Compressed formats and accreditation

3-Mar-2022

Here is HLC's federal compliance doc. We are subject to this during or accreditation review.

https://download.hlcommission.org/FedCompOverview_2020_PRC.pdf

> Institutions should make sure that they have a policy or set of policies and procedures for assigning credit hours for all types of courses, disciplines, programs, credential levels, formats, regardless of modality. Institutions should be able to articulate the processes and structures in place to demonstrate how they adhere to the policy(ies) for assigning credit hours (e.g., by reference to course approval guidelines and processes, course proposal forms, curriculum committee reviews, program review, registrar's class scheduling procedures etc.). Institutions that provide instruction through online, alternative, compressed or other formats should also have policies that address how learning is determined, organized and evaluated, and how the institution determines instructional equivalencies.
> …
> HLC's intent is (1) to review an institution's policies regarding the award of credit in relation to the types of courses, disciplines, programs, credential levels and formats offered, regardless of modality; (2) to determine how the institution ensures it is adhering to those policies; and (3) to review the institution's process for verifying length of academic period and compliance with credit hour requirements through course scheduling.

This illustrated the requirement that there is an approval process for course scheduling formats. This is most likely under the joint control of academic affairs and UGSC/GSC/UFC . We currently do have a robust process for developing and approving new programs in terms of content; **what is missing is this compressed format and credit hour monitoring**. It has always been assumed new programs and courses will operate in the normal semester. We see now that is beginning not to be the case, with newly developed alternative modes. We now need to build in this additional requirement into the approval process especially if there are deviations from the normal semester (J term and compressed).

Scheduling interacts strongly with the credit hour definition:

https://www.hlcommission.org/Policies/assignment-of-credits.html

> **Assignment of Credit Hours**. The institution's assignment and award of credit hours shall conform to commonly accepted practices in higher education. Those institutions seeking, or participating in, Title IV federal financial aid, shall demonstrate that they have policies determining the credit hours awarded to courses and programs in keeping with commonly-accepted practices in higher education and with any federal definition of the credit hour, as may appear in federal regulations and that institutions also have procedures that result in an appropriate awarding of institutional credit in conformity with the policies established by the institution.
> **HLC Review.** HLC shall review an institution's compliance with this policy in conjunction with a comprehensive evaluation for Candidacy, Initial Accreditation or Reaffirmation of Accreditation during HLC's assurance process. Institutions shall also produce evidence of compliance with this policy upon demand in accordance with HLC policy.

Built into HLC's accreditation are pass-through federal compliance reports, which depend on federal regulations. Here there is a clear DoE requirement that classes have a certain workload that justifies their ch designations; (or alternatively that we set their ch designation commensurate with the workload). This provided some flexibility,

especially in how the facetime (seat-time, contact hours) vs self-study ratio. Traditionally, this is 1:2, but other HLC docs allow for a wide ratio, here recognizing that online education may be largely self-directed. **However the expectation for the total remains**

https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/credit.html

> The requirement is that the institution determine that there is an amount of student work for a credit hour that reasonably approximates not less than one hour of class and two hours of out-of-class student work per week over a semester for a semester hour

For 3 ch with a 15-week semester, this is 3 hr/ch * 3ch * 15 weeks = 135 hours of work. This represents total student effort over a semester; however, we have flexibility in terms of the face-time vs. self-study time ratio. All classes, regardless of modality, need to have student effort commensurate with credit hour designation. This is fundamentally a federal financial aid issue, under Title IV.

Recommendation

Given that a 3 ch course required a reasonable expectation of 135 hours of effort:

- In 10 days this is 13. 5 hours of work per day, for 10 days straight. This is implausible and not "reasonable" when coupled with an expectation of focus and learning. This puts us at substantial risk of an accreditation violation.
- The concession in F21-S22 J-term was to move to 12 days. This is better, but is still 11.25 hours of work per day, every day for even longer, 12 days straight. If you take the 2 days off, you are back to 13.5 hours a day for 10 days i.e. 5 days a in row, twice. This still stretches the definition of "reasonable".
- For 15 days we are down to 9 hours a day, 15 days with no break. This is more reasonable for a demanding accelerated class - essentially 15 days no break with modestly long days. If you take a day off... concomitantly longed days).
  - 15 days is essentially 2 weeks, so 7.5x faster than normal - still a very significant acceleration. Most students take 5 or 6 classes, so a 5x or 6x acceleration for a single class is reasonable; a 25-50% boost is noteworthy but might be acceptable.
  - This is still in excess of many federal work hour limits. It is instructive to examine these, for what is reasonable in a federal regulatory context, where attention, engagement with tasks, and focus is required. Most instructors will agree that effective learning requires attention and focus. In the transportation sector, federal regs limit truck drivers and pilots to 60 hours in 7 days. This 15-day course is 9hr /day so at 9*7=63/week. So this is close and perhaps acceptable
  - This is independent of contact hours. There is no requirement here, except a "Regular and substantive interaction (RSI)" with faculty. So we do not and should not mandate contact hour expectations as part of this process.