QUALITY CHECKUP REPORT

Lake Forest Graduate School of Management

Lake Forest, Illinois
May 8-10, 2013

Quality Checkup team members:

Dr. David Starrett
Dean, Academic Information Services
Southeast Missouri State University

Dr. Gertrude Pannirselvam
Associate Professor of Management
Southern Illinois University Edwardsville
**Background on Quality Checkups conducted by the Academic Quality Improvement Program**

The Higher Learning Commission’s Academic Quality Improvement Program (AQIP) conducts Quality Checkup site visits to each institution during the fifth or sixth year in every seven-year cycle of AQIP participation. These visits are conducted by trained, experienced AQIP Reviewers to determine whether the institution continues to meet The Higher Learning Commission’s *Criteria for Accreditation*, and whether it is using quality management principles and building a culture of continuous improvement as participation in the Academic Quality Improvement Program (AQIP) requires. The goals of an AQIP Quality Checkup are to:

1. Affirm the accuracy of the organization’s online Systems Portfolio and verify information included in the portfolio that the last Systems Appraisal has identified as needing clarification or verification (System Portfolio Clarification and Verification), including review of distance delivery and distributed education if the institution is so engaged.

2. Review with organizational leaders actions taken to capitalize on the strategic issues and opportunities for improvement identified by the last Systems Appraisal (Systems Appraisal Follow Up);

3. Alert the organization to areas that need its attention prior to Reaffirmation of Accreditation, and reassure it concerning areas that have been covered adequately (Accreditation Issues Follow Up);

4. Verify federal compliance issues such as default rates, complaints, USDE interactions and program reviews, etc. (Federal Compliance Review); and

5. Assure continuing organizational quality improvement commitment through presentations, meetings, or sessions that clarify AQIP and Commission accreditation work (Organizational Quality Commitment).

The AQIP peer reviewer(s) trained for this role prepare for the visit by reviewing relevant organizational and AQIP file materials, particularly the organization’s last *Systems Appraisal Feedback Report* and the Commission’s internal *Organizational Profile*, which summarizes information reported by the institution in its *Annual Institutional Data Update*. The report provided to AQIP by the institution is also shared with the evaluator(s). Copies of the Quality Checkup report are provided to the institution’s CEO and AQIP liaison. The Commission retains a copy in the institution’s permanent file, and will be part of the materials reviewed by the AQIP Review Panel during Reaffirmation of Accreditation.
Clarification and verification of contents of the institution’s Systems Portfolio

The Team reviewed the Systems Portfolio submitted by Lake Forest Graduate School of Management (LFGSM) and the feedback report before arriving for the Quality Checkup visit to gain an understanding of the College. During the visit, the Team verified and clarified the contents of the System Portfolio through discussions held with the Senior Management Team, EPS Academic Management Team, Dean of Degree Programs & Faculty Relations, Dean of Corporate Learning Solutions, Board of Directors, Business Advisory Council, President, faculty, students, and alumni (see Table 1 for details of sessions and participation).

For most parts of the Systems Portfolio, information that was presented in the document was generally understood and the Lake Forest Graduate School of Management Team agreed that the Appraisal feedback was accurate. At other times in the Systems Portfolio, either the information was not detailed enough or the original reviewers’ understanding of the answer was not complete. These inconsistencies were clarified by onsite discussion.

In the Team’s judgment, the Institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution’s approach to the issue, documentation, and performance were acceptable and comply with the Commission’s standards and AQIP’s expectations. The institution has chosen to focus efforts on specific AQIP categories in updating the Systems Portfolio since the most recent Systems Appraisal.

Review of the organization’s quality assurance oversight of its distance education activities.

In the Team’s judgment, the Institution has presented satisfactory evidence that its distance education activities are acceptable and comply with the Commission’s standards and expectations.

Review of the organization’s quality assurance and oversight of distributed education (multiple campuses, additional locations, off-campus course sites)

In the Team’s judgment, the Institution has presented satisfactory evidence that its distributed education activities are acceptable and comply with Commission’s standards and expectations.

Review of specific accreditation issues identified by the institution’s last Systems Appraisal

The Institution did not have any accreditation issues identified in the last Systems Appraisal.
Review of the institution’s approach to capitalizing on recommendations identified by its last Systems Appraisal in the Strategic Issues Analysis.

In the Team’s judgment, the Institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution’s approach to the issue, documentation, and performance were acceptable and comply with Commission and AQIP’s expectations.

The 2010 Systems Appraisal Feedback report identified 5 strategic issues: faculty engagement, an outdated IS system, use of data, role of the Board of Directors, and the lack of linkage between the strategic planning process and AQIP Action Projects. LFGSM has made progress in addressing all of these strategic issues. The School has four ongoing AQIP Action Projects, the development of which was tied to its strategic planning process; the projects and their goals were derived from the outcome of their strategic planning process. Also, there are a number of linkages between the four projects. Further the outcomes from each of the projects have interlinked impact on multiple fronts – curriculum development, faculty engagement, and student retention.

I. Faculty Engagement:

LFGSM’s provides its curricular services through adjunct faculty members. This model does raise concerns about faculty engagement in curriculum development and student learning outcomes as well as processes for faculty development. This action project was created to address this strategic issue identified in the 2010 Systems Appraisal Feedback Report. The goal of this action project is to provide faculty higher level of training and development and academic support so they can gain more faculty engagement that will lead to better student learning. LFGSM now provides regular development opportunities through Harvard Case Teaching Workshops (on-site, through HBS) and faculty run workshops every Saturday. Two instructional designer positions have been added to provide pedagogical support for course design as well as training in Blackboard and other online tools.

Faculty Benches have been created for four curricular areas, with Bench Leaders identified for each. The Faculty Benches design courses and review changes. This past year the Benches have worked on aligning the course modules across different sections of a course and redesigned the courses for the compressed 8-week, blended, and online formats. Regular faculty meetings are used to discuss pedagogical and content issues within and across areas leading to shared knowledge and pedagogical improvement.

Structurally, LFGSM has combined its corporate education and programs units to enable sharing of resources and ideas between these groups. LFGSM has started using Knowledge Advisors™ to collect information in each course about indirect measures of learning as well as faculty developmental needs. The Dean of Programs and Faculty Relations, Corporate Learning Solutions and Shared Services facilitate these development and engagement processes. LFGSM has started the process of creating a searchable
database (WebDAM) of its learning materials that faculty members can access for their course design and development.

The outcomes of this Action Project to date have been better-coordinated course sections for the same courses, curriculum development that is focused on “areas” that lead to certificates, mapping of competencies to courses. The Team’s meetings with faculty members, bench leaders, and instructional designers points to evidence of a faculty that is very engaged in the curriculum development and student learning and a faculty that is supportive of each other and the School’s programs and objectives.

II. Information Systems

The goal of this action project was to create capabilities to support LFGSM’s strategic initiatives with respect to student retention and curriculum development. In 2012 LFGSM completed its update of the IT infrastructure. The updates included Jenzabar EX and its web component, JICS, for the student information systems, Blackboard for its learning management system, and WebDAM for course material repository.

These updates have led to better and timely access to student registration and retention data as well as early alerts of students at risk. The updates have also enabled collection of indirect measures for assessment of learning. As a result of access to such information, LFGSM is now able to counsel students at risk, contact students who have not returned to help them complete their program, and identify causes for student drops. In addition, the updates have helped improve the student portal (myLFGSM) to the information system. These updates have also helped improve course delivery through the integration of Blackboard to VLC (used to create avatar based simulations for many of their courses), the Proquest subscription to improve access to research material for faculty and students, and access to other course material, including in WebDAM.

Our discussion with the Senior Management Team and faculty members indicate that access to more detailed and timely student information has resulted in faculty involvement in actions to address student retention from the curriculum development and student performance tracking perspectives.

