March 13, 2019

VIA ELECTRONIC MAIL

Dr. William Duffy, President
Upper Iowa University
P.O. Box 1857
605 Washington St.
Fayette, IA 52142

Dear President Duffy:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Upper Iowa University (“the Institution”). This action is effective as of the date the Board acted, February 28, 2019. In taking this action, the Board considered materials from the recent Notice visit, including, but not limited to: the Notice report, the report from the Notice visit team, the Staff Analysis of the Notice report, and the institutional responses to these reports.

Summary of the Action: The Board determined that the Institution is no longer at risk of noncompliance with the Criteria for Accreditation and removed the Institution from Notice. The Institution meets Core Component 3.A with concerns. The Institution is required to submit an interim report, as outlined below, with its next Assurance Filing.

Board Rationale

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

The Institution now meets without concerns 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” and is in conformity with Assumed Practice A.2, for the following reasons:

- The Institution has strengthened several university procedures and, where appropriate, formalized procedures into policies to ensure its systems are secure and to prevent fraudulent activities. These improvements include enrollment management and compliance reporting, grade procedures, cash payment procedures, and a password protection policy.
- The Institution created new positions and university structures to provide administrative oversight. This included the employment of a Compliance Coordinator to ensure the Institution remains in compliance with Federal, State, and local statutes as well as
institutional policies.

- Upper Iowa has implemented required training focused on understanding and complying with ethical standards at the main campus and all additional locations, including focused training for all new staff and faculty.

The Institution now meets without concerns Criterion Two, Core Component 2.C, “the governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity,” for the following reason:

- Significant improvement has been made regarding board cohesion and board governance. A consultant was engaged to help the board understand its role in institutional governance. While there had been inappropriate efforts in the past to encroach in operational management, board members were now appropriately engaged and forthcoming regarding their efforts to resolve issues. Board training, some board turnover, and effective engagement by board members on governance issues contributed to the improvement.

The Institution continues to meet with concerns Criterion Three, Core Component 3.A, “the institution’s degree programs are appropriate to higher education,” for the following reasons:

- The Institution has put into place a systematic and comprehensive approach to oversight of curriculum, instruction, assessment activities, policies, and procedures. The curriculum approval processes place faculty in the lead role for curriculum oversight.
- The oversight of instruction of all modalities and locations has been shifted to the academic offices at the main campus. Lead faculty, department chairs, and deans are responsible for the hiring, credential check, and oversight of faculty teaching in all modalities and locations. However, the team found that the rapid addition of these responsibilities has the potential to be unsustainable from a resource perspective.
- Instructional designers have been incorporated to work with distance and additional location faculty to implement instructional practices and expectation. However, due to the very large caseloads, concerns remain regarding whether there are adequate resources to sustain this change in curriculum management.
- An Assessment Committee was put into place to promote assessment best practices, support the assessment process, and foster a culture of assessment across the academic units of the institution.
- The recent (May 2018) Multi-Location Visit Peer Reviewer Report identified that the Institution systematically fell short of federal expectations for the amount of student work associated with three-credit hour classes. In response, Upper Iowa has adopted a “hybrid” model for its accelerated courses to ensure compliance with U.S. Department of Education (USDE) and HLC expectations for awarding credit hours. This new model and policy were implemented with a pilot program during the summer 2018 session and was intended to be fully implemented across the Institution at all locations and modalities during the 2018-2019 academic year.

The Institution now meets without concerns Criterion Four, Core Component 4.A, “the institution demonstrates responsibility for the quality of its educational programs,” for the
following reason:

- A new program review process is in place, which involves both internal and external faculty review. A seven-year schedule of program reviews for those programs not reviewed by external accrediting organizations was implemented, along with program review guidelines. The Institution now has a university-wide and systematic approach to program review.

The Institution now meets without concerns Criterion Five, Core Component 5.B, “the institution’s governance and administrative structures promote effective leadership and support collaborative processes that enable the institution to fulfill its mission,” for the following reasons:

- While financial aid counseling does occur at additional locations, all financial aid processing occurs at the main campus in Fayette. Following significant turnover in personnel in this area, a consultant was hired to provide the financial aid staff with the appropriate training to ensure financial aid was being handled within university policies and the expectations of the USDE.
- A USDE Federal Student Aid Program Review was completed in March 2018 and the Institution is addressing the findings cited in the report.
- The Institution is meeting HLC and government expectations for appropriate oversight and supervision of its locations.

The Institution now meets without concerns Criterion Five, Core Component 5.C, “the institution engages in systematic and integrated planning,” for the following reasons:

- The Institution has a strategic plan that is appropriate to the Institution, which details five overarching strategic priorities, with strategic objectives beneath each priority and numerous tactics to achieve each strategic goal.
- The strategic planning process included stakeholders across the Institution. The board is involved with the plan and includes strategies from the plan in its meeting agendas. In addition, the strategic plan was used as a framework to drive board agendas and communications throughout the organization.
- The strategic plan is being put into practice, with improvements in faculty governance and the oversight of teaching and learning across all locations and modalities.

The Institution now meets without concerns Criterion Five, Core Component 5.D, “the institution works systematically to improve its performance,” for the following reasons:

- Significant progress has been made in the Institution’s work to improve performance. Upper Iowa’s strategic plan guides and informs the Institution’s work, including the work of the board, the leadership team and the academic leaders. Baseline data on specific goals, resources needed, and progress markers are provided.
- A new Director of Academic Affairs is responsible for Upper Iowa’s institutional research functions, including IPEDs, and for coordinating efforts to measure and evaluate institutional effectiveness.

The Institution has otherwise demonstrated that it is in compliance with the Criteria for Accreditation, Assumed Practices, Federal Compliance Requirements, and Obligations of
Affiliation and is no longer at risk of being out of compliance with the Criteria for Accreditation.

Next Steps in the HLC Review Process

Interim Report: The Board required that the Institution submit an interim report with its next Assurance Filing regarding Core Component 3.A.

Comprehensive Evaluation: The Institution has been maintained on the Standard Pathway with its next comprehensive evaluation for reaffirmation of accreditation in 2019-20.

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.

Information about this action is provided to members of the public and to other constituents in several ways. In accordance with HLC policy,¹ this Action Letter and the enclosed Public Disclosure Notice will be posted to HLC’s website not more than 24 hours after this letter is sent to the Institution.

HLC policy² 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. Mary Vanis.

Sincerely,

Barbara Gellman-Danley
President

Enc:  Public Disclosure Notice

¹ INST.G.10.010, Management of Commission Information
² COMM.A.10.010, Commission Public Notices and Statements
Cc: Chair of the Board of Trustees, Upper Iowa University
    P. Joan Poor, Provost, Upper Iowa University
    Mary Vanis, Vice President for Accreditation Relations, Higher Learning Commission
    Anthea Sweeney, Vice President for Legal and Governmental Affairs, Higher Learning Commission