

June 29, 2023

BY CERTIFIED MAIL

Dr. Richanne Mankey
President
Defiance College
701 N. Clinton St.
Defiance, OH 43512

Dear President Mankey:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Defiance College (“the Institution”). This action is effective as of the date the Board acted, June 22, 2023. 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 3.A, 4.A 4.B, and 5.C with concerns. The Institution does not meet Core Component 5.B. The Institution is required to host a comprehensive evaluation no later than December 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 documents as a single .pdf file to www.hlcommission.org/upload (by selecting “Information about Institutional Disclosures”) no

¹ INST.E.20.010, Probation.

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

Substantive Change: HLC policy³ states that while an institution may file one or more applications for substantive change during the probationary 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.⁴

Notification Program: HLC policy⁵ states that an institution placed on Probation is ineligible for the Notification Program for Additional Locations for three (3) years following the removal of Probation, even if 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:

Defiance College ("the Institution") meets, but with concerns, Criterion Three, Core Component 3.A, "the rigor of the institution's academic offerings is appropriate to higher education," for the following reasons:

- The Institution needs a more consistent program review process for continuous quality improvement.
- The Institution lacks an assessment system for all academic programs to ensure that learning goals and program quality are consistent across all levels and modalities.

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

- The Institution lacks a robust and consistent process for program review.
- The Institution lacks meaningful program review data.
- The Institution does not currently evaluate program health or viability.

² FDCR.B.10.010, HLC Approval of Institutional Teach-Out Arrangements.

³ INST.E.20.010, Probation.

⁴ INST.F.20.040, Substantive Change.

⁵ INST.E.20.010, Probation.

The Institution meets, but with concerns, 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 lacks an assessment system for all degree programs at all levels: Associate, Bachelor's Master's, and Certificates as well as all delivery modes.
- The Institution fails to use what data it collects in substantive and meaningful ways for programmatic improvement, improvement of student learning, planning, or budgeting.
- The Institution needs to focus on using assessment data to improve student learning.

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:

- The Institution lacks a budget strategy and plan that is informed by enrollment data (both historical and projected) as well as an understanding of its current fiscal capacity or whether it shows a pathway to a balanced budget.
- The Institution needs a plan to retire existing debt that is expected to come due in the next 5 years, a strategy to improve management of investments, improved revenues to offset expenses, and an updated drawdown policy to preserve unrestricted endowment assets.
- The Institution needs to demonstrate actions to stabilize the balance sheet, increase revenue opportunities, and reduce debt.

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 Institution’s strategic budget and financial planning has not benefitted consistently from program review data resulting from program reviews or learning outcome assessments.
- The Institution lacks a strategic enrollment plan that assesses the forces impacting the enrollment landscape, defines target market groups and determines ROI or projects enrollment yields.

The Board of Trustees of the Higher Learning Commission has 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 October 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 otherwise meets all the Criteria for Accreditation and

Federal Compliance Requirements.

Comprehensive Evaluation: The Institution will host a comprehensive evaluation no later than December 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 June 2025 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,⁶ 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. Stephanie Brzuzy.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Defiance College

⁶ COMMA.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements

Agnes Caldwell, Vice President of Academic Affairs and Academic Dean, Defiance College

Evaluation Team Chair

IAC Hearing Committee Chair

Stephanie Brzuzy, Vice President of Accreditation Relations, Higher Learning Commission

Anthea M. Sweeney, Vice President of Legal and Regulatory Affairs, Higher Learning Commission

Marla Morgen, General Counsel, Higher Learning Commission

Crystal Puderbaugh, Director of Private Postsecondary Education, Kansas Board of Regents

Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education, U.S. Department of Education