III. Student Retention and Registration Initiative

Although the 2010 Systems Portfolio Feedback Report did not identify student retention as a strategic issue, the outcome of the 2011 – 2014 strategic plan identified improved student registration and retention as a goal. The goal of the action project is to identify and implement MBA program changes to make it more accessible to the travelling, functional experts that LFGSM seeks to attract.

Analysis of student retention data led to the understanding that students missed classes offered in the 10-week format primarily due to work related reasons (45%). Further, highest level of attrition happened
early (after 2 courses into the program) in the program. The alignment of each course module across different sections of the same course has enabled students to attend class meetings for a different section offering of a course when they have to miss a meeting due to work related reasons. The compressed 8-week format is expected to help students make faster progress through the program. The online and blended offerings make the courses more accessible to the population (working professionals) that LFGSM serves. Alignment of the course modules was also pursued across the different course formats. Better collection and access to retention data has enabled LFGSM to seek out lapsed students to encourage them to complete their programs in one of these more assessable formats. Retention data from the past four years point to a marked decline in student attrition.

LFGSM is also seeking to attract students beyond the functional experts population. To this end a different version – the Immersion MBA (iMBA) has been introduced. The program is in its first year and enrollment data is low, but hard to interpret.

As evidence of active linkages sought by LFGSM between these action projects, most of the work in curriculum / course development and change has been performed by the faculty members with support provided by the full-time administrative staff, including the Deans.

IV. Online Delivery of degree and non-degree programs

This Action Project was a redefinition of the Schools 2009 Assessment Action Project. Recognizing the need to offer courses in online format in order to retain existing students and increase enrollment, LFGSM has worked to development an online format for each of its courses. The current project continues to have as one of its objectives the development of more effective outcomes assessment.

Strategic Issues not directly addressed via Action Projects

While there are no specific “projects” to address three of the strategic issues (lack of clean link between strategic planning and action projects, role of the Board of Directors, and use of data) the documents reviewed, presentations made, and interviews leads the Team to conclude that all of the concerns related to these strategic issues have been or are being effectively addressed.

• Strategic Planning

LFGSM uses a 3-yr planning cycle. Documents the Team reviewed and presentations during our visits of the 2011-14 strategic planning process and its outcomes makes clear that each of the action projects were derived based on the strategic objectives for the current planning cycle. Further student and market data were analyzed in the planning process and the goals for each of the action projects were, in part, derived
from such data analyses.

• Role of Board

The Team met with members of the Board of Directors and the Business Advisory Council in various forums, both formally and informally. The Team also had a separate closed meeting with the members of the Board of Directors (including the current and past Chairs of the Board). Discussions during these meetings point to a very engaged and active board with subcommittees established to review programs, marketing, and finances. The Board reviews and approves the School’s budget. There are regular meetings of the subcommittees, executive committee, and the full board. The members of the Board are committed to the long-term reputation of LFGSM. The Business Advisory Council provides input and feedback about program and marketing communications plans.

• Use of data

Discussions and presentations at the various meetings as well as responses to the Team’s specific question indicate that LFGSM collects and uses data for planning and daily activities. Market data (including focus groups) were used for the strategic planning process and for the development of the iMBA program. Updates in the information systems infrastructure has led to timely and easy access to student application, enrollment, retention, and indirect measures of student learning. LFGSM is urged to standardize and document data identification – collection – analysis – and decision-making cycle. Such documentation would enable the School to better evaluate the usefulness of the data it collects, focus on fewer data items, and improve the outcome and timeliness of its decisions.

**Review of organizational commitment to continuing systematic quality improvement**

In the Team’s judgment, the Institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution’s approach to the issue, documentation, and performance were acceptable and comply with Commission and AQIP’s expectations.

Examples of commitment to quality improvement include:

- During our 2-day visit, the members of various constituents in the meetings were engaged in active participation. The participants shared ideas and information with us as well as with each other. All participants were open to the questions we raised and sought details when we made any suggestions. Our meetings with the faculty members were very scholarly and appeared to be just another faculty meeting. All these point to a strong and open organizational culture that is committed to systematic quality improvement.

- LFGSM responded well to the ideas in the 2010 Feedback Report, participated in a strategic
forum last year to help them develop its action plans and use the lessons learned to evaluate the action plan that came out of its strategic planning process.

• All the presentations and discussions indicate that LFGSM tries to be deliberate in making connections between its strategic planning process, action plans, and AQIP action projects.

• LFGSM strives to and achieves collaborative effort between functions and has made organization structural changes to enhance these collaborative efforts.

• There is a clear cycle of weekly, monthly, and 90 day review of tactical data and issues and progress on all the projects being pursued. Project schedules and goals are updated based on the discussions during these meetings.

• LFGSM has taken actions to institutionalize the changes it has made in its decision making in an effort to ensure that the process it has outline for the current action projects becomes part of its organizational culture. Evidence of this commitment include:
  o Restructuring of the organization to enhance decision making capabilities
  o Cataloging (in student, faculty, and staff catalog) changes in policies and methods
  o Having processes in place to regularly gather input from students and faculty, review these data, and relate them to specific initiatives (such as curriculum development, student retention, or faculty development)
  o Faculty understanding of the change in focus to continuous improvement. We heard from them that they have been educated that the change cycles are short and the work never ends. Faculty members seem to have embraced this focus and are committed to a strategic focus in the program and course change process.
  o External constituents, including members of the Board of Directors and Business Advisory Council, have been actively involved in the strategic planning process and decisions relating to curriculum changes and student enrolment.

• Two of its staff members have been trained as reviewers in the Lincoln Quality awards and have been active in bringing the lessons learned to LFGSM’s decision-making process.

The Team encourages LFGSM to document its overall decision-making process and add steps to evaluate the quality of the input data used and the quality of the decisions-made. The Team also urges the School to involve more faculty and staff in HLC and the AQIP process through attendance at the annual meetings and peer reviewer training.
Other AQIP Issues: Outcomes Assessment

In 2008 LFGSM initiated the AQIP Assessment Action Project. This project was updated and changed in 2011 to focus on online delivery of programs, with assessment becoming a part of the project. Since then the project efforts have focused on developing courses for online delivery. The assessment component of this project has focused primarily on indirect assessment measures through the collection of students’ perceptions of their assessment in the competencies (10 main, 27 subcategories). Steps to improve in this area have been taken through mapping competencies to courses.

As a result of this shift in focus of the action project, LFGSM’s assessment plan is currently focused on indirect measures and is lacking in direct, course embedded measures of student learning. Development of such direct measures is an invaluable step in the curriculum development and improvement cycle. LFGSM has completed a competency mapping for its courses with each competency being linked to more than one course. The Team urges the School to reignite the Assessment Action Project and continue it with a focus on developing direct measures of outcomes assessment. Through it other Action Projects, LFGSM has provided a structure for faculty engagement that has resulted in active faculty participation in curriculum design. The School could focus this energy to engage the faculty in using the course map to develop specific course embedded assessment measures. To this end, LFGSM could also enhance its faculty engagement to include faculty training in course assessment through HLC and in other venues.
# Table 1: Participation by LFGSM Stakeholders at Quality Checkup Visit

<table>
<thead>
<tr>
<th>Day</th>
<th>Session</th>
<th>Topic</th>
<th>Number of Participants</th>
<th>People Invited</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Wednesday, May 8, 2013</strong></td>
<td>1</td>
<td>Introductions and Opening Session</td>
<td>21</td>
<td>Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team&lt;br&gt;Faculty Leaders</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Federal Compliance</td>
<td>17</td>
<td>Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team&lt;br&gt;Financial Aid Dep</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>LFGSM’s Quality Initiatives</td>
<td>10</td>
<td>EPS Academic Mgmt Team</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>Meet the LFGSM Community</td>
<td>44</td>
<td>Hotchkiss Fellows&lt;br&gt;Alumni&lt;br&gt;Board of Directors&lt;br&gt;Business Advisory Council&lt;br&gt;EPS Committee of the Board&lt;br&gt;Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team</td>
</tr>
<tr>
<td><strong>Thursday, May 9, 2013</strong></td>
<td>5</td>
<td>Breakfast / Discussion</td>
<td>20</td>
<td>Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team</td>
</tr>
<tr>
<td></td>
<td>6</td>
<td>AQIP Action Projects Overview: past projects</td>
<td>10</td>
<td>EPS Academic Mgmt Team&lt;br&gt;President / CEO</td>
</tr>
<tr>
<td></td>
<td>7</td>
<td>AQIP Action Projects Overview: current action projects</td>
<td>11</td>
<td>EPS Academic Mgmt Team&lt;br&gt;President / CEO</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>Board of Directors – Chair and EPS Committee</td>
<td>5</td>
<td>Chair, Board of Directors&lt;br&gt;EPS Committee of the Board</td>
</tr>
<tr>
<td></td>
<td>9</td>
<td>Strategic Plans and Future Quality Improvement Opportunities</td>
<td>20</td>
<td>Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team&lt;br&gt;Faculty Leaders</td>
</tr>
<tr>
<td></td>
<td>10</td>
<td>Students’ Assessments of LFGSM</td>
<td>5</td>
<td>Hotchkiss Fellows&lt;br&gt;Individual Students</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>Development &amp; Delivery of Online Curriculum /</td>
<td>13 + 4 on WebEx</td>
<td>Online Faculty&lt;br&gt;Design &amp; Tech Support</td>
</tr>
<tr>
<td></td>
<td>12</td>
<td>Faculty Perceptions of LFGSM</td>
<td>11 + 3 on WebEx</td>
<td>Faculty Leaders&lt;br&gt;Faculty Members</td>
</tr>
<tr>
<td><strong>Friday, May 10, 2013</strong></td>
<td>13</td>
<td>Breakfast / Discussion</td>
<td>15</td>
<td>Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team</td>
</tr>
<tr>
<td></td>
<td>14</td>
<td>Informal Review of Impressions with President &amp; Executive Vice President</td>
<td>2</td>
<td>President &amp; CEO&lt;br&gt;Executive Vice President</td>
</tr>
<tr>
<td></td>
<td>15</td>
<td>Review of Impressions with Senior Management and Faculty</td>
<td>18</td>
<td>Senior Mgmt Team&lt;br&gt;EPS Academic Mgmt Team&lt;br&gt;Faculty Leaders&lt;br&gt;Chair, Board of Directors&lt;br&gt;EPS Committee of the Board</td>
</tr>
</tbody>
</table>

1 EPS: Educational Programs & Solutions
Appendix A
Worksheet for The Evaluation Team on Federal Compliance Requirements

Instructions: The team reviews each item identified in the Federal Compliance Guide and documents its findings in the appropriate spaces below. Generally, if the team finds in the course of this review that there are substantive issues related to the institution’s ability to fulfill the Criteria for Accreditation, such issues should be raised in appropriate sections of this AQIP Quality Checkup Report. This Worksheet must be completed for all Quality Checkup visits after January 1, 2012.

Institutional Materials Related to Federal Compliance Reviewed by the Team:

- A Federal Compliance Filing
  - LFGSM Federal Compliance Filing
- B Assignment of Credits
  - A.1 Appendix A Assignment of Credit Hours
  - A.2 2012-2013 Courses
  - B.2 – iMBA Curriculum Design
  - Sample Syllabi:
    - 5100 Kasturi, Sangita
    - 5210 John Pappas
    - 5822 - Shaffer, Carleen
    - 5880 - Flanigan, Laura
    - 7820 Marketing for Results
    - 7825 HR Org Behavior
    - 7830 Financial Accountability
    - 7835 MIS and E-Business
- C Records of Student Complaints
  - C1 Student Complaint Log
- D Transfer Policies
  - LFGWM-Transfer Credits 8.2009-1.2013
  - D.1 Sample Student Transfer Records:
    - LFGSM~1
    - LFGSM~2
    - LFGSM~3
- E Verification of Student Identity
  - E.1 Log-in Set-up
- Title IV
  - F.1.a FY’10 Financial Statements
  - F.1.b FY’11 Financial Statements
  - F.1.c FY’12 Financial Statements
  - F.2.a 2008-2009 HLC AIDU Report
  - F.2.b 2009-2010 HLC AIDU Report
  - F.2.c 2010-2011 HLC AIDU Report
  - F.2.d 2011-2012 HLC AIDU Report
Evaluation of Federal Compliance Program Components

