



June 28, 2021

BY CERTIFIED MAIL

Amber Knoettgen, President
Cloud County Community College
2221 Campus Dr.
Concordia, KS 66901

Dear President Knoettgen:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Cloud County Community College (“the Institution”). This action is effective as of the date the Board acted, June 24, 2021. 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 placed on Probation because it is out of compliance with the Criteria for Accreditation. The Institution meets Core Components 3.A, 4.A, 4.C, and 5.C with concerns. The Institution does not meet Core Component 4.B. The Institution is required to host a comprehensive evaluation no later than December 2022 to determine whether the institution has ameliorated the findings that led to the imposition of the sanction.

Institutional Disclosure Obligation: HLC policy¹ requires that an institution inform its constituencies, including Board members, administrators, faculty, staff, students, prospective students, and any other constituencies about the sanction and how to contact HLC for further information. The policy also requires that an institution on sanction disclose this status whenever it refers to its HLC accreditation. HLC will monitor these disclosures to ensure they are accurate and in keeping with HLC policy. The Institution must submit drafts of its planned disclosures to these various audiences to its HLC Staff Liaison in advance of transmission and provide the staff liaison with a link to relevant information on its website. At a minimum, an institution must: i) provide a copy of this action letter to its governing board, administration, and faculty, ii) provide a copy of the enclosed Public Disclosure Notice to its currently enrolled students, and iii) prominently display the Mark of Accreditation Status where accreditation status is described on its website. Once disclosures have been made, the institution must submit copies of its disclosure documents as a single .pdf file to www.hlcommission.org/upload (by selecting “Information about Institutional Disclosures”) no later

¹ INST.E.20.010, Probation.

than seven (7) business days following receipt of this action letter. HLC will retain this information as part of the institution's record.

Provisional Plan: HLC policy also requires that the institution file a Provisional Plan with HLC for review and approval by the Institutional Actions Council according to HLC's substantive change procedures. This Provisional Plan must comport with HLC's requirements for Provisional Plans.² The Institution must submit its Provisional Plan within 90 calendar days of this letter.

Substantive Change: HLC policy³ states that while an institution may file one or more applications for substantive change during the probation period, such applications will be subject to strict scrutiny and are likely to be denied or deferred until after the probationary period. HLC policy also requires that an institution placed on Probation be subject to additional requirements for substantive change during the probationary period and for three (3) years following the removal of Probation.⁴

Notification Program: HLC policy⁵ states that the institution is now ineligible for the Notification Program for Additional Locations until it has completed ten (10) years in good standing as required for access.

Board Rationale

The Board based its action on the following findings made with regard to the Institution as well as the entire record before the Board:

The Institution meets, but with concerns, Criterion Three, Core Component 3.A, "the rigor of the institution's academic offerings is appropriate to higher education," for the following reasons:

- The Institution has made progress in addressing confusion related to the definitions regarding programs and fields of study. However, the Institution does not sufficiently demonstrate that learning outcomes and levels of achievement are equivalent across all modalities and locations, including where dual credit is offered.
- More time is needed for the Institution to analyze its revised and revitalized program review processes to demonstrate the effectiveness of these developing efforts.
- The Institution has just begun the process of articulating and differentiating learning goals for its programs and certificates.

The Institution meets, but with concerns, Criterion Four, Core Component 4.A, "the institution ensures the quality of its educational offerings," for the following reasons:

- The Institution has returned to its previous practice of stating and using Program Learning Outcomes (PLOs) as part of its assessment process, but the reinstated

² FDCR.B.10.010, Commission Approval of Institutional Teach-Out Arrangements.

³ INST.E.20.010, Probation.

⁴ INST.F.20.040, Substantive Change.

⁵ INST.E.20.010, Probation.

process is in the early stages and more time is needed for the assessment cycle to provide documented benefits from this improvement.

- The Institution has only begun to systematically evaluate teaching uniformity in multiple delivery modalities and locations, including dual credit/concurrent enrollment.
- The Institution's oversight of concurrent enrollment to ensure that courses are equivalent in learning outcomes and levels of achievement to the higher education curriculum is lacking. The Institution has made efforts to reach out to regional high schools where it offers dual credit courses so that administrators and instructors at those high schools are aware of credentialing expectations and expectations for learning and assessment that is consistent with on-campus instruction. However, more time is needed to document that these changes have resulted in equivalent learning outcomes and levels of achievement.

The Institution does not meet Core Component 4.B, “the institution engages in ongoing assessment of student learning as part of its commitment to the educational outcomes of its students,” for the following reasons:

- The Institution does not have an effective process for assessment of student learning and only a few academic areas have articulated program outcomes.
- Varying interpretations of assessment and assessment outcomes across the Institution have contributed to a lack of cohesive student learning outcomes and effective assessment practices in both academic and co-curricular environments. With the recently adopted improvements, time is needed for the Institution to demonstrate that its efforts are effective.
- The Institution has begun to put people, structures and activities in place to articulate student learning outcomes and initiate various assessment processes. However, the Institution needs time to collect and evaluate information about the effectiveness of these improvements.
- The Institution has begun to re-establish and improve a college-wide program of assessment. However, a full assessment cycle demonstrating that the results of these activities are used for systematic improvement has not yet been completed.

The Institution meets, but with concerns, Criterion Four, Core Component 4.C, “the institution pursues educational improvement through goals and strategies that improve retention, persistence and completion rates in its degree and certificate programs,” for the following reasons:

- The Institution has established definitions of persistence, retention, and completion. The development of targets and the use of trend data will better inform the Institution as to how well its goals and strategies are improving student success. More time is needed for the Institution to demonstrate a robust measurement system that effectively uses persistence, retention, and completion rates to improve student achievement.

- The Institution recently filled an Institutional Research position. It will take time for the Institution to demonstrate its efforts to build and use processes for employing data to effectively monitor and improve its programs.

The Institution meets, but with concerns, Criterion Five, Core Component 5.C, “the institution engages in systematic and integrated planning and improvement,” for the following reasons:

- The Institution assesses day-to-day operations and reallocates resources accordingly, and conducts program reviews in advance of budget decisions. However, the Institution has not sufficiently demonstrated how it is assessing pedagogy and tying these assessments, as well as the findings and recommendations of the analysis of program reviews, to resource allocations that build and improve student outcomes.
- The Institution has not projected the impact that increased pressure on public revenue streams and enrollment revenue has with regard to long-term financial forecasting, nor has it integrated such forecasting into operational planning.
- The Institution has ensured that day-to-day pedagogical operations are sufficiently funded. However, the Institution lacks clear long-term goals and measurable outcomes that can be used to monitor performance in both day-to-day operations and pedagogical planning and delivery.

The Board of Trustees of the Higher Learning Commission has determined based on the preceding findings and evidence in the record that the Institution is not in compliance with the Criteria for Accreditation and should therefore be placed on Probation.

Next Steps in the HLC Review Process

Assurance Filing: The Board required that the Institution submit an Assurance Filing no later than October 1, 2022, or at least eight weeks prior to the comprehensive evaluation, providing evidence that the Institution has ameliorated the findings of noncompliance identified in this action that resulted in the imposition of Probation and the findings of Met with Concerns, and providing evidence that the Institution meets the Criteria for Accreditation, Federal Compliance Requirements, and any cited Assumed Practices (if applicable).

Comprehensive Evaluation: The Institution will host a comprehensive evaluation no later than December 2022 to enable a team of peer reviewers to determine whether the Institution has ameliorated the findings of noncompliance that led to the imposition of Probation and whether the Institution otherwise meets the Criteria for Accreditation, and to make a recommendation about whether the Board should remove Probation or take other action.

Board Review: The Board will review the documents associated with the evaluation at its June 2023 meeting to determine whether Probation shall be removed, or if the Institution has not provided sufficient evidence of amelioration as noted above, whether other action should be taken, up to and including withdrawal of accreditation.

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.

In accordance with HLC policy,⁶ information about this action is provided to members of the public and to other constituents in several ways. This action letter and the enclosed Public Disclosure Notice will be posted to HLC's website not more than one business day after this letter is sent to the Institution. Additionally, a summary of Board actions will be sent to appropriate state and federal agencies and accrediting associations. This summary 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. Andrew Lootens-White.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Cloud County Community College
Kimberly Zant, Vice President for Academic Affairs, Cloud County Community College
Evaluation Team Chair
IAC Hearing Committee Chair
Andrew Lootens-White, Vice President of Accreditation Relations, Higher Learning
Commission
Anthea Sweeney, Vice President of Legal and Regulatory Affairs, Higher Learning
Commission
Karla Wiscombe, Director, Kansas Board of Regents
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education, U.S.
Department of Education

⁶ COMM.A.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements