



June 30, 2022

BY CERTIFIED MAIL

Lawrence Schumacher, President  
Northwestern College  
7725 S. Harlem Ave.  
Bridgeview, IL 60455

Dear President Schumacher:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Northwestern College (“the Institution”). This action is effective as of the date the Board acted, June 23, 2022. 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 1.C and 5.B with concerns. The Institution does not meet Core Components 4.B and 5.C. The Institution is required to host a comprehensive evaluation no later than December 2023 to determine whether the institution has ameliorated the findings that led to the imposition of the sanction.

**Institutional Disclosure Obligation:** HLC policy<sup>1</sup> 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 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](http://www.hlcommission.org/upload) (by selecting “Information about Institutional

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<sup>1</sup> INST.E.20.010, Probation.

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.

**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.<sup>2</sup> Northwestern College submitted and secured HLC approval for a Provisional Plan effective April 11, 2022, thus satisfying this requirement. The Institution is required to maintain an updated student inventory and secure student records in a manner that will facilitate prompt implementation of a teach-out in the event such implementation becomes necessary.

**Substantive Change:** HLC policy<sup>3</sup> states that while an institution may file one or more applications for substantive change during the probation 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.<sup>4</sup>

**Notification Program:** HLC policy<sup>5</sup> states that an institution placed on Probation is ineligible for the Notification Program for Additional Locations until it has completed ten (10) years in good standing as required for access.

### **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:

Northwestern College (“Northwestern” or “the Institution”) meets, but with 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 reason:

- While the Institution has plans in place that integrate processes for assessment and include the newly created Assessment Committee, the Institution has not provided evidence demonstrating the completion of any actions identified in the plans relevant to the areas of diversity, equity, and inclusion.

The Institution does not meet 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:

- Northwestern did not provide evidence for assessment at the institutional level relevant to general education outcomes.

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<sup>2</sup> FDCR.B.10.010, Commission Approval of Institutional Teach-Out Arrangements.

<sup>3</sup> INST.E.20.010, Probation.

<sup>4</sup> INST.F.20.040, Substantive Change.

<sup>5</sup> INST.E.20.010, Probation.

- Despite plans to aggregate all program outcomes and curriculum maps, track retention by program, and review other program performance metrics assuring that program review has recommenced, the Institution presented no current evidence of these activities.
- The Institution lacks systematic, ongoing assessment at the program and institutional levels.

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:

- Northwestern has been challenged over several years with staying consistently in compliance with federal requirements for Title IV.
- While the Institution is implementing a new internal software system to assist with Title IV compliance, no evidence was provided indicating whether it is operational and will ensure compliance with all requirements.
- The Institution has not demonstrated consistent fiscal responsibility with financial aid distribution requirements.
- The Institution is tuition-dependent and receives half of its revenue from its nursing program, which is currently under sanction from a state agency due to low NCLEX pass rates and thus is subject to an enrollment cap.
- Although the Institution notes a focus on core programs to save resources that can benefit budget management and enrollment forecasting, the actual benefit and clear budget allocations have not been tested.
- The Institution has taken steps to resolve issues with its current financial liabilities, compliance with debt covenants, and reduction of interest and other payments; has negotiated to amend due dates for debts; and has reduced costs and/or expects to reduce operating expenses going forward. However, the dependence upon student tuition and fees for all revenues puts the Institution at risk of continuing financial issues.

The Institution does not meet Criterion Five, Core Component 5.C, “the institution engages in systematic and integrated planning and improvement,” for the following reasons:

- There is no evidence that assessment results and other student outcome data are linked to planning and budgeting decisions.
- Institutional representatives plan to link institutional operations and assessment to budgeting and the strategic planning process and implementation. Opportunity still exists for the Institution to continue to ensure that strategic planning encompasses the needs of all programs.
- The Institution has yet to create a financial plan to assure its solvency.
- The Institution has identified an overreliance on the nursing program for generating tuition revenue and has developed plans to diversify its admissions; however, these plans are in the early stages, and it is not yet clear how successful they will be.

- The strategic plan was developed with input from the Institution's internal stakeholders and with limited external stakeholder participation, although there has been some input from employers of graduates.

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, 2023, 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 meets the Criteria for Accreditation, and Federal Compliance Requirements.

**Comprehensive Evaluation:** The Institution will host a comprehensive evaluation no later than December 2023 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 2024 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,<sup>6</sup> 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.

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<sup>6</sup> COMM.A.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements

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. Linnea Stenson.

Sincerely,

A handwritten signature in black ink that reads "Barbara Gellman-Danley". The signature is written in a cursive style with a large initial 'B'.

Barbara Gellman-Danley  
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Northwestern College  
Tonya Troka, Chief Academic Officer, Northwestern College  
Evaluation Team Chair  
IAC Hearing Committee Chair  
Linnea A. Stenson, Vice President of Accreditation Relations, Higher Learning Commission  
Anthea Sweeney, Vice President of Legal and Regulatory Affairs, Higher Learning  
Commission  
Ginger Ostro, Executive Director, Illinois Board of Higher Education  
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education, U.S.  
Department of Education