

Request from Antioch University June 2023

Overview of this Report

This item presents a request from Antioch University to maintain its institutional approval despite having withdrawn all its credential programs.

Staff Recommendation

Staff recommends that the COA consider the request and make a determination as to whether Antioch University may maintain its institutional approval status.

Background

Typically, when an institution withdraws all of its credential programs, that institution is “closed” by the Commission and is no longer a Commission approved program sponsor. If that institution seeks to offer a credential program again in the future, it must wait two years and go through the Initial Institutional Approval process. The Chapter 13 (page 14) of the Accreditation Handbook – *Articulation of State and National Accreditation* – contains the following information:

Institutional Closure due to Closure of Programs When a program sponsor withdraws its last program, it loses approval as a Commission-accredited institution. If the institution determines it wishes to seek Commission approval as a program sponsor once again, it must wait two years from the date of institutional closure and must then complete all aspects of the Initial Institutional Approval (IIA) process. In specific instances, and at the request of an institution whose programs have been discontinued, the COA may take action to determine that institution may remain as an approved program sponsor for a specified amount of time as defined by the COA. As an approved program sponsor, annual accreditation fees would still apply.

The catalyst for potentially allowing an institution to remain a Commission approved program sponsor came from a case where a local education agency withdrew all of its existing programs while at the same time indicating its intention to submit a new program proposal. The COA instituted this flexibility in order to recognize those specific instances where an institution either knew it needed to close one program but was planning to offer a different program in the near future or needed to close a program in order to completely redesign and start anew.

Antioch University Request

Antioch University closed all of its credential programs and formally withdrew them through the COA in October 2022. They had operated a Preliminary Multiple Subject credential program including intern, Preliminary Education Specialist credential program including intern, and a teacher induction program. The programs had all been offered by Antioch since 2012. Antioch operated its educator preparation programs out of two campuses: Los Angeles and Santa Barbara. The main campus is located in Ohio and the university is accredited by the Higher

Learning Commission.

Staff had conversations with Antioch during the closure of the programs in which the institution indicated that it would like to remain a Commission approved program sponsor. At that time, however, the institution was in conversations with another institution, Otterbein University, about a potential collaboration or “affiliation.” Because staff was unclear how this new affiliation would impact Antioch University, the closure of Antioch as a program sponsor has been pending for receipt of more information.

The policy of keeping an institution open after the last of its programs have been closed and formally withdrawn was adopted by the COA several years ago to address certain situations indicated above related to the programs and did not anticipate a situation where there would be a simultaneous substantive change to the institution itself. Putting aside the situation of program status, whenever there have been changes to the status of an institution itself the Commission staff have analyzed the specific changes to determine whether the institution is essentially the same institution that was approved by the Commission for program sponsorship or whether the change was so substantive to the control of the institution that the “new” entity must go through initial institutional approval. Two major factors typically contribute to the decision as to whether an institution has to go through Initial Institutional Approval: 1) whether the changes are related to the control of the institution such that the original entity is no longer the institution that was approved by the Commission and 2) if it is an institution of higher education, how the change has been viewed by or impacts its regional accreditation status.

A recent example of Commission staff analyzing the changes of this nature include Brandman University’s change to UMass Global. In that situation, although the institution’s name changed significantly and there was a new affiliation with an out of state university (University of Massachusetts), Brandman maintained its overall control of the institution and its regional accreditation status remained unchanged. Therefore, it was determined that UMass Global could continue to operate as an approved program sponsor without going through the Initial Institutional Approval process. To make this complex situation transparent, staff did go to the Commission to approve that action. Another example is Western Governors University, that also went through a recent change which made it a subsidiary of the non-profit organization Western Governor’s Corporation. Western Governor’s University maintained its existing regional accreditation and control of the governing board, so the decision was also made that it could maintain its program sponsorship status. A final example is Northeastern University, which recently “merged” with Mills College in Oakland; however, in that situation Mills College is actually closing its doors and the new entity, Northeastern University at Mills College, will not have WASC accreditation as Mills had. Instead, Mills College will be under the umbrella of Northeastern University’s accreditation through New England Commission on Higher Education. Therefore, although the institutions are calling it a merger, it is the Commission’s perspective that this is an entirely new institution, and the institution is now going through Initial Institutional Approval.

The question here, then, is whether the Commission should close Antioch University as a program sponsor and require it to go through Initial Institutional Approval when and if it should decide to offer a new preparation program, or whether to maintain its institutional status as a Commission approved program sponsor.

Staff submits the following details for COA consideration of Antioch University's new affiliation with Otterbein College:

- Under the new arrangement, the accreditation status of Antioch University will remain through the Higher Learning Commission.
- The Higher Learning Commission conducted a team visit and reviewed the Change of Control Request by Antioch University and Otterbein University in April 2023 and a decision by the Higher Learning Commission is expected on June 23 or 24.
- The intent of the new affiliation between Antioch University and Otterbein University is to create a "system" of education comprised of the two different institutions. The new system would "build on and leverage the aligned missions and complementary programming and deliveries of Antioch University and Otterbein University for growth to benefit all members."
- Antioch University will be an operating division of Antioch University Corporation, a not-for-profit dba Antioch University and superordinate entity of Otterbein University.
- Otterbein University will be a subsidiary of the Antioch University Corporation.
- Antioch University's status as a not-for-profit university will not change under this new arrangement. The Antioch University Corporation will have fiduciary responsibility, hiring and firing the President, while the division of the parent corporation, Antioch University, will be overseen by an Advisory Board with authority over functions such as curriculum, personnel decisions, degree requirements and pedagogical matters.
- The Antioch University Corporation will have a governing board with equal representation from Antioch University and Otterbein University, plus one non-affiliated member.
- Under the new arrangement both institutions will remain separate degree granting institutions, largely autonomous, with their own individual boards.
- Both institutions will continue to be separately accreditation through HLC.
- Otterbein will transfer most of its graduate programs to Antioch University and will focus on undergraduate education.
- Antioch University has indicated it seeks to offer educator credential programs only in California and not extend those programs to other states.
- Otterbein University will maintain its own educator credentialing programs in Ohio, where those programs are accredited.

Staff Conclusion: While the changes proposed are complex, Antioch University will maintain substantial control over university matters and hold independent accreditation from Otterbein. Therefore, staff concludes that the changes undergoing by Antioch University as an affiliated

partner with Otterbein do not make it a significantly different institution than the institution that has held Commission approval as a program sponsor.

Moving forward. The COA can decide one of two ways as follows:

- 1) If the COA denies Antioch University's request to maintain its status as a Commission approved institution after having closed its programs in 2022, it will have to go through the full five stage Initial Institutional Approval process before it can once again offer any credential programs. This process takes a number of years to complete.
- 2) If the COA approves Antioch University's request to maintain its status as a Commission approved institution, it may propose new programs as early as October 2023 if they are the same programs they once offered, or at any time for programs not already offered. If the COA has concerns about the institution as it relates to the proposed new programs, it may be helpful to note that the Initial Program Review process includes responses Preconditions and to particular aspects of the Common Standards. In the case of Antioch, it is possible for the COA to require an enhanced response to the Common Standards for any new programs submitted over the next two years.

Antioch University personnel will be available at the COA meeting to answer specific questions from the COA.