



# HIGHER LEARNING COMMISSION

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November 7, 2022

BY CERTIFIED MAIL

Dr. Frank Weller, President  
Great Lakes Christian College  
6211 West Willow Highway  
Lansing, MI 48917-1299

Dear President Weller:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Great Lakes Christian College (“the Institution”). This action is effective as of the date the Board acted, November 3, 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 4.C and 5.A with concerns. The Institution does not meet Core Components 5.B and 5.C. The Institution is required to host a comprehensive evaluation no later than April 2024 to determine whether the Institution has ameliorated the findings that led to the imposition of the sanction.

**Institutional Disclosure Obligation:** HLC policy<sup>1</sup> 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](http://www.hlcommission.org/upload) (by selecting “Information about Institutional

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<sup>1</sup> INST.E.20.010, Probation.

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.<sup>2</sup> The Institution must submit its Provisional Plan within 90 calendar days of this letter.

**Substantive Change:** HLC policy<sup>3</sup> 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.<sup>4</sup>

**Notification Program:** HLC policy<sup>5</sup> states that an institution placed on Probation is ineligible for the Notification Program for Additional Locations until three years following the removal of Probation, providing all other requirements for the Notification Program are met.

### **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:

Great Lakes Christian College 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’s new president has identified several key performance indicators for the Institution. However, the Institution is in the very early stages of collecting and using data for robust decision-making and needs to develop associated goals and actionable plans to achieve those goals.
- Some evidence of data collection for retention, persistence, and graduation rates exists. However, there is insufficient evidence regarding the analysis or use of these data for planning or improvement.

The Institution meets, but with concerns, 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 reasons:

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<sup>2</sup> FDCR.B.10.010, Commission Approval of Institutional Teach-Out Arrangements.

<sup>3</sup> INST.E.20.010, Probation.

<sup>4</sup> INST.F.20.040, Substantive Change.

<sup>5</sup> INST.E.20.010, Probation.

- The Institution recognizes the need to collect and analyze data. However, there is not yet a systemic culture of collecting, analyzing and using information for making informed decisions and changes.
- The Institution's new president brings a strong leadership focus on important indicators such as retention, enrollment, and cash monitoring. However, as the importance of these focus areas becomes more pervasive across the Institution, it needs to demonstrate that it has formalized processes related to these indicators.

The Institution does not meet 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:

- Lapses in financial oversight and planning created inaccurate perceptions about the Institution's financial position and it will take time to implement new processes that, over time, will provide a progressively more accurate understanding of the Institution's financial position. The Chief Financial Officer role is currently vacant and the Institution is utilizing a consultant to assist with the duties of the position.
- The Institution was unable for a significant period of time to produce important operational metrics, resulting in inaccurate Composite Financial Index (CFI) ratios being reported to HLC and the U.S. Department of Education.
- Some faculty members serve dual roles, including key staff and administrative positions such as Chief Financial Officer, Registrar, and Director of Financial Aid. The individuals in these positions have no prior experience with serving in these non-faculty roles and, in some cases, lacked sufficient qualifications and/or training, which puts the institution at risk, particularly with regard to the Chief Financial Officer position.
- The Institution lacks processes for multi-year budgeting or the systematic monitoring of finances. The Institution's new president has initiated changes in internal procedures, and time is needed to ascertain their effectiveness.
- The Institution sold its campus to a third-party lending organization that is leasing the property back to the Institution, while the Institution itself remains responsible for routine maintenance and other improvements to an aging physical plant.
- The Institution has improved timely payment of vendors by tapping its line of credit. However, that line of credit is nearly exhausted, resulting in limited capacity to address unexpected expenses related to the physical plant or other operational areas.

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:

- Due to its small size, the Institution has used informal approaches to planning and improvement. These approaches are not sustainable and have not resulted in the systematic and integrated planning necessary for the Institution's future success.
- The Institution's strategic plan lacks a focus on implementing change and instead focuses on understanding the Institution's current environment. The Institution cannot demonstrate that its strategic plan is leading it to address a variety of challenges in order to move forward.

- The Institution cannot demonstrate that it strategically links its budgeting process to the mission, assessment, or evaluation for continuous improvement.
- Although the Institution's new president has demonstrated resolve to improve financial reporting and forecasting and to encourage a new institutional culture of data collection and data-informed decision-making, it will take time for the Institution to implement and document improvement in its operations.
- The Institution needs to broaden the subject areas of expertise among its Board members. Although the Board and representatives of the Institution acknowledge this need, it will take time to effectively implement and document.

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 February 1, 2024, 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 April 2024 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 October/November 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,<sup>6</sup> 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, Great Lakes Christian College  
Samuel Long, Vice President of Academic Affairs, Great Lakes Christian 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  
Jim Farhat, Departmental Specialist, Michigan Department of Labor & Economic  
Opportunity, Workforce Development, Postsecondary Schools  
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education, U.S.  
Department of Education

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<sup>6</sup> COMM.A.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements