

Approval to Continue Under-Threshold Degree Programs

INITIAL GUIDANCE AND FAQs

ACADEMIC AFFAIRS, INDIANA COMMISSION FOR HIGHER EDUCATION



INDIANA COMMISSION *for*
HIGHER EDUCATION

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Crucial Details for HEA1001-2025 Implementation

- After July 1, 2025, state educational institutions must seek approval from the Commission to continue an under-threshold degree program. These are degree programs in which the rolling three-year average of graduates was under the corresponding statutory threshold for that degree type, e.g., 15 graduates for a bachelor's degree and 10 graduates for an associate degree.
- No currently enrolled degree programs will be eliminated without an opportunity for currently enrolled students to complete their studies through an orderly Teach-Out.
- Currently enrolled degree programs will maintain normal operations through Academic Year (AY) 2025-2026. If a determination is made proactively by an institution or by the Commission through the approval to continue process to ultimately merge/consolidate or suspend (with Teach-Out) an under-threshold degree program, it will not take effect until AY 2026-2027. However, institutional preparations and commitments to follow through with the merger/consolidation or suspension (with Teach-Out) will need to begin during AY 2025-2026.
- Newer degree programs will receive special consideration as they need time to grow enrollment and produce graduates. However, these degree programs must still obtain approval to continue.
- A degree program's three-year rolling average of graduates will be determined from State Fiscal Years (FY) 2022, FY 2023, and FY 2024; the data submission and validation process for FY 2025 data will not be complete in time to implement the statute.
- The Commission will validate FY 2024 data in early July and provide it to institutions by mid-July.
- The Commission and institutions will collaborate to validate and arrive at a Mutual Consensus List of under-threshold degree programs with newer degree programs flagged. Only degree programs on the Mutual Consensus List must obtain approval to continue from the Commission.
- In requesting approval to continue an under-threshold degree program, institutions will have the opportunity to contextualize data through a fact-based, context-dependent narrative justifying the approval to continue category requested. It must elaborate on the program's essentialness to mission and planned fiscal support, as well as its relative importance in relation to evolving program offerings, career relevance, student outcomes, and service to the region/state/nation. If applicable to the category of approval requested, an improvement plan must be outlined or the merger/consolidation justified in terms of advisability and progress toward the statutory threshold.
- Special consideration will be provided to certain associate degrees, master's degrees, and Education Specialist Programs (Ed.S.) used for stop-out or "off-ramp" purposes.
- Special consideration will be provided to Transfer Single Articulation Pathway (TSAP) associate degree programs and associate degree programs tied to a U.S. Department of Labor Registered Apprenticeship Program (RAP).
- Online multicampus collaborative degree programs will have their rolling three-year average of graduates tabulated in aggregate as a single online program of study.
- Special consideration will be provided to degree programs in which the programmatic accreditor caps cohort size below or approximately at the statutory threshold since some attrition is inevitable.

Approval to Continue Under-Threshold Degree Programs

Initial Guidance and FAQ

v. 1.0 (June 13, 2025)

Initial Guidance

[House Enrolled Act 1001—2025](#)'s Bill Section #248 added, effective July 1, 2025, the following to Indiana Code (IC):

IC 21-18-9-10.7

Sec. 10.7. (a) For each state educational institution degree program, if the:

(1) average number of students who graduate over the immediately preceding three (3) years is fewer than:

(A) ten (10) students for a particular associate degree program;

(B) fifteen (15) students for a particular bachelor's degree program;

(C) seven (7) students for a particular master's degree program;

(D) three (3) students for a particular education specialist program; or

(E) three (3) students for a particular doctorate degree program; and

(2) state educational institution would like to continue a degree program described in subdivision (1); the state educational institution must request approval from the commission to continue the degree program.

(b) If the commission does not grant approval under subsection (a), the state educational institution must eliminate:

(1) the degree program; and

(2) any costs associated with the degree program.

In preparation to implement HEA1001-2025, the Indiana Commission for Higher Education (Commission) is currently developing fuller guidance, timelines, and procedural details, including forms and templates, that will be shared with state educational institutions prior to July 1, 2025 to implement the newly enacted statute above. This **Initial Guidance and FAQ** has been prepared to address key details and recurring questions as both the Commission and state educational institutions work in collaboration to prepare for post-July 1 implementation. The document will be subject to date-stamped updates.

In early May 2025, the Commission offered state educational institutions an opportunity for voluntary early action in preparation for implementation through Routine Staff Actions and/or Future Staff Action Commitments for certain under-threshold degree programs chosen by the institution (See page 4).

The Commission acknowledges federal regulations and accreditation standards require currently enrolled degree programs to undergo what is often a multiyear process toward elimination: initiating a suspension, planning and implementing an **orderly Teach-Out** (multiple years), and, ultimately, elimination through staff action follow-through. **To reiterate, no currently enrolled program will be eliminated without an opportunity for currently enrolled students to complete their studies.** Upon programmatic elimination, the statute requires the campus/institution to eliminate any costs, i.e., reallocate resources. While not immediate, program merger/consolidation is typically faster.

Under HEA 1001-2025, state educational institutions must annually re-evaluate their degree program portfolio in relation to the new three-year rolling average thresholds for graduates. If a degree program is under-threshold, the campus/institution must obtain approval from the Commission to continue the program. (Re)prioritization of programming will require the simultaneous consideration of every under-threshold degree program's essentialness in relation to mission—**Mission Critical, Mission Aligned, or Discretionary**—as categorized by the institution, as well as planned fiscal support--**Maintenance, Enhancement, or Reduction**—for the degree program given limited resources, and relative importance in relation to evolving program offerings, student outcomes, and the shifting needs of the region/state/nation.

After July 1, institutions will need to determine whether and how to request approval to continue certain under-threshold programs, such as a commitment to grow and support newer programs or implement improvement plans for older programs, or make commitments to merge/consolidate or suspend programs (with Teach-Out toward Elimination), enabling reprioritization away from underperforming and, likely, **Discretionary** academic offerings.

Voluntary Early Action (Pre-July 1, 2025):

June 30 AA&Q & July 24 Commission Meetings

In early May 2025, the Commission offered state educational institutions an opportunity for voluntary early action through Routine Staff Actions and/or written Future Staff Action Commitments. Proactively addressing under-threshold degree programs that are underperforming and/or misaligned with evolving institutional priorities will facilitate post-July 1 implementation of HEA 1001-2025. The Commission provided degree conferral data for FY2021, FY2022, and FY2023 to assist preliminary analysis efforts. Institutions were asked to flag inconsistencies and issues. Data for FY2024 is undergoing validation and will not be available until mid-July; FY2022, FY2023, and FY2024 will be used for post-July 1 implementation.

Voluntary early actions are not expected to apply to all under-threshold degree programs. Institutions seeking the Commission's **Approval to Continue** under-threshold programs will follow a FORTHCOMING request and approval process for post-July 1 (see next page). This document previews its general outlines.

The list of voluntary early action options is outlined further below. To facilitate submissions, the Commission circulated a spreadsheet template—'**Bulk Staff Actions and Future Staff Action Commitments – UPDATED Template – May 14, 2025**'—which included illustrative scenarios for the sake of example. A formalized letter template for Future Staff Action Commitments via voluntary early action will be forthcoming.

For those institutions wishing to voluntarily exercise this early action opportunity, please complete and submit the spreadsheet to API@che.in.gov **no later than June 23** to be eligible for the June 30 Academic Affairs & Quality (AA&Q) Committee meeting, which precedes the July 24 full Commission meeting.

- *Routine Staff Action*
 - **Eliminate** a program via Routine Staff Action for the July Commission meeting, assuming the program/institution is in the position to do so, e.g., zero-enrollment programs.
 - **Merge/Consolidate** programs via Routine Staff Action for the July Commission meeting, assuming the program/institution is in a position to do so.
 - **Suspend** (with Teach-Out toward Elimination) a program via Routine Staff Action for the July Commission meeting, assuming the program/institution is in a position to do so.
- *Future Staff Action Commitments*
 - A written **Commitment to Merge/Consolidate** a specified degree program as soon as possible (before AY 2026-2027), acknowledging that post-July 1 approval to continue the under-threshold program(s) through AY 2025-2026 is dependent upon this commitment and eventual future Routine Staff Action follow-through as soon as possible.

- Institutions have two context-dependent options when making a commitment to merge/consolidate an under-threshold program or programs:

1. Merge two or more degree programs into a new, consolidated degree program;
 - The institution must begin proper curricular procedures to accommodate each of the merged programs into the consolidated program, e.g., offering the corresponding concentrations, majors, or tracks of each original degree program, before AY 2026-2027
2. Merge one or more degree programs into a preexisting degree program.
 - Ultimately, this will also require an eventual Suspension (with Teach-Out) for the programs being absorbed into the preexisting degree program via merger/consolidation before AY 2026-2027.
 - The institution must begin proper curricular procedures to accommodate the absorbed program(s), e.g., incorporation of the concentration(s), major(s), or track(s) into the preexisting degree program before AY 2026-2027.

- Institutions must clarify and describe these commitments for future staff action using the '*Nature of Change*,' '*For Merger/Consolidation: Other Program(s) – Program ID(s), Title(s)*,' and '*Justification/Notes*' fields of the bulk actions/commitments spreadsheet. Provide complete information on every degree program effected and the ultimate programmatic outcome of the merger/consolidation.

- NOTE: For accredited and licensure preparation programs, institutions must ascertain if standards permit the proposed merger/consolidation without endangering critical programmatic components.

- A written **Commitment to Suspend** (with Teach-Out toward Elimination) a specified degree program as soon as possible (before AY 2026-2027), acknowledging that post-July 1 approval to continue the under-threshold program through AY 2025-2026 is dependent upon this written commitment and future Routine Staff Action follow-through as soon as possible.

- *Other*

- This option was reserved for exceptional circumstances or unique scenarios such as the possibility of making a commitment to eliminate a specified degree program soon, e.g., late summer or early AY 2025-2026. This approval category can address suspended degree programs that will soon complete their Teach-Out or the program has a pre-scheduled upcoming 2025 elimination date.

Post-July 1, 2025 Implementation:

Approval to Continue Requests

In preparation to implement IC 21-18-9-10.7, state educational institutions must identify their under-threshold degree programs based on the preceding three state fiscal years under analysis: FY2022, FY2023, and FY2024. The Commission will collaborate with campuses/institutions to validate and arrive at a **Mutual Consensus List** of under-threshold degree programs. Institutions must decide whether and how to request **Approval to Continue** for each under-threshold degree program.

The categories of **Approval to Continue** include:

- **Conditional Approval to Continue:**
 - Conditional Approval to Continue: *In “Ramp-Up Period” and Monitoring*
 - This category is for newer degree programs.
 - Conditional Approval to Continue: *With Improvement Plan and Monitoring*
 - This category is for older degree programs.
- **Restricted Approval to Continue**
 - **Restricted Approval to Continue: Pre-July 1 Future Staff Action Commitment**
 - Commit to the corresponding future staff action submitted in June as soon as possible (before AY 2026-2027), acknowledging that post-July 1 approval to continue the under-threshold program(s) through AY 2025-2026 is dependent upon this commitment and future Routine Staff Action follow-through as soon as possible.
 - **Restricted Approval to Continue: Commitment to Merge/Consolidate**
 - Commit to merge/consolidate the specified degree program as soon as possible (before AY 2026-2027), acknowledging that post-July 1 approval to continue the under-threshold program(s) through AY 2025-2026 is dependent upon this commitment and future Routine Staff Action follow-through as soon as possible.
 - Institutions have two context-dependent options when requesting a commitment to merge/consolidate an under-threshold program or programs:
 1. Merge two or more degree programs into a new, consolidated degree program;
 - The institution must begin proper curricular procedures to accommodate each of the merged programs into the consolidated program, e.g., offering the corresponding concentrations, majors, or tracks of each original degree program, before AY 2026-2027
 2. Merge one or more degree programs into a preexisting degree program.

- The institution must begin proper curricular procedures to accommodate the absorbed program(s), e.g., incorporation of the concentration(s), major(s), or track(s) into the preexisting degree program before AY 2026-2027.
- Institutions must clarify and describe these commitments for future staff action, providing complete information on every degree program effected and the ultimate programmatic outcome of the merger.
- **NOTE:** For accredited and licensure preparation programs, institutions must ascertain if standards permit the proposed merger/consolidation without endangering critical programmatic components.
- **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out***
 - Commit to suspend a specified degree program as soon as possible (before AY 2026-2027), acknowledging that post-July 1 approval to continue the under-threshold program through AY 2025-2026 is dependent upon this written commitment and future Routine Staff Action follow-through as soon as possible. Future requests will likely be necessary to implement a multiyear Teach-Out.
- **Restricted Approval to Continue: *Commitment to Eliminate***
 - Commit to eliminate as soon as possible a specified degree program which has zero enrollments and/or concluded a suspension with Teach Out.

Newer under-threshold degree programs in their “**Ramp-Up Period**” will receive special consideration but must still obtain approval to continue. If institutions remain committed to the growth and support of the newer program, a request for **Conditional Approval to Continue: In “Ramp-Up Period” and Monitoring** should be submitted.

Older under-threshold degree programs the institution is committed to maintaining and supporting must submit a request for **Conditional Approval to Continue: With Improvement Plan and Monitoring** in which there is a compelling, facts-based **Rationale to Continue** the program given pertinent factors, such as its essentialness to mission (**Mission Critical, Mission Aligned, or Discretionary**), its planned fiscal support (**Maintenance, Enhancement, or Reduction**), (any) upward enrollment/completion trends, notable programmatic attributes, career relevance, service to the region/state/nation, current or proposed improvement/reorganization plans, and any mitigating circumstances or special considerations. This justification must address the **Program Viability Data** comparisons between all corresponding degree programs at the campus/institutions.

Given reprioritization imperatives, an institution may determine to request **Restricted Approval to Continue: Commitment to Merge/Consolidate** or **Restricted Approval to Continue: Commitment to Suspend with Teach-Out**, enabling resource reallocations to more essential degree programs.

Given the procedural requirements to orderly merge/consolidate program(s) or initiate orderly Teach-Outs under suspension, institutions will probably need to request approval to continue nearly all currently enrolled under-threshold degree programs, regardless of the institution’s ultimate plans for the program.

Pre-July 1 Future Staff Action Commitments made during the opportunity for voluntary early action in June (See page 4) will require approval to continue as the corresponding procedures and eventual staff action are resolved. In these instances, an institution must request **Restricted Approval to Continue: Pre-July 1 Future Staff Action Commitment**. Requests for a **Restricted Approval to Continue** category are very likely to be granted, given the institution's proactive efforts at resource reprioritization.

The Commission acknowledges:

- Mid-summer is a difficult period with some campus/institutional leadership, staff, and faculty away.
- Students are already registered for the Fall of Academic Year 2025-2026.
- For certain programs, the recruitment cycle for AY 2026-2027 has already begun accepting applications.
- The Commission's CHEDSS degree conferral data collection for FY2025 occurs September 1 through November 1.

The Commission anticipates:

- Providing institutions a preliminary list of under-threshold programs (FY2022, FY2203, and FY2024) mid-July 2025.
- Allowing institutions time to review the preliminary list, validate, and respond with any issues and/or inconsistencies.
- Collaborating with the institution to validate and arrive at a **Mutual Consensus List** of all under-threshold degree programs (FY2022, FY2023, and FY2024) through a similar data validation process used for the Outcomes-Based Performance Funding (OBPF) formula.
 - This process will also identify newer programs in their respective **"Ramp-Up Period."**
 - If a program is not on the **Mutual Consensus List**, it will not need approval to continue.
- Requiring institutions to submit **Program Viability Data** on enrollments, completions, and credit hours (undergraduate only) for all degree programs at the campus/institution to enable simultaneous relative comparisons of under-threshold degree programs to each other and all programs.

The forthcoming process to request a category of **Approval to Continue** will accommodate:

- A pre-meeting with the Commission to review the **Mutual Consensus List**.
- Degree program-specific requests for **Approval to Continue**, allowing for a compelling, fact-based, and context-dependent justification, including:
 - Categorization of essentialness: **‘Mission Critical,’ ‘Mission Aligned,’** or **‘Discretionary.’**
 - A note on planned fiscal support to accompany all requests for the two **Conditional Approval to Continue** categories, in which the fiscal officer of the campus/institution provides the following categorization of planned fiscal support for the degree program: **‘Maintenance,’ ‘Enhancement,’** or **‘Reduction.’**
 - A **Program Overview** to briefly describe the under-threshold degree program’s talent pipeline purpose, essentialness to mission, targeted student populations, notable programmatic details including accreditation, career relevance, distinctiveness from peer programs, and a brief history of its responsiveness to evolving regional/state/national needs.
 - A **Rationale to Continue** narrative that contextualizes quantitative and qualitative data to elaborate on the program’s essentialness to campus/institutional mission and its relative importance in terms of limited resources, evolving program offerings, students, and service to the region/state/nation. The narrative can identify mitigating circumstances and special considerations, cite more recent data or forecasts, and detail underway or planned improvement/reorganization plans, or rationalize a proposed merger/consolidation.
- A meeting with the Commission to review and discuss the **Final Recommendation** regarding degree program approvals for the Academic Affairs & Quality Committee and the full Commission.
- Fully documenting and outlining expectations following review and action by the full Commission, including monitoring approved programs and the fulfillment of **Restricted Approval to Continue** commitments.

Frequently Asked Questions (FAQ)

1.0 Requesting Approval to Continue

1.1 Q: What must an institution provide in its request to continue a specific under-threshold degree program?

The Commission is preparing degree-type specific forms/templates to request **Approval to Continue** an under-threshold degree program on the **Mutual Consensus List**.

#1 Specify the Request for Approval to Continue Category

All requests must specify the approval category sought:

- **Conditional Approval to Continue:**
 - **Conditional Approval to Continue: In “Ramp-Up Period” with Monitoring**
 - Needs only a brief narrative specifying the institution remains committed to the newer program’s support and growth, and briefly describes how the institution will make progress toward the statutory threshold, special considerations permitting. The **Mutual Consensus List** will identify under-threshold programs eligible for this special consideration.
 - **Conditional Approval to Continue: With Improvement Plan and Monitoring**
 - This category of approval has the highest burden of proof to prioritize the under-threshold program above others. ‘**Mission Critical**’ and ‘**Mission Aligned**’ programs are prime candidates, particularly in relation to planned fiscal support.
 - It requires a compelling justification to continue the program, specifying any planned or underway improvement/reorganization efforts to increase enrollment, completions, and/or cost-savings, including a timeline.
 - It requires a brief description of how the institution will monitor its growth, and, special considerations permitting, make progress toward the statutory threshold.
- **Restricted Approval to Continue**
 - **Restricted Approval to Continue: Commitment to Merge/Consolidate**
 - ‘**Mission Critical**’ or ‘**Mission Aligned**’ programs needing to right-size are good candidates, particularly in relation to planned fiscal support.
 - The request must rationalize why the applicable degree program(s) should be continued after merger/consolidation and why the process will be advisable and feasible in terms of serving student demand, maintaining quality, realizing cost-savings, and, circumstances and special considerations permitting, making progress toward the statutory threshold.

- The request must commit to merge/consolidate the specified degree program as soon as possible (before AY 2026-2027), acknowledging that post-July 1 approval to continue the under-threshold program(s) through AY 2025-2026 is dependent upon this commitment and future Routine Staff Action follow-through as soon as possible.
 - Institutions have two context-dependent options when requesting a commitment to merge/consolidate an under-threshold program or programs:
 1. Merge two or more degree programs into a consolidated degree program;
 - The institution must begin proper curricular procedures to accommodate each of the merged programs into the consolidated program, e.g., offering the corresponding concentrations, majors, or tracks of each original degree program, before AY 2026-2027
 2. Merge one or more degree programs into a preexisting degree program.
 - The institution must begin proper curricular procedures to accommodate the absorbed program(s), e.g., incorporation of the concentration(s), major(s), or track(s) into the preexisting degree program before AY 2026-2027.
 - Institutions must clarify and describe these commitments for future staff, providing complete information on every degree program effected and the ultimate programmatic outcome of the merger/consolidation.
 - **NOTE:** For accredited and licensure preparation programs, institutions must ascertain if standards permit the proposed merger/consolidation without endangering critical programmatic components.
 - For example, recent legislative action does not negate existing degree requirements within Indiana licensure rules ([REPA 3](#)) for teachers. Education preparation programs undergoing revision must ensure continued alignment to Indiana [educator standards](#) and licensing requirements; institutions should consult the Indiana Department of Education. Changes will be noted and reviewed as part of the regular educator preparation program accreditation review cycle.
- **Restricted Approval to Continue (All Others)**
 - **Restricted Approval to Continue: *Pre-July 1 Future Staff Action Commitment***
 - **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out***
 - **Restricted Approval to Continue: *Commitment to Eliminate***
 - Requests for the three **Restricted Approval to Continue** categories listed above do not need not a thorough narrative justification but must briefly explain the proposed action, particularly in terms of reprioritizing resources, and specify the anticipated timeline to initiate procedures and execute the corresponding staff action as soon as possible (before AY2026-2027). Under-threshold **‘Discretionary’** and struggling **‘Mission Aligned’** programs are *prime* candidates for these categories of restricted approval, particularly in relation to planned fiscal support.

#2 Categorize the Program's Essentialness

All requests for approval to continue must include the thoughtful categorization of the under-threshold degree program's essentialness in relation to the campus'/institution's mission, current strategic plan, limited resources, evolving program offerings, students, and the shifting needs of the region/state/nation, as either:

- **'Mission Critical';**
- **'Mission Aligned';** or
- **'Discretionary.'**

#3 Categorize the Program's Planned Fiscal Support (If Applicable)

All requests for the two **Conditional Approval to Continue** categories must provide a note in which the fiscal officer of the campus/institution provides the following categorization of planned fiscal support for the degree program, as either:

- **'Maintenance';**
- **'Enhancement';** or
- **'Reduction.'**

#4 Provide a 'Program Overview' (250-word limit)

In the **Program Overview**, campuses/institutions must briefly describe the under-threshold degree program's talent pipeline purpose, essentialness to mission, and notable programmatic elements. It can mention targeted student populations, details such as accreditation or recent authoritative rankings and awards, career relevance, high-impact practices, distinctiveness from peer programs (especially within the region/state), and, if relevant, a brief history of its evolution in response to evolving trends in serving the region/state/nation, such as mergers/splits/reorganizations, the last curricular change, and the most recent program review's findings or recommendations. The overview sets the context in which the **Rationale to Continue** (see below) can focus on a compelling, evidence-based justification for the approval category requested.

#5 Provide a 'Rationale to Continue' (500-word limit)

In the **Rationale to Continue**, institutions can respond to and contextualize data through a fact-based and context-dependent narrative justifying the approval category requested. It should elaborate on the program's essentialness to the campus'/institution's mission and planned fiscal support, as well as relative importance in relation to evolving program offerings, career relevance, and service to the region/state/nation in producing graduates prepared for high-demand, high-societal value, or priority sectors, including national security. The narrative must address student outcomes, such as completion rates, employment, earnings, in-state graduate retention, professional/graduate school preparation, or licensure passage rates, if applicable. **Program Viability Data** (See 3.1) must be addressed in terms of enrollment/completions trends and service to the wider campus/institution, such as credit hour production (undergraduate only). These datapoints can help demonstrate both the essentialness and the institution-wide contributory role of the under-threshold program. The narrative also enables the institution to outline an improvement plan to reach the statutory threshold and

address special considerations (See 5.0) as to why the under-threshold program should be continued in the manner requested.

The narrative also enables the institution to justify the merger/consolidation of degree programs, mandatory accreditation and licensure standards permitting. The request must address why the new program will be advisable and feasible in terms of serving students, maintaining quality, cost-savings, and, circumstances and special considerations permitting, reaching the statutory threshold.

Overall, relative program essentialness and planned fiscal support should be front of mind when institutions prudently prioritize **Conditional Approval to Continue** requests and **Restricted Approval to Continue: Commitment to Merge/Consolidate** requests versus other under-threshold programs that may likely need to be suspended or eliminated. For those latter two outcomes, the narrative should simply explain the proposed action, the reprioritization of resources, and specify the anticipated timeline to initiate procedures and execute the corresponding future staff action as soon as possible (before AY 2026-2027).

1.2 Q: What if an institution determines not to seek approval to continue for an under-threshold degree program?

After evaluating under-threshold programs in relation to all degree programs and the imperatives of reprioritization, an institution may determine to discontinue the normal operations for the program after AY 2025-2026, i.e., pursue Merger/Consolidation or Suspension (Teach-Out toward Elimination) for AY 2026-2027.

A campus/institution has at least three scenario-dependent options:

No Enrolled Students: Elimination

For under-threshold degree programs without enrolled students, the institution should be in a position to eliminate the program through Routine Staff Action. However, if timelines preclude prompt action, the institution should request **Restricted Approval to Continue: Commitment to Eliminate**, understanding post-July 1, 2025 approval is dependent upon this commitment and follow-through as soon as possible before AY 2026-2027. This approval category could also address degree programs that have recently completed or will soon complete their Teach-Out.

Currently Enrolled Students: Merger/Consolidation or Suspension

For under-threshold degree programs with currently enrolled students, the institution should request one of the following **Restricted Approval to Continue** categories:

- **Restricted Approval to Continue: Commitment to Merge/Consolidate** (See 1.1) in which the institution commits to promptly initiate the Merger/Consolidation procedures and file a Routine Staff Action with the Commission to formally Merge/Consolidate the degree program(s) as soon as possible, understanding post-July 1, 2025 approval to continue through AY 2025-2026 is dependent upon this

commitment and Routine Staff Action follow-through (before AY 2026-2027). The institution's **Rationale to Continue** must justify why the applicable degree program(s) should be continued after Merger/Consolidation and why the new program will be advisable and feasible in terms of serving students, maintaining quality, cost-savings, and, circumstances and special considerations permitting, reaching the statutory threshold. Institutions must clarify and describe these commitments for future staff, providing complete information on every degree program effected and the ultimate programmatic outcome of the merger/consolidation.

- **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out*** (See 1.1) in which the institution commits to initiate the Suspension procedures toward eventual Elimination through an orderly Teach-Out to accommodate all currently enrolled students regardless of their academic progress, and file a Routine Staff Action with the Commission to formally Suspend the degree program as soon as possible (before the AY 2026-2027), understanding post-July 1, 2025 approval to continue through AY 2025-2026 is dependent upon this commitment and Routine Staff Action follow-through. The Commission acknowledges requests to continue a Suspended program in Teach-Out may require years of subsequent **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out*** requests until Elimination via Routine Staff Action is feasible.

1.3 Q: *If a degree program is denied approval to continue, what does that mean, and what happens next?*

An institution will have the opportunity to meet with the Commission to review and discuss a **Final Recommendation** for the AA&Q Committee and, ultimately, the full Commission.

If an under-threshold degree program with currently enrolled students is denied approval to continue, it will be in terms of a denial to continue normal operations after AY 2025-2026: It will be granted **Restricted Approval to Continue: *Commitment to Merge/Consolidate*** or **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out***.

In preparing the **Program Viability Data** and categorizing under-threshold degree programs by essentialness and planned fiscal support, institutions will be in a better position to reprioritize and identify programs that are prime candidates for **Restricted Approval to Continue** categories.

2.0 Timing Details & Newer Degree Programs

2.1 Q: What years constitute the “immediately preceding three years”?

Since Indiana degree program data is collected and reported for state fiscal years, the immediately preceding three years under analysis post-July 1, 2025, will be fiscal years **FY2022, FY2023, and FY2024**. Fiscal Year 2025 data collection is September 1 through November 1; it will not be available and validated in a timely manner to implement the statute.

The Commission is working to validate its FY2024 degree conferral data. A preliminary list of under-threshold degree programs for the three-year period will be supplied to institutions mid- to late July. Institutions will be allowed to review the preliminary list, validate, and respond to any issues and/or inconsistencies. However, institutions should have their own FY2024 records to inform internal deliberations regarding the opportunity for voluntary early action and for post-July 1 implementation.

The Commission will collaborate with institutions to validate and arrive at a **Mutual Consensus List** of under-threshold degree programs (FY2022, FY2023, and FY2024) through a data validation process similar to the Outcomes-Based Performance Funding (OBPF) formula. This process will also identify any under-threshold degree programs in their respective **“Ramp-Up Period.”**

2.2 Q: How is the three-year average calculated?

A degree program’s average is a three-year rolling average determined by calculating the sum of all degree conferrals during the three-year period under analysis, divided by three.

2.3 Q: How long does approval last?

At least one state fiscal year. The Commission may determine to grant a multi-year **Conditional Approval to Continue** category, which may include further stipulations. Otherwise, if an institution cannot promptly eliminate an under-threshold degree program, an institution must request some form of **Approval to Continue** every year. All approval categories should address timelines:

A Conditional Approval to Continue: In “Ramp-Up Period” and Monitoring should briefly assess and describe the newer degree program’s progress toward reaching the statutory threshold before the corresponding **“Ramp-Up Period”** ends. This approval *could* be multiyear.

A Conditional Approval to Continue: With Improvement Plan and Monitoring may acknowledge a multiyear improvement plan that is likely necessary to realize an increase in degree conferrals towards the statutory threshold. This approval *could* be multiyear.

A Restricted Approval to Continue: Commitment to Merge/Consolidate and **Restricted Approval to Continue: Commitment to Suspend** must address anticipated timelines in which the necessary procedures will be initiated during AY 2025-2026 and when the corresponding staff action may be accomplished as soon as possible (before AY 2026-2027).

The Commission acknowledges requests to continue a Suspended program in Teach-Out may require years of subsequent approval requests until Elimination via Routine Staff Action is feasible. The institution must submit a **Restricted Approval to Continue: Commitment to Suspend** to simply demonstrate the Teach-Out Plan's timetable is being followed.

2.4 Q: How will newer degree programs be treated? What is the “Ramp-Up Period”?

Acknowledging that newer degree programs will need multiple years to enroll and produce graduates for at least three consecutive years, the Commission has conceptualized a **“Ramp-Up Period”** for each degree type. The duration of the period is the first fiscal year of approval and the approximate average time to completion for the respective degree type, plus three more fiscal years to build a three-year average. However, HEA 1001-2025 provides an important opportunity for institutions to revisit newer degree programs' respective performance and consider the (re)prioritization of resources if a newer degree program is encountering unexpected difficulties or campus/institutional priorities are shifting. If enrollment and completion trends suggest it is unrealistic for the newer degree program to reach the statutory threshold after the **“Ramp-Up Period,”** an institution should carefully balance the program's essentialness and planned fiscal support with the imperatives of reprioritizing scarce resources. Newer programs that have failed to meet their enrollment projections may be good candidates for merger/consolidation or suspension.

****Institutions committed to the growth and support of an under-threshold degree program still in its “Ramp-Up Period” in FY2024 should submit a Request for Conditional Approval: In “Ramp-Up Period” with Monitoring****

The **“Ramp-Up Period”** for each degree program type is summarized below in reference to FY2024 as the most recent year under analysis:

Associate Degree Program

7-Year Ramp-Up: In FY2024, new programs FY2018-forward

- First Fiscal Year
- Three Fiscal Years (Approximate Average Time to Completion)
- Three Fiscal Years (Build 3-Year Average)

Bachelor's Degree Program

10-Year Ramp-Up: In FY2024, new programs FY2015-forward

- First Fiscal Year
- Six Fiscal Years (Extended On-Time Completion)
- Three Fiscal Years (Build 3-Year Average)

Master's Degree Program

7-Year Ramp-Up: In FY2024, new programs FY2018-forward

- First Fiscal Year
- Three Fiscal Years (Approximate Average Time to Completion)
- Three Fiscal Years (Build 3-Year Average)

Education Specialist Program

7-Year Ramp-Up: In FY2024, new programs FY2018- forward

- First Fiscal Year
- Three Fiscal Years (Approximate Average Time to Completion)
- Three Fiscal Years (Build 3-Year Average)

Doctoral Degree Program

12-Year Ramp-Up: In FY2024, new programs FY2013-forward

- First Fiscal Year
- Eight Fiscal Years (Approximate Average Time to Completion)
- Three Fiscal Years (Build 3-Year Average)

2.5 Q: Can a degree program’s formal Reinstatement after a formal Suspension and curricular reorganization reset the “Ramp-Up Period”?

Yes. If a degree program underwent a formal period of Suspension through Routine Staff Action to implement a curricular reorganization and was subsequently reinstated through Routine Staff Action, the state fiscal year of the Reinstatement should be treated as the approval year for the purposes of determining the **“Ramp-Up Period.”**

When the Commission and institution collaborate to validate and arrive at a **Mutual Consensus List** of under-threshold degree programs, all programs in their respective **“Ramp-Up Period”** will be identified. Institutions must identify programs in which the above Suspension-Reinstatement scenario is applicable.

(NOTE: This special consideration is only retrospective to enactment. Institutions will not be able to use Suspension and Reinstatement Routine Staff Actions to reset a degree program’s **“Ramp-Up Period.”**)

2.6 Q: Do under-threshold degree programs still in their “Ramp-Up Period” need approval to continue?

Yes. The statute requires state educational institutions to request approval from the Commission to continue all under-threshold degree programs. However, HEA 1001-2025 provides an opportunity for institutions to revisit newer degree programs’ respective performance and consider the (re)prioritization of resources if a newer degree program is encountering unexpected difficulties or campus/institutional priorities are shifting. If enrollment and completion trends suggest it is unrealistic for the newer degree program to reach the statutory threshold after the **“Ramp-Up Period”** (See 2.4), an institution should carefully balance the program’s essentialness and planned fiscal support with the imperatives of reprioritizing scarce resources. Newer programs that have failed to meet their enrollment projections may be good candidates for merger/consolidation or suspension.

Institutions committed to the growth and support of an under-threshold degree program still in its **“Ramp-Up Period”** (See 2.4) in FY2024 should submit a **Request for Conditional Approval: In “Ramp-Up Period” with Monitoring.**

Under-threshold programs still in their respective “**Ramp-Up Period**” are excluded from the quintile-sorted lists of **Program Viability Data**: the three-year average of graduates, ‘**Replacement Ratio**’ (See 3.2), ‘**Credit Hour Production Ratio**’ (See 3.3), and ‘**Viability Index**’ (See 3.4).

2.7 Q: Does the Approval to Continue process for under-threshold degree programs change the seven-year institutional reviews in HEA1001-2025 and the Commission’s ten-year reviews in SEA448-2025?

It will not. The Commission’s review of a program during the **Approval to Continue** process for an under-threshold degree program under HEA1001-2025’s Bill Section #248 (IC 21-18-9-10.7) does not satisfy nor supplant the post-July 1 statutory requirements under:

- SEA448-2025’s Bill Section #6 (IC 21-18-9-5.5); and
- HEA1001-2025’s Bill Section #269 (IC 21-41-7).

The Commission’s upcoming 10-year program review process will attempt to synchronize with most 7-year institutional reviews to avoid duplication of effort and ensure the Commission’s utilization of timely data, findings, and recommendations. However, the Commission reserves the right to prioritize the review of a particular degree program if, for example, it was granted **Conditional Approval to Continue: With Improvement Plan and Monitoring**, perhaps once or multiple times.

3.0 Data Considerations

3.1 Q: What data must an institution submit to the Commission?

All campuses/institutions with at least one under-threshold degree program on the **Mutual Consensus List** must submit the following **Program Viability Data** to the Commission for its entire Academic Program Inventory (API), including both above-threshold and under-threshold degree programs while excluding all programs in their **“Ramp-Up Period”** (See 2.4):

- The **‘Replacement Ratio’** (See 3.2) for all degree programs;
- The **‘Credit Production Ratio’** for all undergraduate degree programs (See 3.3);
- The **‘Viability Index’** for all undergraduate degree programs (See 3.4); and.
- The statutory three-year average of graduates for all under-threshold degree programs on the **Mutual Consensus List**.

All four measures will inform simultaneous, relative comparisons of the respective campuses’/institutions’ under-threshold degree programs to each other and to above-threshold programs, excluding all programs in their **“Ramp-Up Period”** (See 2.4). (NOTE: Ivy Tech Community College and Vincennes University will submit their respective data in system-wide terms. All other state educational institutions will do so by the corresponding campus reflected in the CHEDSS API.)

3.2 Q: What is a degree program’s ‘Replacement Ratio’ for the Three-Year Period (FY22-FY24)?

For all degree programs not in their **“Ramp-Up Period”** (See 2.4), the campus/institution must submit the following enrollment and completion data for the three-year period to calculate every degree program’s **‘Replacement Ratio.’** This basic metric illuminates the number of majors in the degree program’s pipeline to replace its current level of graduate production and can be easily compared across programs.

Total Headcount of Declared Majors in the Degree Program (FY22, FY23, and FY24)

Total Degrees Awarded (FY22, FY23, and FY24)

Calculating the Degree Program-Specific ‘Replacement Ratio’:

Total Headcount / Total Degrees Awarded = X.X ‘Replacement Ratio’

- Note and exclude degree programs without a denominator (zero graduates during the three-year period). These are likely Suspended or very low performing.
- Note and exclude online multi-campus collaborative degree programs (See 5.7)

Provide the campus/institution-wide average **‘Replacement Ratio’** for each degree type for the three-year period, excluding all programs in their **“Ramp-Up Period,”** if applicable:

- Associate Degrees
- Bachelor’s Degrees
- Master’s Degrees
- Education Specialist Programs

- Doctoral Degrees

By the following degree types, provide the **‘Replacement Ratio’** for all respective programs for the three-year period in descending order and sorted by quintiles, excluding all programs in their **“Ramp-Up Period,”** if applicable:

- Associate Degrees
- Bachelor’s Degrees
- Master’s Degrees and Education Specialist Programs
- Doctoral Degrees

***NOTE:** If there are not enough under-threshold degree programs under analysis for a particular table to sort by quintiles, then sort by quartiles, if possible. If quartiles are not possible, sort by thirds. If thirds are not possible, simply rank by descending order.*

3.3 Q: What is an undergraduate degree program’s ‘Credit Hour Production Ratio’ for the Three-Year Period (FY22-FY24)?

For all undergraduate degree programs (associate and bachelor’s), the campus/institution must submit the corresponding **Credit Hour Production** tied to the degree program for the three-year period under analysis and the total **Institutional Credit Hours** for the three-year period. Dividing the former by the latter will determine the degree program’s **‘Credit Hour Production Ratio’** (see below).

This basic metric captures the undergraduate credit hours generated by the degree program for both its majors and, more importantly, the general education courses, services courses, and electives for all other majors. The measure is modality agnostic; treat on-campus and online credit hours the same. As a ratio, it approximately measures the degree program’s revenue and curricular support to the wider campus/institution relative to other degree programs. (NOTE: Ivy Tech Community College and Vincennes University will submit credit hour production spanning their entire college or university system, respectively.)

Credit Hour Production Directly Tied to the Undergraduate Degree Program (FY22, FY23, and FY24)

- Use only undergraduate credit hours tied to the *lowest possible* academic unit in relation to the degree program, e.g., Chemistry course codes for an A.S. in Chemistry or Spanish course codes for a B.A. in Spanish.
 - For example, a hypothetical B.A. in English and B.A. in Creative Writing housed in the same closest academic unit, e.g., an English Department, using English course codes should have the same Credit Hour Production, whereas a hypothetical B.S. in Chemistry and B.S. in Physics housed in a multi-discipline science department/unit, for example, will have different course codes and thus different production totals.
 - For more complicated scenarios, such as a hypothetical multilingual B.A. in Foreign/World Languages or multidisciplinary/interdisciplinary degree programs, the institution should measure the most appropriate academic department’s/unit’s **Credit Hour Production** within its respective data

system or otherwise note and exclude these degree programs from the data submission and analysis.

- Since the credit hours generated by undergraduate minors and credit-bearing certificates are captured in this higher-level data, institutions can instead highlight these details in the **Program Overview** and/or **Rationale to Continue**.

Institutional Credit Hours (FY22, FY23, and FY24)

- Use the total credit hours produced by the institution for undergraduate education.

Determining the Degree-Specific ‘Credit Hour Production Ratio’:

$$\text{Credit Hour Production} / \text{Institutional Credit Hours} = \text{X.X Credit Hour Production Ratio}$$

Provide the campus/institution-wide average **‘Credit Hour Production Ratio’** for each undergraduate degree type for the three-year period, excluding all programs in their **“Ramp-Up Period”** (See 2.4), if applicable:

- Associate Degrees
- Bachelor’s Degrees

Provide the **Credit Hour Production Ratio** for all applicable undergraduate degree programs (associate and/or bachelor’s) for the three-year period in descending order and sorted by quintiles, excluding all programs in their **“Ramp-Up Period.”**

3.4 Q: What is an undergraduate degree program’s ‘Viability Index’ for the Three-Year Period (FY22-FY24)?

For all undergraduate degree programs in which a **‘Replacement Ratio’** (See 3.2) and **‘Credit Hour Production Ratio’** (See 3.3) could be calculated, the campus/institution must also provide its calculated **‘Viability Index’** (see below). This is the product of the two ratios, encompassing three measures of relative program strength: enrollment, completions, and credit hour utilization by the campus/institution.

$$\text{‘Replacement Ratio’} \times \text{‘Credit Hour Production Ratio’} = \text{‘X.X Viability Index’}$$

Provide the campus/institution-wide average **‘Viability Index’** for each degree type, excluding all programs in their **“Ramp-Up Period”** (See 2.4), if applicable:

- Associate Degrees
- Bachelor’s Degrees

Note and exclude associate and/or bachelor’s programs in which the **‘Viability Index’** could not be calculated, such as degree programs without a denominator (zero graduates/degree conferrals) to calculate a **‘Replacement Ratio,’** online multicampus collaborative degree programs (See 5.72), or programs in which **Credit Hour Production** (See 3.3) could not be readily identified and assigned in order to make calculation.

Provide the ‘**Viability Index**’ for all applicable undergraduate degree programs (associate and/or bachelor’s) for the three-year period in descending order and sorted by quintiles, excluding all programs in their “**Ramp-Up Period**.”

3.5 Q: How will the Commission use the Ratios and Viability Indexes?

(Re)prioritization requires simultaneously examining all degree program offerings in relation to one another. The two ratios and index measures, as applicable, will also be compared to a quintile-sorted list of the campus’/institution’s under-threshold degree programs’ three-year average of graduates by the same degree type, excluding all programs in their “**Ramp-Up Period**” (See 2.4).

Across all these measures, **Replacement Ratio** (See 3.2), **Credit Hour Production Ratio** (See 3.3), as applicable, **Viability Index** (See 3.4), as applicable, and the three-year average of graduates, the following tables must sort the respective degree types’ values in descending order and by quintiles, when possible.

Three-Year Averages of Graduates, quintile sorted with no “**Ramp-Up Period**” programs by:

- Associate (*only under-threshold programs*)
- Bachelor’s (*only under-threshold programs*)
- Master’s and Education Specialist Programs together (*only under-threshold programs*)
- Doctoral (*only under-threshold programs*)

‘**Replacement Ratio**,’ quintile sorted with no “**Ramp-Up Period**” programs by:

- Associate (*all programs*)
- Bachelor’s (*all programs*)
- Master’s and Education Specialist Programs together (*all programs*)
- Doctoral (*all programs*)

‘**Credit Hour Production Ratio**,’ quintile sorted with no “**Ramp-Up Period**” programs by:

- Undergraduate Programs (*all associate and/or bachelor’s*)

‘**Viability Index**,’ quintile sorted with no “**Ramp-Up Period**” programs by:

- Undergraduate Programs (*all associate and/or bachelor’s*)

***NOTE:** If there are not enough under-threshold degree programs under analysis for a particular table to sort by quintiles, then sort by quartiles, if possible. If quartiles are not possible, sort by thirds. If thirds are not possible, simply rank by descending order.*

None of the above measures will be viewed in isolation. Placement in the bottom three quintiles (first, second, and third) for any measure, *particularly multiple measures*, must be addressed in a **Rationale to Continue** narrative, providing context in which a continued program, absent mitigating circumstances and special considerations, will make progress toward the statutory threshold through an improvement plan or merger/consolidation. For older degree programs, the measures will be strongly considered by the Commission when contemplating whether the program should be granted a **Restricted Approval to Continue** category, e.g., to merge/consolidate or suspend (with Teach-Out). With each under-threshold

degree program's essentialness and planned fiscal support front of mind, institutions must prudently prioritize **Approval to Continue** requests.

4.0 Suspensions, Teach-Outs, and Elimination

4.1 Q: Will under-threshold degree programs with currently enrolled students be eliminated before the opportunity for a Teach-Out period?

No. Currently enrolled programs will maintain normal operations through AY 2025-2026 and all students will be able to complete their studies.

The Commission acknowledges currently enrolled degree programs must undergo what is often a multiyear process towards ultimate elimination: initiating a suspension and developing a Teach-Out Plan (roughly an academic year), implementing an orderly Teach-Out Plan for all currently enrolled students regardless of their academic progress (multiple years), and, ultimately, elimination through Routine Staff Action when feasible. However, institutional preparations and commitments to follow-through with a merger/consolidation or suspension (with Teach-Out) will need to begin during AY 2025-2026.

Under [34 CFR 600.2](#), a program-specific ‘Teach-Out’ involves:

“A process during which a program, institution, or institutional location that provides 100 percent of at least one program engages in an orderly closure...”

Under [34 CFR 600.2](#), a program-specific ‘Teach-Out Plan’ involves:

“A written plan developed by an institution that provides for the equitable treatment of students if an institution, or an institutional location that provides 100 percent of at least one program,...plans to cease operations before all enrolled students have completed their program of study.”

It is the responsibility of institutions to consult the Higher Learning Commission’s requirements and procedures for initiating, implementing, and concluding a Teach-Out, some of which are available here:

- Approval of Teach-Out Arrangements policy:
 - <https://www.hlcommission.org/accreditation/policies/teach-out-arrangements/>
- Teach-Out Resources Website:
 - <https://www.hlcommission.org/accreditation/cycles-and-processes/substantive-change/teach-out-arrangements/>

For currently enrolled under-threshold degree programs, the **Restricted Approval to Continue: Commitment to Suspend with Teach-Out** approval category will accommodate these procedures. The Commission acknowledges requests to continue a Suspended program in Teach-Out may require years of subsequent approval requests until Elimination via Routine Staff Action is feasible.

4.2 Q: Do Suspended under-threshold degree programs, whether in Teach-Out or not, require approval to continue?

Yes. The statute requires state educational institutions to request approval from the Commission to continue all under-threshold degree programs. If a program is already Suspended and, for example, working toward a Teach-Out, the program must still obtain Commission approval to continue. The

Commission will approve the continuance of under-threshold Suspended degree programs that are adhering to an orderly Teach-Out Plan's timetable through the **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out*** category. The Commission acknowledges requests to continue a Suspended program in Teach-Out may require years of subsequent approval requests until Elimination via routine staff action is feasible.

5.0 Considerations: Quantitative & Qualitative

While the anticipated request for approval forms will have dedicated fields inquiring about certain considerations, a request's **Program Overview** and **Rationale to Continue** should explicitly address the below scenarios in relation to other pertinent factors. Above all, essentialness and planned fiscal support for an under-threshold degree program should be front of mind when prioritizing **Approval to Continue** requests.

5.1 Q: Will there be consideration for program size constraints beyond the institution's control, e.g., a programmatic accreditor caps the cohort size for a professional program?

Yes. The Commission will provide special consideration for under-threshold degree programs in which the accreditor caps the cohort size below or roughly at the corresponding statutory threshold, since some attrition is inevitable.

Campuses/institutions committed to the growth and support of under-threshold degree programs in these unique circumstances should consider seeking **Conditional Approval to Continue: With Improvement Plan and Monitoring**. The **Program Overview** should note and describe this scenario, and the **Rationale to Continue** should make a compelling justification to continue the program despite the constraints in reaching the statutory threshold, including details such as career relevance, service to the region/state/nation, and trends for enrollment, completion, and student outcomes. Program essentialness and planned fiscal support should be front of mind when (re)prioritizing under-threshold degree programs' requests for **Approval to Continue**.

