

November 8, 2023

BY CERTIFIED MAIL

Dr. John Crooks
Interim President
Eastern Gateway Community College
4000 Sunset Boulevard
Steubenville, OH 43952-3598

Dear President Crooks:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Eastern Gateway Community College (“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 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, the institutional responses to these reports, and the Institution’s submission dated October 20, 2023.

Summary of the Action: The Board extended Probation because the Institution remains out of compliance with the Criteria for Accreditation and meets the conditions for the extension of Probation set forth in HLC policy. The Institution meets Core Components 1.B, 2.A, 2.C, 3.A, 3.C, 4.A, 4.B, 4.C, and 5.C with concerns. The Institution does not meet Core Component 5.B, Assumed Practice D.3, and FDCR.A. 10.060. The Institution is required to host a Focused Visit no later than May 2024 to determine whether the Institution has ameliorated the findings that led to the extension of Probation.

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 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

¹ INST.E.20.010, Probation.

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 later than seven (7) business days following receipt of this Action Letter. HLC will retain this information as part of the Institution’s record.

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:

Eastern Gateway Community College (“the Institution”) meets, but with concerns, Criterion One, Core Component 1.B, “the institution’s mission demonstrates commitment to the public good,” for the following reasons:

- The Institution is working to develop policies and processes that take into account the national population of students that are enrolled at the Institution.
- The Institution is working to increase sensitivity to local workforce needs and links to communities where students reside.
- The Institution has not engaged in a pre-planned, community needs-based assessment of valued credentials for intended stakeholders.
- The Institution’s lack of preparation with respect to its national footprint results in an inequitable duality of the local and national service areas.
- The Institution has not yet fulfilled plans to refine and articulate the mission.

The Institution now meets without concerns, Criterion One, Core Component 1.C, “the institution provides opportunities for civic engagement in a diverse, multicultural society and globally connected world, as appropriate within its mission and for the constituencies it serves,” for the following reasons:

- The Institution has demonstrated service to promote equitable services to diverse populations through the relatively new Office of Institutional Diversity.
- The Institution offers multiple co-curricular programs, many online, that have proven valuable to students.
- The Institution’s student government is active regardless of modality.
- The Institution offers opportunities for civic engagement that are available for all institutional stakeholders.

The Institution continues to meet, but with 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 Institution is working to provide sufficient oversight of financial aid and human relations. This remains a work in progress and personnel are being hired to oversee these areas.
- The Institution’s student complaint process is undergoing changes to make it easier for students to register their complaints and for responses to be provided in an expedited fashion.

- The final determination of the US Department of Education program review, which discussed discrepancies regarding financial aid, has not yet been released.

The Institution now meets without concerns Criterion Two, Core Component 2.B, “the institution presents itself clearly and completely to its students and to the public,” for the following reasons:

- The Institution has eliminated a website hosted by a former third party that provided incorrect or incomplete information about the Free College Program.
- The Institution has created a situation where continued attention to Federal and State compliance requirements will be overseen by at least two institutional representatives.
- The Institution has plans to review accuracy of information posted to the official website in an ongoing manner.

The Institution meets, but with concerns, Criterion Two, Core Component 2.C, “the governing board of the institution is autonomous to make decisions in the best interest of the institution in compliance with board policies and to ensure the institution’s integrity,” for the following reasons:

- The Institution has yet to establish robust Board training and systems.
- The Institution could not demonstrate that Board members received sufficient information in order provide the necessary oversight functions.

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 has begun, but not yet completed, work to develop differentiated learning outcomes aligned with the type of credential awarded.
- The Institution is doing additional work to develop assessment plans.
- The Institution has studied the role of faculty roles in significant oversight of the academic enterprise and work regarding equity in workload assignments is underway.
- The Institution is focusing attention on regular and substantive interaction across distance education courses.
- The Institution is implementing new data systems.
- The Institution needs to continue to pursue many of its initiatives to determine if they contribute to high quality program delivery.

The Institution now 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 continues to review staffing levels, especially in light of declining enrollment.
- The Institution is working to assure that qualified full-time faculty oversee all courses and to improve adjunct faculty engagement.

The Institution now meets Assumed Practice B.2.a (faculty qualified primarily by credentials; equivalent experience) and Assumed Practice D.4 (effective systems for collecting and analyzing data), for reasons noted above under Core Component 3.C.

The Institution now meets Criterion Three, Core Component 3.D, “the institution provides support for student learning and resources for effective teaching,” for the following reasons:

- The Institution has demonstrated progress in providing more support and resources for student learning and effective teaching through the development of an office to focus on institutional effectiveness, revisions to leadership on the Assessment Committee and investment in technology tools.
- The Institution has hired student success coaches to advance its student success goals.

The Institution now 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 has plans to adjust the schedule of academic program reviews but cannot yet demonstrate successful evaluations.
- The Institution has limited utilization of disaggregated data to understand the effectiveness of the various modalities and plans for a data warehouse are in development.
- The Institution initiatives to ensure the quality of its educational offerings need additional time to mature.

The Institution now 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 is working to map outcomes into technology solutions with plans to document the status of implementation by Spring 2024.
- The Institution is on schedule to differentiate program-level outcomes by the end of the Fall 2023 semester.
- Many of the Institution’s assessment initiatives are in their initial stages.
- The Institution needs additional time to demonstrate the full deployment of the new systems.

The Institution now meets Assumed Practices B.2.d.iv (faculty role in analysis of data and appropriate action on assessment of student learning and program completion) and C.6 (institutional data on assessment of student learning), for reasons noted above under Core Component 4.B.

The Institution now 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 is working to improve disaggregation of student data to evaluate success rates and has invested in several software systems with a comprehensive data system still in development.
- The Institution has assigned appropriate personnel to have oversight of these activities.
- The Institution needs additional time to analyze data and implement solutions to improve the retention, persistence and completion rates across all credentials offered wherever and however the curriculum is delivered.

The Institution now meets Assumed Practices A.6 (accuracy of published data) and C.7 (institutional data on student persistence, retention and completion), for the reasons noted above under Core Component 4.C.

The Institution now meets without 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:

- The Institution has evolving shared governance structures.
- The Institution has a student governance model that engages students located across the United States in participating in institutional planning and decision-making.
- The Institution has improved data analysis due to the implementation of planning and improvement software to track progress on the strategic plan.

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 US Department of Education program review regarding the Institution has not been finalized. It is unknown what financial sanctions, limitations, suspensions, or other consequences may be assigned to the Institution, which may impact ongoing operations.
- The Institution has ongoing litigation-related issues with a third party that may impact ongoing operations.
- The Institution’s budget for FY23 does not appear to be realistic.
- The Institution’s student enrollment continues to decline as the Free College program is winding down.
- The Institution is working to create a more accurate forecasting model for and enrollment and estimations of revenue in order to build a 3-5 year budget plan.
- The Institution is developing a financial aid manual and processes in order to comply with regulations required by the US Department of Education.

The Institution does not meet Assumed Practice D.3 (future financial projections addressing long-term financial sustainability) for the reasons noted above under Core Component 5.B.

The Institution continues to meet, 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 is in the midst of a significant enrollment decline that has impacted systematic planning and improvements.
- The Institution is in the early stages of conducting an analysis of assessment results and progress based on implemented changes.
- The Institution will need to revise its current plan based on fluctuations of institutional resources and the Institution’s current capacity.

The Institution does not meet FDCR.A. 10.060, Title IV Program Responsibilities, for the following reason:

- The US Department of Education Program Review has not been finalized, and the final outcome may affect the Institution’s operations and ability to comply with Title IV program responsibilities.

The Commission may extend Probation for an institution if it demonstrates that it meets certain conditions under HLC policy, and the Board of Trustees of the Higher Learning Commission has determined based on the preceding findings and evidence in the record that the Institution meets those conditions.

Next Steps in the HLC Review Process

Focused Visit: The Board required that the Institution submit a Focused Visit Report no later than April 15, 2024, or at least four weeks prior to the visit, providing evidence that the Institution is no longer out of compliance with Core Component 5.B, Assumed Practice D.3, and FDCR.A. 10.060, and that it has ameliorated the issues that necessitated the extension of Probation, including any findings of Met with Concerns. The Institution will host its Focused Visit no later than May 2024, focused on determining whether the remaining findings of non-compliance with Core Component 5.B, Assumed Practice D.3, and FDCR.A. 10.060 and any findings of Met with Concerns have been fully ameliorated.

Board Review: The Board will review the Focused Visit team report and related documents at its November 2024 meeting to determine whether the Institution has demonstrated that it is now in compliance with all Criteria for Accreditation, Assumed Practices, and Federal Compliance Requirements and whether Probation can be removed, or if the Institution has not demonstrated compliance, whether accreditation should be withdrawn, or other action taken.

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. Karen Solomon.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Eastern Gateway Community College
Vanessa Birney, Vice President of Institutional Effectiveness, Eastern Gateway
Community College
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 & Approval,
Ohio Department of Higher Education
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education,
U.S. Department of Education

² COMMA.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements