



March 4, 2021

BY CERTIFIED MAIL

Ginny R. Favede, President
Wheeling University
316 Washington Ave.
Wheeling, WV 16003

Dear President Favede:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Wheeling University (“the Institution”). This action is effective as of the date the Board acted, February 25, 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 2.C (sufficient board autonomy), 4.B (assessment of student learning), 4.C (persistence, retention and completion), and 5.D (institutional effectiveness) with concerns. The Institution does not meet Core Components 5.A (resources) and 5.C (strategic planning).¹ The Institution also requires monitoring related to the Federal Compliance Requirements “Title-IV Program Responsibilities” and “Standing with State and Other Accrediting Agencies.” The Institution is required to host a comprehensive evaluation no later than September 2022 to determine whether the Institution has ameliorated the findings that led to the imposition of the sanction.

Institutional Disclosure Obligation: HLC policy² 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

¹ Because of the timing of evaluation, the Core Components cited in this letter refer to HLC’s Criteria for Accreditation in effect prior to September 1, 2020. However, the required Assurance Filing demonstrating compliance must be written to the current Criteria for Accreditation.

² INST.E.20.010, Probation.

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 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.³ The institution must submit its Provisional Plan within 90 calendar days of this letter.

Substantive Change: HLC policy⁴ 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.⁵

Notification Program: HLC policy⁶ 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:

Wheeling University (“the Institution” or “Wheeling”) meets, but with 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 reasons:

- The current composition of the board is consistent with the Institution’s revised by-laws. Approval of the revised by-laws by the Bishop was delayed due to leadership changes at the Wheeling-Charleston Diocese office.
- The Institution has documented appropriate changes in the areas of board composition, organization, and training, but the Institution needs time to demonstrate that the Core Component is fully met in practice.

³ FDCR.B.10.010, Commission Approval of Institutional Teach-Out Arrangements.

⁴ INST.E.20.010, Probation.

⁵ INST.F.20.040, Substantive Change.

⁶ INST.E.20.010, Probation.

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

- Wheeling has documented significant effort in the assessment of student learning. However, several recent campus, program, and leadership changes underscore that Wheeling’s work in this area is still in its infancy stage. The first cycle of data collection for assessment of program outcomes has not yet been completed. Similarly, the measurement of cocurricular learning goals and outcomes is not yet supported with data.
- Faculty responsibility for the assessment of learning outcomes and structured processes for providing adequate training for faculty to fulfill this responsibility have not been clearly documented.

The Institution meets, but with concerns, Criterion Four, Core Component 4.C, “the institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs,” for the following reason:

- The Institution lacks clear, shared definitions for the terms retention, persistence, and completion and as a result, the Institution’s goals for these key benchmarks of student success remain unclear. This has hampered Wheeling’s ability to make meaningful comparisons to measure its current performance against its own past performance, or to compare its performance with that of peer institutions.

The Institution does not meet Criterion Five, Core Component 5.A, “the institution’s resource base supports its current educational programs and its plans for maintaining and strengthening their quality in the future,” for the following reasons:

- The Institution does not have sufficient fiscal resources to support its operations, as evidenced by its declaration of financial exigency in the spring of 2019.
- Two critical planning documents, Wheeling’s “Five-Year Financial Sustainability Plan” (October 18, 2019 and revised January 24, 2020) and “Journey Forward Together: A Strategic Plan for Wheeling University 2020-2024” (September 6, 2020) both contain exceedingly optimistic targets for critical indices of fiscal health, including enrollment growth, retention, and discount rate. For example, the Strategic Plan calls for the Institution to increase “Freshmen retention” from a historic baseline of 71% in fall 2020 to 85% by fall 2023. However, as previously noted under Core Component 4.C, this metric does not have a clear and widely understood definition within the Institution. In another important example, the new plan indicates that the discount rate (for undergraduates only) will be held at 67% beginning in fall 2020. However, the first quarter FY 2021 (unaudited) budget information provided in the response to the Institutional Actions Council (IAC) Hearing Report indicates a 68.9% rate. Wheeling’s discount rate directly affects its net tuition revenue and is, therefore, a critical component of the Institution’s attempts to achieve financial sustainability.
- The Institution has relied heavily on the support of the Diocese of Wheeling-Charleston since its declaration of financial exigency in March 2019. The Diocese’s commitment of \$7 million over six years (\$2.5 million this year) is what has enabled the Institution to

