9 December 2011

To: School/College Curriculum Committee Colleagues

From: Andrea Poehling, Divisional Committees Coordinator

Re: Accreditation Policy Regarding Credit Hours

I am writing to inform you of a recent policy regarding credit hours adopted by the Higher Learning Commission, the University of Wisconsin-Madison’s accrediting body. The policy, which was recently passed by HLC, is attached.

The policy restates the definition of the credit hour, which was codified in federal regulation in 2010. This credit definition is essentially the same as the UW-Madison credit definition, based on the Carnegie unit credit definition, which has been the basis for our credit policy since the 1960s.

The HLC policy states that institutions are responsible for adhering to the definition; institutions will have courses audited for compliance at the time of accreditation review; and institutions with cases of non-compliance will be reported to the U.S. Department of Education.

The implications for UW-Madison are expected to be relatively modest. When reviewing new course and course change proposals, the divisional committees will continue to pay attention to the alignment of student work with the credit load. Faculty who make traditional course proposals will not notice any difference. Faculty who propose courses that plan for new kinds of patterns of work to fulfill credit may find that there are more questions from the divisional committees regarding credit assignment. Please be aware that questions from the divisional committees about credit level are based in the broader federal and HLC policies, in addition to our institutional interests.

Federal credit hour definition:

A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally-established equivalency that reasonably approximates not less than:

(1) one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester
hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) at least an equivalent amount of work as required in paragraph (1) of this definition for other activities as established by an institution, including laboratory work, internships, practica, studio work, and other academic work leading toward to the award of credit hours.

CC: Scott Owczarek, Registrar
    Karen Hanson, Registrar’s Office
    Jocelyn Milner, Academic Planning and Analysis
Policies Adopted on Second Reading
Credit Hours

The Board of Trustees adopted these policies on second reading at its meeting on November 4, 2011.

Background

In November 2010 the U.S. Department of Education adopted new regulations regarding an eligible institution’s awarding of academic credit for Title IV federal financial aid purposes. These revised regulations consisted of two parts: 1) a federal definition of the credit hour applicable to eligible institutions and 2) requirements for accrediting agencies, as a condition of their recognition, to review the institution’s policies and procedures for determining credit hours and the application of those policies and procedures in practice, using the federal definition. The revised regulations further required the recognized agency to require the institution to take action to address any deficiencies and to report any systematic noncompliance to the Secretary of Education.

It is important to note that the Department has promised additional guidelines for implementation by next spring, after it reviews the recognition petitions filed with the Department in 2011-12. These guidelines may result in the Commission modifying its policies in summer of 2012.

Implementation

The policies are effective immediately. They will be applied beginning January 1, 2012, for those institutions undergoing a comprehensive evaluation for initial candidacy, accreditation, or reaffirmation of accreditation. Institutions preparing for a comprehensive evaluation or AQIP Checkup Visit in the spring of 2012 should anticipate completing an addendum to the self-study addressing this new requirement. (The Commission has prepared a set of documents to assist institutions and teams in responding to these new policies. These documents are available on ncahlc.org.)

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<tr>
<th>Policy no. 3.10(a)</th>
<th>ASSIGNMENT OF CREDIT HOURS</th>
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<td>The institution’s assignment 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 and with the federal definition of the credit hour, as reproduced herein for reference only, and that institutions also have procedures that result in an appropriate awarding of institutional credit in conformity with the policies established by the institution.</td>
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<tr>
<th>Policy no. 3.10(b)</th>
<th>COMMISSION REVIEW OF THE ASSIGNMENT OF CREDIT HOURS, PROGRAM LENGTH, AND TUITION</th>
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<td>The Commission shall review the assignment of credit hours, program length, and tuition in conjunction with an evaluation of the institution for candidacy, biennial evaluation, or evaluation for initial or continued accreditation in conjunction with the Commission’s assurance process. The Commission shall monitor, through its established monitoring processes, the resolution of any concerns identified during that evaluation with regard to the awarding of academic credit, program length, or tuition, and shall require that an institution remedy any deficiency in this regard by a date certain but not to exceed two years from the date of the action identifying the deficiency.</td>
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<th>Policy no. 3.10(c)</th>
<th>NOTIFICATION TO THE SECRETARY OF EDUCATION</th>
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<td>The Commission shall notify the Secretary of Education if, following any review process identified above or through any other mechanism, the Commission finds systematic noncompliance with the Commission’s policies in this section regarding the awarding of academic credit. The Commission shall understand systematic noncompliance to mean that an institution lacks policies to determine the appropriate awarding of academic credit or that there is an awarding by an institution of institutional credit across multiple programs or divisions or affecting significant numbers of students not in conformity with the policies established by the institution or with commonly accepted practices in higher education.</td>
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