

## **IBHE Institutional Closure Processes and Definitions**

**A Teach-Out Plan** is a written plan developed by an institution that provides for the equitable treatment of students if an institution, or an institutional location that provides 50 percent of at least one program, ceases to operate before all students have completed their program of study.

Among the first things the institution should do is to create an inventory of its students to determine how many students remain enrolled and how many credits each student must earn to graduate. It can then determine, based on this inventory, those students who may be eligible for a teach-out and those students who must transfer to other institutions to complete their degrees.

An institution that is in good standing with state, federal, and regulatory agencies and is not in a financial emergency may have some flexibility to cease operation or close a location by simply not accepting new students and continuing to offer academic programs until all students have graduated.

An alternative for an institution where the institution itself remains open and in good standing but is merely closing a campus or additional location, may be to teach-out students at another campus or additional location if the institution has such a location in the vicinity of the closing campus or location. In this case the Teach-Out Plan will need to outline the institution's intent to teach-out its own students and include information to indicate how the institution will continue to assure access to appropriate faculty and student services. When closing a campus or additional location, it is typically not acceptable to provide only distance education options to students enrolled in degree programs affected by the closure.

**A Teach-Out Agreement** is a written agreement between institutions that provides for the equitable treatment of students and a reasonable opportunity for students to complete their program of study if an institution, or an institutional location that provides 50 percent of at least one program offered, ceases to operate before all enrolled students have completed their program of study.

An institution that must close in the very near future or whose accreditation, access to Title IV funds, or degree-granting authority for one or more programs has been withdrawn must also execute a Teach-Out Agreement. The institution will need to identify possible partner Teach-Out institutions **in its vicinity** with similar programs that might be willing to accept and teach out students and approach those institutions about executing a Teach-Out Agreement.

To assist students in transfer, the institution may need to arrange for transfer fairs or other activities to help students to identify possible places to which they might transfer and then assist students with the process of applying for admission at appropriate institutions. If the institution is closing, the institution also will need to identify a location that will accept and retain student records. Finally, the institution must develop a communication plan for working with students through this transition. Once these arrangements are made, they should be explained in the Teach-Out Plan.

It also should be noted that institutions must comply with state and federal laws around records and links to:

- Personal Information Protection Act (PIPA) <http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2702>
- Family Educational Rights and Privacy Act (FERPA) <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>;  
See also <https://www.law.cornell.edu/uscode/text/20/1232g> and <http://www.aacrao.org/resources/compliance/ferpa>



## **Illinois Board of Higher Education Guidelines for Teach-Out Plan** *Degree-Granting Institution*

### **Teach-Out Plan**

Teach-Out Plans detail arrangements made for students for the following circumstances:

- The institution intends to cease operating as an educational institution.
- The U.S. Department of Education takes an emergency action, limitation, suspension, termination, or similar action against the institution.
- The institution loses institutional accreditation.
- The institution permanently closes a location at which it offers 100 percent of either a certificate or a degree program before all students enrolled at that location have completed their programs of study.
- The State and/or legal authorization to operate is revoked and the institution is no longer authorized to provide an education program in the State of Illinois.

### **The Teach-Out Plan should include the following elements:**

1. Evidence of equitable treatment of students, in particular by ensuring opportunities to complete their intended educational programs.
2. Evidence that the Teach-Out Plan provides for students to complete their degree programs within a reasonable period of time.
3. Anticipated timeline of activities, including the effective date of closure or loss of degree-granting authority, loss of access to Title IV, etc.
4. A communication plan that includes the proposed timeline and methods for notifying students, faculty, staff, and other institutional constituents of the Teach-Out Plan, including any students who may be on approved leaves of absence.
5. A plan for providing advising services and transfer fairs for students (group and/or individual meetings, dates, agenda, etc.).
6. A list of students affected and anticipated resolutions (graduation, transfer, remain at institution, participate in teach-out and at what institution, etc.). The list of students should be provided to IBHE upon notification, at a mid-point in the phase down of programs, and just prior to closure.
7. A staffing plan for transitioning the phase down of academic programs and institutional closure. Staffing must include Academic Affairs, Financial Aid, Registrar's office, and Information Technology in the transition plan.
8. If the institution is closing a location, an updated list of degree programs offered at the location and identification of any programs that are unique to the location.
9. A list of any institutional or specialized accreditations held by the institution. If the Teach-Out Plan applies to the closing of a location, a list of any specialized accreditation that applies to programs offered at that location.
10. If the institution is closing, information regarding the location of and official access to the institution's records. Institution must make preparations to transition all paper records to digital format and identify a third-party provider prior to official date of closure.



## Illinois Board of Higher Education Guidelines for Teach-Out Agreement

### *Degree-Granting Institution*

#### **Teach-Out Agreement**

An institution must include a Teach-Out Agreement in its Teach-Out Plan when:

- The institution will not be able to teach out its own students prior to its closure as an academic institution;
- The location is closing before all students attending have completed their programs of study; or
- If loss of Title IV funds will require that some students cannot complete their programs at that institution even if the institution itself will continue in business

#### **The Teach-Out Agreement must demonstrate that it meets the following conditions:**

1. The Teach-Out Agreement is with another institution (Teach-Out institution) that is accredited by or holding candidacy with an agency recognized by the U.S. Department of Education.
2. Where appropriate, the Teach-Out institution is eligible for Title IV financial aid.
3. The Teach-Out Agreement is consistent with all applicable state and federal regulations.
4. The Teach-Out institution has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and is reasonably similar in content, structure, and scheduling to that provided by the institution that is closing or ceasing operations.
5. The Teach-Out institution can provide students access to such programs and services without requiring them to move or travel substantial distances.
6. The Teach-Out institution is stable and is carrying out its mission and meeting all of its obligations to current students.
7. The Teach-Out institution provides each student with a degree audit and a breakdown of all articulated credit from the institution to the teach-out provider.
8. The Teach-Out Agreement provides students with reasonable opportunities to complete their education without additional charges. The Teach-Out Agreement includes a notification provision to ensure that students have complete information about the tuition and fees of the institution conducting the teach-out arrangement.
9. The Teach-Out Agreement will contractually outline all academic and financial incentives offered to the students. For example, the Teach-Out partner institution might waive admissions fees, provide comparable tuition and fees, waive residency requirements or an academic policy regarding transfer, and provide priority registration and advising.
10. Ideally, a few Teach-Out Agreements should be presented to the affected students to provide for choice in the completion of the closed program.



## **INSTITUTIONAL CLOSURE CHECKLIST FOR INDEPENDENT INSTITUTIONS**

**According to Illinois Administrative Rules (23 Ill. Adm. Code 1030.70), an independent institution which is closing, either voluntarily or involuntarily, is required to immediately notify the Illinois Board of Higher Education:**

### **IBHE Notice Requirements:**

- 1. Send official notice of the closure to the Academic Affairs Division (see address below).  
In addition, all institutions need to file an institutional change request in the IBHE system and upload any documentation: teach-out plan and accrediting agency communications.
- 2. Provide teach-out plans, if available or an option, for currently enrolled students who have not completed their program or course of instruction. Also provide details regarding arrangements for transferring students to another approved institution. The teach-out agreement must demonstrate equitable treatment of students and provide avenues for students to complete their degree programs within a reasonable period of time. Include all transfer agreements and provide a copy of letter to accrediting agency.
- 3. Post an Institutional Closure Website within 24 hours of the announcement with relevant information for students regarding teach-out plans, student meetings, advising assistance, financial aid questions, transfer fairs, and state regulatory and agency contact information. Provide URL for the Institutional Closure Page to IBHE.
- 4. Provide the name, email, address, and phone number of the person who will be responsible for managing the closure. Provide a list of names and contact information for those student services personnel assisting with the closure (i.e., advising, financial aid, etc), in case of a need for a referral.
- 5. Provide a list of students affected and anticipated decisions regarding teach-out for each student (graduation, transfer, remain at institution, participate in teach out and at what institution, etc.).
- 6. Provide a list of any specialized accreditation held by the institution or programs requiring licensure.
- 7. Provide a plan for the advising services offered to students (meetings, dates, agenda, etc.).
- 8. Furnish copies of all accrediting agency approvals.
- 9. Furnish copies of the communication plan that includes the proposed timeline and methods for notifying students of the teach-out plan, including any students who may be on approved leaves of absence, as well as to faculty, staff, and other institutional constituents.

### **Academic Records:**

- 10. Provide detailed information on how all original or legible true copies of the institution's academic records will be kept and it shall include, at a minimum, the academic records of each former student that is traditionally provided on an academic transcript, such as, but not limited to, courses taken, terms, grades, and other such information.
- 11. Convert all paper records to digital records at the time of closure and release all academic and financial holds on students prior to closure. Provide a list of those students with academic and financial holds.
- 12. Previous and currently enrolled students shall be notified of which institution or entity will become the custodian of all academic records for the closing school. The Board maintains a list of closed degree-granting institutions for which academic records are available.
- 13. IBHE shall be notified of where all records are located. IBHE shall be given written legal authorization for access to all facilities where academic records are stored prior to closure.

### **External Relations:**

- 14. Provide institutional spokesperson contact information to IBHE.
- 15. Provide a copy of the press release and other campus communication regarding the closure.

**Illinois Board of Higher Education, Division of Academic Affairs**  
1 N. Old Capitol Plaza, Suite 333  
Springfield, Illinois 62701-1377