HIGHER LEARNING COMMISSION

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June 29, 2021

VIA ELECTRONIC MAIL

Dr. Deidra Peaslee, President
Saint Paul College – A Community & Technical College
235 Marshall Ave.
Saint Paul, MN 55102

Dear President Peaslee:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees ("the Board") concerning Saint Paul College – A Community & Technical College ("the Institution"). This action is effective as of the date the Board acted, June 24, 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 Board determined that the Institution is no longer out of compliance with the Criteria for Accreditation and removed the Institution from Probation and assigned interim monitoring. The Institution meets Core Component 4.A with concerns. The Institution is required to submit an embedded Interim Report, as outlined below, with its next Assurance Filing.

Notification Program: HLC policy[1] states that the Institution remains ineligible for the Notification Program for Additional Locations until it has completed ten (10) years in good standing as required for access.

<u>**Board Rationale**</u>

The Board based its action on the following findings made with regard to the Institution as well as the entire record before the Board:

> The Institution now meets without concerns Criterion Two, Core Component 2.A, "the institution establishes and follows policies and processes to ensure fair and ethical behavior on the part of its governing board, administration, faculty and staff," for the following reasons:
> - The financial integrity of the Institution is safeguarded through its commitment to open and honest communication about college finances as demonstrated through the

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[1] INST.E.20.010, Probation.

Budget Plan menu posted on the Institution's website under Planning and Research, the development of the annual operating budget through a participatory process, integration of the budget planning process with the Strategic Plan, and completion of an independent audit as part of the Minnesota State Colleges and Universities ("Minnesota State" or "the System") Annual Financial Report.

- The Institution has clearly defined budgeting principles that build the framework for development of the annual budget. Strong internal controls safeguard the Institution's assets and ensure that policies and procedures are followed. Employees have a clear understanding of the budgeting principles and process. The administration now provides clear and complete information about the state of the Institution and its financial viability.

- The integrity of the Institution's academic programs is safeguarded through both internal and external methods. Externally accredited programs meet rigorous accrediting standards essential to validate that graduates have a solid educational foundation and are ready to enter their fields. Supported by a new position in human resources, all faculty credentials are evaluated in keeping with HLC requirements and System and Institution procedures. Evaluations are now performed on a regular basis and used to inform professional development opportunities and highlight the contributions made by each employee in support of the Institution's mission. All course descriptions and program requirements are listed for each diploma, certificate, and degree in the catalog.

- The Institution has policies and collective bargaining agreements to ensure the fair and ethical treatment of all employees and students. The Institution's nondiscrimination policy offers a commitment to equal opportunity for education, employment, and participation in the Institution's activities. It also clearly articulates that harassment "has no place in a learning or work environment" and that the Institution is committed to eliminating all forms of violence and barriers to admissions or participation. A commitment to expanding the staffing and services of the human resources department has helped address concerns that the Institution was under-resourced.

- The Institution has filled over 70 positions since the last comprehensive evaluation and is investing time and talent toward its staff retention practices. Strong hiring practices coupled with professional development to help employees understand how to navigate new and existing processes and value each other have helped change the culture at the Institution. In addition, the Institution is working to increase the diversity of faculty to more accurately reflect its student population and community and has actively provided education and training to build awareness and sensitivity.

- The Institution has made remarkable progress in the last two years in regard to its campus climate. A comprehensive campus climate study was performed in 2019 and the consultant's resulting recommendations have been used to facilitate open and intentional discussions about how to improve the Institution. Many improvements have been made under the new administration in creating and using inclusive communication channels that facilitate authentic and direct conversations, making sure that committees are high-functioning and have the autonomy to make decisions

and recommendations, facilitating campus-wide engagement, fostering trust and respect, and building a culture that is vested in a deep sense of commitment to each other. The Campus Climate workgroup guides this important and informative work, providing regular updates to the faculty and staff.

- The Institution's policies and Minnesota State's procedures ensure that the auxiliary functions operate in support of the academic experience, enhance student life and provide financial stability for these operations.

The Institution now meets without concerns Criterion Two, Core Component 2.D, "the institution is committed to academic freedom and freedom of expression in the pursuit of truth in teaching and learning," for the following reasons:

- Relevant System policies provide evidence of the Institution's formal commitment to academic freedom and freedom of expression in the pursuit of truth for teaching staff. Students expressed satisfaction in their opportunity to share divergent perspectives and engage in freedom of expression.
- The Institution's organizational structures and committees provide mechanisms for engaging stakeholders in decision making. Communication and shared governance have improved significantly since the last comprehensive evaluation. Scores from the most recent PACE Climate Survey also provide evidence that employee satisfaction has improved significantly.
- Faculty and staff expressed confidence in their ability to freely express opinions, ideas, dissatisfaction, and issues.

The Institution now meets without concerns Criterion Three, Core Component 3.C, "the institution has the faculty and staff needed for effective, high-quality programs and student services," for the following reasons:

- The Institution strives to ensure that the composition of faculty and staff reflects the demographics of the community it serves. Its policies ensure that hiring processes provide for thorough, well documented, open and competitive searches that result in hiring the best qualified candidates. Moreover, the policy ensures that the applicant pool and college workforce reflect the diversity of its service delivery area as an Equal Opportunity/Affirmative Action employer. During the most recent Strategic Planning process, one of the identified key performance indicators (KPIs) was to increase diversity among faculty and staff to 30% in 2022-2023. The Institution is currently at 25.4%.
- The Institution has sufficient numbers and continuity of faculty members to carry out their classroom and non-classroom roles, including oversight of the curriculum and expectations for student performance, assessment of student learning, and establishment of academic credentials for instructional staff. Faculty to student ratios by academic division represent best practices for areas of study and are aligned to peer institutions.
- To address institutional and departmental capacity concerns, new positions have been added to increase personnel in understaffed areas and to reduce turnover.

Specifically, over 70 positions have been hired and onboarded in the past 15-18 months.

- Faculty credential standards are established by Minnesota State Academic Affairs College Faculty Credentialing Unit, housed at the System office. While the System establishes faculty credential standards, the Institution monitors faculty credentials in alignment with established standards. A comprehensive audit of all faculty credentials was conducted in March 2019. Faculty credentialing files were updated, and any credentialing compliance issues were addressed. The Institution has added a Faculty Credentialing and Recruiting Coordinator to Human Resources to ensure faculty are qualified per HLC and state guidelines. The Institution has created a robust and well documented process to ensure faculty are qualified per Minnesota State and HLC requirements.

- The Institution created a comprehensive Faculty Development and Evaluations process, which includes a faculty professional development plan, classroom observations, student surveys, and a summative comprehensive review of all aspects of a faculty member's responsibilities.

- The Institution supports and prioritizes access to professional development for faculty and staff. The Academic Effectiveness and Innovation (AEI) department provides professional development activities on campus and supports additional off-campus professional development. Faculty have access to on-demand consultation with curriculum designers, professional development training sessions and links to outside resources and opportunities. A New Faculty Academy supports new faculty and includes a three-day orientation, mentoring, monthly "lunch and learn" sessions and formative observations.

- Staff members providing student support services are appropriately qualified, trained and supported in their professional development. Staff Development opportunities are held in the fall and spring and offices are closed to enable all staff to attend.

The Institution continues to meet, but with concerns, Criterion Four, Core Component 4.A, "the institution ensures the quality of its educational offerings," for the following reasons:

- The Institution has embarked on development of a program review process that focuses on quality improvement and institutional effectiveness. The Institution utilizes the process to engage in continuous improvement at the course, college services, and student outcome levels. While this progress is noteworthy, due to the newness of the process evidence of sustainability is not yet available, nor is there evidence that the Institution's program review has significantly impacted student learning outcomes or program improvements.

- Although the Institution's program review processes are very new and contain just one data cycle, there has been significant progress in this area as follows:
    o The program review process contains metrics that are part of a three-year cycle. These are reviewed periodically for relevance.
    o The Institution has altered the dashboard to distinguish between General Education and Workforce programs within the review process.

- o The aggregate findings are used for the upcoming academic year's planning process and strategic decision making.
- o Education on obtaining data specific to a program is provided through several tools (e.g., data request form), and stakeholders can request a coaching session to learn how to determine which information is most relevant.
- In spring 2019, the Institution revised its program review process to ensure broader participation by all programs and greater use of data to make decisions, which includes a new Program Review Handbook; templates for annual and comprehensive reporting; new data dashboards; and analysis of data related to curricula, learning outcomes, and program costs. The new process includes updated schedules for review, with a third of the academic programs reviewed each year on three-year cycles. Expectations of the review process are outlined in the new handbook, and feedback is welcomed from deans, peers, and the Assessment of Student Learning Committee.
- The program review system connects to the Institution's system for assessing program learning outcomes (PLOs). Each sample program report contains maps which align courses with PLOs. Faculty assess student mastery of PLOs through a variety of methods (exams, papers, projects, skill demonstrations, signature assignments, etc.) as identified in their assessment plans. The Institution aggregates scores across courses and sections. The Assessment of Student Learning Committee reviews aggregated data across the Institution.
- Because the Institution's program review and assessment systems contain just one cycle of data, continued sustainability or evidence of improvement in student learning is still not evident. A majority of the Institution's programs have not yet participated in comprehensive program reviews, which occur on a rotating three-year basis, and while the Institution provides ample evidence for many essential elements of review – for example, evidence of shared responsibility in creating outcomes and designing rubrics – other elements have yet to be tested. Data analyses and interpretations are incomplete in many of the program examples.
- The Institution uses the Minnesota Transfer Curriculum to evaluate credits accepted in transfer. It also has policies for credit transfer based on examination, experiential learning and prior learning.
- Through an updated assessment process and review by the Academic Affairs and Standards Council (AASC), the Institution assures the quality and rigor of all courses, including prerequisite courses, and expectations for student learning. The Institution follows a prescribed workflow for all course proposals and modifications as well as new program proposals. There is sufficient state oversight of curricular processes for all programs and the Minnesota Transfer Curriculum is used for transfer programs. A Curriculum Assessment Coordinator, hired in 2018, ensures compliance with Institution and System standards and works directly with programs to ensure that any modifications meet stated PLOs. The Institution retains primary oversight and control over learning resources in its learning management system.
- The Institution provides detailed explanation and direct evidence of consistency between Concurrent Enrollment courses taught by high school instructors and the

same courses taught by the Institution's faculty. Program reviews contain learning outcome data for concurrently enrolled students and formal processes for mentoring high school instructors, including in-class observations.

- The Institution ensures the success of its graduates and evaluates their success. The *Next Destination Questionnaire* is used to assess employment outcomes of career program graduates and the resulting data appear on program review dashboards. The Institution also assesses the success of transfer graduates through continued enrollment indicators provided by the National Student Clearinghouse, and these figures also appear on program review dashboards.

The Institution now meets Criterion Four, Core Component 4.B, "the institution engages in ongoing assessment of student learning as part of its commitment to the educational outcomes of its students," for the following reasons:

- The Institution continues to make improvements to its assessment of academic and cocurricular programs. Intensive in-service trainings that were provided in the 2018-2019 academic year have had a significant impact on the assessment practices of faculty and staff. In 2019, the Institution approved new learning outcomes for all programs and courses, and course-level learning outcomes are clearly articulated to students.
- The Institution uses Strategic Planning Online (SPOL) to gather assessment data, the same software that is used for budgeting. Faculty made the decision to use SPOL, so there is significant faculty acceptance of the platform. Use of SPOL has helped connect program assessment results to budget requests.
- Cocurricular assessment processes are well designed and implemented across the Institution. The Institution has developed five cocurricular learning outcomes (CCLOs) that staff in Student Affairs assess. Each Student Affairs department uses the Co-Curricular Assessment – Department Plan & Report template to develop its assessment plan. The template is well developed, straightforward, and easy to use. Similar to the academic programs, Student Affairs departments enter their data into SPOL.
- The new assessment processes for both academic programs and cocurricular offerings are both manageable and meaningful. The student learning outcomes in all areas are clearly written and provide a variety of assessment strategies to measure student learning.
- Although the Institution's revised assessment processes are still new, they have already yielded improvements to both academic and cocurricular programs and have led to concrete evidence that changes to curriculum or delivery strategies in academic departments, general education, and cocurricular programs are based on assessment data.
- Because the current assessment process is relatively new, improvements can be made by closing the assessment loop in all areas in which weaknesses have been identified and ensuring that the changes actually make a difference and positively impact student learning. The current processes and the faculty and staff enthusiasm for them

signify that the Institution is committed to the long-term implementation of the assessment plan.
- There is now substantial participation in assessment processes at the Institution. Much of the on-campus enthusiasm has been attributed to the high level of quality assessment support that faculty and staff receive from the AEI department.

The Institution now meets without 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 has established goals for student retention, persistence, and completion, informed by historical data and compared against other Minnesota State colleges, Metro colleges, and the National Community College Benchmarking Project (NCCBP). Data are disaggregated by year, enrollment intensity (full-time vs. part-time), and academic division.
- Goals for retention, persistence, and completion are clearly communicated to all stakeholders. The Institutional Research, Planning, and Grants (IRPG) Department provides training to the campus community on how to access and analyze data that are broadly used throughout the Institution. Although the Strategic Enrollment Plan implementation began only in summer 2020, it does provide a strong framework for continued oversight and accountability across the Institution.
- Retention data has helped inform changes to the Institution's reading, sports science, and psychology programs. In addition, analysis of retention data is having an impact on various services, including pathway advising (EAB Navigate) and a summer bridge program (Title III Grant). Analysis of retention, persistence, and completion data informed recent changes in communications to students who are not making sufficient academic progress (i.e., the Satisfactory Academic Progress process).
- The methodologies the Institution uses to examine retention, persistence, and completion reflect sound practice. Not only does the Institution maintain its own definitions of these metrics, but it also evaluates itself against the Minnesota State definitions. The student record system used by the Institution allows it to analyze data on retention, persistence, and completion at various times and by various student demographics.

The Institution now meets without concerns Criterion Five, Core Component 5.A (formerly Core Component 5.B), "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:
- The Institution, the System, and the Board of Trustees follow the standards formally articulated in legislation, as well as policies and procedures of the state, System, bargaining unit, and Institution. The Board, Chancellor, and leadership team are appropriately knowledgeable about the Institution's actions and activities.
- The leadership team has collaboratively improved and/or developed formal and informal processes to increase faculty, staff, student, and community involvement in

the Institution's governance. Communication about these processes is clear and open. There is also a process for reviewing and improving policies and processes, which are memorialized in a repository available for stakeholder review. The Institution's organizational and committee structures offer mechanisms for constituents to provide input in planning and decisions. Institutional constituents expressed significantly improved satisfaction with open communication and their involvement in shared governance since the last comprehensive evaluation. This is further affirmed by improved scores in the PACE survey.

- The Institution documents and describes how it more effectively uses data for decision-making and has invested in new and/or improved staffing, processes and tools that enable faculty and staff to decentralize data analysis and increase data literacy. This supports a number of processes, including strategic planning, program review, and assessment of student learning outcomes. Additionally, there now exists significant training and professional development in the use of data to inform planning and decision making.

- The Institution uses formal processes, committees, shared governance, and collaboration with faculty and students to establish and update its academic requirements, policies, and processes. Some elements of academic planning and policy are determined at the state or System level; others are at the local level.

- The Institution has invested in staffing, technology, and software to enhance academic planning and review and has provided appropriate training for those using these tools.

The Institution now meets without concerns Criterion Five, Core Component 5.B (formerly Core Component 5.A), "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:

- The Institution has qualified and trained operational staff. To address staff shortages in key areas, positions have been added or filled in several key departments since the beginning of the 2018-19 academic year. These positions expanded capacity sufficiently to support the Institution's operations.

- The Institution has infrastructure sufficient to support its operations wherever and however programs are delivered, including physical space, equipment, and technology.

- The Institution's stated goals are realistic and demonstrate awareness of its resources and opportunities to meet the needs of its stakeholders. The Institution has moved to a transparent budgeting and planning process, and the Cabinet sets the budget priorities for the upcoming year. This helps determine the base budget, while additional requests are considered via a prioritization list. The planning process is open to the entire campus via budget and spending workshops held throughout the year. The Institution delegates budget authority to employees based on the nature of their positions and responsibilities. When an employee designated as a cost center manager is hired, the Accounting Supervisor leads new employee orientation on the responsibilities of managing resources and monitoring a cost center budget.

- Despite enrollment declines as a result of COVID-19, the Institution's fiscal allocations ensure that its educational purposes are achieved. The Institution was able to manage the financial impacts of COVID-19 in FY2020 and realize a surplus of approximately $1.4 million. Non-personnel spending decreased dramatically as operations and classes became remote. As of September 2020, the Institution achieved better than expected summer enrollment. Actual fall enrollment is slightly better than the FY2021 budget projection.

The Institution now meets without concerns Criterion Five, Core Component 5.C (including former Core Component 5.D), "the institution engages in systematic and integrated planning and improvement," for the following reasons:

- The Institution aligns its resources with its priorities through processes for systematic and integrated planning and budgeting. The annual Alignment of Budget and Planning process ensures resource allocations align with annual priorities. Annual priorities derived from the Strategic Plan are determined with involvement of faculty, staff and administration. Objectives and budget requests are coordinated and prioritized to ensure that the institution allocates its resources in alignment with its mission and priorities.
- The Institution utilizes SPOL to integrate assessment into the planning and budgeting process. Assessment data, benchmarking, and analysis are also utilized in program review to inform program planning, development, and resource identification. During the planning and budgeting cycle, requests from academic departments are reviewed and prioritized by Academic Affairs leaders. Academic Deans present findings from program review and assessment to the Cabinet, and institutional operations data is the foundation for the annual planning and budgeting cycle.
- The Institution uses a robust planning process that includes external groups. Staff and faculty planning symposia are held annually to discuss and affirm the strategic priorities for the upcoming year, and other live events and surveys are utilized. The Institution further involves stakeholders in collaborative decision making in annual planning and budgeting. There is a four-phase process that encompasses the entire Institution and considers the perspectives of various constituent groups. The Institution also consults with external constituent groups to ensure that additional perspectives are included in the planning process. The needs of external stakeholders are considered through Program Advisory Committees, the Friends of Saint Paul College Foundation, and the President's Advisory Council.
- The Institution has a sound understanding of its current capacity, including fluctuations in its sources of revenue and enrollment. Budget scenarios used in the integrated planning and budget process consider the impact of all such factors. The Institution is developing an improved projection model to better predict future cash flow that will support its ability to make strategic decisions during the annual planning process.

The Board of Trustees of the Higher Learning Commission has determined based on the preceding findings and evidence in the record that the Institution has demonstrated that it is otherwise in compliance with the Criteria for Accreditation, Assumed Practices and Federal Compliance requirements.

Next Steps in the HLC Review Process

Interim Report: The Board required that the Institution submit an embedded Interim Report regarding Core Component 4.A with its next Assurance Filing.

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

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,[2] 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. A. Gigi Fansler.

Sincerely,

Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

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[2] COMM.A.10.010, Notice of Accreditation Actions

Cc: Nichole Sorenson, Dean of Institutional Research, Planning & Grants, Saint Paul College –
           A Community & Technical College
        Evaluation Team Chair
        IAC Hearing Committee Chair
        A. Gigi Fansler, Vice President of Accreditation Relations, Higher Learning Commission
        Anthea Sweeney, Vice President of Legal and Regulatory Affairs, Higher Learning
           Commission
        Devinder Malhotra, Chancellor, Minnesota State Colleges and Universities