

U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** North Central Association Of Colleges and Schools, The Higher Learning Commission (1952 / 2015)
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Petition for Continued Recognition
3. **Current Scope of Recognition:** The accreditation and preaccreditation ("Candidate for Accreditation") of degree-granting institutions of higher education in Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming, including the tribal institutions and the accreditation of programs offered via distance education and correspondence education within these institutions. This recognition extends to the Institutional Actions Council jointly with the Board of Trustees of the Commission for decisions on cases for continued accreditation or reaffirmation, and continued candidacy, and to the Appeals Body jointly with the Board of Trustees of the Commission for decisions related to initial candidacy or accreditation or reaffirmation of accreditation.
4. **Requested Scope of Recognition:** Same as above.
5. **Date of Advisory Committee Meeting:** 02/07/2018
6. **Staff Recommendation:** Renew the agency's recognition for five years.
7. **Issues or Problems:** None

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Higher Learning Commission (HLC or the agency) is a regional institutional accreditor that accredits (or preaccredits) around 1,000 degree granting institutions in 19 states, tribal institutions and including those programs offered via distance education and correspondence education within these institutions.

The Secretary's recognition of the agency enables its accredited institutions to seek eligibility to participate in student financial aid programs administered by the Department of Education under Title IV of the Higher Education Act of 1965, as amended. Consequently, the agency must meet the separate and independent requirements established in the regulations.

The current recognition of HLC extends to the Institutional Action Council (IAC) jointly with the Board of Trustees for decision on cases for continued accreditation or reaffirmation, and continued candidacy. The Secretary's recognition also extends to the Appeals Panel jointly with the Board of Trustees of the Commission for decisions related to initial candidacy or accreditation or reaffirmation of accreditation.

Recognition History

HLC received initial recognition in 1952 and has received periodic renewal of recognition since that time. HLC was last reviewed for renewal of recognition at the spring 2013 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). Both Department staff and the NACIQI recommended to the senior Department official to continue the agency's recognition and require it to come into compliance within 12 months, and submit a compliance report that demonstrates the agency's compliance with the 11 issues cited in the staff report. The senior Department official, Acting Assistant Secretary Brenda Dann-Messier, concurred with the recommendations. The compliance report was reviewed and accepted by Department staff, NACIQI, and senior Department official, Acting Assistant Secretary Lynn Mahaffie, at the spring 2015 meeting.

In 2015, the U.S. Department of Education's Office of Inspector General (OIG) conducted a review of the agency's competency-based education and direct assessment approval processes. The OIG found that HLC did not establish a system of internal control that provided reasonable assurance that schools' classifications of delivery methods and measurements of student learning for competency-based education programs, including direct assessment programs, were sufficient and appropriate to help the Department ensure that it properly classified the schools' programs for Title IV purposes. Based on that finding, the Department's Office of Postsecondary Education (OPE) determined that HLC was not in compliance with 34 C.F.R. §§ 602.18, 602.22, and 602.24 of the Secretary's Criteria for Recognition for its approval of direct assessment programs and agreed in part with the OIG's

finding. In response, HLC provided a comprehensive work plan to address all areas. OPE reviewed the information and documentation provided to demonstrate implementation of the work plan and concluded it addressed all areas of noncompliance noted in the OIG audit. The audit was closed in 2016 and no further corrective action was necessary.

Since the agency's last review, the Department has received two complaints and no 3rd party comments. Of the two complaints, one complainant did not avail themselves of HLC's complaint process, therefore it was not reviewed by the Department. The other complaint was reviewed by the Department, and the Department found no evidence that HLC did not follow its policies and procedures or fail to meet regulatory requirements.

In conjunction with agency's petition, Department staff reviewed the agency's supporting documentation, and observed a on-site visit in October 2017 and a board meeting in November 2017.

PART II: SUMMARY OF FINDINGS

The agency meets the requirements of the Secretary's Criteria for Recognition.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third - party comments regarding this agency.