

## **WORKSHEET ON Federal Compliance Requirements**

### **INSTITUTIONAL MATERIALS RELATED TO FEDERAL COMPLIANCE REVIEWED BY THE TEAM:**

- 2009 EADA Equity in Athletics Report
- Student complaint files
- FWS/FSEOG Waiver of Institutional Share Requirement letter
- Federal Student Aid Program Eligibility letter
- USDOE Federal Student Aid Program Eligibility and Certification Approval Report
- USDOE Federal Student Aid Program Participation Agreement
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### **EVALUATION OF FEDERAL COMPLIANCE PROGRAM COMPONENTS**

*The team verifies that it has reviewed each component of the Federal Compliance Program by reviewing each item below. Generally, if the team finds substantive issues in these areas and relates such issues to the institution's fulfillment of the Criteria for Accreditation, such discussion should be handled in appropriate sections of the Assurance Section of the Team Report or highlighted as such in the appropriate AQIP Quality Checkup Report.*

**1. Credits, Program Length, and Tuition:** *The institution has documented that it has credit hour assignments and degree program lengths within the range of good practice in higher education and that tuition is consistent across degree programs (or that there is a rational basis for any program-specific tuition).*

The team has reviewed catalog and web resources related to credit hour requirements and program lengths and finds that they comply with federal guidelines and requirements. Knox uses a credit system wherein one Knox credit equals 3.3 semester hours.

**2. Student Complaints:** *The institution has documented a process in place for addressing student complaints and appears to be systematically processing such complaints as evidenced by the data on student complaints for the three years prior to the visit.*

The team has reviewed the policies describing the student complaint process and found that files are maintained for the few complaints that have been received.

**3. Transfer Policies:** *The institution has demonstrated it is appropriately disclosing its transfer policies to students and to the public. Policies contain information about the criteria the institution uses to make transfer decisions.*

The team has reviewed catalog and web resources related to transfer policies and finds that they comply with federal guidelines and requirements. Knox clearly communicates its policies and procedures to both prospective students on its website and all students in its catalog.

**4. Verification of Student Identity:** *The institution has demonstrated that it verifies the identify of students who participate in courses or programs provided to the student through distance or correspondence education.*

Not applicable – The institution does not offer distance or correspondence education.

**5. Title IV Program and Related Responsibilities:** *The institution has presented evidence on the required components of the Title IV Program. The team has reviewed these materials and has found no cause for concern regarding the institution's administration or oversight of its Title IV responsibilities.*

- **General Program Requirements:** *The institution has provided the Commission with information about the fulfillment of its Title IV program responsibilities, particularly findings from any review activities by the Department of Education. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area.*
- **Financial Responsibility Requirements:** *The institution has provided the Commission with information about the Department's review of composite ratios and financial audits. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area.*
- **Default Rates, Campus Crime Information and Related Disclosure of Consumer Information, Satisfactory Academic Progress and Attendance Policies:** *The institution has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations.*
- **Contractual Relationships:** *The institution has presented evidence of its contracts with non-accredited third party providers of 25-50% of the academic content of any degree or certificate programs.*

The team reviewed:

- All materials documenting the institution's participation in Federal financial aid programs and found the documentation to be in order
- Financial information, including financial audits and composite ratios, and advised the institution regarding risks in this area.
- The institution's default information and found the documentation to be in order
- Campus crime information and found the documentation to be in order
- Satisfactory Academic Progress and Attendance Policies and found that Knox clearly communicates its policies and procedures to both prospective students on its website and all students in its catalog

The institution does not contract with any third party providers of academic content.

**6. Institutional Disclosures and Advertising and Recruitment Materials:** *The institution has documented that it provides accurate, timely and appropriately detailed information to current and prospective students and the public about its accreditation status with the Commission and other agencies as well as about its programs, locations and policies.*

The institution provides accurate, timely and appropriately detailed information to its constituents and public about its status with the Commission and other accrediting bodies.

**7. Relationship with Other Accrediting Agencies and with State Regulatory Boards:** *The institution has documented that it discloses its relationship with any other specialized, professional or institutional accreditor and with all governing or coordinating bodies in states in which the institution may have a presence. Note that if the team is recommending initial or continued status, and the institution is currently under sanction or show-cause with, or has received an adverse action from, any other federally recognized specialized or institutional accreditor in the past five years, the team must address this in the body of the Assurance Section of the Team Report and provide its rationale for recommending Commission status in light of this information.*

The institution appropriately discloses its relationships with other accrediting bodies

**8. Public Notification of an Evaluation Visit and Third Party Comment:** *The institution has made an appropriate and timely effort to solicit third party comments. The team has evaluated any comments received and completed any necessary follow-up on issues raised in these comments. Note that if the team has determined that any issues raised by third-party comment relate to the team's review of the institution's compliance with the Criteria for Accreditation, it must discuss this information and its analysis in the body of the Assurance Section of the Team Report.*

The team determined that the institution provided appropriate notification of the evaluation visit and solicited third party comments. No comments were received prior to the visit.

# **ADVANCEMENT SECTION**

## **REPORT OF A COMPREHENSIVE EVALUATION VISIT**

TO

**Knox College**  
Galesburg, Illinois

November 1-4, 2009

FOR

**The Higher Learning Commission**  
A Commission of the North Central Association of Colleges and Schools

### **HLC EVALUATION TEAM**

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## Contents

### I. Overall Observations about the Organization

The team has already offered its observations of the organization in the Assurance Section of HLC the report but offers additional consultations for consideration in this report.

### II. Consultations of the Team

#### A. Administration and Organizational Development

- The team encourages campus and trustee leadership to utilize the results of the self-study to begin a visioning and planning process for what Knox can aspire to achieve over the next five to ten years.
- Knox has an inordinately high percentage of alumni (34 of 38) who serve as trustees. Realizing the challenge of electing a trustee with minimal association with the college, the college might develop a trustee prospect list of satisfied and endearing parents. Without trustee term limits a board is challenged to ensure that each and every trustee functions at the highest level of service and commitment. The team suggests the Board and Knox might be well-served to explore term limits.
- Succession planning in higher education is a challenging and infrequently pursued strategy. A stable and capable senior staff has provided exceptional leadership throughout a challenging eight years. During this period Knox has stewarded its limited resources wisely, resulting in a lean and under-resourced staff. Understandably the Board is concerned about continuity and succession. However, the urgency of resources for capital projects, faculty, staff, and program support should take precedence over developing and resourcing a succession plan for senior leadership.
- For Knox to secure the resources for mission critical capital and endowment projects it must expand its donor base. This can be facilitated by resourcing prospect research capability and a prospect management system that brings timely focus and intentionality to the work of the Advancement team.
- Beyond Admissions, Finance, and Advancement the team was unable to discover other areas where regular evaluation and program review processes are informing strategies for success and improvement.
- The 2009 team believes Knox would benefit from regular performance reviews for all staff and administrators, also a suggestion in the 1999 team report.
- The development of key dashboard indicators that track longitudinal progress are needed to keep the Board informed and senior staff cognizant of areas in need of improvement.
- Alumni Hall is a significant central campus icon. In its current state this facility projects an image that detracts from the inviting, dynamic, progressive learning community Knox desires to be. Having considered various options, including demolition, the Trustees have affirmed a future for this facility. The Board must now embrace this restoration as a signature Trustee initiative by setting a project restoration start date and committing significant financial gifts as a challenge to all Knox alumni to participate in this much needed restoration.

## B. Financial Aid.

The college could consider restating in its mission statement its commitment to “access ... regardless of financial need.” Knox’s mission statement expresses its commitment “to increase access to all qualified students of varied backgrounds, races and conditions, regardless of financial means.” Staff and the self-study acknowledge, however, that recent steps taken to reduce the tuition discount rate have included moving away from meeting full financial need of students, a move away from the spirit and past interpretation of the mission statement. Instead, the college is now committed to making a Knox education as accessible as possible, minimizing gaps between aid and need when they exist. Given its new financial aid packaging strategies, the college is encouraged to review and restate more accurately its commitment to access in its mission statement.

## C. Mission

The Knox mission statement covers significant, and perhaps too much, ground, answering *who* (history and identity), *why* (values and learning outcomes) and *how* (curriculum, learning environment, residential campus culture and community) questions. The final sentence of the statement seems to capture the essence of *why* Knox is in business: “Our aims throughout are to foster a lifelong love of learning and a sense of competence, confidence and proportion that will enable us to live with purpose and to contribute to the wellbeing of others.” Statements of how Knox accomplishes these goals – including elements identified during the self-study as missing in the current statement – could be incorporated into a separate supporting document.

## D. Faculty Responsibility in Decision Making

As Knox emerges out of its financial crisis, faculty who have become accustomed to having full access to financial information appear eager to participate in institutional decision-making. It would be worth the time invested to sit down, without specific decisions in hand or in mind, to talk through and even document respective and appropriate roles for faculty. For example, what information can faculty expect to receive and at what point in the decision-making process? While faculty responsibility is most often focused on curriculum, promotion and tenure, and issues of instruction, Knox’s bylaws give faculty a broader charge: “... responsibility for regulation of educational policy concerned in the requirements of any degree in course authorized by the Board of Trustees. This responsibility includes such matters as standards of admission of students, definition of good standing of students, curriculum, class attendance, grade reports, and the recommendations for degrees. The faculty also have supervision over disciplinary action and over student activities, including such matters as athletic eligibility, extra-curricular activities, fraternities, sororities, and the social life of students.” This broader range of responsibilities appears to have been the source of some recent tensions on campus and should be clarified.

## E. Assessment of Student Learning Outcomes

Assessment of student learning outcomes at Knox College is in its infancy. The recent establishment of an Office of Institutional Research and Assessment, with a position dedicated to assessment, affords the College an opportunity to develop and implement an effective, efficient assessment system.

The Higher Learning Commission Handbook of Accreditation presents good examples of the types of evidence that document that learning is taking place, and these statements may be useful in pointing the way for developing and implementing a sound program of learning outcomes assessment.

During the past academic year, Knox College made progress in developing learning outcomes (= “fundamental goals” in Knox parlance) for many of its departments and programs. Some of these outcomes are clearly and concisely stated and will be easily assessable (e. g., Mathematics, History, Computer Science); others may be difficult to assess because there are multiple outcomes within outcomes (Art) or the outcome is inherently difficult to assess, e. g., “to foster a vision of theatre and dance as a means of understanding the world and the students’ place in it (Theater); “to create a sense of civic engagement and responsibility” (First-Year Preceptorial); or to “equip students to understand and function in a diverse and increasingly interconnected world (Political Science and International Relations). In order to assist with assessment throughout the College, the Director of OIRA and the Associate Director of Assessment described a plan for holding a number of workshops in the coming months, with several work-days to be proposed for the summer. It would be particularly helpful if one of the upcoming workshops focused on how to develop clear, concise, easily assessable learning outcomes.

The Higher Learning Commission also strongly recommends that there be “multiple direct and indirect measures of student learning;” thus, how to develop and/or select appropriate assessment instruments would be an excellent topic for another workshop.

Additionally, outcomes assessment should occur at department, program, and institutional levels, where course-embedded assessment can be one of the instruments for assessing learning outcomes and bringing about program enhancement. Key competencies and “foundations” are institutional learning outcomes and should be assessed by a campus-wide initiative. The Associate Director of Assessment (ADA) might encourage and help establish one or more faculty task forces for orchestrating assessment of the key competencies, the foundations courses, experiential learning, and the Education Plan.

The following sections are meant as non-prescriptive suggestions for possible ways that learning outcomes assessment can be accomplished at Knox College. They are offered to spark ideas and to help Knox College design an assessment program that will best serve Knox.

For the Foundations, an ad hoc task force for each area (Arts, History and Social Sciences, Humanities, and Mathematics and Natural Sciences) might be an ideal way to accomplish the development of each area’s specific 3-5 learning outcomes, some of which could be assessed by course-embedded instruments. Those who teach each of the courses might discern how his/her course’s evaluation instruments (tests, papers, presentations, projects, final exam) might serve as the means for course-embedded assessment. Following data-collection during the courses, each instructor could submit

his/her data to the ADA, who might take responsibility for analysis and summary, which could include preliminary conclusions about what aspects of the courses are obviously resulting in student learning and which might need improvement. These preliminary conclusions could be fed back to the task forces for each broad area of human inquiry for their more thorough analysis and conclusions. Task force final conclusions, along with suggestions for improving areas needing attention, could then be funneled back to the ADA and from there on to the faculty as a whole. Task forces for each broad area could also be responsible for alerting all faculty who teach in that area about suggestions for improving their courses to improve student learning. As instructors collect data during the following years, feedback loops can be completed with information describing how suggested changes have actually been successful (or not) in improving student learning. Additionally, some assessment instruments may turn out to be more useful than others, and appropriate modifications in these tools can take place.

A similar process could be undertaken by those working with key components, the First-Year Preceptorial, majors, experiential learning, the Educational Plan, student development, athletics, etc.

Actual selection or development of assessment instruments and choosing “criteria for success” for each learning outcome would be excellent topics for summer workdays for departments and task forces. Knox College will be well on its way to multiple direct and indirect, multiple-level learning outcomes assessment if at the end of the summer the following tasks have been completed for all academic departments and programs and by co-curricular departments, such as student development and athletics, for which student learning outcomes are appropriate:

1. A set of 3-5 clear, concise, easily assessable learning outcomes;
2. 1-2 assessment instruments selected or developed for each outcome, with a mix of direct and indirect measures for each department or program;
3. “criteria for success” for each learning outcome measure.

As soon as data analysis begins, departments and programs might begin implementing suggested changes. Subsequently, 2-3 years down the road, the College may be able to assess whether changes made have improved student learning. A successful assessment program will clearly demonstrate these improvements. An effective assessment program also evolves over time as learning outcomes evolve, assessment instruments are improved or changed, and as the curriculum and co-curricular activities adapt to an ever-changing world. One of the pitfalls of young assessment programs is that faculty and staff often think that the program must be “perfect” before assessment is begun. Since assessment is a work in progress and should be on-going, best practice involves “just doing it.” As time passes and the process matures, it should become easier, more effective, and should result in concrete evidence that demonstrates that students, faculty, and staff are indeed partners in life-long learning.

#### F. Program Review

Much of what was contained in the Knox College 2008-2009 Academic Assessment Report was more related to Program Review than to learning outcomes assessment. Thus, many departments and programs at Knox have already undertaken a good deal of thinking and some of the work involved in reviewing their programs. A good Program Review includes but is not limited to evaluation of curriculum and schedule of curricular offerings, personnel, facilities, and co-curricular activities. There are various ways to obtain such evaluative information but external reviewers and advisory committees can be particularly helpful. Good Program Reviews result in well-documented requests for additional staffing or facilities, thoughtful requests for addition of new courses or other modifications of the curriculum, and creative new ways to involve students in their disciplines. Typically, Program Reviews are carried out on a rotating, or rolling, basis with each department or program reviewed every 5-10 years. The newly established OIRA should be quite helpful in launching these reviews and can serve as a central depository for all information collected during the Reviews, such information thus being readily available for all those involved in institutional planning.

#### G. Documentation of Faculty Credentials

The Commission requires that an accredited institution “demonstrate that it has engaged qualified academic personnel essential to assure effective curriculum, instruction, and academic programs.” Best practice in academe is to have present on campus the official transcripts for at least the highest graduate degree received for each faculty member. Therefore, the Team recommends that Knox gather all official transcripts that are presently scattered across campus into one central location, probably in the Dean’s Office. The Team further recommends that Knox obtain official transcripts of all faculty for which none are currently on hand, and that the College consider having official transcripts sent to the Dean’s Office as part of all faculty searches. Copies could then be made available to each search committee for use during the search process. Similar recommendations are made for staff transcripts.

#### H. Assessment of Student Learning Outside the Classroom.

While it may seem that the responsibility for student learning assessment is primarily the responsibility of the faculty it is also important for those areas of a residential college where students and faculty are engaged in learning to also develop learning outcomes and plans for assessing those outcomes. One example not often used is in athletics. One of the most important goals for any athletic department is to have both coaches and athletes learn the NCAA rules in order to be in compliance. Colleges often employ compliance officers who have the responsibility of assuring the NCAA that this has occurred. This might be an opportunity for athletic departments to participate in the development of learning outcomes for both coaches and athletes.

Greek Life may also be a place to develop gender-specific programming and to use that environment for an opportunity to discover what unique learning opportunities exist in

both fraternities and sororities for women and men. The recent work of Linda Sax at UCLA would be a place to start as she has outlines scores of possible advantages to both combined and separate gender learning environments.

Richard Keeling and Associates may also be a resource for assessment of student learning outcomes as they provide useful workshops targets at the departmental area where staff are given practice in writing departmental specific learning outcomes and presenting them to colleagues as a skill building experience that can help each department develop their own assessment plans.

#### I. Science Facilities and Equipment

As evidenced by a tour of Umbeck Science-Mathematics Center, many instruments and some facilities are nearing the end of their life span and need to be replaced. Much of the repair and maintenance of these aging instruments is currently carried out by two older faculty members in two different departments. Funds for these repairs and maintenance may need to be budgeted in the future.

Neither Biochemistry nor Neuroscience have needed dedicated space for continued growth of the teaching and research program, while other spaces are underused. The Chemistry stockroom has no fire management system and the air handling system does not function well.

Because the Self-Study (p. 236) listed the Umbeck Science Mathematics Center at the top of its listing of “Biggest Needs,” one of the team members spent time with the science department chairs and toured this facility. The Self-Study (pp. 92-93) also noted space needs in other departments and programs, such as studio art, music, and theater; however, time constraints of the visit prevented all of these areas from being toured. Comments on the needs in the sciences do not mean to imply that they are more important than those of other disciplines.

#### J. Employee Evaluation

The administration is encouraged to adopt an annual employee evaluation process. The self-study expressed concerns about tying an evaluation process to a merit pay system and named this as one reason the college has not adopted annual evaluations. Without an institution-wide program, however, the college has a wide variety of evaluation structures, ranging from nothing at all in some departments to a formal evaluation of the president by the board. Annual evaluations, when done well, are excellent tools for professional development, provide important information for new supervisors of existing staff and document expectations and outcomes for staff and supervisors alike. Annual evaluations can but don't need to be tied to raises or merit pay programs.

*Team Recommendations for the  
STATEMENT OF AFFILIATION STATUS*

**INSTITUTION and STATE:** : Knox College, IL

**TYPE OF REVIEW (from ESS):** Continued Accreditation

**DESCRIPTION OF REVIEW (from ESS):**

**DATES OF REVIEW:** 11/2/09 - 11/4/09

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**Nature of Organization**

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**LEGAL STATUS:** Private NFP

**TEAM RECOMMENDATION:** no change

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**DEGREES AWARDED:** B

**TEAM RECOMMENDATION:** no change

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**Conditions of Affiliation**

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**STIPULATIONS ON AFFILIATION STATUS:** None.

**TEAM RECOMMENDATION:** no change

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**APPROVAL OF NEW DEGREE SITES:** Prior Commission approval required.

**TEAM RECOMMENDATION:** no change

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**APPROVAL OF DISTANCE EDUCATION DEGREES:** Prior Commission Approval Required

**TEAM RECOMMENDATION:** no change

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**REPORTS REQUIRED:** None

**TEAM RECOMMENDATION:** Contingency report due December 31 of any year for which the second consecutive Composite Financial Ratio falls below 1.5; Monitoring report due 4/30/13 on program review and student learning outcomes.

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**OTHER VISITS REQUIRED:** None

**TEAM RECOMMENDATION:** None

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**Summary of Commission Review**

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**YEAR OF LAST COMPREHENSIVE EVALUATION:** 1999 - 2000

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**YEAR OF NEXT COMPREHENSIVE EVALUATION:** 2009 - 2010

**TEAM RECOMMENDATION:** 2019-2020

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## ORGANIZATIONAL PROFILE

**INSTITUTION and STATE:** Knox College, IL

**TYPE OF REVIEW (from ESS):** ) Continued Accreditation  
\_\_\_ No change to Organization Profile

### Educational Programs

		Program Distribution	<b>Recommended Change (+ or -)</b>
Programs leading to Undergraduate	Associate	0	
	Bachelors	39	
Programs leading to Graduate	Masters	0	
	Specialist	0	
	First	0	
	Professional		
	Doctoral	0	

### Off-Campus Activities

In-State:	Present Activity:	<b>Recommended Change: (+ or -)</b>
Campuses:	None	
Sites:	None	
Course	None	
Locations:		

Out-of-State:	Present Wording:	<b>Recommended Change: (+ or -)</b>
Campuses:	None	
Sites:	None	
Course	None	
Locations:		

Out-of-USA:	Present Wording:	<b>Recommended Change: (+ or -)</b>
Campuses:	None	
Sites:	None	
Course	None	
Locations:		

### Distance Education Certificate and Degree Offerings:

Present Offerings:

None

**Recommended Change:  
(+ or -)**