November 15, 2018

VIA ELECTRONIC MAIL

Dr. Royce Frazier, President
Barclay College
607 N. Kingman Street
Haviland, KS 67059

Dear President Frazier:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Barclay College (“the Institution”). This action is effective as of the date the Board acted, November 1, 2018. In taking this action, the Board considered materials from the most recent comprehensive evaluation, including, but not limited to: the Assurance Filing the Institution submitted, the report from the comprehensive evaluation team, the report of the Institutional Actions Council (IAC) Hearing Committee, and the institutional responses to these reports.

Summary of the Action: The Institution has been granted initial accreditation. The Institution has been approved to offer Certificates, Associate’s, Bachelor’s, and Master’s degrees. The Institution is required to host a Focused Visit no later than March 30, 2019, and a second Focused Visit no later than October 2020, as outlined below.

Board Rationale

The Board based its action on the following findings made with regard to the Institution:

The Institution meets Criterion Two, Core Component 2.A, “the institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff,” but with concerns for the following reasons:

- The annual audits of federal financial aid programs identified weaknesses in the financial operation:
  - The segregation of financial duties has been noted repeatedly and continues as an unresolved matter.
  - In an on-campus interview, the Chief Financial Officer stated that the Institution plans to discuss this note with the Institution’s audit firm and to work to implement creative segregation of duties that would not require the College to add staff.
- During the Institutional Actions Council (IAC) Hearing, the Hearing Committee learned from institutional representatives that preliminary verbal feedback from auditors showed that all concerns were resolved for fiscal year 2017. These included, but were not limited
to, segregation of financial duties, training for financial aid, and procedural changes. However, verification of these concerns was not yet available at the time of the Hearing.

- During the IAC Hearing, the Hearing Committee learned from institutional representatives that certain executive officers of the Institution and an external party had formed a limited liability corporation that would construct housing in the community to address a housing shortage, and evidence available at the time of the HLC Board meeting did not resolve concerns related to a possible conflict of interest.

- The Institution must provide Title IX training to all faculty and staff in order to comply with federal regulations:
  - The IAC Hearing Committee learned that the Institution has established a committee that intends to plan and implement training for faculty and staff.
  - Institutional representatives acknowledge that much more work needs to be done beyond training, including developing a knowledge of the requirements for compliance, and implementing this knowledge in roles and processes.
  - The IAC Hearing Committee is concerned that the Institution may not be proceeding quickly enough by restricting itself to internal resources; it appears the Institution would benefit greatly from external expertise.

The Institution meets Criterion Three, Core Component 3.C, “the institution has the faculty and staff needed for effective, high-quality programs and student services,” but with concerns for the following reasons:

- The Institution in AY17–18 employed some faculty without requisite qualifications to teach a number of its courses.
- The Institution’s policy on faculty qualifications lacks clarity on the “policies, procedures and documentation” needed to demonstrate when experiences are “tested,” that is, determined to be sufficient to meet a component of faculty qualifications.

The Institution meets Criterion Four, Core Component 4.A, “the institution demonstrates responsibility for the quality of its educational programs,” but with concerns for the following reason:

- Program review is in revision and the new process is not yet regularized. The Director of Institutional Research and Assessment acknowledged that the current development process will require up to two more years to fully establish a new cycle of meaningful program review.

The Institution meets Criterion Four, Core Component 4.B, “the institution demonstrates a commitment to educational achievement and improvement through ongoing assessment of student learning,” but with concerns for the following reasons:

- Direct assessment of learning and achievement is conducted at the level of the assessment unit, and includes both academic program outcomes and student and auxiliary services outcomes. The system is in its initial year of implementation. More evidence will need to be collected to evaluate the effectiveness of the system and processes used to assess learning goals and outcomes.
- Although faculty were engaged in the development of the learning outcomes and assessment processes, the processes and measures currently in use were piloted for the first time in AY17-18; assessment efforts are in the early phases of a new system:
Outcome statements are not consistently measurable. Some outcome statements describe a student activity and not the performance or competency demonstrated through the activity. Assessments of co-curricular learning are not fully aligned to the intended outcomes and in fact evaluate personality traits versus learned behaviors and dispositions in some instances.

- Although the IAC Hearing Committee learned that the Institution will be engaged with curriculum mapping activities for the current academic year, and while some academic programs appear to be successfully engaging in assessment, there is no institutional framework for program-level assessment. There appears to be a lack of data to drive decision-making based on assessment results.
- The IAC Hearing Committee learned that the Institution was unable to identify measurable student learning outcomes for General Education. Goals for General Education have been established, but it is not clear how these relate to measurable outcomes.

The Institution has otherwise demonstrated that it meets the Eligibility Requirements, the Assumed Practices, and the Criteria for Accreditation, including all Core Components, though with concerns related to the Core Components noted above.

The Institution has demonstrated that it is currently in compliance with all Federal Compliance Requirements.

Next Steps in the HLC Review Process

**Focused Visit:** The Institution is required to host a Focused Visit no later than March 30, 2019, on the following topics:

**Core Component 2.A**
- Evidence that the Institution has taken corrective action to address the deficiency in identified internal controls and Title IX training.
- Evidence that the limited liability corporation formed by certain executive officers of the Institution and an external party related to the construction of housing in the community to address a housing shortage does not present a conflict of interest.

**Core Component 3.C**
- Evidence that the Institution is in full compliance with HLC’s expectations for faculty qualifications and that the Institution has a policy for identifying qualified faculty through tested experience.

**Focused Visit:** The Institution is required to host a second Focused Visit no later than October 2020, on the following topics:

**Core Component 4.A**
- Implementation of a template and guidelines for Program Review.
- An established cycle and schedule for the review of all programs.
- Evidence of the completion of one cycle of program reviews.

**Core Component 4.B**
• Alignment of curriculum and co-curricular services with intended, measurable student learning outcomes.
• Identification of how course, program, general education, and co-curricular student learning outcomes will be measured.
• Evidence that data are gathered, analyzed, and reviewed for improvement for at least one student learning outcome per program.

**Comprehensive Evaluation:** The Institution is assigned to the Standard Pathway for its initial ten-year cycle. An institution in its first cycle of accreditation undergoes a comprehensive evaluation and is considered for reaffirmation of accreditation in Year 4 of the ten-year cycle. If reaffirmation of accreditation is granted in Year 4, the institution moves to Year 5 and continues on the Standard Pathway until it completes the ten-year cycle. The Institution will host its next comprehensive evaluation for reaffirmation of accreditation in 2022-23.

**HLC Disclosure Obligations**

The Board action resulted in changes that will be reflected in the Institution’s Statement of Accreditation Status as well as the Institutional Status and Requirements Report. The Statement of Accreditation Status, including the dates of the last and next comprehensive evaluation visits, will be posted to the HLC website.

HLC policy requires that a summary of Board actions be sent to appropriate state and federal agencies and accrediting associations. It also will be published on HLC’s website. The summary will include this HLC action regarding the Institution.

On behalf of the Board of Trustees, thank you in advance for your cooperation. If you have questions about any of the information in this letter, please contact your HLC Staff Liaison, Dr. A. Gigi Fansler.

Sincerely,

Barbara Gellman-Danley
President

Cc: Chair of the Board of Trustees, Barclay College
   Jim Le Shana, Vice President for Academic Services, Barclay College
   Evaluation Team Chair
   IAC Hearing Committee
   A. Gigi Fansler, Vice President for Accreditation Relations, Higher Learning Commission

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1 INST.C.10.010, Substantive Requirements for Reaffirmation of Accreditation
2 COMM.A.10.010, Commission Public Notices and Statements
Anthea Sweeney, Vice President for Legal and Governmental Affairs, Higher Learning Commission
Herman Bounds, Accreditation and State Liaison, Office of Postsecondary Education, U.S. Department of Education