

November 8, 2023

BY CERTIFIED MAIL

Vann Newkirk
President
Wilberforce University
P. O. Box 1001
1055 N. Bickett Road
Wilberforce, OH 45384-1001

Dear President Newkirk:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Wilberforce University (“the Institution”). This action is effective as of the date the Board acted, November 2, 2023. In taking this action, the Board considered materials from the most recent Focused Visit, including, but not limited to: the Focused Visit Report the Institution submitted, the report from the Focused Visit team, the report of the Institutional Actions Council (IAC) Hearing Committee, the report of the Board Committee Hearing, and the institutional responses to these reports.

Summary of the Action: The Institution has been placed on Notice because it is at risk of being out of compliance with the Criteria for Accreditation. The Institution meets Core Components 3.C, 4.C, 5.B, and 5.C with concerns. The Institution does not meet Assumed Practices D.3 and D.4. The Institution is required to host a Notice Visit no later than May 2024 to determine whether the Institution has ameliorated the findings that led to the imposition of the sanction.

Institutional Disclosure Obligation: HLC policy¹ 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 its 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

¹ INST.E.10.010, Notice.

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.

Substantive Change: HLC policy² requires that an institution placed on Notice be subject to additional requirements for substantive change during the Notice period and for three (3) years following the removal of Notice.

Notification Program: HLC policy³ states that an institution placed on notice is ineligible for the Notification Program for Additional Locations for three (3) years following the removal of Notice, 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:

Wilberforce University (“the Institution”) meets, but with 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 has added full-time faculty and the utilizes post-doc faculty from neighboring institutions, which raises the total number of faculty to 40 faculty.
- Professional development funds are now available for all faculty at the Institution.
- Support staff positions at the Institution remain unfilled.
- The Institutional Research office at the Institution recently modified its protocols for extracting student enrollment data, which is expected to minimize conflicting data reports. This process was launching in Summer 2023 and has not been tested.

The Institution 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:

- During Summer 2023, the Institution hired enrollment personnel and a professional with expertise in data management and analysis.
- Though a Strategic Retention Committee had previously been re-established, the Institution continues to demonstrate that retention of students continues to be challenging.

The Institution meets, but with concerns, 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:

² INST.F.20.040, Substantive Change.

³ INST.E.10.010, Notice.

- Several Board members with financial and business management experience have been added to the Board of Trustees of the Institution.
- New personnel have joined the Institutional Advancement office at the Institution but the Institution has yet to demonstrate success in meeting fundraising goals.
- The Board of Trustees of the Institution recently passed a resolution in August 2023 to restrict the approval of deficit budgets.
- As of August 2023, the audit management letter was not yet signed in order for the FY 2023 audit for the Institution to commence. The Institution has a history of not completing audits on a timely schedule due to challenges with accounting personnel.

The Institution does not meet Assumed Practice D.3, “institution has future financial projections addressing its long-term financial sustainability,” for the reasons noted above under Core Component 5.B and the following reason:

- The Institution is an enrollment dependent institution with fluctuating enrollments and uneven fundraising, and long-term financial sustainability has not yet been demonstrated.

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

- The President and a majority of the President’s cabinet joined the Institution in 2023 and are in the midst of learning their roles and institutional culture.
- The new leadership of the Institution is working to align the strategic plan with a redefined budgeting process.
- Student housing at the Institution is at maximum capacity and some students are living in contracted facilities at two other institutions. The Institution has developed a long-term five year plan to address this issue, which is underway but not yet completed.

The Institution does not meet Assumed Practice D.4, “the institution maintains effective systems for collecting, analyzing, and using institutional information,” for the reasons noted above under Core Component 5.C and the following reason:

- The Institution is in the initial stages of establishing structures to analyze and use data for informed decision-making. Recent actions that the Institution has taken in this area have yet to be tested.

The Board of Trustees of the Higher Learning Commission has determined based on the preceding findings and the evidence in the record that the Institution is at risk of being out of compliance with the Criteria for Accreditation.

Next Steps in the HLC Review Process

Notice Report: The Board required that the Institution submit a Notice Report no later than March 1, 2024, or at least eight weeks prior to the Notice Visit, providing evidence that the Institution is no longer at risk for non-compliance with the Criteria for Accreditation and that it

has ameliorated the issues that led to the Notice sanction.

Notice Visit: The Institution will host a Notice Visit no later than May 2024 to determine whether the Institution has ameliorated the findings that led to the imposition of Notice and to make a recommendation about whether to remove Notice or take other action.

Board Review: The Board will review the Notice Report and related documents at its November 2024 meeting to determine whether the Institution has demonstrated that it is no longer at risk of noncompliance with the Criteria for Accreditation and Core Components identified in this action and whether Notice shall be removed, or if the Institution has not demonstrated compliance, whether other action should be taken.

Comprehensive Evaluation: The Institution remains on the Standard Pathway with its next comprehensive evaluation for reaffirmation of accreditation in 2025-2026.

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,⁴ 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. Karen Solomon.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

⁴ COMMA.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements

Cc: Chair of the Board of Trustees, Wilberforce University
Michael Self, Sr., Associate Provost for Academic Affairs, Wilberforce University
Evaluation Team Chair
IAC Hearing Committee Chair
Karen J. Solomon, Vice President and Chief Transformation Officer, Higher Learning
Commission
Marla Morgen, Vice President and General Counsel, Higher Learning Commission
Stephanie McCann, Associate Vice Chancellor, Program Development and Approval,
Ohio Department of Higher Education
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education,
U.S. Department of Education