



## RESPONDING TO EMERGENCIES AND INSTITUTIONAL DISRUPTIONS

### Proposed New Policy 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 November 3, 2022.

#### Background

The last two years have highlighted the need for a standing policy that provides HLC’s membership with a level of comfort that when disaster strikes, HLC will not hesitate to act as exigencies demand within the parameters of federal guidelines. The proposed new policy establishes that HLC may leverage its existing policies and, if available, flexibilities permitted by the U.S. Department of Education or other entities to allow institutions time to manage an emergency or severe disruption while maintaining a high level of academic quality. Institutions would be required to request accommodations by HLC, and HLC would make determinations on a case-by-case basis as to what accommodations are available and appropriate.

#### Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on February 23–24, 2023. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by January 16, 2023.

#### Proposed New Policy

Policy Title: Responding to Emergencies and Severe Institutional Disruptions

Number: INST.G.10.010

Occasionally, emergencies and circumstances beyond an institution's control severely disrupt institutions of higher education. In response to this, HLC may leverage its existing policies and, if available, any additional flexibilities permitted by the U.S. Department of Education or other entities to allow institutions time to manage the disruption while maintaining a high level of academic quality.

## Severe Institutional Disruptions

Severe institutional disruptions are unforeseen circumstances that directly and seriously impact an institution's ability to operate as it did immediately prior to the disruption. Such circumstances include but are not limited to: natural weather phenomena (hurricanes, tsunamis, tornados, floods, typhoons, wildfires, straight-line winds), geological conditions (earthquakes, volcanic eruptions, mudslides, landslides), public health emergencies (epidemics, pandemics, biological disasters, regardless of origin, water crises), public safety incidents (active shooters, mass shootings or hostage-taking incidents on institutional premises), cybersecurity incidents, or other circumstances beyond the institution's control that directly and seriously impact the institution's ability to operate as it did immediately prior to the disruption.

Note that neither an act of nature nor a declaration of a natural disaster or public health emergency by a government official is necessary to establish a severe institutional disruption. At the same time, this policy is not automatically triggered by any such event. Rather, an institution must take the specific steps further explained below in order for HLC to consider applying this policy.

## Eligibility for Consideration Under This Policy

All institutions directly affected by a severe institutional disruption are eligible for consideration for accommodations by HLC without regard to their accreditation status or how long they have held any status with HLC.

## Process for Consideration

Institutions must inform HLC in writing as soon as possible after being impacted by any circumstance representing a severe institutional disruption and request consideration for this policy to be applied. The institution must:

1. clearly identify the disruption;
2. describe in detail what aspects of the institution's operations have been directly affected;
3. describe what steps the institution is taking to manage the affected operations; and
4. articulate what accommodations are specifically requested.

## Accommodating Severe Institutional Disruptions

HLC will make a determination on a case-by-case basis as to what accommodations are available and appropriate under existing policies and taking into account any additional flexibilities afforded by the U.S. Department of Education or other entities, if applicable. The length of the accommodation period will also be

tailored to suit the circumstances based on information provided by the institution and the impact of the disruption in question.

### Decision-Making Process

The initial decision to allow for accommodations pursuant to this policy shall be approved by HLC's President or a designee and such accommodations shall be implemented in accordance with HLC policies and procedures. Depending on the accommodations being sought, further action through an appropriate HLC decision-making body may also be taken.

### Policy Number Key

Section INST: Institutional Processes

Chapter G: Accommodations for Severe Institutional Disruptions

Part 10: General