



INDIANA COMMISSION *for*
HIGHER EDUCATION

TO: State Educational Institutions

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

DATE: October 6, 2025

SUBJECT: Requesting Approval to Continue Under-Threshold Degree Programs on the
'Mutual Consensus List' (I.C. 21-18-9-10.7)

Accompanying this memorandum are two documents specific to your institution:

1. **The Mutual Consensus List**, in both spreadsheet format and PDF (see page 2).
2. **The Approval Request Template** in spreadsheet format (see page 4).

Immediately below is the timeline for the under-threshold program review process, followed by instructions and explanatory information on the approval request process of submitting a complete **Approval Request Template** and the corresponding **Program Viability Data** (see **Appendix II**).

Under-Threshold Degree Program Review Timeline, AY 2025-2026 (FY2026)

Friday, July 25, 2025	Preliminary Analysis and Working Template sent to institutions by CHE
Friday, September 19, 2025	Working Table and Response Summary due to CHE from institutions
Monday, September 29, 2025	DRAFT Mutual Consensus List sent to institutions by CHE
Tuesday, September 30 – Friday, October 3, 2025	If necessary, schedule meeting
Monday, October 6, 2025	Mutual Consensus List and Approval Request Template sent to institutions by CHE
Friday, November 7, 2025	Completed Approval Request Template and Viability Data due to CHE from institutions
Monday December 1 - Friday, December 5, 2025	Meetings to discuss Staff Recommendations
December 15, 2025	Academic Affairs & Quality Committee approves/amends Staff Recommendations
January 15, 2026	Approved/amended Staff Recommendations considered by full Commission for approval/amendments

Mutual Consensus List

The **Mutual Consensus List** details the degree programs at your respective institution below the statutory graduate thresholds under [IC 21-18-9-10.7\(a\)](#) by degree type (see below table). The list also identifies newer under-threshold degree programs still within their respective “Ramp-Up Period.”

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

Each degree program listed on the Mutual Consensus List must obtain approval from the Commission to continue, in some manner, under [IC 21-18-9-10.7\(b\)](#).

The **Mutual Consensus List** is the product of the Commission and your institution working collaboratively from the **Preliminary Analysis**, circulated July 25, 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) for state fiscal years (FY) FY2022, FY2023, and FY2024.

The **Preliminary Analysis** included each program’s respective number of graduates for each state fiscal year and the average number of graduates for the three-year period. It identified under-threshold degree programs in relation to the statutory graduate thresholds under [IC 21-18-9-10.7\(a\)](#) by degree type (see table above).

The **Preliminary Analysis** was the basis for institutions to identify any issues and/or inconsistencies with internal records and recent actions, such as voluntary early commitments before July 1 and recent Routine Staff Actions. Institutional responses through a **Working Template** and **Response Summary** were due to the Commission not later than September 19. Utilizing these documents, the Commission and your institution collaboratively arrived at the enclosed **Mutual Consensus List** of under-threshold degree programs for the three-year period under analysis. That **List** has been incorporated by the Commission into the institution-specific **Approval Request Template**.

The **Mutual Consensus List** and **Approval Request Template** maintain previous documents' conditional formatting to indicate whether an under-threshold degree program is "in" or "out" of its respective "Ramp-Up Period":

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

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		
<i>Degree Type</i>	<i>Duration</i>	<i>"Ramp-Up Period"</i>
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

Approval Request Template

Institutions must address every degree program on the **Mutual Consensus List** by completing the **Approval Request Template**. Each template is customized to the institution, incorporating all the mutually agreed upon under-threshold degree programs and their respective information from the institution's **Mutual Consensus List**. Each degree type has a different sheet tab within the spreadsheet.

If you note inconsistencies or omissions between the **Mutual Consensus List** and **Approval Request Template**, immediately notify Commission staff to promptly resolve the issue. Questions on completing these steps should be sent to the Commission's API@che.in.gov email address.

All under-threshold programs at an institution are being evaluated simultaneously to enable (re)prioritization and the optimal reallocation of scarce resources. Nonetheless, each program will have its relative merits and individual context considered.

Instructions: Requesting Approval to Continue

In completing the template, an institution must provide the following information for each listed under-threshold degree program.

1. Specify the 'Approval Category Requested'

- All requests must specify the approval category requested under column ('O') using the pull-down menu.
 - There are two main category types:
 - **Conditional Approval to Continue**; and
 - **Restricted Approval to Continue**.
- **Conditional Approval to Continue**, if granted, will not change the program status of the under-threshold degree program:
 - **Conditional Approval to Continue: In "Ramp-Up Period" with Monitoring**
 - This applies to all newer, under-threshold degree programs still in their respective **"Ramp-Up Period"** an institution is committed to supporting. This approval *could* be multiyear.
 - **Conditional Approval to Continue: With Improvement Plan and Monitoring**
 - This applies to all older, under-threshold degree programs an institution is committed to supporting in its current standalone format. This approval *could* be multiyear.

- **Restricted Approval to Continue** categories will, ultimately, result in a program status change for the under-threshold degree program (or maintain its suspended/merged program status):
 - **Restricted Approval to Continue: *Pre-July 1 Future Staff Action Commitment*** – by the corresponding action type (see below):
 - ***Merge/Consolidate (Pre-AY26-27)***

Merge

- Already Merged: This pre-July 1 category applies to an under-threshold degree program that had a program or programs merged into it during the Opportunity for Voluntary Action through Routine Staff Action. Specify in the 'Details for Merger-Consolidate (Potential and/or Requested') which programs were absorbed (see #7).
- To-Be Merged: This pre-July 1 category also applies to under-threshold degree programs in which the institution made a commitment during the Opportunity for Voluntary Early Action to merge during AY 2025-2026 but has not yet filed the corresponding Routine State Action(s).
- ❖ NOTE: If, during the Opportunity for Voluntary Early Action, the institution both 1) suspended through Routine Staff Action -AND- 2) committed to merge a program, this category of approval should be requested. Given the current suspended program status, the institution is not required to follow through with a merge/consolidate Routine Staff Action if an ultimate merger/consolidation is subsequently determined to be inadvisable/unfeasible or, conversely, the program of study is being accommodated as a new concentration/track/major in an adjacent degree program. As already suspended, the degree program will be in Teach-Out toward Elimination.

Consolidate

- Already Consolidated: A new degree program resulting from an already executed pre-July 1 consolidation will be a new program in “Ramp-Up.” Institutions should simply seek **Conditional Approval to Continue: In “Ramp-Up Period” with Monitoring** for these newly consolidated programs (see further above).
- To-Be consolidated: This pre-July 1 category applies to degree programs in which the institution made a commitment during the Opportunity for Voluntary Early Action to consolidate during AY 2025-2026 but has not yet filed the corresponding Routine Staff Actions.

****If a pre-July 1 commitment was made to merge a program into another program or if programs were committed pre-July 1 to be consolidated into a new program, the action must be taken during AY 2025-2026. The corresponding merged/suspended status change for the original programs must be executed during AY 2025-2026 to initiate the Teach-Out of currently enrolled students. The resulting new, consolidated degree program should be established before the publication of the institution’s catalog/bulletin for AY 2026-2027.****

- ❖ NOTE: If, during the Opportunity for Voluntary Early Action, the institution both 1) suspended through Routine Staff Action -AND- 2) committed to consolidate programs, this category of approval should be requested. Given the current suspended program status, the institution is not required to follow through with a merge/consolidate Routine Staff Action if an ultimate merger/consolidation is subsequently determined to be inadvisable/unfeasible or, conversely, the program of study is being accommodated as a new concentration/track/major in an adjacent degree program. As already suspended, the degree program will be in Teach-Out toward Elimination.

- ***Suspend (Pre-AY26-27)***

- Already Suspended: This pre-July 1 category applies to under-threshold degree programs currently suspended because the institution filed a Routine Staff Action during the Opportunity for Voluntary Early Action.
- To-Be Suspended: This pre-July 1 category applies to degree programs in which the institution made a commitment during the Opportunity for Voluntary Early Action to suspend during AY 2025-2026 but has not yet filed the corresponding Routine Staff Action.

****If a pre-July 1 commitment was made to suspend a program, the action must be taken during AY 2025-2026 to initiate the Teach-Out of currently enrolled students. The program should not be listed in the institution's catalog/bulletin for AY 2026-2027.****

- ***Eliminate (Pre-AY26-27)***

- To-Be Eliminated: This pre-July 1 category applies to under-threshold degree programs the institution made a commitment during the Opportunity for Voluntary Early Action to eliminate during AY 2025-2026.

****If a pre-July 1 commitment was made to eliminate a program, the action must be taken during AY 2025-2026. The program should not be listed in the institution's catalog/bulletin for AY 2026-2027.****

- **Restricted Approval to Continue: *Commitment to Merge/Consolidate (Pre- or During AY26-27)***

- **Merge** one or more adjacent degree programs into a preexisting adjacent degree program. The absorbed program(s) will be accommodated through concentration(s)/track(s)/major(s) by the absorbing program.

- NOTE: If an under-threshold degree program already had one or more degree programs merged into it during the Opportunity for Voluntary Action through the execution of a Routine Staff Action, that program should instead request **Restricted Approval to Continue: *Pre-July 1***

Future Staff Action Commitment – Merge/Consolidate (Pre-AY26-27) (see above). Specify in the ‘Details for Merger-Consolidate (Potential and/or Requested’) which programs were absorbed (see #7).

- **Consolidate** two or more adjacent degree programs into a new degree program that accommodates the previous programs through concentrations/tracks/majors. Specify in the ‘Details for Merger-Consolidate (Potential and/or Requested’) which programs were absorbed (see #7).

****If this approval category requires a program to merge into another program or requires programs to consolidate into a new program, the applicable under-threshold programs must be suspended (via a Routine Staff Action) following the publication of the institution’s catalog/bulletin for AY 2026-2027; incoming students for Fall 2026 will be the last admitted cohort and the program will begin its Teach-Out. During AY 2026-2027, if not earlier, institutions will implement procedures to merge or consolidate in preparation to file the corresponding Routine Staff Action during AY 2026-2027. The new offering should be available by AY 2027-2028, if not earlier.****

○ **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out (Beginning with AY 26-27)***

- To-Be Suspended: Institution should request this category for under-threshold degree programs they intend to suspend and initiate a Teach-Out beginning with AY 2026-2027.

****If a program is to be suspended under this category, the corresponding Routine Staff Action should immediately follow the publication of the institution’s catalog/bulletin for AY 2026-2027, enabling incoming students to begin their Teach-Out. The Fall 2026 cohort will be the last admitted to the program.****

- Already Suspended: Institutions should request this category for under-threshold degree programs already suspended prior to or after the Opportunity for Voluntary Early Action as they

progress through an orderly Teach-Out toward eventual elimination.

- NOTE: If the program was already suspended but not in relation to the Pre-July 1 Opportunity for Voluntary Early Action, institutions should request this category. The Commission acknowledges requests to continue a suspended program in Teach-Out may require subsequent approval requests until elimination is feasible. This approval *could* be multiyear.

- **Restricted Approval to Continue: *Commitment to Eliminate (Pre- or Beginning with AY26-27)***
 - Programs with or soon-to-have zero enrollments should be eliminated as soon as possible, either before or immediately after the publication of the institution's catalog/bulletin for AY 2026-2027. Otherwise, the program should be suspended or remain suspended (see above).

2. Categorize '*Essentialness to Mission*'

- All requests for approval to continue must specify under column ('P') the thoughtful categorization of the under-threshold degree program's essentialness in relation to the 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.'**
 - NOTE: This categorization will contextualize the degree program alongside all other under-threshold programs seeking approval to continue from an institution. Categorizations should be applied prudently.
- Institutions should describe and elaborate upon these details in the 'Program Overview' and 'Rationale to Continue,' but only when requesting:
 - **Conditional Approval to Continue: *With Improvement Plan and Monitoring*; and**
 - **Restricted Approval to Continue: *Commitment to Merge/Consolidate (Pre- or During AY26-27).***

3. Categorize '*Planned Fiscal Support*' for Certain Approval Categories

- Only requests for:
 - **Conditional Approval to Continue: *In “Ramp-Up Period” with Monitoring;***
 - **Conditional Approval to Continue: *With Improvement Plan and Monitoring;***
 - **Restricted Approval to Continue: *Pre-July Future Staff Action Commitment – Merge/Consolidate (Pre-AY26-27);* and**
 - **Restricted Approval to Continue: *Commitment to Merge/Consolidate (Pre- or During AY26-27);***

; must categorize under column ('Q') the institution's **Planned Fiscal Support** for the degree program, as either:

- **'Enhancement';**
 - **'Maintenance';** or
 - **'Reduction.'**
 - For all other approval category requests, select '**N/A.**'
- NOTE: Categorizing a program's **Planned Fiscal Support** as '**Maintenance**' should not be construed as endangering or undermining a request to continue the program as each situation is context- and facts-dependent, e.g., the program's three-year average for the period under analysis was very close to the statutory threshold, the program is already on a demonstrable growth trend to reach the statutory threshold very soon, and/or special considerations apply to the program. Moreover, the categorization of '**Reduction**' could comport with the requested merger/consolidation of the particular under-threshold program(s).

4. Address Degree Type-Specific Special Considerations

- The [Preliminary Guidance and FAQ](#) (June 13, 2025) addressed various special considerations (Section 5.0), many of which were specific to degree type.
- As applicable, address the following considerations using the table's Y/N format:
- **Associate**
 - Specify whether the associate degree is:
 - One of the 23 formalized **Transfer Single Articulation Pathway (TSAP)** [associate degrees](#) in column ('R').
 - A **Registered Apprenticeship Program (RAP)** program in column ('S').
 - A **stop-out or "off-ramp" degree** for a baccalaureate program in column ('T'). Specify these degree(s) in the 'Program Overview' and their threshold status.
 - Part of an **Online, Multicampus Collaborative** in column ('U'). Identify the other constituent degree programs in the 'Program Overview.'
- **Bachelor's**
 - Specify whether the Bachelor's degree is:
 - Formally [articulated](#) to one of the 23 formalized **Transfer Single Articulation Pathway (TSAP)** associate degrees in column ('R'). Specify the TSAP in the 'Program Overview.'
 - Part of an **Online, Multicampus Collaborative** in column ('S'). Identify the other constituent degree programs in the 'Program Overview.'
- **Master's**
 - Specify whether the Master's degree is:
 - A **stop-out or "off-ramp" degree** for a doctoral program in column ('R'). Specify the degree(s) in the 'Program Overview' and their threshold status.
 - Part of an **Online, Multicampus Collaborative** in column ('S'). Identify the other constituent degree programs in the 'Program Overview.'

- **Education Specialist Program**
 - Specify whether the Education Specialist Program is:
 - A **stop-out or “off ramp”** degree for a doctoral program in column ('R'). Specify the degree(s) in the 'Program Overview' and their threshold status.
 - Part of an **Online, Multicampus Collaborative** in column ('S'). Identify the other constituent degree programs in the 'Program Overview.'
- **Doctoral**
 - Specify whether the doctoral program is:
 - Part of an **Online, Multicampus Collaborative** in column ('R'). Identify the other constituent degree programs in the 'Program Overview.'

5. Provide a 'Program Overview' (Maximum of 250 Words)

- The 'Program Overview' will be assigned a rubric evaluation (**Appendix I**) and is a critical component when requesting:
 - Conditional Approval to Continue: *With Improvement Plan and Monitoring*; and**
 - Restricted Approval to Continue: *Commitment to Merge/Consolidate (Pre- or During AY26-27)*.**

Approval Categories Requiring a 'Program Overview' and 'Rationale to Continue'		
	Program Overview	Rationale to Continue
Conditional Approval to Continue		
Conditional Approval to Continue: <i>In "Ramp-Up Period" with Monitoring</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Conditional Approval to Continue: <i>With Improvement Plan and Monitoring</i>	Yes, critical component.	Yes, critical component.
Restricted Approval to Continue		
Restricted Approval to Continue: <i>Pre-July 1 Future Staff Action Commitment - Suspend (Pre-AY26-27)</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Restricted Approval to Continue: <i>Pre-July 1 Future Staff Action Commitment - Merge/Consolidate (Pre-AY26-27)</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Restricted Approval to Continue: <i>Pre-July 1 Future Staff Action Commitment - Eliminate (Pre-AY26-27)</i>	<i>No, unnecessary.</i>	Only specify zero-enrollments or Teach-Out Status
Restricted Approval to Continue: <i>Commitment to Merge/Consolidate (Pre- or During AY26-27)</i>	Yes, critical component.	Yes, critical component.
Restricted Approval to Continue: <i>Commitment to Suspend with Teach-Out (Beginning with AY26-27)</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Restricted Approval to Continue: <i>Commitment to Eliminate (Pre- or Beginning with AY26-27)</i>	<i>No, unnecessary.</i>	Only specify zero-enrollments or Teach-Out Status

- The 'Program Overview' sets the context in which the 'Rationale to Continue' (see #6) can focus on a compelling, evidence-based justification for the approval category requested.
 - It will be assessed based on the guidance provided in the [Preliminary Guidance and FAQ](#) (June 13, 2025) and this memorandum using the evaluation rubric in **Appendix I**.
- The 'Program Overview' is unnecessary and will not be assigned a rubric evaluation (**Appendix I**) when requesting:
 - **Conditional Approval to Continue: *In "Ramp-Up Period" with Monitoring***;
 - **Restricted Approval to Continue: *Pre-July 1 Future Staff Action Commitment* –**
 - *Suspend (Pre-AY26-27)*
 - *Merge/Consolidate (Pre-AY26-27)*;
 - *Eliminate (Pre-AY26-27)*;
 - **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out (Beginning with AY26-27)***; or
 - **Restricted Approval to Continue: *Commitment to Eliminate (Pre- or Beginning with AY26-27)***.
- In the 'Program Overview,' institutions must briefly describe the under-threshold degree program's talent pipeline purpose:
 - What problem is it solving?
 - How is it serving students as well as the region/state/nation in terms of current and future talent needs?
 - What is the occupational outlook?
 - How are students provided market-informed career advising and facilitated connections with employment opportunities, particularly in-state?
 - &c.
- A brief description of any claimed special considerations (see #4), such as the program's usage in a formalized **TSAP** pathway, an **Online Multicampus Collaborative**, as a **stop-out or "off-ramp" degree**, or in a **Registered Apprenticeship Program (RAP)**, should be provided in the 'Program

Overview.’ If elaboration is necessary, utilize the ‘Rationale to Continue’ (see #6).

- Explain the thoughtful categorization of the under-threshold degree program’s **Essentialness to Mission** (see #2) in relation to the institution’s current strategic plan, limited resources, evolving offerings, students, and the shifting needs of the region/state/nation. If elaboration is necessary, utilize the ‘Rationale to Continue’ (see #6).
- Explain the **Planned Fiscal Support** categorization (see #3), if applicable. If elaboration is necessary, such as in relation to a proposed **Improvement Plan** to grow enrollment/conferrals toward the statutory threshold, utilize the ‘Rationale to Continue’ (see #6).
- Address and briefly describe **notable programmatic and curricular features**, such as the academic unit(s) delivering the program; high-impact, student-serving practices such as a **work-based or experiential learning requirement**, capstone experiences, and program-tailored career courses; opportunities or options for **embedded, stackable credentials/degrees, credit for prior learning**, and **accelerated delivery**.
 - The institution may wish to briefly highlight popular minors and credit-bearing certificates, but these should be reflected in the **Viability Data** measures for the **Credit Hour Production Ratio** and, by extension, the **Viability Index**.
 - For **stackable pathways** that culminate in an associate degree program, specify any embedded, stackable credit-bearing certificates. Specify if enrollment and completions are robust. As part of requirements under [IC 21-18-9-5\(b\)](#) for the Commission to consider the “opportunity for embedded, stackable degrees and credentials” and “options for accelerated delivery,” pathways that culminate in an associate degree in which there is an embedded, credit-bearing certificate that typically results in immediate workforce entry will receive some special consideration. An institution seeking approval to continue an associate degree under this scenario must demonstrate the corresponding long-term certificate is robust on many levels—enrollment, completion, workforce demand/relevance, post-graduation student outcomes, etc.—to make a compelling, evidence-based argument in the ‘Rationale to Continue’ (see #6) that the stackable pathway should remain intact and continue with efforts (via an **Improvement Plan**) to grow enrollment/conferrals toward the statutory threshold.

- Briefly address, if applicable, any **programmatic accreditation or certification**, recent **authoritative rankings and awards**, and other elements of distinction in serving students, the wider institution, and/or the region/state/nation. If elaboration is necessary, utilize the 'Rationale to Continue' (see #6).
- Briefly summarize how the program has been **responsive to evolving workforce and/or disciplinary trends** in serving the region/state/nation. If applicable, this may include a brief history of the program. If elaboration is necessary, utilize the 'Rationale to Continue' (see #6).

6. Provide a 'Rationale to Continue' (Maximum of 1,000 Words)

Approval Categories Requiring a 'Program Overview' and 'Rationale to Continue'		
	Program Overview	Rationale to Continue
Conditional Approval to Continue		
Conditional Approval to Continue: <i>In "Ramp-Up Period" with Monitoring</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Conditional Approval to Continue: <i>With Improvement Plan and Monitoring</i>	Yes, critical component.	Yes, critical component.
Restricted Approval to Continue		
Restricted Approval to Continue: <i>Pre-July 1 Future Staff Action Commitment - Suspend (Pre-AY26-27)</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Restricted Approval to Continue: <i>Pre-July 1 Future Staff Action Commitment - Merge/Consolidate (Pre-AY26-27)</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Restricted Approval to Continue: <i>Pre-July 1 Future Staff Action Commitment - Eliminate (Pre-AY26-27)</i>	<i>No, unnecessary.</i>	Only specify zero-enrollments or Teach-Out Status
Restricted Approval to Continue: <i>Commitment to Merge/Consolidate (Pre- or During AY26-27)</i>	Yes, critical component.	Yes, critical component.
Restricted Approval to Continue: <i>Commitment to Suspend with Teach-Out (Beginning with AY26-27)</i>	<i>No, unnecessary.</i>	<i>No, unnecessary.</i>
Restricted Approval to Continue: <i>Commitment to Eliminate (Pre- or Beginning with AY26-27)</i>	<i>No, unnecessary.</i>	Only specify zero-enrollments or Teach-Out Status

- The 'Rationale to Continue' will be assigned a rubric evaluation (**Appendix I**) and is a critical component when requesting:
 - **Conditional Approval to Continue: *With Improvement Plan and Monitoring***; and
 - **Restricted Approval to Continue: *Commitment to Merge/Consolidate***
- The 'Rationale to Continue' for the above two approval request categories must provide a fact-based and context-dependent narrative justifying the approval category requested.
 - It will be assessed based on the guidance provided in the [Initial Guidance and FAQ](#) (June 13, 2025) and this memorandum using the evaluation rubric in **Appendix I**.
 - Overall, relative program **Essentialness to Mission** and **Planned Fiscal Support** should be front of mind when institutions prudently prioritize these two request categories versus other under-threshold programs that are less essential and, perhaps, less viable. Moreover, relatively lower enrollment, low-producing degree programs may be detracting from '**Mission Critical**' and '**Mission Aligned**' degree programs.
- The 'Rationale to Continue,' when applicable, should briefly elaborate on the program's **Essentialness to 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, and/or priority sectors, including national security.
- Very importantly, the narrative enables the institution, as applicable, to outline a multiyear **Improvement Plan**, whether already underway or forthcoming, to realize an increase in enrollments and degree conferrals towards the statutory threshold as well as potentially incorporate student-serving, high-impact programmatic features.
- The narrative also enables the institution to justify the **merger/consolidation** of adjacent degree programs, mandatory accreditation and licensure standards permitting. The narrative can also address whether a potential, non-requested merger/consolidation is not advisable and feasible (see #7).
 - For **merger** requests, the 'Rationale to Continue' must address why the merger of one or more programs into adjacent 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.

- Likewise, for **consolidation** requests, the 'Rationale to Continue' must address why the newly consolidated 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.
- As applicable, the narrative should address at least some key measures, metrics, and programmatic features the Commission must consider under [IC 21-18-9-5\(b\)](#) and in the Commission's [New Degree Program Proposal](#) application packet,
 - As applicable, the narrative should address **Student outcomes** such as career relevance and workforce alignment, labor market supply and demand for the course of study's learning outcomes and graduates, student outcomes (completion rates, employment, earnings, in-state graduate retention, professional/graduate school preparation, or licensure passage rates, if applicable),
 - As applicable, the narrative should address **Programmatic features**, like opportunities for embedded, stackable credentials, opportunities for credit for prior learning, accelerated delivery options, high-impact practices, such as work-based or experiential learning requirements, career exploration courses, and capstone courses, specialized programmatic accreditation (if applicable), facilitated connections between students and employment opportunities, and other student-serving, high-impact practices.
- **Program Viability Data** (see **Appendix II**) should be addressed in terms of enrollment/completions trends and/or service to the wider campus/institution, such as credit hour production (undergraduate only). These data points can help demonstrate both the essentialness and the institution-wide contributory role of the under-threshold program.
 - Overall, no one **Program Viability Data** measure will be considered in isolation, but the 'Rationale to Continue' should address their interplay and the wider context in which a continued program, absent special considerations, will make progress toward the statutory threshold through an improvement plan or merger/consolidation.
 - None of the **Program Viability Data** measures will be viewed in isolation.

- If the institution has not historically reported **dual degrees and double majors** via annual CHEDSS collection, institutions may opt to include these figures when seeking approval to continue the applicable program:
 - It should be noted and incorporated into the headcounts and conferrals for its **Program Viability Data**: the **Three-Year Average of Graduates** (*all under-threshold programs only*) and the **Replacement Ratio** (*all programs*), the latter of which, by extension, will be reflected in the **Viability Index** (*only undergraduate programs*).
 - Including unreported **dual degree and double major** conferrals should be addressed in the 'Rationale to Continue' only when seeking:
 - **Conditional Approval to Continue: *With Improvement Plan and Monitoring***
 - **Restricted Approval to Continue: *Commitment to Merge/Consolidate***
 - ❖ The institution should include a written plan in its 'Rationale to Continue' for how it will begin accurately reporting all degrees earned to the Commission as part of the annual CHEDSS data collection.
- The 'Rationale to Continue' will not be assigned a rubric evaluation (**Appendix I**) but should be very brief when requesting:
 - **Restricted Approval to Continue: *Pre-July 1 Future Staff Action Commitment- Eliminate (Pre-AY26-27)***
 - For a ***Commitment to Eliminate***, the institution should very briefly specify the program has zero-enrollment or will have completed the Teach-Out of enrolled students by the anticipated filing of the corresponding Routine Staff Action before AY 2026-2027, ideally before the publication of the institution's catalog/bulletin for AY 2026-2027. Otherwise, the program should instead be suspended or remain suspended.
 - **Restricted Approval to Continue: *Commitment to Eliminate (Pre-or Beginning with AY26-27)***

- The institution should very briefly specify the program has zero-enrollment or will have completed the Teach-Out of all enrolled students by the anticipated filing of the corresponding Routine Staff Action before or beginning with AY 2026-2027. Otherwise, the program should instead be suspended or remain suspended (see above).
- The 'Rationale to Continue' will not be assigned a rubric evaluation (**Appendix I**) and it is unnecessary when requesting:
 - **Conditional Approval to Continue: *In "Ramp-Up Period" with Monitoring*;**
 - **Restricted Approval to Continue: *Pre-July 1 Future Staff Action Commitment – Merge/Consolidate (Pre-AY26-27)*;**
 - Since commitments and actions during the pre-July 1 Opportunity for Voluntary Early Action reflect institutions proactively reviewing and acting upon their under-threshold degree programs in preparation to implement the statute, the Commission will approve this approval category if it is in keeping with the pre-July 1 submission or the institution has already executed the corresponding action.

****If an under-threshold program was committed pre-July 1 to an eventual merger into another program or if under-threshold programs were committed pre-July 1 to consolidate into a new program, the action must be taken during AY 2025-2026. The program resulting from these actions should be available for AY 2026-2027; the Teach-Out for the merged or consolidated degrees should begin either AY 2025-2026 or AY 2026-2027.****
 - **Restricted Approval to Continue: *Pre-July 1 Future Staff Action Commitment – Suspend (Pre-AY26-27)*;**
 - If one or more degree programs were already suspended in fulfillment of a Voluntary Early Action during the Opportunity for Voluntary Early Action, an institution should request this category of approval; the status should have been updated to Suspended when finalizing the Mutual Consensus List.

- **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out (Beginning AY26-27)***

- To-Be Suspended: The institution can provide the anticipated timeline to file the corresponding Routine Staff Action before (or beginning with) AY 2026-2027 and the estimated duration of the Teach-Out, but it is unnecessary .

****If an under-threshold program is to be suspended under this category, it should follow the publication of the institution's catalog/bulletin for AY 2026-2027, enabling incoming students to begin their Teach-Out; the Fall 2026 cohort will be the last admitted to the suspended under-threshold program.****

- NOTE: If the program was already suspended but not in relation to the Pre-July 1 Opportunity for Voluntary Early Action, institutions should request this category: **Restricted Approval to Continue: *Commitment to Suspend with Teach-Out (Beginning with AY26-27)***. This will distinguish the program from Voluntary Early Actions. The Commission acknowledges requests to continue a suspended program in Teach-Out may require subsequent approval requests until elimination is feasible. This approval *could* be multiyear.

7. Provide 'Details for Merger-Consolidation (Potential and/or Requested)'

- All requests for **Conditional Approval to Continue: With Improvement Plan and Monitoring** should include information on:
 - *Potential* merger/consolidation options for the degree program, *if advisable and feasible*:
 - The *potential* to **merge** one or more adjacent degree programs into a preexisting adjacent degree program. The absorbed program(s) will be accommodated through concentration(s)/track(s)/major(s) by the absorbing program.
 - The *potential* to **consolidate** two or more adjacent degree programs into a new degree program that accommodates the previous programs through concentrations/tracks/majors.
 - In making determinations, the Commission *may* determine an under-threshold degree program or adjacent programs should be merged/consolidated *instead* of being granted **Conditional Approval to Continue: With Improvement Plan and Monitoring**. Therefore, institutions should include the above potential merger/consolidation options, if applicable.

****If Restricted Approval to Continue requires an under-threshold program to merge into another program or requires under-threshold programs to consolidate into a new program, the applicable under-threshold programs must be suspended (via a Routine Staff Action) following the publication of the catalog/bulletin for AY 2026-2027; incoming students for Fall 2026 will be the last admitted cohort and the program will begin its Teach-Out. During AY 2026-2027. Institutions will implement procedures to merge or consolidate in preparation to file the corresponding staff action(s) during AY 2026-2027 and to provide the new offering by AY 2027-2028, if not earlier.****

- All requests for a Commitment to Merge/Consolidate—**Restricted Approval to Continue: Commitment to Merge/Consolidate** and a merger/consolidation commitment during the Opportunity for Voluntary Early Action (**Restricted Approval to Continue: Pre-July Future Staff Action Commitment – Merge/Consolidate**)—must include technical details, if available.

8. Submission

- Submit the completed **Approval Request Template**, the corresponding **Viability Data**, and any supporting documentation to the Commission's API@che.in.gov email address by close-of-business **Friday, November 7, 2025**.
- The Commission will acknowledge receipt of submission.
- After reviewing the materials, Commission staff may request additional information before scheduling a meeting to discuss **Staff Recommendations** to be presented before the Commission's Academic Affairs & Quality Committee meeting on **Monday, December 15, 2025**.
 - Committee-approved/amended **Staff Recommendations** are tentatively slated for the full Commission's consideration at its **Thursday, January 15, 2026** meeting.

APPENDIX I: Approval to Continue Evaluation Rubric

Program Overview (max. 250 words)

- NOTE: The **Program Overview** is only necessary when requesting either 1) ‘Conditional Approval to Continue: *With Improvement Plan and Monitoring*’ or 2) ‘Restricted Approval to Continue: *Commitment to Merge/Consolidate*.’ For all other approval categories, it will not be assigned a rubric evaluation (below); it is unnecessary but can be very brief.
- In the **Program Overview**, institutions must briefly describe the degree program’s talent pipeline purpose, explain its **Essentialness to Mission** categorization, specify any **special considerations** under Section 5.0 of the Commission’s [Initial Guidance and FAQs](#), and address any **mitigating circumstances** vis-à-vis reaching the statutory threshold. The **Rationale to Continue** should elaborate on these details.
- The overview should briefly **address key curricular and programmatic features** under [IC 21-18-9-5\(b\)](#) and the Commission’s [New Degree Program Proposal](#) application packet, such as **career relevance** and the **occupational outlook, labor market-informed career advising**, and **facilitated connections with employment opportunities**, particularly in-state.
 - It should briefly describe noteworthy programmatic elements, such as any opportunities or options for **embedded, stackable credentials/degrees** (e.g., credit-bearing certificates and stop-out degrees), **accelerated delivery** (e.g., Degree-in-3 or 4+1), **credit for prior learning**, and, especially, **high-impact, student-serving practices** (e.g., **work/experiential-based learning requirements, capstone experience(s)**, and program-tailored **career courses**). Other aspects such as programmatic **accreditation/certification, recent authoritative rankings and awards**, distinctiveness from peer programs, and, if relevant, a brief history of how the program has remained **responsive to evolving workforce/disciplinary trends** in serving the region/state/nation.
- 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 for the program, such as continuance under an **Improvement Plan** or through **merger/consolidation**.

Inadequate	Needs Improvement	Promising
Several of the following apply: The program does not have a compelling talent pipeline purpose and/or lacks examples of notable programmatic elements of quality and student-serving features. Indications of career relevance and/or responsiveness are missing or weak. The program’s purpose in relation to mission and/or strategic plan alignment is unclear.	Several of the following apply: The program has a clear talent pipeline purpose. The program can cite only limited examples of programmatic quality, distinction, and/or student-serving, high-impact practices. There are some indications of responsiveness to evolving workforce/disciplinary trends. The program’s essentialness and strategic alignment are understandable.	The program has a compelling talent pipeline purpose that is clearly career relevant. Several of the following apply: The program has multiple programmatic elements indicating quality and high impact for students. It can cite recent, noteworthy examples of responsiveness and innovation. The essentialness to mission and strategic alignment of the program is coherent and convincing.

Rationale to Continue (max. 1,000 words)

- **NOTE:** The **Rationale to Continue** is a critical component when requesting either 1) ‘Conditional Approval to Continue: *With Improvement Plan and Monitoring*’ or 2) ‘Restricted Approval to Continue: *Commitment to Merge/Consolidate*.’ For all other approval categories, it will not be assigned a rubric evaluation (below); it is unnecessary but can be very brief.
- 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 Mission, Planned Fiscal Support**, and strategic (re)allocation of limited resources, as well as any **special considerations** and/or **mitigating circumstances** pertaining to its under-threshold status.
- Noteworthy programmatic features and high-impact, student-serving practices from the **Program Overview** should be described further.
- The program’s relative importance should be addressed in relation to **service to the region/state/nation** in producing well-prepared graduates for high-demand, high-societal value, and/or priority sectors, including national security.
- It must address **student outcomes** under [IC 21-18-9-5\(b\)](#) and the Commission’s [New Degree Program Proposal](#) application packet, such as completion rates, employment, earnings, in-state graduate retention, professional/graduate preparation, and/or licensure passage rates.
- **Program Viability Data** must be addressed in terms of **enrollment/completions trends** particularly in relation to other programs.
 - Is the program declining, stagnant, or growing, and why?
 - If the conferral of **dual degrees** and/or **double majors** results in reaching/exceeding the threshold or would otherwise bolster the justification, institutions should note this in the narrative. More recent data, e.g., FY2025, may also be cited in support.
 - What is the program’s **service to the wider institution**, such as credit hour production (*undergraduate programs only*)?
- If applicable, the narrative enables the outlining of an **Improvement Plan** to improve viability (enrollment/conferrals) toward the threshold; it may also include planned implementation of new programmatic features and high-impact, student-serving practices under [IC 21-18-9-5\(b\)](#).
- The narrative also enables an institution to address potential and/or requested **mergers/consolidations**. The request must address why a curricular reorganization will (or, conversely, would not) be advisable and feasible in terms of serving students, maintaining quality, realizing cost-savings, and, special considerations permitting, making progress toward the statutory threshold.

Inadequate	Needs Improvement	Promising
The program’s difficulties stand apart from other under-threshold programs. Several of the following apply: There are no special considerations or mitigating circumstances. Examples of the program providing institutional or external service are lacking or weak; its strategic role is comparatively marginal. Student outcomes and/or Program Viability Data are concerning. Noteworthy programmatic features are absent or unremarkable. The Improvement Plan, if proposed, is unlikely to make appreciable progress toward the threshold. The rationale does not demonstrate a merger/consolidation is advisable nor is the continuance of a standalone degree.	Several of the following apply: There are special considerations or mitigating circumstances. There are limited examples of internal and/or external service; its continuance, in some form, aligns with mission/strategy. Student outcomes and/or Program Viability Data are not concerning. There are limited examples of noteworthy programmatic features. The Improvement Plan is plausible. The rationale demonstrates the program should be continued through merger/consolidation or, if that is not feasible, as a standalone program under close adherence to the proposed Improvement Plan.	The program stands apart and clearly above most of the institution’s other under-threshold programs. Several of the following apply: There are compelling special considerations and/or mitigating circumstances in relation to its under-threshold status. The program provides demonstrable internal and/or external service; its role and continuance are strategic. Student outcomes and/or Program Viability Data are robust. There are multiple examples of noteworthy programmatic features. The rationale and Improvement Plan demonstrate standalone continuance is promising.

APPENDIX II: Program Viability Data

As detailed in Section 3.0 of the [Initial Guidance and FAQ](#) (June 13, 2025), all institutions with at least one under-threshold degree program on the **Mutual Consensus List** (and in their **Approval Request Template**) must submit the following **Program Viability Data** to the Commission for its entire Academic Program Inventory (API) for that particular campus/institution, including both above-threshold and under-threshold degree programs (while excluding all programs in their “**Ramp-Up Period**”):

- The ‘**Replacement Ratio**’ for all programs (see Section 3.2 of the [Initial Guidance and FAQ](#));
- The ‘**Credit Production Ratio**’ for all undergraduate programs (Section 3.3 of the [Initial Guidance and FAQ](#));
- The ‘**Viability Index**’ for all undergraduate programs (Section 3.4 of the [Initial Guidance and FAQ](#)); and.
- The **Three-Year Average of Graduates** for all under-threshold degree programs (from **Mutual Consensus List**).

(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/institution reflected in the CHEDSS API.)

All four measures must be submitted in Excel Spreadsheet format containing 10 separate sheet tabs for each of the following tables, as applicable to the institution, sorted into quintiles in descending order, when possible:

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

1. Associate (*only under-threshold programs*)
2. Bachelor’s (*only under-threshold programs*)
3. Master’s (*only under-threshold programs*)*
4. Education Specialist Programs -AND- Doctoral (*only under-threshold programs*)*

****CORRECTION****: The *Initial Guidance and FAQ* incorrectly paired masters and education specialist programs for this sorted list; instead, the education specialist programs and doctoral programs should be in the same list and sorted together.

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

5. Associate (*all programs*)
6. Bachelor’s (*all programs*)
7. Master’s (*all programs*)*
8. Education Specialist Programs -AND- Doctoral (*all programs*)*

****CORRECTION****: The *Initial Guidance and FAQ* incorrectly paired masters and education specialist programs for this sorted list; instead, the education specialist programs and doctoral programs should be in the same list and sorted together.

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

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

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

10. 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 terciles (thirds). If terciles are not possible, simply rank by descending order.*

All four measures will inform simultaneous, relative comparisons of the respective institution’s under-threshold programs to each other and to above-threshold programs, excluding all programs in their **“Ramp-Up Period.”** The two ratios and index measures, as applicable, will also be compared to a quintile-sorted list of the campus’s/institution’s under-threshold degree programs’ three-year average of graduates by the same degree type, excluding all programs in their **“Ramp-Up Period.”**

None of the above measures will be viewed in isolation given the importance of the ‘Program Overview’ and, most especially, ‘Rationale to Continue.’ Placement in the bottom three quintiles for any measure, *particularly multiple measures*, should be addressed in the ‘Rationale to Continue’ (see #6 and **Appendix I**).