

APPROVED

March 13, 2024

Melissa Bealon

Board Secretary Melissa Bealon

Item #E-3

March 13, 2024

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY
FOR INDEPENDENT INSTITUTIONS**

Submitted for: Action.

Summary: New independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of the original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions are also required to obtain authorization for each new degree program.

Action Requested: That the Illinois Board of Higher Education deny the following:

Trillium University

- Operating Authority in the Chicago Region

STATE OF ILLINOIS
BOARD OF HIGHER EDUCATION

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY
FOR INDEPENDENT INSTITUTIONS**

The Illinois Board of Higher Education (IBHE) has responsibility for administration of The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010). Under these statutes, new independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions are also required to obtain authorization for each new degree program.

Applications for new operating and degree-granting authority submitted by independent Illinois institutions and out-of-state institutions are reviewed by the staff. Recommendations are developed by applying criteria for operating and/or degree-granting authority, which are defined in the rules adopted for administration of the statutes and Board policies on assessment of student learning and specialized accreditation requirements for student licensure. These criteria encompass educational objectives, institution and degree titles, curricula, facilities, faculty and administrator qualifications, student policies, publications, records, compliance with pertinent laws, and fiscal stability. Staff recommendations are based on analyses of application materials, responses to questions, and site visits. Out-of-region sites are defined as sites located within an IBHE approval region other than the region within which an institution's original operating authority was granted. There are ten IBHE approval regions; each is coterminous with one or more community college districts. Approval to operate within a new approval region entitles an institution to operate throughout the region, and not solely at the site at which the institution initially applied. In addition to the approval criteria in rules, each new program was reviewed for its contributions to the goals of *A Thriving Illinois: Higher Education Pathways to Equity, Sustainability, and Growth*, which sets forth new priorities to guide Illinois higher education. Staff recommendations are based on analyses of application materials and responses to staff questions.

This item includes recommendations to deny operating authority to one institution.

Staff Recommendation and Rationale

1030.30 (b)(8) The Executive Director of the Board will submit the staff recommendation for action to the Board at a regular meeting. The Chief Executive Officer of the institution, or a designee, will be invited to attend and may be asked to respond to Board questions. In the event the staff recommendation is negative, the applicant shall be given an opportunity to respond in writing. This response shall be transmitted to the Board at the same time as the staff recommendation.

The staff of the Illinois Board of Higher Education has reviewed the application for authorization to operate in the Chicago Region submitted by Trillium University and recommends that the Board deny the application. The following is a discussion regarding the institution's failure

to meet specific criteria provided in the Private College Act (110 ILCS 1005), Academic Degree Act (110 ILCS 1010), and the related Administrative Code (Admin. Code) (Ill. Admin. Code tit. 23, § 1030(2017)).

Staff Conclusion: Staff recommends denial of the application for operating authority.

Trillium University
20 N. Clark Street, Suite 3300
Chicago, IL 60606
Chief Executive Officer: Dr. Sunny Handa

Trillium University

- Trillium University requests authorization to operate in the Chicago Region.

Background and History

Staff Conclusion: Staff recommends denial of the application for operating authority. The IBHE staff has serious concerns about the financial stability of the institution and its noncompliance with state regulations. Furthermore, Trillium University failed to provide evidence to demonstrate its capacity to deliver its educational plans. Finally, after numerous attempts to clarify the requirements to institutional staff through an orientation, technical questions, a site visit, and phone calls, the proposal does not meet the criteria for operating authority as set forth in the Administrative Code to implement the “Private College Act” (110 ILCS 1005/I et seq.) and the “Academic Degree Act” (110 ILCS 1010/I et seq.).

Trillium University (Trillium or the University) is a private, proprietary institution of higher education that plans to offer health and medical sciences programs in Illinois. Affiliates of Trillium University offer post-secondary programs in health sciences, including establishing Caribbean Medical University on the island of Curacao in 2011 to offer programs to students pursuing careers in the medical field. In 2013, Trillium Medical Education and its subsidiary Easton Education, was established in Ontario, Canada. Easton Education offered online continuing education programs in medical sciences, law, and technology for international students. Easton Education later expanded nationally to Alberta, Manitoba, and New Brunswick. In 2021, Easton Education merged with Osler Education which is currently in operation. Trillium University seeks to offer bachelor's and master's level online and hybrid programs focused on health and medical sciences and technology. According to Trillium University's proposal, the institution seeks to provide “foundational learning and experiences for students that equip them for their professional endeavors and enable them to become leaders of tomorrow.” The proposal also indicates that students have real-time access to faculty, fellow students, and mentorship.

Trillium University submitted an application to the IBHE for operating authority on January 24, 2023. Staff review of Trillium University's application for operating authority commenced February 2023. The application materials were incomplete and missing multiple required elements as follows:

- Facilities;
- Audited financial statement; and
- Business registration with the Illinois Secretary of State.

Staff requested missing information through a series of technical questions and phone interactions with institutional leaders. To date, IBHE staff have sent the institution four rounds of technical questions relating to the contents of the application between March 1, 2023, and December 13, 2023. The institution provided written responses to the technical questions between March 23, 2023, and January 8, 2024. IBHE staff also conducted a site visit on January 25, 2024, to the institution's Illinois facility located at 20 N. Clark Street, Suite 3300 in Chicago, IL.

In multiple rounds of technical questions, IBHE staff informed Trillium University staff that the application was not sufficiently completed. The application required the submission of an audited financial statement. Instead, the institution submitted an unaudited financial statement. Trillium University's response to the request for an audited financial statement resulted in a call between IBHE staff and the institution's accountant. Another financial statement was sent to IBHE staff to review; however, the statement was not the required audited financial statement and did not present a clear financial picture of the financial viability of the institution. In subsequent technical questions, IBHE staff reiterated that Trillium had not provided key application materials to meet the requirements as set forth in the Administrative Code to implement the "Private College Act" (110 ILCS 1005/1 et seq.) and the "Academic Degree Act" (110 ILCS 1010/1 et seq.), including business registration with the Secretary of State, curriculum, lease agreement, and an audited financial statement.

Illinois Administrative Code specifies that institutions, as described in Section 1030.10(a) and (b) that is not otherwise exempted in Section 1030.10(c), must maintain a place of business within the State and hold a current certificate of good standing from the Secretary of State. Trillium University did not become a registered business with the Secretary of State until January 2024 and appeared to be unaware of the business registration requirement in Illinois, therefore at the time of the institution's submission of the application, it was already deemed incomplete. In email communication on December 18 and 21, 2023, and January 8, 2024, following IBHE staff request for business registration documentation, Trillium University staff requested guidance on how to register with the Secretary of State, stating, "since we are [an] out of state applicant, we have not yet registered a business in the state of Illinois. Is business registration a requirement for the IBHE application process - even though we are operating from out of state and providing online/distance learning." Trillium University subsequently registered in January 2024. Additionally, during a conversation between IBHE staff and Trillium University staff on January 26, 2024, IBHE staff reiterated that core aspects of the institution's curriculum did not align with requirements. Section 1030.30(a)(3) states: the caliber and content of each course or program of instruction, training or study shall be reasonable and adequate for achieving the stated objectives for which the course or program is offered. An undergraduate curriculum shall include general education in alignment with the degree level and objectives. Therefore, IBHE staff cannot determine the alignment of courses provided.

Need

Public Act 102-1046, 110 ILCS 1005/4, Sec. 4 (7): That the proposed degree program is educationally and economically consistent with the educational priorities and needs of this State and meets a need that is not currently met by existing institutions and is supported by clear evidence of need. If the examination shows that the applicant has such qualifications a certificate of approval shall be issued.

Staff Conclusion: Trillium University's proposal does not provide sufficient evidence to demonstrate a need for the proposed programs in the State of Illinois.

