



November 14, 2017

VIA CERTIFIED MAIL

Dr. Daniel Barwick, President
Independence Community College
1057 W. College Ave.
Independence, KS 67301

Dear President Barwick:

This letter is formal notification of action taken by the Higher Learning Commission (“HLC” or “the Commission”) Board of Trustees (“the Board”) concerning Independence Community College (“the College” or “the institution”). During its meeting on November 2-3, 2017, the Board continued the accreditation of the College and placed it on Notice because the College is at risk of being out of compliance with the Criteria for Accreditation and the Core Components identified in the Board’s findings as outlined below. This action is effective as of the date the action was taken. In taking this action, the Board considered materials from the most recent comprehensive evaluation, including but not limited to: the Quality Highlights Report the College submitted, the report from the comprehensive quality review team, the report of the Institutional Actions Council (“IAC”) Hearing Committee, and the institutional responses to these reports.

The Board required that the College submit a Notice Report no later than March 1, 2019, or at least eight weeks prior to the focused visit, providing evidence that the College is no longer at risk for non-compliance with the Criteria for Accreditation and Core Component identified in this action and that it has ameliorated the issues that led to the Notice sanction. Included in this report should be evidence of the following:

- Development and implementation of an institutional plan for systematic review of data connected with institutional complaints; especially student complaints. The plan should include a process that ensures oversight by knowledgeable persons of the analysis of trends associated with complaints; especially those connected to Title IX compliance and student complaints (Core Component 2.A).
- Development and implementation of a technology plan that aligns with strategic objectives and budgetary plans. The plan must assure that security policies regarding the onboarding and off-boarding of employees is included in policies and procedures and that the process for determining access to secure institutional data and the network is clear and assures that only employees with a need to know and/or input responsibilities have access (Core Component 3.D).
- Development of a long-range institutional plan to fully address deferred maintenance of facilities; inclusive of projected timelines, resources needed, and possible funding. The plan should include prioritization policies and procedures to assure that issues directly connected to impacts on student learning and safety are prioritized (Core Component 3.D).

- The plan for program review has been fully implemented and institutionalized according to the proposed plan. The College should provide evidence that results from program reviews have been incorporated into budget and strategic plans and have been used for improvement of courses, programs, and the larger institution (Core Component 4.A).
- Existence of a culture of using data from student learning in curricular and co-curricular programs, as evidenced by at least one to two years of using data for improvement of programs from program assessment processes and related data, and evidence of using data collected from co-curricular programs to improve student experiences and activities (Core Component 4.B).
- Identification of appropriate comparison benchmarks and institutional targets for persistence, completion, retention, and graduation in all programs and at the overall institutional level, which are appropriate for the College based on its mission, values, and characteristics (Core Component 4.C).
- Development and documentation of decision-making responsibilities and processes across campus constituencies, including students, faculty, and staff. The College should clearly delineate final decision responsibilities above simple participation in input of information (Core Component 5.B).
- Development of a clear, well-documented process for the systematic integration of campus planning, with intentional processes and connections between all planning documents on campus, that is inclusive of the results of assessment of student learning (Core Component 5.C).
- Development of a systematic process of regular review of institutional data with clear processes for collection and review of data, and improvement of considerations based on the results of data review that is in-line with institutional benchmarks and targets. The College should provide evidence of long-range planning with trending data used to project plans and targets for three to five years forward. The College must provide evidence of at least one year of improvements based on this regular review of data analysis (Core Component 5.D).

The College is also required to host a Notice focused visit no later than May 2019, focused on validating the contents of the Notice Report. Following the visit, Commission staff will review the materials from the College and the focused visit and will prepare a staff report on whether the College should be removed from Notice because it has been able to demonstrate that it has remedied the issues identified in this action and is no longer at risk of being out of compliance with the Criteria for Accreditation and Core Components. If the institution has not remedied the issues that led it to be placed on Notice or has not been able to demonstrate that it is no longer at risk of being out of compliance with the Criteria for Accreditation and Core Components, the staff report may recommend Probation or other appropriate action up to and including withdrawal of accreditation. The Board will consider the staff report, institutional materials, and visit materials at its November 2019 meeting and will take action as appropriate.

In addition, the Board placed the College on the Standard Pathway with its next comprehensive evaluation (Year 4) in 2021-22.

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

The College 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 because:

- The College has historically demonstrated a lack of oversight and proper controls regarding access to, and control of, data; and
- The College may continue to have issues with decision-making and releasing accurate data because of a lack of appropriate staffing to assure the reliability and validity of the data.

The College meets Criterion Three, Core Component 3.D, “the institution provides support for student learning and effective teaching,” but with concerns because, while the College intends to address resource issues as monies become available, it lacks a detailed technology plan and has several deferred maintenance issues on campus.

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

- The College will need to demonstrate that budgetary and faculty staffing needs are being met in order to implement fully the program review process as explained at the IAC Hearing; and
- It is not clear that the program review process and cycle as explained will be a sustainable model for the College and will provide detailed results leading to effective recommendations for program improvement.

The College 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 because:

- There continues to be a lack of evidence of effective measurement in co-curricular programs; and
- A detailed identification of course outcomes, data collection, and a clear alignment between the College’s strategic and budget plans is lacking.

The College meets 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,” but with concerns because:

- The College does not effectively analyze nor utilize data related to persistence, retention, and completion, and so it does not determine benchmarks, identify trends, set goals, or identify peer institutions and compare itself to them; and
- It also remains unclear how the College determines and prioritizes short- and long-term academic needs.

The College meets 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,” but with concerns because:

- The College has no formal faculty governance body and no student government organization, the absence of which indicates that the College does not sufficiently engage these stakeholder groups in governance in a systematically collaborative manner; and
- While the Academic Affairs Council has decision-making responsibilities for course changes, program changes, and catalog changes, there is no college-wide document

(e.g. faculty or employee handbook) that clarifies the decision-making responsibilities of faculty and administration.

The College meets Criterion Five, Core Component 5.C, “the institution engages in systematic and integrated planning,” but with concerns because:

- While strategic planning has become more inclusive, the planning process is not systematic, intentional and overall forward-looking; and
- There is no assurance that plans for institutional improvement are systematic and coordinated to assure adequate resources for implementation.

The College meets Criterion Five, Core Component 5.D, “the institution works systematically to improve its performance,” but with concerns because:

- While the College has begun to address past neglect regarding program review, it is not clear that (regardless of the exact number of programs) the College has sufficient academic personnel to sustain the process as currently planned;
- The College shows no real evidence of a systematic and integrated approach to planning, as data does not appear to be reviewed intentionally with the determination of using it for decision-making;
- While short-term targets are utilized for enrollment management, no long-term plan has been set for upcoming years that would allow the College to monitor both short- and long-term data for shifts and trends; and
- While the College, in its response to the findings of the IAC Hearing Committee provided a list of data sources and some examples of its usage of data, it has not definitively demonstrated that it consistently and systematically uses appropriate and relevant data to inform its short- and long-term planning and that it has identified and acted on areas of improvement based on this activity.

The College has indicated in its response to the IAC Hearing Committee report that it acknowledges many of these deficiencies.

The College has demonstrated that it meets the Criteria for Accreditation, but with concerns and thus is also at risk of non-compliance with the Criteria and should be placed on Notice.

At this time, the Commission will reassign the College from its HLC Staff Liaison, Dr. Linnea Stenson, to Dr. Anthea Sweeney. Please be assured that Dr. Stenson will work with Dr. Sweeney to create a smooth transition.

The Board action resulted in changes to the affiliation of the College. These changes are reflected on the Institutional Status and Requirements Report. Some of the information on that document, such as the dates of the last and next comprehensive evaluation visits, will be posted to the HLC website.

Information about the sanction is provided to members of the public and to other constituents in several ways. Commission Policy INST.G.10.010, Management of Commission Information, anticipates that the Commission will release action letters related to the imposition of a sanction to members of the public. The Commission will do so by posting this action letter on the Commission website. Also, the enclosed Public Disclosure Notice will be posted to the Commission’s website not more than 24 hours after this letter is sent to you.

Commission policy INST.E.10.010, Notice, subsection Disclosure of Notice Actions, 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 the Commission for further information. The policy also requires that an institution on Notice disclose this status whenever it refers to its Commission accreditation. The Commission will monitor these disclosures to ensure they are accurate and in keeping with Commission policy. I ask that you copy Dr. Sweeney on emails or other communications with campus constituents regarding the sanction as required and provide her with a link to information on your website and samples of related disclosures.

In addition, Commission policy COMM.A.10.010, Commission Public Notices and Statements, requires that the Commission prepare a summary of actions to be sent to appropriate state and federal agencies and accrediting associations, and published on its website. The summary will include the Commission Board action regarding the College. The Commission will also simultaneously inform the U.S. Department of Education of the sanction by copy of this letter.

On behalf of the Board of Trustees, I thank you and your associates for your cooperation. If you have questions about any of the information in this letter, please contact Dr. Sweeney.

Sincerely,



Barbara Gellman-Danley
President

Enclosure: Public Disclosure Notice

cc: Chair of the Board of Trustees, Independence Community College
Kara Wheeler, Vice President for Academic Affairs, Independence Community College
Evaluation team chair
Institutional Actions Council Hearing Committee chair
Karla Wiscombe, Director of Academic Affairs, Kansas Board of Regents
Linnea A. Stenson, Vice President for Accreditation Relations and Director of the AQIP
Pathway, Higher Learning Commission
Anthea Sweeney, Vice President for Accreditation Relations, Higher Learning Commission
Karen Peterson Solinski, Executive 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