

## NWCCU POLICIES | ACCREDITATION ACTIONS

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The Northwest Commission on Colleges and Universities (NWCCU or Commission) seeks to ensure fair, equitable, and consistent actions on accreditation. This Policy identifies Commission actions.

### **Application and Determination of Candidacy and Accreditation**

#### **Initial Inquiry and Application for Consideration of Eligibility**

NWCCU may accept or decline an institution's inquiry about application for accreditation as outlined in the [Accreditation Criteria Policy](#) and NWCCU Handbook of Accreditation.

After initial inquiry, an institution may submit an Application for Consideration of Eligibility, with its responses to all NWCCU Eligibility Requirements. The assigned NWCCU Staff Liaison will conduct a site visit and make a recommendation for Commission action on the Applicant Status at least 30 days prior to the Commission meeting for action. The Board of Commissioners may accept the institution as an Applicant, defer action, or reject the Application.

Denial of an Application for Consideration is not an adverse action subject to appeal. The institution may submit a new Application for Consideration of Eligibility after one year. Institutions approved as Applicants may remain in that status for up to three years before the award of Candidacy. If not awarded Candidacy within three years, the institution loses Applicant status unless extended by the Commission for good cause.

#### **Candidacy**

The Board of Commissioners may grant Candidate for Accreditation (i.e., pre-accreditation) status when an institution meets all Eligibility Requirements, meets Standards for Accreditation at an acceptable level, and has the potential to fully meet all Standards for Accreditation within five years. Institutions demonstrate their readiness for Candidacy through an Initial Candidacy Self-Evaluation Report and a peer evaluation team visit and report. Following the recommendation from the peer evaluation team, the Board of Commissioners may award Candidacy, may award Accreditation, may defer a decision, or may deny Candidacy. The denial of Candidacy is an appealable action per NWCCU's [Appeals Procedure Policy](#).

The effective date of Candidacy is the date of the Letter of the Action communicating the Board of Commissioner's action. A teach-out plan is required of Candidate institutions under Commission policy and *34 CFR § 602.23(f)(1)(ii)* and must be reviewed and approved in accordance with NWCCU's [Procedure to Close a Program, Branch Campus, or Institution Policy](#). Candidate institutions must complete an Interim Candidacy Self-Evaluation Report every 18 months after Candidacy, unless the institution is submitting a report for consideration of initial accreditation. The institution may not be in Candidacy status for more than five years under *34 CFR § 602.16(a)(2)*.

## **Accreditation**

The Commission may grant Accreditation to a Candidate institution when it meets the Eligibility Requirements and substantially meets Standards for Accreditation, Policies, and applicable federal regulations. Institutions demonstrate readiness for Accreditation through an Initial Accreditation Self-Evaluation Report and a peer evaluation team visit and report. Following the recommendation from the peer evaluation team, the Board of Commissioners may award Accreditation, may defer a decision, or may deny Accreditation. The denial of Accreditation is an appealable action per NWCCU's Appeals Procedure Policy.

An Accredited institution will begin a regular accreditation review cycle. Accreditation will apply retroactively to the date of Candidacy for the benefit of students, including to facilitate transfer, ensure eligibility for licensure, and other purposes. The retroactive accreditation date cannot predate a decision date to deny accreditation or candidacy. The action may stipulate that the institution emphasize specific areas in its next self-evaluation report.

Institutions already accredited by another accreditor should refer to the [Institutions Accredited by Another Accreditor Policy](#).

## **Reaffirmation of Accreditation**

NWCCU may Reaffirm Accreditation when the institution continues to meet the Eligibility Requirements and substantially meets Standards for Accreditation, Policies, and applicable federal regulations. The institution is subject to its regular accreditation review cycle. The action may stipulate that the institution emphasize specific areas in a future report. The Reaffirmation action may require that the institution complete ongoing monitoring activities. NWCCU may request further evidence of accreditation compliance in a future report prior to the next regularly scheduled evaluation visit. The reaffirmed institution may also be asked to prepare follow-up reports. In which case, the action will specify the due date and which Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations must be addressed by the Institution.

## **Accreditation Actions Following Non-Compliance**

NWCCU may Reaffirm Accreditation even when an institution is non-compliant with one or more Standards, Eligibility Requirements, Policies, or applicable federal regulations. When the Board of Commissioners determines that an institution is out of compliance with one or more of the Standards, Eligibility Requirements, Policies, or applicable federal regulations, NWCCU will notify the institution in a Letter of Action and provide a timeline for coming into compliance, not to exceed the maximum allowed by *34 CFR § 602.20(a)(2)* of the lesser of four years or 150 percent of the length of the longest program at the institution. Such a timeline may include intermediate checkpoints for demonstrating compliance.

A compliance and/or monitoring report by the institution is required for a Reaffirmation Action that follows a non-compliance action. A report will be followed by a peer evaluation team visit for reaffirmation after a Probation or Show Cause action.

## **Sanctions**

NWCCU has three types of sanctions that may be issued to institutions that are out of compliance with Standards, Eligibility Requirements, Policies, or applicable federal regulations: Warning, Probation, and Show Cause. Sanctions are an expression of heightened Commission concern related to compliance and must be publicly disclosed by the institution. The Board of Commissioners may issue a sanction at any time following non-compliance and may not provide an extended timeline for coming into compliance.

### **Warning**

NWCCU may issue a Warning to an institution that its accreditation may be in jeopardy when it does not appear to be in compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations but the institution: appears to demonstrate capacity to make improvements and return to compliance under the written timeline set by the Commission pursuant to *34 CFR § 602.20(a)(2)*; and appears to demonstrate capacity to sustain itself in the long term.

### **Probation**

NWCCU may place an institution on Probation and note its Accreditation is in jeopardy when it does not appear to be in compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations, and there is evidence non-compliance is sufficiently serious, extensive, or substantial, that it raises concern about: quality of student learning experience; capacity to make appropriate improvements within a short period of time; capacity to sustain itself in the long term such that a teach-out plan is required; or information collected through monitoring activities suggests there are serious concerns related to student achievement, viability and capacity, or financial health.

### **Procedures Related to Sanctions of Warning and Probation**

The period for coming into compliance is determined under a written timeline set by the Commission, pursuant to *34 CFR §602.20(a)(2)*, not to exceed the lesser of four years or 150 percent of the length of the longest program at the institution. NWCCU retains authority to take any action during this period of time because a sequence of action is not required. An institution placed on Warning or Probation will prepare a monitoring or compliance report(s) on a schedule set by NWCCU based on the nature and complexity of the area(s) of non-compliance, and the stated mission and educational objectives of the institution in accordance with *34 CFR 602.20(a)(2)*. The monitoring or compliance reports must provide evidence demonstrating the institution appears to be in compliance with identified Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations. A follow-up peer evaluation team visit will occur after submission of the report. For institutions on Probation, NWCCU will require a teach-out plan and possibly teach-out agreement(s) in accordance with the [Policy on Procedures to Close a Program, Branch Campus or Institution](#). An action to continue Probation or Warning will specify areas of non-compliance that have been remedied, continued areas of non-compliance, and any new areas of non-compliance. If new areas of non-compliance are identified, NWCCU will require a further compliance or monitoring report and will direct a follow-up peer evaluation team visit. Review of the report(s) and visit(s) must be completed and accreditation reaffirmed in accordance with the schedule set by the Commission pursuant to *34 CFR 602.20(a)(2)*. NWCCU will Reaffirm Accreditation after a non-compliance action only when the institution provides

evidence that it is in compliance with all Standards for Accreditation, Eligibility Requirements, Policies, and applicable federal regulations.

### **Show Cause**

NWCCU may require an Accredited or Candidate institution to Show Cause and note its accreditation is in jeopardy when it does not appear to be in compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations, and there is evidence the non-compliance is sufficiently egregious such that it raises concerns the institution: has not made sufficient progress toward achieving compliance; does not appear to demonstrate capacity to comply with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations under the timeframe set by the Commission pursuant to *34 CFR § 602.20(a)(2)*; is in imminent danger of closing; has demonstrated a lack of integrity, truthfulness, or responsibility, and the Commission determines students may be harmed; or information from monitoring activities suggests serious concerns related to student achievement, viability and capacity, or financial health.

### **Procedures Related to Sanction of Show Cause**

A Show Cause action requires the institution to present evidence why its accreditation should not be withdrawn. A Show Cause action will identify Standards for Accreditation, Eligibility Requirements, Policies, or federal regulations that must be addressed in a show cause report, the due date, and require a show cause visit. For accreditation to be reaffirmed, the institution's Show Cause report must provide evidence that it made all necessary improvements and meets the Standards for Accreditation, Policies, and applicable federal regulations. An on-site show cause visit will follow submission of the show cause report to verify the information submitted. The Board of Commissioners may move an institution from a Sanction of Show Cause to a Sanction of Probation or Sanction of Warning with continued monitoring, If the institution has made marginal progress, but not enough to be reaffirmed for accreditation. The Show Cause action will require a teach-out plan and, if applicable, teach-out agreement(s). The institution may be required to appear before the Commission to consider the status of its accreditation.

### **Extension for Good Cause**

NWCCU may continue an institution's non-compliance status and extend for good cause beyond the timeframe set by the Commission pursuant to *34 CFR § 602.18(d) and § 602.20(a)(2)*. A decision to grant an extension for good cause is done only under exceptional circumstances, is not a right, is made at the discretion of the Commission, and is not subject to appeal. An extension is not available to Candidate institutions. The Commission may continue to accredit an institution in non-compliance status, including those issued a sanction, for good cause beyond the timeframe set by the Commission pursuant to *34 CFR § 602.20(a)(3)*. NWCCU will set the length of the extension not to exceed one year.

NWCCU will consider compelling evidence of one or more of the following when making a decision to grant an extension for good cause: student learning experience is not compromised; institution has complied with Commission Policies; an implementable teach-out plan with signed teach-out agreements, if requested by the Commission; demonstrated improvement and potential to remedy non-compliance issues within period of extension; reasonable plan to meet

reaffirmation within period of extension; support from an entity that will contribute to compliance; accurate, fair, and complete information on all operations in response to Commission requests; compliance with state and federal requirements; good standing with other accreditors; and impacts of a natural disaster, catastrophe, or other circumstance outside of the institution's control.

NWCCU will Reaffirm Accreditation at the conclusion of the extension, take adverse action, or consider a final, second extension for good cause not to exceed one year. In considering whether to grant a final extension for good cause, the Commission will consider compelling evidence: of further progress in implementing changes toward compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations; that the institution will come into compliance during the extended timeframe; or since the first extension, the institution made progress to stabilize its financial condition, enrollments, or sufficient levels of qualified staffing.

The institution remains Accredited during an extension for good cause. The rationale for granting or denying an extension for good cause will appear in the Commission action letter. NWCCU's action to Deny an extension for good cause is not an adverse action subject to appeal. NWCCU will act to Reaffirm or Withdraw Accreditation at the conclusion of the final extension.

### **Adverse Action**

NWCCU will take an adverse action (denial, withdrawal, suspension, revocation, or termination of Accreditation or Candidacy) when an institution has not demonstrated compliance, and/or the timeframe set by the Commission pursuant to *34 CFR § 602.20(a)(2)* for noncompliance plus good cause extension, if any, has expired. NWCCU may take an adverse action immediately when the situation warrants such action. An institution has the right to appeal an adverse action in accordance with the [Appeals Procedure Policy](#). The institution also has the right to arbitrate a final decision of the Appeals Board in accordance with the [Arbitration Policy](#). The institution retains its Candidate or Accredited status until the effective date of withdrawal or completion of the appeal process, and arbitration, whichever is later. Membership in NWCCU ceases when Withdrawal of Candidacy or Accreditation is effective.

NWCCU may Deny Candidate for Accreditation Status if an institution does not demonstrate compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations within the five-year period of Candidacy under *34 CFR § 602.16(a)(2)(ii)*, and the institution must wait two years to reapply.

NWCCU may Withdraw Candidate for Accreditation Status if it determines the institution no longer appears to demonstrate compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations within the five-year period of Candidacy under *34 CFR § 602.16(a)(2)*.

NWCCU may Deny Accreditation if the Candidate institution fails to demonstrate compliance with Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations within five-year period of Candidacy established under *34 CFR § 602.16(a)(2)*. If the institution is denied Accreditation, NWCCU will maintain the institution's Candidate status for currently enrolled students until the institution has had a reasonable time to complete its teach-

out plan to assist students but for no more than 120 days, unless approved by NWCCU for good cause under *34 CFR § 602.23(f)(1)(iii)*.

NWCCU may Withdraw Accreditation if it determines an institution no longer meets Standards for Accreditation, Eligibility Requirements, Policies, or applicable federal regulations, fails to show cause why its accreditation status should not be withdrawn, and the institution has failed to demonstrate: it can provide a quality student learning experience; it has the capacity to make required improvements; it can sustain itself; or it can come into compliance within the timeframe set by the Commission pursuant to *34 CFR §602.20(a)(2)*.

Prior to an adverse action, NWCCU may require the institution to Show Cause. If the institution chooses not to prepare a show cause report and hold a show cause visit, or does not comply with requests for a written report, teach-out plan, or other information, NWCCU may take an immediate adverse action under *34 CFR § 602.20(b)*. The Commission may maintain the institution's accreditation until the institution has had reasonable time to complete its teach-out plan or to fulfill the obligations of any teach-out agreement to assist students in transferring or completing programs per *34 CFR § 602.20(c)*.

When an adverse action becomes final, NWCCU shall set the effective date for the termination of accreditation and thereafter membership ceases.

### **Substantive Change Action**

NWCCU will act on requests for substantive change under its [Substantive Change Policy](#).

### **Procedural Actions**

NWCCU may take other actions related to the accreditation process and may alter the timing or schedule of an accreditation review cycle. NWCCU may defer a decision on any action when it determines additional information is needed and request a supplemental report, with or without a follow-up peer evaluation team visit. A decision may be deferred only if it will be made within established timeframes under *34 CFR §602.16(a)(2)* for Candidate institutions, under *34 CFR § 602.20(a)(2)* for accredited institutions, or Commission Policies.

If the institution demonstrates extraordinary circumstances, NWCCU may delay the due date of accreditation activity within the accreditation review cycle and continue accreditation. Extraordinary circumstances include situations beyond the institution's control or any situation which may put Commission representatives at risk such as natural disaster, pandemic, catastrophic event, or political unrest. The action will specify the revised due date, not to exceed one year. If it is still not possible to conduct an appropriate review at the conclusion of the one-year delay, the Commission may grant another one-year delay if the risk or extraordinary circumstances persist.

NWCCU may, in extraordinary circumstances, waive a specific requirement in its Policy. The Commission may include innovative program delivery approaches or offer an alternative means of satisfying NWCCU's requirements under *34 CFR § 602.18(c)(1-4)*. In such circumstances, the institution must demonstrate the need for such a waiver and ensure that students will receive equivalent benefit and not be harmed.

NWCCU will take action when an institution requests to voluntarily surrender candidacy or accreditation. The institution must obtain NWCCU's approval and meet necessary conditions, including payment of outstanding dues and fees. The Commission may request a report addressing information needed to terminate membership including a teach-out plan and teach-out agreements.

Procedural actions are not appealable.

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