Careers in healthcare are in demand and may economically elevate individuals and their families. Based on the data available from the U.S. Bureau for Labor Statistics, the median annual wage for healthcare practitioners and technical occupations (such as dental hygienists, physicians, surgeons, and registered nurses) was \$77,760 in May 2022, which was higher than the median annual wage for all occupations of \$46,310. The median pay for a health information technician is

\$58,250 with a 16 percent projected growth outlook for 2022–2032. Healthcare support occupations (such as home health and personal care aides, medical transcriptionists, and occupational therapy assistants) had a median annual wage of \$33,600 in May 2022, which was lower than the median annual wage for all occupations. Though the institution provided a variety of career options for students, there is little to no evidence of how the institution will provide support to students for career preparation such as a career services center and career advisors/coaches.

According to data from the Illinois Board of Higher Education program inventory, there are several institutions in the state that offer the proposed Bachelor of Science in Health Sciences, Master of Business Administration in Healthcare Management and Health Informatics, and the Master of Science in Nutrition. For instance, the search for the degree title, “Health Sciences” bachelor’s level program on the IBHE program inventory yields about 31 institutions offering the program across the state and seven in the Chicago region. Similarly, the search for the Master of Business Administration in Healthcare Management and Health Informatics, and the Master of Science in Nutrition yields multiple programs across the state, therefore, with minimal information provided such as insufficient course descriptions of the proposed programs and interest in the programs, the institution has not demonstrated a need for another institution to offer the proposed programs.

Other programs the institution intends to offer include a Master of Health Sciences in Primary Care, Master of Health Sciences in Internal Medicine, and a Master of Health Sciences in Aesthetic Medicine. According to the institution’s proposal and phone call with institution staff, no public institutions or independent institutions offer master’s-level primary care, internal medicine, or aesthetic medicine programs in the state, hence, it is not clear what standards the institution used in the development of the programs or if there is need for the programs.

Compliance with State Regulations

Criterion 1030.30(a)(2)(C) and (D) provide that the Board staff will consider actions of federal or state regulatory agencies or Offices of Attorneys General, Offices of Inspectors General, or similar bodies that affect an institution’s status with those bodies and compliance with the requirements outlined under the PBVS Act, if applicable.

Staff Conclusion: The name “Trillium University” is inconsistent with Criterion 1030.30 (a)(1)(A), of the administrative code which states,

The term “university” shall only be used in the name of an institution of higher education when the institutional structure includes two or more distinct colleges (e.g., College of Business, College of Education, and College of Liberal Arts and Sciences) providing instruction at the baccalaureate and graduate levels, and is involved in public service activities, scholarship and research.

After an in-depth review of Trillium University’s application materials, IBHE staff did not find any evidence that more than one distinct college exists within its organizational structure, nor that its faculty are involved in scholarship and research. While academic programs do exist in different disciplines, such as medical sciences and technology, they are not organized by college and department. As such, the term “university” should not be included in the name of the institution within the State of Illinois.

Curriculum / Assessment

1030.30(a)(3): The caliber and content of each course or program of instruction, training or study shall be reasonable and adequate for achieving the stated objectives for which the course or program is offered. An undergraduate curriculum shall include general education in alignment with the degree level and objectives.

1030.60(a)(4): The caliber and content of the curriculum shall assure that the stated certificate or degree objectives for which the program is offered will be achieved.

Staff Conclusion: The institution has not provided sufficient evidence of course alignment with generally acceptable post-secondary education standard. Staff review of the curriculum for the bachelor's program with limited general education coursework, demonstrate the institution lacks the capacity to develop, deliver, and support academic programs.

Curriculum

The insufficient description of program structure and curriculum provided in the application impedes IBHE staff review to determine whether the institution has the capacity to develop, deliver, and support academic programs in Illinois. Trillium University proposes to offer a Bachelor of Science in Health Sciences. The Bachelor of Science in Health Sciences is a 120-semester hour program designed for students to expand their knowledge of human health, disease, and health promotion. IBHE staff reviewed the courses required to complete the Bachelor of Science in Health Sciences and could not determine how the required courses compare with generally acceptable standards for bachelor's program. Trillium University did not provide adequate descriptions of the required courses and has a confusing course numbering structure that ranges from 101 to 1003, hence, it is difficult to determine which courses are offered at the lower and upper divisions or what eligibility criteria applies for offering courses at different levels. Furthermore, the institution failed to provide sufficient requirements for general education coursework that aligns with the program objectives necessary to gain a broad foundation of study to build an undergraduate education. While the mock catalog indicates that "Trillium University has partnered with other post-secondary institutions to provide students with transfer credit opportunities," no specific details were provided on any established partners or how the institution will secure these partnerships. As an institution without institutional accreditation, it is not clear how partnerships with other accredited institutions will be obtained, hence, staff is concerned about the lack of adequate plans for course transferability and the impact on potential students. During the phone call on January 26, 2024, Trillium staff requested IBHE staff guidance on how to revise the curriculum to meet standards and underscored that there were no other higher education institutions offering such programs in the nation.

Trillium University proposes to offer a Master of Business Administration in Healthcare Management and Health Informatics. The program is a 60-semester hour program for students who wish to become effective and influential leaders within the healthcare industry. This program seeks to provide students with a solid foundation in business administration with a focus on healthcare management. Within the application, Trillium University did not explain how the Master of Business Administration program would align with MBA-based accrediting bodies such as the Association to Advance Collegiate School of Business (AACSB), the Accreditation Council for Business Schools and Programs (ACBSP), and the International Accreditation Council for Business Education (IACBE).

Trillium University proposes to offer a Master of Science in Nutrition. This is a 48-semester hour thesis-based program to broaden the knowledge of human nutrition. Students will explore topics such as nutritional planning, intervention, and health promotion, and their function in enhancing patient care. IBHE staff reviewed comparable programs within the program inventory and identified that Benedictine University, Dominican University, and the University of Chicago offer a similar program, however, there are major differences in the program offerings and requirements, such as required accreditation by the Council on Accreditation for Education in Nutrition and Dietetics (ACEND). IBHE staff cannot determine whether the proposed program will prepare students to sit for the Registration Examination for Dietitians by the Commission on Dietetic Registration (CDR) as required for many careers with a M.S. in Nutrition including sports nutritionists, nutritional therapists, and nutritional consultants.

Trillium University proposes to offer a Master of Health Sciences in Primary Care. This is a 36-semester hour program designed for medical graduates and physicians who wish to acquire current knowledge and skills within the field of family medicine. As part of the program, students will explore a wide range of medical specialties and gain an understanding of the practice standards and processes involved in the provision of primary care. The proposal asserts that the program is well suited for International medical graduates who wish to apply for a medical residency program. In addition, the program is delivered through hybrid learning. Students will complete program material online and through clinical placements. IBHE staff assessed the program and have concerns about criteria for placement and qualifications of preceptorship at the international level could not be defined. The term hybrid is defined by the institution as online work and work in the student's home country. As a result, there is little information provided on how a student can select a quality preceptor in their home country.

Trillium University proposes to offer a Master of Health Sciences in Internal Medicine. The 36-semester hour program is designed for medical graduates and physicians who wish to acquire current knowledge and skills within the field of internal medicine. Students in this program will gain an understanding of human body systems and methods of preventing, diagnosing and treating simple and complex diseases affecting adults. The projected table of course offerings in the application included only five courses to be completed in three terms. With limited information on how the clinical component of the program will be implemented, staff cannot determine whether the program will achieve the stated objectives.

Trillium University proposes to offer a Master of Health Sciences in Aesthetic Medicine. This is a 30-semester hour program designed for medical graduates and physicians who wish to acquire current knowledge and skills within the field of aesthetic medicine. Students in this program will gain an understanding of facial anatomy and medical procedures used to enhance the appearance of the skin. The projected table of course offerings in the application included only five courses to be completed in two terms. It is not clear how students will complete the required 30 semester hours within two terms and limited information was provided on the plans for implementing requirements for clinicals, therefore IBHE staff is unable to determine how the objectives of the program will be achieved.

Considering that the proposal does not provide any specific plan for recruitment of students or how students will be supported through the program, without an enrollment management plan, IBHE staff is concerned that the institution may face difficulty sustaining operation and cause undue burden to students. Of note, it is also not clear what administrative staff will be available to provide support for the delivery of the program in Illinois. In its application and phone calls with IBHE staff,

the institution repeatedly stated that as an online-based institution, the institution's facility in Illinois will only be for administrative purposes, therefore, a definitive location has not been identified for students and faculty to seek support and guidance. This raises further questions about the level of support Illinois students will receive to be successful in their education.

Facilities (space, equipment, instructional materials)

1030(a)(4) and 1030.60(a)(5): The institution shall have adequate and suitable space, equipment and instructional materials to support institutional programs.

Staff Conclusion: Trillium University's application provides insufficient information for analysts to evaluate the facility's adequacy and suitability to support instructional programs.

Trillium University's proposal states that the institution entered a renter's agreement with the company, Integrated Offices. This agreement allows the institution to operate an administrative center located at 20 N. Clark Street, Suite 3300 in Chicago but the application notes the space "will not be utilized as an educational facility." In spite of repeated IBHE staff requests to provide supporting documentation of adequate facilities, Trillium University has not provided a standard lease agreement or additional documentation to IBHE to clarify what terms and space areas are solely dedicated to Trillium University, hence, staff cannot attest that space for the institution's proposed operations is adequate nor whether the institution could manage associated costs. In response to technical questions posted on December 13, 2023, requesting a rental agreement, the institution sent a letter signed by the Chief Executive Office of Integrated Office Suites, stating "This correspondence is to confirm that Trillium University is a tenant at 20 N. Clark Street, Suite 3300, Chicago, Illinois 60602 and that Trillium University's phone number is 877-517-8800. Should you have any questions, please do not hesitate to contact us." IBHE staff conducted a site visit on January 25, 2024, to the address stated in the application at 20 N. Clark Street in Chicago. During this site visit, information was presented to IBHE staff that Trillium University did not have any dedicated physical space. Rather, the offices at 20 N. Clark Street, Suite 3300 in Chicago are all available for any tenant to use at any given time pending availability, as the offices are virtual. In response to the second round of technical questions regarding the facility, the institution stated "Initially, Trillium University will only have one physical facility used for administrative purposes and as the main mailing address of the institution. The facility will not be used by faculty members for teaching purposes. Faculty members will be working remotely." The lack of any dedicated office space raises concerns that sensitive student information such as transcripts and personal information may be accessible for others to view, which further creates consumer protection issues. Therefore, staff cannot determine compliance with the requirements of 23 IAC § 1030.30(a)(9) requiring that institutions, "must provide adequate security measures to protect student data and records and must comply with all State and federal laws relevant to protection of individual privacy and preservation of records" as the location does not seem to provide facilities for the sole use of Trillium University. In addition, during the January call, Trillium noted that they have been offering educational activities for the past 13 years at this facility. It is not clear what authority the institution has to implement such post-secondary offerings, which further raises concerns about compliance. IBHE staff plans to work with the institution to understand their plans to seek authorization for the referenced existing programs.

The institution provided limited information about library resources and appropriately qualified library personnel. In response to application question relating to access to library resources for students, the school responded that, "The library resources available to students

include a wide selection of online academic journals and articles, eBooks and interlibrary loans. Every effort will be made to provide students with access to library resources needed for their programs. Any supplementary library resources required for a course will be included within the course description.” The institution did not provide sufficient details about the nature of the resources or how students would have access to these learning resources or qualified personnel who could assist them in accessing the same.

Faculty and Staff

1030.30(a)(5) and 1030.60(a)(6): The education, experience and other qualifications of directors, administrators, supervisors and instructors shall ensure that the students will receive education consistent with the objectives of the program.

Staff Conclusion: Trillium University failed to provide information relating to the necessary standards to retain and support faculty and staff.

Trillium University has provided documentation regarding faculty that will teach courses for the institution. All fourteen faculty will be regular, full-time faculty and will be compensated at \$5,222 per course. With the projected total faculty compensation of \$224,546 for the first year of operation and about \$300,000 subsequently, it does not appear that faculty on full-time status are adequately compensated to provide scholarly support and be involved in the decision making, planning, and design of curricula. IBHE staff conducted an extensive review of faculty resumes and identified that some faculty do not have the necessary qualifications to teach certain courses. For instance, one faculty will be teaching MBA courses, however, he does not have a terminal degree to teach MBA courses. Illinois Administrative Code specifies in Section 1030.30(a)(3)(B)(iv) that faculty teaching in a graduate program shall have a doctorate or terminal degree in the field of instruction. The application does not provide measures to retain faculty and staff or specify whether technology support will be available beyond help desk functions therefore, IBHE staff cannot determine how faculty and staff will be supported during their time at the institution.

Fiscal / Personnel Resources

1030.30(a)(11): The institution should be financially stable and capable of assuring the revenues needed for meeting stated objectives and fulfilling commitments to students.

1030.60(a)(8): Fiscal and personnel resources shall be sufficient to permit the institution to meet obligations to continuing programs while assuming additional resource responsibilities for the new certificate or degree program.

Staff Conclusion: Trillium University's financial stability cannot be determined. As a foundational issue, the institution has yet to submit an audited financial statement as required in the application process.

Trillium University has yet to submit an audited financial statement specific to the institution. Rather, the institution submitted an unaudited financial statement, hence, staff has not been provided with a clear financial viability analysis to determine the financial strength of the institution. In response to the technical question posed by staff regarding this concern, the institution explained that “to complete an audit solely on Trillium University, that would require an audit on their other 18 companies/entities, and that would take additional time.” Additionally, Trillium stated during the phone call on January 26, 2024, that an audit would be required for 52 other companies and

could take approximately two years for completion. The institution has provided conflicting information and continues to express hesitance to submit an audited financial statement of the company. With limited verifiable information, staff cannot determine the unfinancial solvency of the institution. The submission of an audited financial statement is outlined in the Illinois Administrative Code. Failure to provide statements at the time of application is valid for classifying an application as an incomplete status.

Tuition and Enrollment

Staff Conclusion: Trillium University's projected headcount and tuition for programs are not clear.

IBHE staff reviewed the cost per course and tuition estimates for the proposed programs and found that Trillium's tuition is significantly lower than the standard tuition rates for public and independent institutions in the region, across the state, and the nation. Moreover, since the institution is new and does not participate in Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), there are no federally available funds, hence, the information provided is not sufficient for staff to determine that Trillium's cost structure as provided in the proposal is capable of sustaining the institution's operation. Institutional data provided in the Projected Annual Headcount Enrollment table shows marginal enrollments in the degree programs at Trillium University.

Table 1: Trillium University Projected Annual Headcount Enrollment

Degree Title	First Year	Second Year	Third Year	Fourth Year	Fifth Year
Bachelor of Science in Health Sciences	10	20	30	40	50
Master of Business Administration in Healthcare Management and Health Informatics	10	20	30	40	50
Master of Science in Nutrition	10	20	30	40	50
Master of Health Sciences in Primary Care	20	40	60	80	100
Master of Health Sciences in Internal Medicine	20	40	60	80	100
Master of Health Sciences in Aesthetic Medicine	20	40	60	80	100

With no clear plans for recruitment, IBHE staff cannot determine how the institution plans to meet their minimal estimated projected numbers. As provided in the institution's application, Trillium University's tuition ranges between \$150 to \$650 per credit hour and total program cost ranges from \$18,120 for the bachelor's program to \$22,999 for the master's programs, which are significantly lower than standard rates for tuition across the state and the nation. There is little to no information on how tuition revenue will aid in the sustainability of the institution's operations. The application indicates that the institution "will provide new students with access to Financial Aid services to assist them in accessing financial resources and choosing loan options with low interest rates and manageable repayment schedules." However, the institution provided no information on

the types of financial aid services they will provide, nor did the institution identify any staff who will serve as financial advisors for students.

Table 2: Tuition Comparison

Institution	Degree level	Region	Total Program Cost
Trillium University	Bachelor of Science in Health Sciences	Chicago	\$18,120
Chicago State University	B.S. in Health Sciences	Chicago	\$65,088
Rush University	B.S. in Health Science	Chicago	\$95,400
Illinois College	B.S. in Health Science	Central	\$48,200
Trillium University	Master of Business Administration in Healthcare Management and Health Informatics	Chicago	\$17,775
University of Illinois Chicago	M.B.A. in Health Care Management M.S. in Health Informatics	Chicago	\$34,736
DePaul University	M.B.A. in Health Care Management M.S. in Health Informatics	Chicago	\$68,760
Northwestern University	M.B.A. in Health Care Management M.S. in Health Informatics	North Suburban	\$81,015
Trillium University	Master of Science in Nutrition	Chicago	\$14,710
University of Illinois Urbana-Champaign	M.S. in Nutritional Sciences	Prairie	\$72,524
Rush University	M.S. in Nutritional Sciences	Chicago	\$76,060
Dominican University	M.S. in Nutrition & Dietetics	West Suburban	\$31,500

Source: IBHE Tuition and Fee Report

Accreditation / Licensure

Staff Conclusion: Trillium University's application provides insufficient information on the financial strength and institutional capacity to develop and maintain standards to satisfy the requirements of the Higher Learning Commission.

Trillium University submitted plans to seek accreditation from the Higher Learning Commission (HLC). The institution submitted documentation outlining a timeline for seeking accreditation. HLC notes on its website that the organization “evaluates such things as governance and administration, financial stability, admissions and student services, institutional resources, student learning, institutional effectiveness, and relationships with internal and external constituencies.”

Institutions seeking HLC's accreditation must meet the Criterion for Accreditation and Core Components which include the following:

Criterion 5. Institutional Effectiveness, Resources and Planning

The institution's resources, structures, processes, and planning are sufficient to fulfill its mission, improve the quality of its educational offerings, and respond to future challenges and opportunities.

Core Components

5.B. The institution's resource base supports its educational offerings and its plans for maintaining and strengthening their quality in the future.

1. The institution has qualified and trained operational staff and infrastructure sufficient to support its operations wherever and however programs are delivered.
2. The goals incorporated into the mission and any related statements are realistic in light of the institution's organization, resources and opportunities.
3. The institution has a well-developed process in place for budgeting and for monitoring its finances.
4. The institution's fiscal allocations ensure that its educational purposes are achieved.

Trillium University will be required to provide documentation as evidence of sufficient financial resources to support institutional plans to the HLC. As aforementioned, the institution submitted an unaudited financial statement as part of the application, however, it does not depict a full financial viability analysis nor explain all assets and equity in its entirety (which is also an HLC requirement). Furthermore, for an established and functioning institution of higher education, three years is not a realistic timeline for attaining HLC accreditation. For the most well-positioned start-up institution with sufficient resources to support a successful launch, the IBHE's five-year deadline for obtaining accreditation is extremely difficult to meet.

Staff Conclusion and Recommendation. The staff concludes that Trillium University does not meet the criteria in Sections 1030.30 and 1030.60 of the rules to implement The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010) and the relating Illinois Administrative Code (Title 23 Section 1030) pertaining to the assessment and licensure of a postsecondary institution.