balance its budget and to achieve an estimated CFI of 1.4 for FY 2020, largely due to booking \$5 million in gifts receivable from the Diocese as assets. Utilizing such sources of revenue to maintain operations is a financially unsustainable model, and there is no evidence that additional fundraising or enrollment growth will be able to close future budget gaps.

- Although Wheeling's current FY 2021 budget is projected to be balanced by year's end, the Institution has a line of credit of \$4.25 million that has a short payoff period, in addition to \$6 million it has borrowed from its endowment.

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

- Wheeling's new Strategic Plan was completed shortly before the Institution's September 2020 verification visit. This plan is very similar to its 2012 Strategic Plan, which contained the same initiatives and identical planning measures with similar goals. Both plans, however, suffer from the same overly ambitious enrollment-related targets, including proposing to increase retention from 71% to 85% over the plan period and increasing enrollment by at least 80%. Furthermore, Wheeling has not provided convincing evidence that these goals are achievable or that if achieved, the goals would result in financial sustainability.

The Institution meets, but with concerns, Criterion Five, Core Component 5.D, "the institution works systematically to improve its performance," for the following reasons:

- While the Institution has shown its desire to systematically improve its performance, there has not been sufficient time, under the Institution's new executive leadership, to adequately demonstrate Wheeling's capacity for systematic improvement. Currently personnel are being hired and systems and processes are being designed and implemented. However, these developments have been initiated too recently to be evaluated.
- The Institution's approach to developing its financial models (e.g., enrollment and retention data disaggregated by program) appears to be of questionable use in providing data that would lead to systematic improvement of institutional performance.

The Institution requires monitoring related to the Federal Compliance Requirement, Title-IV Program Responsibilities, for the following reason:

- Wheeling's last Title IV Program Review was conducted in May 2014 with multiple violations noted at that time. While the Institution notes that there have been no limitations, suspensions, or terminations imposed by the U.S. Department of Education (USDE), the Institution was found not to be in compliance with the Clery Act and the Drug Free Schools and Communities Act and, according to a July 2016 letter from USDE, the Institution was assessed a total liability of \$13,741.15. The Institution expects to successfully address all areas of concern before the expiration of its current USDE certification term in December 2021.

The Institution requires monitoring related to the Federal Compliance Requirement, Standing with State and Other Accrediting Agencies, for the following reason:

- Wheeling needs to complete and report out on several programmatic accreditor-related events, including teach-outs for low enrollments with the Commission on Accreditation of Athletic Training Education and the Commission on Accreditation for Respiratory Care. Wheeling is also processing a voluntary resignation with the Council for the Accreditation of Educator Preparation and completing a postponed follow-up visit with the Accreditation Council of Business Schools and Programs that was delayed due to the pandemic.

The Board of Trustees of the Higher Learning Commission 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 July 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 September 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 February 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.

Institutional Designation: The Institution was assigned the Institutional Designation of “Financial Distress” in May 2019. The purpose of the designation was to signal to the public and others that HLC was aware of the Institution’s financial circumstances, including its previous declaration of financial exigency and that HLC would be conducting a further review of the Institution. As the comprehensive evaluation that led to this action afforded an opportunity for HLC to thoroughly review the Institution’s ongoing compliance with Core Component 5.A, the Institutional Designation is no longer necessary. Therefore, the designation is removed effective as of the date of the HLC Board’s action.

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, Wheeling University
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
Corely Dennison, Vice Chancellor for Academic Affairs, West Virginia Higher Education Policy Commission
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education, U.S. Department of Education

⁷ INST.G.10.010, Management of Commission Information; COMM.A.10.010, Commission Public Notices and Statements