutional changes, but hinders change for institutions with proven capacity for nimble and sound response to marketplace evolution.
- The one-size-fits-all approach does not realize the efficiencies available given HLC's extensive knowledge of member schools.

The intent of the proposed changes is to streamline the process, while assuring increased transparency and objectivity for decisions made. The hope is this change process will:

- make it easier for institutions who have established successful records of change and evaluations of HLC's Criteria for Accreditation to have a more effective and efficient process for future changes;
- require more information from, and provide more services to, challenged/novice schools without hindering their progress;
- free HLC to spend more time on creating services/ focusing on institutions in need of assistance;
- foster better communication regarding program approval and notification; and
- accommodate the fast-pace of change that institutions now face in the competitive environment.

Share Feedback

HLC is asking institutional representatives and peer reviewers to share your thoughts about this proposal as well as the opportunities and challenges envisioned with the potential implementation. Please provide [comments](#) to HLC on this proposal.





RECOMMENDATIONS

Proposal Overview

In general, the idea is to create a progressive process whereby institutions first provide essential information about the proposed change and their institutional characteristics, where history and HLC standing could help determine next steps and potentially expedite approval. In this way, required information should be minimal and feedback/approval could be nearly instantaneous for institutions:

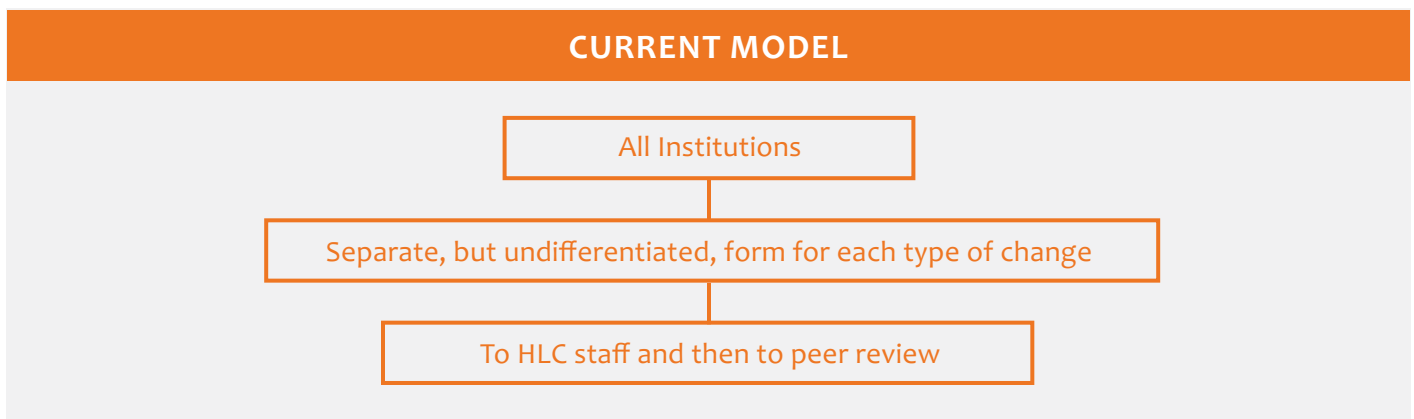
- in good standing,
- with no limitations or concerns,
- having a documented history of successful substantive change,
- proposing new academic programs, distance education or branch campuses.

As indicated, institutions would complete this form for new academic programs (where stipulations require applications), distance education and branch campuses. Other types of change are ineligible for opportunity of expedited approval; those ineligible changes would have institutions follow the existing substantive change model and processes. The approval process would be similar to the current model, too, for institutions with monitoring, concerning financial or non-financial indicators, or limited history of substantive change.

When completed, the form ensures documentation and notification to HLC of the change. With the right conditions, however, it could enable expedited approval for a substantive change. Where not as easy or simple a situation for substantive change, it would start the standard process and identify level of detail/information needed for approval consideration.

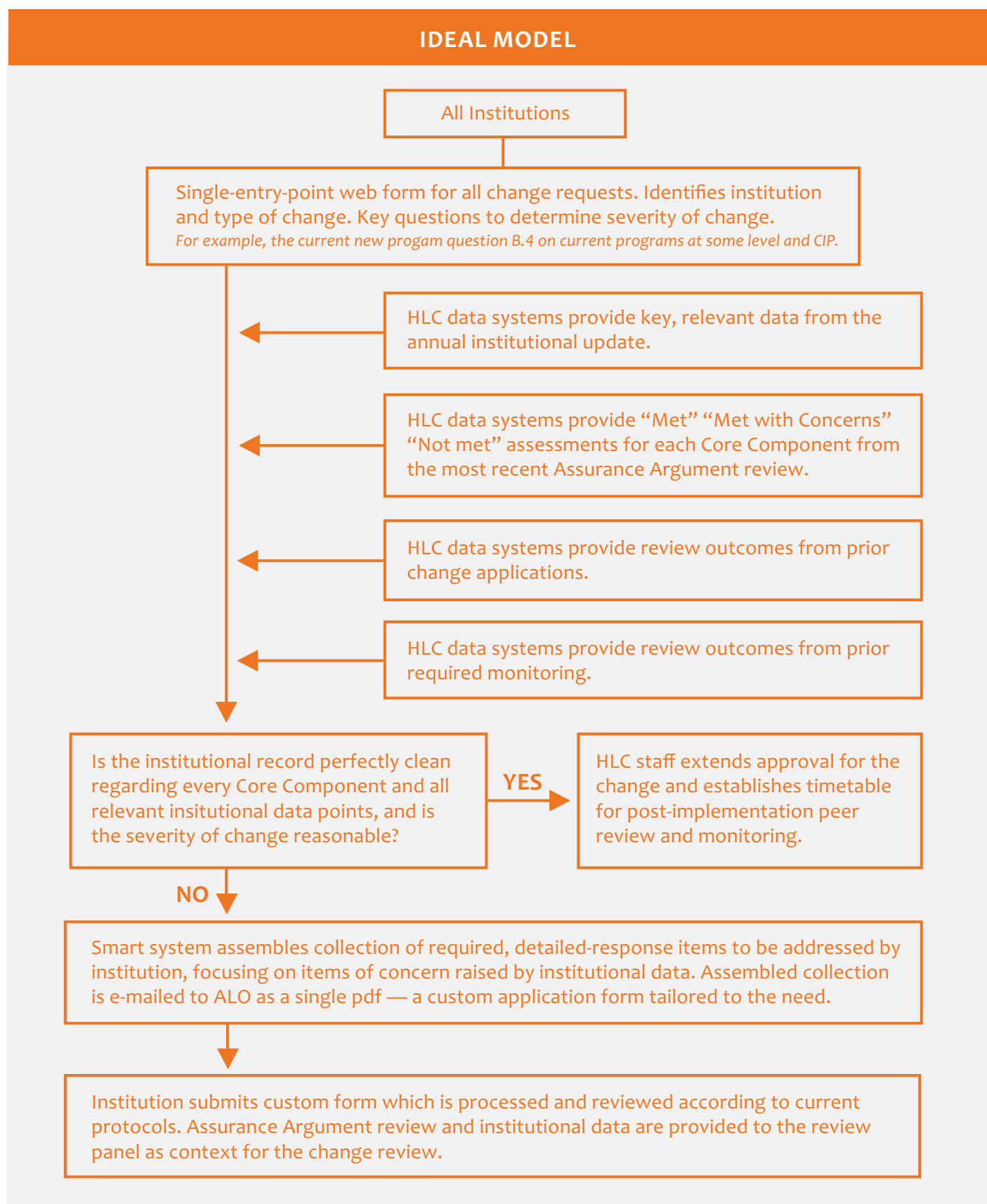
The Models

What follows is the current process compared to the ideal solution. This is a depiction of the current change process. This existing model differentiates only between types of change, each with its own form. The process for different schools varies only in whether desk review and panel review are available options.



The proposed ideal model utilizes a smart system web screening form to incorporate known institutional data into the decision stream. The single substantive change screening form would solicit essential information from the institution (name of institution, institutional record in relation to HLC's Criteria for Accreditation, nature of change, etc.), and then draw additional information from HLC databases to determine whether the institution is eligible for expedited approval of the proposed change. If all flags are green, the institution is granted approval for the change and the case is forwarded to HLC staff to design post-implementation peer review. If all flags are not green, the smart system determines additional information required for sufficient review of the application and constructs a custom application form tailored to the particular needs of the institution. The completed custom form would be processed by HLC staff into the appropriate peer review process. The worst case scenario for the institution would be essentially engaging in the current application and approval process.

IDEAL MODEL



While a process by which schools could apply for approval or entry into an expedited change process seems reasonable at first glance, the ever-evolving dynamics of institutions introduce complicating considerations for such a system. As such, considerable time and effort will be required to build the ideal solution and enact this kind of change to existing processes. A subcommittee has proposed technology and interim step recommendations for HLC to consider should member institutions favor this recommendation.



ABOUT THE AUTHORS

HLC was awarded a \$500,000 Lumina Foundation grant in 2016 for programming to cultivate industry leading practices within the higher education accreditation process. One initiative resulting from the grant is the development of HLC's Innovation Zone. It is comprised of 10 representatives from institutions in HLC's region that are focused on innovative practices at the institutional level. This group met repeatedly in the last two years and identified two main areas in which HLC might be able to foster innovation:

- HLC substantive change process.
- A defined structure for institutions to test innovative practices.

HLC thanks the Innovation Zone participants, listed below, for their work to help HLC foster innovation in higher education.

- **Tawnie Cortez**, Senior Vice President for External and College Relations, Rasmussen College
- **William Harting**, Assistant Provost, Marian University
- **James A. Howley**, Director, B.A. in General Studies, Outreach, and Educational Attainment, Eastern Illinois University
- **Joseph Levy**, Executive Director of Assessment and Accreditation, National Louis University

- **Kim Pearce**, Associate Vice President of Academic Quality Analytics and Accreditation, Capella University
- **Hank Radda**, Provost, Grand Canyon University
- **Don Sprowl**, Associate Provost, Indiana Wesleyan University
- **Connie Thurman**, Dean of Institutional Effectiveness/ Human Resources, Carl Sandburg College
- **Dev Vanugopalan**, Vice Provost, Academic Affairs, University of Wisconsin – Milwaukee

About the Higher Learning Commission: The Higher Learning Commission (hlcommission.org) accredits approximately 1,000 colleges and universities that have a home base in one of 19 states that stretch from West Virginia to Arizona. HLC is a private, nonprofit regional accrediting agency. HLC's mission is to assure and advance the quality of higher learning.

About Lumina Foundation: Lumina Foundation is an independent, private foundation in Indianapolis that is committed to making opportunities for learning beyond high school available to all. We envision a system that is easy to navigate, delivers fair results, and meets the nation's need for talent through a broad range of credentials. Our goal is to prepare people for informed citizenship and for success in a global economy.

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About Lumina Foundation: Lumina Foundation is an independent, private foundation committed to increasing the proportion of Americans with high-quality degrees, certificates and other credentials to 60 percent by 2025. Lumina's outcomes-based approach focuses on helping to design and build an equitable, accessible, responsive and accountable higher education system while fostering a national sense of urgency for action to achieve Goal 2025.