Associate Degree Programs

5.2 Q: Will there be special consideration for Transfer Single Articulation Pathway (TSAP) associate degrees?

Yes. Since TSAP associate degrees are a statutory requirement under IC 21-42-6, the Commission will provide special consideration for these competency-based degree tracks designed to promote seamless transfer from a two-year state educational institution to a four-year state educational institution.

This applies to the current 23 TSAP associate degree programs and future additions:

- Biology
- Business Administration
- Chemistry
- Computer Science
- Criminal Justice
- Education, Early Childhood
- Education, Elementary
- Education, Special
- Electrical Engineering Technology
- Human Services

- Human Services – Social Work
- Information Technology and Informatics
- Mechanical Engineering
- Mechanical Engineering Technology
- Nursing
- Psychology
- Secondary Education – Biology
- Secondary Education – Chemistry
- Secondary Education – English
- Secondary Education – Mathematics
- Secondary Education – Social Studies (*Only offered at Ivy Tech Community College*)
- Sociology (*Only offered at Vincennes University*)

Institutions committed to the growth and support of an under-threshold TSAP associate program should submit a request for **Conditional Approval: With Improvement Plan and Monitoring** in which the **Rationale to Continue** outlines an improvement or reorganization plan to increase enrollment, completions, and realize cost savings while making progress toward the statutory threshold. Program essentialness and planned fiscal support should be front of mind when prioritizing under-threshold degree programs' requests for **Approval to Continue**.

5.3 Q: Will there be special consideration for associate degree programs utilized for stop-out or “off-ramp” purposes?

Yes. As part of SEA 448-2025's requirement for the Commission to consider the “opportunity for embedded, stackable degrees and credentials,” as well as the Commission's prioritization of these student-serving options, under-threshold associate degree programs utilized as a stop-out or “off ramp” option for certain baccalaureate programs will be provided special consideration. Typically, these associate degrees are not marketed as a standalone course of study and do not directly admit students. These details should be addressed in the request's **Program Overview** and elaborated upon in the **Rationale to Continue**. Program essentialness and planned fiscal support should be front of mind when prioritizing under-threshold degree programs' requests for **Approval to Continue**.

5.4 Q: Will there be special consideration for associate degree programs tied to a specific U.S. Department of Labor Registered Apprenticeship Program (RAP)?

Yes. As part of SEA 448-2025's requirement for the Commission to consider “the opportunity for embedded, stackable degrees and credentials” and a “work-based learning requirement,” as well as the Commission's prioritization of these student-serving options, under-threshold associate degree programs embedded into structured Registered Apprenticeship Programs (RAPs) will receive special consideration.

Institutions committed to the growth and support of an under-threshold associate degree program tied to a specific RAP should submit a request for **Conditional Approval: With Improvement Plan and Monitoring** in which the **Rationale to Continue** outlines an improvement or reorganization plan to increase enrollment, completions, and realize cost savings while making progress toward the statutory

threshold. These details should be addressed in the request's **Program Overview** and elaborated upon in the **Rationale to Continue**. Program essentialness and planned fiscal support should be front of mind when prioritizing under-threshold degree programs' requests for **Approval to Continue**.

Master's Degree Programs

5.5 Q: Will there be special consideration for master's degree programs utilized for stop-out or "off-ramp" purposes?

Yes. As part of SEA 448-2025's requirement for the Commission to consider the "opportunity for embedded, stackable degrees and credentials," as well as the Commission's prioritization of these student-serving options, master's degree programs utilized as a stop-out or "off-ramp" option for certain doctoral programs will be provided special consideration. These master's degrees may or may not be marketed as a standalone course of study or directly admit students. These details should be addressed in the request's **Program Overview** and elaborated upon in the **Rationale to Continue**. Program essentialness and planned fiscal support should be front of mind when prioritizing under-threshold degree programs' requests for **Approval to Continue**.

Education Specialist Programs

5.6 Q: Will there be special consideration for education specialist programs utilized for stop-out purposes?

Yes. As part of SEA 448-2025's requirement for the Commission to consider the "opportunity for embedded, stackable degrees and credentials," as well as the Commission's prioritization of these student-serving options, education specialists programs utilized as a stop-out or "off ramp" "option for certain graduate programs in education will be provided special consideration. These specialist programs may or may not be marketed as a standalone course of study or directly admit students. These details should be addressed in the request's **Program Overview** and elaborated upon in the **Rationale to Continue**. Program essentialness and planned fiscal support should be front of mind when prioritizing under-threshold degree programs' requests for **Approval to Continue**.

Online Programs

5.7 Q: How will online multi-campus collaborative degree programs be considered?

Online multi-campus collaborative degree programs are inherently designed to pool resources and share overhead across a multicampus system. These programs were submitted to and approved by the Commission with these aspects in mind. Unlike a traditional online program, students are enrolled through their respective campus within the wider institution's collaborative to ensure access to in-person support, student success programming, and facilities. Given their unique nature in harnessing cost-saving curricular, faculty, and administrative synergies, the Commission will provide special consideration to under-threshold online multi-campus collaborative degree programs in terms of calculating the rolling three-year average of graduates for the period under analysis.

These unique programs, regardless of **“Ramp-Up Period”** (See 2.4) status, should be flagged and addressed during the collaborative process to validate and arrive at a **Mutual Consensus List** of under-threshold degree programs. The total number of graduates/conferrals across all the constituent collaborative degree programs for the three-year period shall be considered as a single online program of study vis-à-vis the corresponding degree type threshold. If above the threshold, then all constituent degree programs of the collaborative will be removed from the **Mutual Consensus List**.

However, if an online multi-campus collaborative degree program, regardless of **“Ramp-Up Period”** status, is under-threshold in aggregate and on the **Mutual Consensus List**, all the constituent programs must seek approval to continue. They must be flagged and bundled so the Commission will treat them as one program of study. Institutional systems committed to the growth and support of a collaborative that is under-threshold in aggregate should consider **Conditional Approval to Continue: In “Ramp-Up Period” with Monitoring**, if applicable, or **Conditional Approval to Continue: With Improvement Plan and Monitoring**. The consolidated request would apply to each constituent degree program of the collaborative. These details should be addressed in the request's **Program Overview** and a compelling justification to continue the collaboration provided in the **Rationale to Continue**. Program essentialness and planned fiscal support should be front of mind when prioritizing under-threshold degree programs' requests for **Approval to Continue**.

Miscellaneous Items

5.8 Q: For non-degree programs with a six-digit CIP code and CHE program identification number, e.g., some institution's Pre-Medicine and Pre-Law or undeclared baccalaureate major programs, can these recordkeeping devices be considered under-threshold degree programs?

No. These unique programs will be removed during the collaborative process to validate and arrive at a **Mutual Consensus List** of under-threshold degree programs.