November 20, 2019

VIA ELECTRONIC MAIL

Dr. Fletcher Lamkin, President Westminster College 501 Westminster Ave. Fulton, MO 65251

Dear President Lamkin:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees ("the Board") concerning Westminster College ("the Institution"). This action is effective as of the date the Board acted, November 7, 2019. In taking this action, the Board considered materials from the recent Notice visit, 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 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 Components 4.B, 5.A, and 5.C with concerns. The Institution is required to host a Focused Visit, as outlined below, no later than October 31, 2021.

Board Rationale

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

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:

- The Institution supports activities focused on assessment and conducts regular program reviews, but some personnel voiced confusion between assessment and program review. The campus community needs to understand the differences between and purposes of these two concepts.
- Due to financial constraints, several external tools such as the National Survey of Student Engagement, the Collegiate Learning Assessment, and Skyfactor are no longer utilized. It is unclear what tools the Institution has instituted to gather information from external sources. Internal, institution-developed tools are used by several departments. The Institution has a college-wide assessment system in place,

but not all departments have submitted their annual assessment results in recent years.

- The Institution was able to provide evidence that student writing skills have improved for a small sample of the first-year population, but assessment of all firstyear students needs to occur.
- There was no evidence of learning outcomes for co-curricular programs or tools to gather information in order to provide data for decision-making and improvement. The assessment of co-curricular programs needs to be integrated into the institution-wide assessment plan. The Institution affirmed the lack of assessment practices and that ongoing, consistent leadership is needed in this area.

The Institution continues to meet, but with concerns, 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's resources remain challenged and stressed, but improvements in financial controls have occurred and knowledge of institutional resources across all levels of the institution has improved. Resources appear to be sufficient to support operations and deliver educational programs, but continued progress and improvement is needed.
- Turnover of personnel remains a concern, as more than 53 employees (including 15 faculty members) have left since the start of the 2017-18 academic year. More than six new faculty members have been hired, a former president returned, three Cabinet positions were filled, and 12 new or consolidated positions have been filled. Some staff positions (both vacant and filled) have been eliminated.
- In FY2018, the Institution's operating revenues declined to \$25.8 million, to include \$3 million in assets released from restrictions and \$10.6 million in combined annual fundraising and endowment draws. Total unrestricted operating expenses were reduced to \$23.5 million, for an improved \$2.3 million increase in net assets from operating activities. Reliance on assets released from restrictions and annual fundraising/endowment draws continued but was reduced to \$13.6 million. The reliance on non-core student operating revenues remains a concern.
- An amortization schedule was established to repay \$9.8 million of endowment funds over 20 years at 3.85% nominal interest. Beginning in FY2020, the repayment changes from interest only to principal and interest. An additional \$450,000 in cash will be required annually to meet the commitment.
- Enrollment continues to decline for fall total degree-seeking students from 746 in FY2018 and 703 in FY2019 to 648 in FY2020. Enrollment of new students continues to decline. The Institution recognized it had made unrealistic enrollment projections and is working to define strategic goals grounded in historic trends and institutional capacity. The budget for FY2020 was developed with a more realistic projection of enrollment and right-sizing of operations, but the final tally will require another modification to the budget. While the Institution demonstrated improved retention, the incoming class was smaller than expected.

- The Institution's board set limitations to a 2.3% draw-down on endowment funds in order to begin rebuilding the funds and require greater operational discipline regarding expenses. It will be necessary to continue using unrestricted funds to cover institutional costs while changes are made to operations and a strategic enrollment plan is implemented. Heavy reliance on annual fundraising to cover lower operating revenues will continue into the future.
- Human Resources has been impacted by the financial challenges. Low salaries and
 minimal retirement contributions are not at competitive levels. This has contributed
 to turnover and the inability to hire top candidates. The institution expressed
 commitments to improve in this area as soon as possible.
- While internal controls, key hires, and institutional engagement regarding finances and the utilization of resources indicate that the Institution is actively addressing the need to right-size the operations to reflect a changing higher education environment, ongoing improvement is necessary.

The Institution meets, but with concerns, Criterion Five, Core Component 5.C, "the institution engages in systematic and integrated planning," for the following reasons:

- Retention rates have improved due to the expansion of services in the areas of academic support, first year experience, and career planning. The Institution appears committed to strengthening academic technology and campus infrastructure to reflect student expectations of a 21st century higher education institution.
- The Institution needs to continue its efforts to develop long-term planning for enrollment growth by returning to its multi-year budget and to evaluate its enrollment and financial aid assumptions in order to improve net revenue forecasting. The Institution must review its enrollment projections relative to student cost and its ability to continue high levels of fundraising to offset deficits.
- The strategic planning process is still in its infancy as the Institution studies its operations in order to right-size. A comprehensive strategic plan is needed for the Institution to meet net revenue targets and establish a strong foundation for its future.

The Institution has otherwise demonstrated that it is in compliance with the Criteria for Accreditation, Assumed Practices, and Federal Compliance Requirements and is not at risk of noncompliance with the Criteria, and thus should be removed from Notice.

Next Steps in the HLC Review Process

Focused Visit: The Board required that the Institution host a Focused Visit regarding Core Components 4.B, 5.A, and 5.C. as outlined in its August 2019 Institutional Actions Council Hearing Report no later than October 31, 2021.

Comprehensive Evaluation: The Board maintained the Institution maintained on the Standard Pathway with its next comprehensive evaluation for reaffirmation of accreditation in 2024-25.

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,¹ 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 24 hours 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. Karen Solomon.

Sincerely,

Barbara Gellman-Danley

Barrara German-Darley

President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Westminster College

David Jones, Professor of Psychology, Westminster College

Evaluation Team Chair

IAC Hearing Committee Chair

Angelette Prichett, Director of Academic Programs and Initiatives, Missouri Department of Higher Education

Karen Solomon, Vice President for Accreditation Relations and Director of the Standard Pathway, Higher Learning Commission

Anthea Sweeney, Vice President for Legal and Governmental Affairs, Higher Learning Commission

¹ INST.G.10.010, Management of Commission Information; COMM.A.10.010, Commission Public Notices and Statements