1. Credits, Program Length, and Tuition: The institution has documented that it has credit hour assignments and degree program lengths within the range of good practice in higher education and that tuition is consistent across degree programs (or that there is a rational basis for any program-specific tuition). New for 2012: The Commission has a new policy on the
Credit Hour. Complete the Worksheet in Appendix A and then complete the following responses. Attach the Worksheet to this form.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

__X__ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: The team reviewed the worksheet in Appendix B and has found that the institution meets the Commission’s requirements on Federal Compliance.

Additional Monitoring, if any: None

2. Student Complaints: The institution has documented a process in place for addressing student complaints and appears to be systematically processing such complaints as evidenced by the data on student complaints for the three years prior to the visit.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

__X__ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: The team notes that the institution does an excellent job of monitoring student satisfaction and responding to issues appropriately when needed. Many issues are
handled informally at the initial stage and resolved satisfactorily so that few end up going through a formal process

   Additional Monitoring, if any: None

3. Transfer Policies: The institution has demonstrated it is appropriately disclosing its transfer policies to students and to the public. Policies contain information about the criteria the institution uses to make transfer decisions.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

___ X ___ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

   Comments: The team found the policy to be appropriate and effectively communicated. LFGSM has relatively few courses transferred in but handles them effectively when courses are brought in for credit.

   Additional Monitoring, if any: None

4. Verification of Student Identity: The institution has demonstrated that it verifies the identity of students who participate in courses or programs provided to the student through distance or correspondence education and has appropriate protocols to disclose additional fees related to verification to students and to protect their privacy.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

___ X ___ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.
_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: Verification of student identity solely through a unique login is appropriate for programs in the early stages of developing an online presence, but the institution is encouraged to consider additional measures for verifying student identity in online courses as the institution expands further into this mode of delivery, particularly as it expands into a global market.

Additional Monitoring, if any: None

5. Title IV Program and Related Responsibilities: The institution has presented evidence on the required components of the Title IV Program.

- **General Program Requirements:** The institution has provided the Commission with information about the fulfillment of its Title IV program responsibilities, particularly findings from any review activities by the Department of Education. It has, as necessary, addressed any issues the Department raised regarding the institution’s fulfillment of its responsibilities in this area.

- **Financial Responsibility Requirements:** The institution has provided the Commission with information about the Department’s review of composite ratios and financial audits. It has, as necessary, addressed any issues the Department raised regarding the institution’s fulfillment of its responsibilities in this area. (Note that the team should also be commenting under Criterion Two if an institution has significant issues with financial responsibility as demonstrated through ratios that are below acceptable levels or other financial responsibility findings by its auditor.)

- **Default Rates.** The institution has provided the Commission with information about three years of default rates. It has a responsible program to work with students to minimize default rates. It has, as necessary, addressed any issues the Department raised regarding the institution’s fulfillment of its responsibilities in this area.

- **Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures:** The institution has provided the Commission with information about its disclosures. It has demonstrated, and the team has reviewed, the institution’s policies and practices for ensuring compliance with these regulations.
- **Student Right to Know.** The institution has provided the Commission with information about its disclosures. It has demonstrated, and the team has reviewed, the institution’s policies and practices for ensuring compliance with these regulations. The disclosures are accurate and provide appropriate information to students. (Note that the team should also be commenting under Criterion One if the team determines that disclosures are not accurate or appropriate.)

- **Satisfactory Academic Progress and Attendance.** The institution has provided the Commission with information about policies and practices for ensuring compliance with these regulations. The institution has demonstrated that the policies and practices meet state or federal requirements and that the institution is appropriately applying these policies and practices to students.

- **Contractual Relationships:** The institution has presented a list of its contractual relationships related to its academic program and evidence of its compliance with Commission policies requiring notification or approval for contractual relationships. The institution should review the Contractual Change Application on the Commission’s Web site for more information. If the team learns that the institution has a contractual relationship that may require Commission approval and has not completed the appropriate Commission Contractual Change Application the team must require that the institution complete and file the form as soon as possible.

- **Consortial Relationships:** The institution has presented a list of its consortial relationships related to its academic program and evidence of its compliance with Commission policies requiring notification or approval for consortial relationships. The institution should review the Consortial Change Application on the Commission’s Web site for more information. If the team learns that the institution has such a consortial relationship that may require Commission approval and has not completed the appropriate Commission Consortial Change Application the team must require that the institution complete and file the form as soon as possible.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

____ X ____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).
Comments: In the team’s opinion, the institution has effectively met all of the components of the Title IV section of the Federal Compliance requirements

Additional Monitoring, if any: None

6. Institutional Disclosures and Advertising and Recruitment Materials: The institution has documented that it provides accurate, timely and appropriately detailed information to current and prospective students and the public about its accreditation status with the Commission and other agencies as well as about its programs, locations and policies.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

___X___ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: None

Additional Monitoring, if any: None

7. Relationship with Other Accrediting Agencies and with State Regulatory Boards: The institution has documented that it discloses accurately to the public and the Commission its relationship with any other specialized, professional or institutional accreditor and with all governing or coordinating bodies in states in which the institution may have a presence. Note that if the team is recommending initial or continued status, and the institution is currently under sanction or show-cause with, or has received an adverse action from, any other federally recognized specialized or institutional accreditor in the past five years, the team must explain the action in the body of the Assurance Section of the Team Report and provide its rationale for recommending Commission status in light of this action. In addition, the team must contact the staff liaison immediately if it learns that the institution is at risk of losing its degree authorization or lacks such authorization in any state in which the institution meets state presence requirements.
CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

___X___ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: None

Additional Monitoring, if any: None

8. Public Notification of an Evaluation Visit and Third Party Comment: The institution has made an appropriate and timely effort to solicit third party comments. The team has evaluated any comments received and completed any necessary follow-up on issues raised in these comments. Note that if the team has determined that any issues raised by third-party comment relate to the team's review of the institution’s compliance with the Criteria for Accreditation, it must discuss this information and its analysis in the body of the Assurance Section of the Team Report.

CHECK THE APPROPRIATE RESPONSE THAT REFLECTS THE TEAM’S CONCLUSIONS:

___X___ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.

_____ The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends follow-up.

_____ The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends follow-up.

_____ The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: One public comment was received by the HLC and forwarded to the team and institution. The institution effectively responded to the specific comment and demonstrated
an effective overall process for responding to any similar concerns expressed by students or the public.

Additional Monitoring, if any: None
Appendix B
Credits and Program Length

Instructions: The team reviews the “Protocol for Peer Reviewers Reviewing Credit Hours Under the Commission’s New Policies” before completing this Worksheet. This Worksheet must be completed for all Quality Checkup visits after January 1, 2012.

A: Answer the Following Questions

Institutional Policies on Credit Hours

- Does the institution’s policy for awarding credit address all the delivery formats employed by the institution? (Note that for this question and the questions that follow an institution may have a single comprehensive policy or multiple policies.)
  - X Yes
  - No
  - Comments: None

- Does that policy relate the amount of instructional or contact time provided and homework typically expected of a student to the credit hours awarded for the classes offered in the delivery formats offered by the institution?
  - X Yes
  - No
  - Comments: None

- For institutions with non-traditional courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the timeframe and utilizing the activities allotted for the course?
  - No
  - Yes
  - Comments: N/A

- Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)
  - X Yes
  - No
  - Comments: None

Application of Policies
Are the course descriptions and syllabi in the sample academic programs reviewed by the team appropriate and reflective of the institution’s policy on the award of credit? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

[X] Yes  [ ] No
Comments: None

Are the learning outcomes in the sample reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution’s policy on the award of credit?

[X] Yes  [ ] No
Comments: None

If the institution offers any alternative delivery or compressed format courses or programs, were the course descriptions and syllabi for those courses appropriate and reflective of the institution’s policy on the award of academic credit?

[X] Yes  [ ] No
Comments: All courses are offered in compressed format.

If the institution offers alternative delivery or compressed format courses or programs, are the learning outcomes reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution’s policy on the award of credit? Are the learning outcomes reasonably capable of being fulfilled by students in the time allocated to justify the allocation of credit?

[X] Yes  [ ] No
Comments: All courses are offered in compressed format.

Is the institution’s actual assignment of credit to courses and programs across the institution reflective of its policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

[X] Yes  [ ] No
Comments: None

B: Identify the Sample Courses and Programs Reviewed by the Team. For the programs the team sampled, the team should review syllabi and intended learning outcomes for several of the courses in the program, identify the contact hours for each course, and expectations for homework or work outside of instructional time.
LFGSM has two programs. A number of syllabi were examined for each program. Course syllabi reviewed:

- 5100 Executive Success Skills
- 5210 Marketing
- 5822 Social Media
- 5880 Sustainable Business
- 7820 Marketing for Results
- 7825 Human Resources & Organizational Behavior
- 7830 Financial Accountability
- 7835 MIS and E-business

C: **Recommend Commission Follow-up, If Appropriate**

Is any Commission follow-up required related to the institution’s credit hour policies and practices?

☐ Yes  ☒ No

Rationale:

Identify the type of Commission monitoring required and the due date:

D: **Identify and Explain Any Findings of Systematic Non-Compliance in One or More Educational Programs with Commission Policies Regarding the Credit Hour**
Appendix C  
Clock Hour Worksheet

Instructions: Teams complete the following worksheet only if the institution offers any programs in clock hours OR that must be reported to the U.S. Department of Education in clock hours for Title IV purposes even though students may earn credit hours for graduation from these programs. Such programs typically include those that must be identified in clock hours for state licensure of the program or where completing clock hours is a requirement for graduates to apply for licensure or authorization to practice the occupation. Such programs might include teacher education, nursing, or other programs in licensed fields.

Federal Formula for Minimum Number of Clock Hours of Instruction (34 CFR §668.8)

<table>
<thead>
<tr>
<th>Formula</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 semester or trimester hour</td>
<td>must include at least 37.5 clock hours of instruction</td>
</tr>
<tr>
<td>1 quarter hour</td>
<td>must include at least 25 clock hours of instruction</td>
</tr>
</tbody>
</table>

Note that the institution may have a lower rate if the institution’s requirement for student work outside of class combined with the actual clock hours of instruction equals the above formula provided that a semester/trimester hour includes at least 30 clock hours of actual instruction and a quarter hour include at least 20 semester hours.

A: Answer the Following Questions

- Does the institution’s credit to clock hour formula match the federal formula?
  
  ☐ Yes ☐ No
  
  Comments: N/A

- If the credit to clock hour conversion numbers are less than the federal formula, indicate what specific requirements there are, if any, for student work outside of class?

- Did the team determine in reviewing the institution’s credit hour policies that they reasonable within the federal definition as well as within the range of good practice in higher education?
  
  ☐ Yes ☐ No
  
  Comments: N/A
Did the team determine in reviewing the assignment of credit to courses and programs across the institution that it was reflective of the institution’s policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

Yes  No

Comments: N/A

B: Does the team approve variations, if any, from the federal formula in the institution’s credit to clock hour conversion?

Yes  No

(Note that the team may approve a lower conversion rate than the federal rate as noted above provided the team found no issues with the institution’s policies or practices related to the credit hour and there is sufficient student work outside of class as noted in the instructions.)

C: Recommend Commission Follow-up, If Appropriate

Is any Commission follow-up required related to the institution’s clock hour policies and practices?

Yes  No

Rationale:

Identify the type of Commission monitoring required and the due date: