

July 2, 2024

BY CERTIFIED MAIL

Lawrence Schumacher
President
Northwestern College
9400 South Cicero Avenue
Oak Lawn, IL 60453

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 27, 2024. In taking this action, the Board considered materials from the most recent comprehensive evaluation, including, but not limited to: the Assurance Argument the Institution submitted, the report from the comprehensive evaluation team, the report of the Institutional Actions Council (IAC) Hearing Committee, and institutional responses to these reports.

Summary of the Action: The Institution has been removed from Probation and has been placed on Notice because it is at risk of being out of compliance with the Criteria for Accreditation. This action also resulted in a reaffirmation of the Institution’s accreditation. The Institution meets Core Components 5.B and 5.C with concerns. The Institution is required to host a Notice Visit no later than December 2025 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 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 (by selecting “Information

¹ INST.E.10.010, Notice.

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 the Institution remains ineligible for the Notification Program for Additional Locations until it has completed three (3) 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 (“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 reformulated its Diversity, Equity, and Inclusion Committee into a more active, voting body that focuses efforts on data-informed assessment processes.
- The Institution plans monthly co-curricular “Spotlight Topics,” which are shared throughout the Institution and are inclusive of faculty, staff, and students.

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 has reevaluated and rewritten program outcomes for all programs to align with the Institution’s mission.
- The Institution entered its second cycle of assessment planning and evaluation with an emphasis on assessment of general education.
- The Institution’s practices used in the training and support of faculty for assessment have been widely shared and include curriculum maps, rubrics, and documented analysis and improvement plans.
- The Institution is now routinely aggregating program outcomes, tracking retention by program, and reviewing other applicable program metrics.

The Institution continues to meet, 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:

- The Institution’s processes for monitoring its finances and fiscal allocations need improvement, as evidenced by the numerous findings from its most recent audit.

² INST.F.20.040, Substantive Change.

³ INST.E.10.010, Notice.

While the Institution has contracted with a third-party to help resolve ongoing issues related to the Institution's monitoring and reporting of its finances, the contract has yet to be fully executed.

- The Institution has a large amount of short-term debt held by private notes. While the Institution is confident that these notes will be extended beyond the payoff dates, if any noteholders are unwilling to extend the terms there could be sufficient adverse impact to affect its long-term financial health.

The Institution now 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 Heightened Cash Monitoring 2 status with the U.S. Department of Education is putting a strain on its finances, and it is unclear when and if that status will be changed.
- The Institution has encountered issues in getting appropriate employees trained in federal financial aid regulations and procedures. While some internal training is taking place, the Institution has not taken advantage of the many training opportunities offered by other entities.

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 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 Core Components identified in this action 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 December 2025 to validate the contents of the Notice Report and to make a recommendation of whether to remove Notice or take other action.

Board Review: The Board will review the documents associated with the evaluation at its June 2026 meeting to determine whether the Institution has ameliorated the findings of Met with Concerns and is no longer at risk of noncompliance with the Criteria for Accreditation and thus whether Notice shall be removed, or if the Institution has not ameliorated the findings, whether other action should be taken under HLC policy, up to and including withdrawal of accreditation.

Comprehensive Evaluation: The Institution has been placed on the Standard Pathway with its next comprehensive evaluation for reaffirmation of accreditation in 2027-28.

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. Linnea Stenson.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Northwestern College
Gail Schumacher, Executive Vice-President/COO, Northwestern College
Evaluation Team Chair
IAC Hearing Committee Chair
Linnea A. Stenson, Vice President of Accreditation Relations, Higher Learning
Commission
Marla Morgen, Vice President and General Counsel, Higher Learning Commission
Nkechi Onwuameze, Senior Associate Director for Academic Affairs, Illinois Board of
Higher Education
Herman Bounds, Director, Accreditation Group, Office of Postsecondary Education,
U.S. Department of Education

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