TO: State Educational Institutions

FROM: Matthew Butler, PhD, Senior Associate Commissioner and Chief Academic Officer, Indiana Commission for Higher Education

DATE: July 25, 2025

SUBJECT: Preliminary Analysis of Under-Threshold Degree Programs, FY22, FY23, FY24 and Collaboratively Developing a 'Mutual Consensus List' (I.C. 21-18-9-10.7)

Accompanying this memorandum is a **Preliminary Analysis** spreadsheet of all active and suspended degree programs at your respective institution using the Academic Program Inventory (API) data within the Indiana Commission for Higher Education's (Commission) Data Submission System (CHEDSS). Spanning state fiscal years (FY) FY2023, FY2023, and FY2024, the **Preliminary Analysis** includes each degree program's number of graduates for each state fiscal year and the average number of graduates for the three-year period. It identifies under-threshold degree programs in relation to the statutory graduate thresholds under IC 21-18-9-10.7(a) by degree type (see below table).

Three-Year Average Graduate Thresholds by Degree Type	
Degree Type	*Three-Year Average Graduate Threshold*
Associate	10
Bachelor's	15
Master's	7
Education Specialist	3
Doctoral	3

This **Preliminary Analysis** list is only a starting point.

The Commission will collaborate with institutions to develop and arrive at an eventual **Mutual Consensus List** of under-threshold degree programs. Only degrees programs on an institution's **Mutual Consensus List** must obtain approval to continue from the Commission in relation to the three-year period ending in FY2024.

Institutions must review the Preliminary Analysis spreadsheet for any issues or inconsistencies following the instructions on pages 3-6 of this memorandum.

The **Preliminary Analysis** flags older (pink) and newer (orange) under-threshold degree programs separately in relation to whether the program is either "in" or "out" of its respective "Ramp-Up Period" based on the type of degree and the state fiscal year of its approval. If a newer degree program is still in its "Ramp-Up Period" but above the threshold, it is not flagged and treated like any above-threshold program (no fill/white). The spreadsheet has the following color-coded key:

Key	Description
	Below Degree Threshold + Newer Program in "Ramp-Up Period"
	Below Degree Threshold + Older Program outside of "Ramp-up Period"
	Above Degree Threshold

The "Ramp-Up Period" for newer degree programs for the three-year period under analysis ending in FY2024 is detailed in the following table:

"Ramp-Up Period" by Degree Level Type for FY2024		
Degree Type	*Duration*	*"Ramp-Up Period"*
Associate	7 Fiscal Years	Established in FY2018 and later
Bachelor's	10 Fiscal Years	Established in FY2015 and later
Master's	7 Fiscal Years	Established in FY2018 and later
Education Specialist	7 Fiscal Years	Established in FY2018 and later
Doctoral	12 Fiscal Years	Established in FY2013 and later

The **Preliminary Analysis** specifies the first state fiscal year in which a degree program has exited (or is "out") of its respective "Ramp-Up Period." For example, a doctoral degree approved in FY2012 would exit its "Ramp-Up Period" after 12 years: FY2023 would be the last year within the period and FY2024 would be the first year outside the period. If the doctoral degree had been approved in FY2013, it would still be in its "Ramp-Up Period" in FY2024.

The **Preliminary Analysis** will not reflect any pre-July 1 Voluntary Early Actions submitted to the Commission for the June 30 meeting of the Academic Affairs & Quality Committee, whether through Routine Staff Actions or future staff action commitments. It may also not reflect all Routine Staff Actions from May or June 2025. If applicable, these should be identified and addressed through both the **Response Summary** and annotations to the **Working Table** (see pages 3-7).

Instructions: Responding to the Preliminary Analysis

Institutions should review the **Preliminary Analysis** to identify any issues and/or inconsistencies with internal records. Any issues should be documented and described through the submission of both a written **Response Summary** document and by adding the below annotations, if necessary, to a **Working Table**. Questions on completing these steps should be sent to the Commission's API@che.in.gov email address.

1. **Create a Working Table from the Preliminary Analysis**
   - Import all degree program rows from the **Preliminary Analysis** into the accompanying **Working Table Template**, filling columns 'A' ('Program Id') through 'N' ('In Ramp-Up Period').
     - An institution may pre-sort the **Preliminary Analysis**, e.g., by 'CIP Six Digit Code,' 'Program Approval Date,' or 'Degree Type,' before or after importing the information.
     - Paste over and replace the five illustrative example degree programs in rows 10-14.
   - Name and save the file as '**[Insert Institution] Working Table, FY22_FY23_FY24.**'
   - Annotate the **Working Table**, if necessary, using the below applicable steps.

2. **Identify any Informational or Data Issues:**
   - In the **Working Table**, highlight the applicable spreadsheet cells with <mark>yellow</mark>. You made add an explanatory note in the degree program's 'Comments' column ('V').
   - Address and describe the issue in the **Response Summary**.

3. **Record-Level Validation Requests:**
   - Indicate whether the institution is seeking record-level validation for certain degree programs identified under #2 using an 'x' in the 'Validation Request' column ('O').
   - Address and describe the issue in the **Response Summary**, specifying the CHEDSS Program ID#, Degree Level, and CIP Code.
   - A copy of record-level data will be provided to the institution via a secure file transfer.
   - Validation requests should be limited to under-threshold degree programs in which there is data discrepancy or issue between the **Preliminary Analysis** and the institution's records that would result in a change to the program's status as below the established threshold OR other substantiative change to the 3-year average in support of a planned request for program continuance

4. **Identify any "Ramp-Up Period" Issues**
   - Indicate whether the institution believes a particular degree program should still be in its respective "Ramp-Up Period" through FY2024 but is indicated otherwise.

- In the **Working Table**, identify the degree program using an 'x' in the 'Ramp-Up Issue' column ('P'). You made add an explanatory note in the degree program's 'Comments' column ('V').
- Address these degree programs in the **Response Summary**.

NOTE: The **Preliminary Analysis** does not account for the reinstatement of degree programs that were suspended for the purposes of reorganization. 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." Institutions must identify programs in which the above Suspension-Reinstatement scenario is applicable and provide documentation of the Reinstatement. 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" after July 1, 2025.

5. **Identify Recently Suspended Programs**
   - Identify each degree program that is marked 'Active' when it should be 'Suspended' within the 'Program Status' column ('F').
     - For example, a program may be marked 'Active' when it should be 'Suspended' due to recent Routine Staff Actions (including the Voluntary Early Actions taken pre-July 1).
     - Under-threshold suspended degree programs will be on the **Mutual Consensus List** and must still obtain **Approval to Continue**. Institutions should request *'Restricted Approval to Continue: Commitment to Suspend with Teach-Out'* for these already suspended programs.
     - If an institution made a commitment to a future suspension Routine Staff Action, the program is <u>not yet</u> 'Suspended'; the institution should refer to #7 'Identifying Future Staff Action Commitments' for flagging these still 'Active' degree programs.
   - In the **Working Table**, identify the degree program using an 'x' in the 'Recent Suspend' column ('Q'). You made add an explanatory note in the degree program's 'Comments' column ('V').
   - Specify these degree programs and their corresponding Routine Staff Action, e.g., elimination, in the **Response Summary**.

6. **Identify Recently Eliminated, Merged, or Consolidated (E/M/C) Programs**
   - Identify each degree program that was
     - Eliminated;
     - Merged into another program; or
     - Consolidated into a new degree program;

through a recent Routine Staff Actions (including the Voluntary Early Actions taken pre-July 1).

- Since these programs technically no longer exist in the API, they should be removed from the **Mutual Consensus List** and do not need to obtain approval to continue.
- In the **Working Table**, identify the degree program using an 'x' in the 'Recent E/M/C' column ('Q'). You made add an explanatory note in the degree program's 'Comments' column ('V').
- Specify these degree programs and their corresponding Routine Staff Action, e.g., elimination, in the **Response Summary**.

  NOTE: Degree programs that fit these criteria should not be on the **Mutual Consensus List** and will not require approval to continue.

7. **Identify Future Staff Action Commitments**

- Identify each degree program that was subject to a written commitment to future Routine Staff Action during the pre-July Opportunity for Voluntary Early Action, e.g., a written commitment to Suspend before AY2026-2027.
- In the **Working Table**, identify the degree program using an 'x' in the 'Future RSA Commit' column ('R'). You made add an explanatory note in the degree program's 'Comments' column ('V').
  - Under the pre-July Opportunity for Voluntary Early Action, an institution may have submitted a two-step process:
    1. Immediate Suspension through an RSA (annotate in the **Working Table**, see #5); and
    2. A written commitment to a subsequent, future RSA commitment, e.g., Merge/Consolidate (annotate in the **Working Table**, under #7).
- Specify these degree programs and their corresponding written commitment, e.g., suspension and/or merger/consolidation, in the **Response Summary**.

  NOTE: If under the corresponding statutory threshold, these degree programs should be on the **Mutual Consensus List** and must obtain approval to continue. During the Approval to Continue process, institutions should request *'Restricted Approval to Continue: Pre-July 1 Future Staff Action Commitment'* for all degree programs submitted with a future commitment during the pre-July Opportunity for Voluntary Early Action even if they included a Suspension through an RSA.

8. **Identify Online Multi-Campus Collaborative Programs**
- Identify all online multi-campus collaborative degree programs and their constituent programs.
- In the **Working Table**, identify these degree programs using an 'x' in the 'Online Collab.' column ('T').
- In the **Working Table**, specify the campuses of the entire collaborative in the 'Comments' column ('U').
- Specify and bundle these collaboratives in the **Response Summary**.

- The collaborative shall be considered as a single online program of study vis-à-vis the corresponding degree type threshold. The total number of graduates/conferrals for the three-year period across all the constituent degree programs of the collaborative will be considered in calculating the three-year average for the period under analysis. If above the threshold, then all constituent online programs of the collaborative will be removed from the **Mutual Consensus List**. If below the threshold, then all constituent online programs of the collaborative must remain on the **Mutual Consensus List**.

9. **Identify Omitted/Missing Programs**
   - Identify any degree programs omitted or missing from the **Preliminary Analysis**.
     - Degree programs recently created through Routine Staff Actions, such as Splitting a Program or Consolidating Programs, will not be included in the **Preliminary Analysis**. They will need to be added.
   - At the bottom of the **Working Table Template** are blue-field rows labeled 'For omitted programs only'. In the **Working Table**, insert the omitted degree program's information across a blue-field row's columns 'A' ('Program Id') through 'N' ('In Ramp-Up Period') and insert an 'x' in the 'Omitted' column ('S').
     - Indicate whether the omitted/missing degree program is 'Below Graduate Threshold' and 'In Ramp-Up Period' by using a '1' in the respective column, 'M' and 'N.'
     - You made add an explanatory note in the degree program's 'Comments' column ('V').
   - Specify this degree program in the **Response Summary**.

     NOTE: New degree programs created through Routine Staff Action consolidations during May, June, and June's Opportunity for Voluntary Early Action will need to be added to the **Mutual Consensus List**. Since these very new degree programs will be in their "Ramp-Up Period," institutions should request *'Conditional Approval to Continue: In "Ramp-Up Period" and Monitoring'* for these degree programs during the approval to continue process.

10. **Submission**
    - Ensure the sequence of flagged issues in the written **Response Summary** document corresponds with the order of annotations in the **Working Table**.
    - Submit the **Response Summary**, **Working Table**, and any supporting documentation challenging the **Preliminary Analysis** to the Commission's API@che.in.gov email address by close-of-business **Friday, September 19, 2025**.
    - The Commission will acknowledge receipt of submission.
    - Any requests for validation of record-level data (under #2 above) will be reviewed immediately. Requests may take up to 5 business days.

- After reviewing the **Response Summary** and **Working Table**, Commission staff may request additional information before scheduling a meeting to collaboratively develop a **Mutual Consensus List** of under-threshold degree programs.