



June 30, 2022

BY CERTIFIED MAIL

Rev. Dr. Steven Beseau, Rector/President
Pontifical College Josephinum
7625 N. High St.
Columbus, OH 43235-1498

Dear President Beseau:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Pontifical College Josephinum (“the Institution”). This action is effective as of the date the Board acted, June 23, 2022. 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.B, 4.A, 4.C, and 5.B with concerns. The Institution does not meet Core Components 2.A, 2.B, 3.A, 5.A, and 5.C. The Institution also requires monitoring related to Federal Compliance: Assignment of Credits, Program Length & Tuition and Federal Compliance: Publication of Student Outcome Data. The Institution is required to host a comprehensive evaluation no later than December 2023 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

¹ INST.E.20.010, Probation.

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 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 an institution placed on Probation is 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:

Pontifical College Josephinum (“the Institution”) does not meet Criterion Two, Core Component 2.A, “the institution establishes and follows policies and processes to ensure fair and ethical behavior on the part of its governing board, administration, faculty and staff,” for the following reasons:

- As of the date of its Institutional Actions Council (IAC) hearing, the Institution was knowingly offering an online graduate degree, the Master of Arts in Pastoral Studies (MAPs), without required HLC approvals for the program itself or its online delivery modality. Institutional documents confirm that MAPs has been under development since at least 2018.
- The Institution’s Director of Human Resources also leads Title IX investigations. This dual assignment potentially inhibits the effective administration of the complaint process.

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.

The Institution does not meet Criterion Two, Core Component 2.B, “the institution presents itself clearly and completely to its students and to the public,” for the following reason:

- The Institution has not clearly shared with the public that its MAPS program has not been approved by HLC even though the Institution is required to secure advance approval prior to launching academic programs that represent a significant departure from its preexisting offerings.

The Institution does not meet Criterion Three, Core Component 3.A, “the rigor of the institution’s academic offerings is appropriate to higher education,” for the following reason:

- At the Josephinum Diaconate Institute (JDI), an administrative unit inaugurated in 2007, learning goals for the master’s and certificate programs are not differentiated. In some instances, students seeking certification and students working toward the master's degree are enrolled in the same courses and expected to complete the same course requirements.

The Institution meets, but with concerns, Criterion Three, Core Component 3.B, “the institution offers programs that engage students in collecting, analyzing and communicating information; in mastering modes of intellectual inquiry or creative work; and in developing skills adaptable to changing environments,” for the following reason:

- Although the Institution has made some progress in the formalization of its General Education program, including plans for the assessment of student learning outcomes, at the time of the IAC hearing these plans had not been finalized and implemented.

The Institution meets, but with concerns, Criterion Four, Core Component 4.A, “the institution ensures the quality of its educational offerings,” for the following reason⁶:

- Few full-time faculty appear to be involved in the MAPs program, which is administered through the JDI. Materials provided to the Institute’s programmatic accreditor, the Association of Theological Schools (ATS) in 2019 to petition to offer the MAPS degree stated, “[T]he courses are accredited and award graduate credit, regardless of the educational background of the student,” and that “Each institution sets its own rules, protocols and standards for awarding a graduate degree.” These claims raise concerns regarding both the awarding of credit in this program and the maintenance of consistent content within the program.

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 reason:

⁶ HLC Subcomponent 4.A.(5) reads, “the institution maintains specialized accreditation for its programs as appropriate to its education purposes.” While the results of the Institution’s most recent ATS review are not cited in this Resolution as evidence of HLC’s findings in 4.A., it should be noted that the Institution’s member status with ATS has been designated as “Accredited on Warning,” with required reports due in November 2022 on Educational Policies, April 2023 on Governance, and November 2023 on Planning.

- The Institution does not have numerical goals for persistence, retention, and completion. Furthermore, the Institution's publication of student outcome data on its website only includes a small portion of the required data. In addition, student learning outcome data is not available for the Institution's undergraduate degrees or certificates, and data on the MAPS degree was not reported.

The Institution does not meet Criterion Five, Core Component 5.A, "through its administrative structures and collaborative processes, the institution's leadership demonstrates that it is effective and enables the institution to fulfill its mission," for the following reason:

- The Institution has struggled, with little long-term success, in its attempts to implement and maintain an effective process of shared governance.

The Institution meets, but with concerns, Criterion Five, Core Component 5.B, "the institution's resource base supports its educational offerings and its plans for maintaining and strengthening their quality in the future," for the following reasons:

- The Institution does not currently use a clear set of financial metrics to gauge fiscal effectiveness. A set of metrics is being developed to measure progress on the next strategic plan.
- There is no evidence of an endowment spending policy that specifies the target endowment draw each year and requires Board approval for supplementary endowment draws above the target.
- While there has been discussion of right-sizing the Institution, there is no formal analysis of its optimal size or whether its business model provides sufficient cash flow to operate in a typical year. Recent financial results are likely not sustainable due to the end of federal COVID relief programs and the volatility of the stock market.

The Institution does not meet Criterion Five, Core Component 5.C, "the institution engages in systematic and integrated planning and improvement," for the following reasons:

- Various institutional representatives acknowledged that the 2011 strategic plan has not been utilized in any substantive manner.
- Delays in the process for review and approval of a new constitution for the Institution resulted in delays in initiating the process for developing the next strategic plan, which may be presented for review and approval at the Institution's February 2023 Board meeting.
- Despite a respite in annual deficits in FY2021, most financial statements over the last decade reveal a pattern of operating deficits and a projected deficit for FY2022.
- Although the Institution's audits and budgets provide evidence that its leaders are aware of the impact of declining enrollments, the Institution continues to rely on unrealistic assumptions about recruiting goals and fundraising as ways to fill enrollment and budget shortfalls.

The Institution requires monitoring related to HLC's Federal Compliance requirement on Assignment of Credits, Program Length & Tuition, for the following reason:

- The assignment of credits in BI1612EE, The Four Gospels--Synoptics and John raises significant concerns. This course enrolls both students with no baccalaureate degree and graduate students in the same class and articulates course learning outcomes only at the knowledge level. Successful completion of the course earns a student two hours of credit at both the certificate and master's levels. The Institution will need to review the assignment of credit hours, particularly for programs and courses that enroll a mix of undergraduate, graduate, and certificate students.

The Institution requires monitoring related to HLC's Federal Compliance requirement on Publication of Student Outcome Data, for the following reason:

- A review of the Institution's website reveals that student outcomes for only two programs are posted with a limited number of outcome-related categories, including average time to graduation, average GPA at admission, and average GPA at graduation.

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, 2023, 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, and Federal Compliance Requirements.

Comprehensive Evaluation: The Institution will host a comprehensive evaluation no later than December 2023 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 2024 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,⁷ 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. John Marr.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Pontifical College Josephinum
Eric Graff, Dean of Institutional Planning, Accreditation & Assessment, Pontifical College Josephinum
Evaluation Team Chair
IAC Hearing Committee Chair
John Marr, Vice President of Accreditation Relations, Higher Learning Commission
Anthea Sweeney, Vice President of Legal and Regulatory Affairs, Higher Learning Commission
Stephanie McCann, Associate Vice Chancellor, Program Development & Approval, Ohio Department of Higher Education
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education, U.S. Department of Education

⁷ COMM.A.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements