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Restoring Accreditation in Two Private Texas Historically Black Colleges

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**Restoring Accreditation in Two Private Texas Historically Black Colleges**

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**Dissertation**

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## Dedication

This work is dedicated to the two constants in my life; my grandfather, Mr. Asbury Jones Sr. and my mother, Ms. Darlene Jones. These two individuals have provided me with unconditional love and never-ending support and encouragement; and taught me the importance of faith and prayer. In humbleness and love, I offer them my sincerest gratitude.

This work is also dedicated to the faculty and staff at all Historically Black Colleges and Universities who labor tirelessly to ensure the education of generations of underserved minority populations. The value of the opportunities you provide are as necessary today as they were when these institutions were founded.

## Acknowledgement

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I want to thank the faculty and staff at Huston-Tillotson University and Texas College who gave their valuable time to share in this research. All twenty-nine members of the faculty and staff shared openly and truly represented the dedication of those who carry out the important mission of Historically Black Colleges and Universities.

Lastly, to my sisters and sister-friends, Charisse Thompson, Twineia Wilmer, Shakitha Stinson, Toni Randle-Castenada, Del Watson, Kim Jones, Melody Fullylove, Virginia Stewart-Miller and Cynthia Burleigh, please know that I could not have done this without your love and support – Peace, Blessings and Joy.

## **Restoring Accreditation in Two Private Texas Historically Black Colleges**

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During the period 1996-2002, 47% of the private Historically Black Colleges and Universities (HBCUs) accredited by the Southern Association of Colleges and Schools were sanctioned. The statistics within Texas mirrored the regional statistics because two of the four private Texas HBCUs (50%), Huston-Tillotson and Texas College, were sanctioned during this period. The purpose of this study was to analyze and document the factors that led to the sanctions at Huston-Tillotson and Texas College and the actions that led to both institutions restoring their full accreditation with SACS. This research

project involved a comparative case study approach, which included case studies at the two institutions and then a cross-analysis of the results.

Multiple sources of evidence were used in this study, including documentation prepared by the institutions for the Southern Association and correspondence received from the Association. Included in this documentation were institutional self-study reports, annual financial audits, follow-up reports and responses and the membership application filed by Texas College. The information secured from these records was complimented by data secured from interviews and participant observations that were made throughout the research project to develop answers for the research questions.

The first research question was, why were the two institutions sanctioned by the Southern Association of Colleges and Schools? The findings and analysis suggest that there were four primary answers to this question, including: campus turmoil, failure to provide appropriate responses and support in follow up and progress reports, non-compliance with federal programs, and the lack of financial stability.

The second research question was, how did the institutions restore their full accreditation? The primary answers to this question included resolution of audit findings, improved financial stability, demonstrated use of administrative and academic program evaluation results, and, most important, new dynamic leadership.

Given the critical role that HBCUs have played within the African American higher education communities, it is imperative that they better prepare themselves for the accreditation process. Looking forward to a nation and state that are projected to become majority - minority within the next decade, the need for institutions that serve special populations is ever increasing. In Texas, the minority population will exceed

50% by 2010. As many of the nation's flagship institutions debate the legality and constitutionality of race-based admission policies, minority students will need to consider all of their higher education options. The need for HBCUs continues and the administrators at these institutions must prepare themselves to navigate the accreditation reaffirmation process successfully in an effort to maintain their institutions' legacy.

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# CHAPTER I

## OVERVIEW OF THE STUDY

### **Introduction and Background to the Study**

#### **Accreditation:**

The struggle over establishing and maintaining standards within higher education is one that dates back to the emergence of universities during the medieval period, with original competing factions of students and faculty, and the papacy and crowns. During this period, the rights, responsibilities and recognition of institutions was granted by papal bull or royal order. This manner of establishing standards within higher education was maintained until the fifteenth century. From that point until today, the role of maintaining standards within British and other European societies has been maintained by Ministries of Education and External Examining Authorities (Selden, 1960, pgs. 14-15).

In the United States, the contenders in the battle for maintaining higher education standards have included faculty and trustees, clergy and laity, in addition to state and private forces (Selden, p. 2). Accreditation in the United States marked its beginning in 1787 with the enactment of state legislation that required the members of the Board of Regents of the State University of New York to visit and report annually on the status of every college within the state. In 1885, almost 100 years later, the first regional accrediting institution, the New England Association of Colleges and Secondary Schools, was founded in direct response to the varying problems, both regionally and nationally, that resulted from the lack of curriculum standards and college admission policies (Selden, pgs. 31-32).

Following the development of the New England Association, five additional regional accrediting associations were developed, thus providing accreditation coverage for all the established colleges and universities throughout the United States. Included in this group were the North Central Association, the Middle States Association, the Southern Association, the Northwest Association, and the Western Association. The Southern Association of Colleges and Schools, founded in 1895, is the regional association on which this paper is focused.

The Southern Association of Colleges and Schools (SACS) is made up of three commissions: the Commission on Secondary and Middle Schools founded in 1912, the Commission on Colleges, founded in 1919, and the Commission on Elementary and Middle School, founded in 1965. SACS is responsible for accrediting institutions in eleven southern states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia. Each member institution of the Commission on Colleges is classified according to its highest level of degree offered. The classification levels are: Level I – institutions offering associates degrees; Level II – institutions offering baccalaureate degrees; Level III – institutions offering master’s degrees; Level IV – institutions offering master’s and specialist degrees; Level V – institutions offering doctoral degrees in three or fewer major academic or professional disciplines; and Level VI – institutions offering doctoral degrees in four or more major academic or professional disciplines (SACS – Criteria for Accreditation, 1998, pg. iii).

The College Delegate Assembly (CDA) and the Commission on Colleges (the Commission) hold primary responsibility within SACS for executing the accreditation

procedures. The CDA is comprised of one voting representative from each of the almost 800 accredited member institutions. The CDA holds its annual business meeting during the December meeting of the Association and bears primary responsibility for approval of all revisions in accrediting standards (on recommendation by the Commission), approval of the annual dues of candidate and member institutions (on recommendation by the Commission), approval of major changes in procedures, election of an Appeals Committee comprised of chief executive officers of member institutions to hear appeals of certain accreditation decisions, and election of the 77-members of the Commission on Colleges (SACS-Handbook for Institutional Self-Study, 1994, p. 4).

**Private Historically Black Colleges and Universities:**

“For all practical purposes, black higher education began in institutions established in the South just after the Civil War (Drewery and Doermann, 2001, p. 33). In response to an 1863 report by the Freedmen Bureau’s Inquiry Commission to the Secretary of War regarding the difficult conditions under which newly freed slaves were living and the corruption of the southern white officials, Congress established the Bureau of Refugees, Freedmen, and Abandoned Land, most commonly referred to as the Freedmen’s Bureau (Drewery and Doermann, p. 35). With an initial investment of five million dollars in 1866, the Freedmen’s Bureau played a key role in the establishment of educational institutions for freedmen. Contributions from church groups, secular freedmen’s associations, and individual donations were added to those of the Freedmen’s Bureau to establish many of the private schools and colleges for Blacks that exist today.

During the period of 1866 through 1954, black educational institutions experienced several periods of drastic transition. Many of these institutions were

originally developed as “higher schools,” a term used to denote black institutions offering post-elementary education. But the introduction of public secondary schools for blacks led to the demise and closing of many of these schools. The number of newly developed black institutions reached its peak in 1920, with 217 in operation, but by 1954 more than 124 institutions had been unable to make the transition to offering only college-level work (See Table A) (Drewery and Doermann, p. 74).

**Table A: “Higher Schools” for Black Americans at the End of Each Decade, 1860-1950 and in 1915 and 1954**

Year	Number of Institutions	Percentage Increase/Decrease
1860	5	
1870	100	1900
1880	118	18
1890	155	31
1900	172	11
1910	192	12
1915	215	12
1920	217	1
1930	130	-40
1940	93	-28
1950	92	-1
1954	92	0

(Drewery and Doermann, p. 71)

By 1913, a collaborative spirit replaced the extreme competition between private black colleges, as most, with very few exceptions, accepted the chilling reality of their challenge to provide a quality educational opportunity with limited financial and human resources. Among the first collaborations was the Association of Colleges for Negro Youth (ACNY), which began with three primary areas of focus: “first, to have their work approved by a recognized accrediting agency; second, to use the accreditation procedures as an aid in improving academic and administrative programs; and third, to exercise collective pressure on such organizations as the American Medical Association to

abandon the practice of issuing a list of approved colleges on the basis of ratings given by regional accrediting agencies, from which black colleges in the South were excluded” (Drewery and Doermann, p. 92).

The membership of the ACNY was small and exclusive and included Howard University, Atlanta University, Wilberforce University, Virginia Union College, Fisk University, Morehouse College, Knoxville College, Talladega College, Shaw University and Claffin University. This organization was also responsible for improving the entrance and graduation requirements for its institutions, recommending curriculum changes and addressing fiscal issues. Upon its dissolution in 1934, the mission and goals of the ACNY were assumed by a newly created, more inclusive and larger organization, the Association of Colleges and Secondary Schools for Negroes (Association). The Association would become the organization credited with securing accreditation eligibility for southern black institutions in 1957 (Carter, 1996, p. 62).

### **Accreditation and Historically Black Colleges and Universities:**

During the fall of 1926, in response to multiple requests, SACS representatives agreed to a meeting with the ACNY and the National Association of Teachers in Colored Schools (NATCS) to discuss the possibilities of regional accreditation for southern black schools. During the meeting, SACS representatives agreed to take the accreditation request back to its membership for consideration and vote. Unfortunately, at its 1927 annual meeting, SACS took a different action: a resolution was passed that identified the ACNY as the accrediting body for the black institutions of the Southern region (Carter, p. 68).

The 1927 resolution was not enough to discourage the ACNY or the NATCS who continued their efforts until SACS agreed in 1929 to appoint a Committee on the Approval of Negro Schools. This committee, which was referred to as the Highsmith Committee because it was chaired by Henry Highsmith from the North Carolina Department of Education, was responsible for visiting black institutions to review their supporting documentation and make rating recommendations. While the Highsmith Committee invited eighty-five black institutions to submit applications to request inspections, there were only sixty that completed the application process. From the sixty applications submitted, nine were selected for review. SACS produced its first approved listing for black institutions in 1930. Fisk University was the only college that satisfied all of the accreditation standards. Six other institutions whose general quality warranted the admission of their students into graduate programs throughout the country were also listed (Carter, pgs. 66 -70).

Driven by the goal of achieving full accreditation status and membership in the Commission on Colleges, the Association of Colleges and Secondary Schools for Negroes, which assumed the responsibilities of the ACNY, continued to push SACS. By 1957, three years after the *Brown v. Board of Education* Supreme Court decision that declared racial segregation in schools unconstitutional, there were fifty-nine black institutions on the SACS approved list that were eligible to apply for full membership with the Commission. For reasons unclear to many, SACS required each of the fifty-nine previously approved institutions to undergo a second evaluation in conjunction with their applications for membership in the Commission. Following the second evaluation only eighteen of the previously approved institutions were granted membership.

The remaining thirty-nine institutions were denied accreditation. As discussed by Drewery and Doermann , there are two conclusions that can be drawn from these actions: the first is that SACS discriminated against black colleges by requiring them to undergo a second evaluation; the second is that SACS had previously acted inappropriately by including on their approved list black institutions that did not meet the standards that had been established for majority institutions and by not providing these institutions with recommendations to allow them to resolve their problems and be positioned to become fully accredited (Drewery and Doermann, p. 104).

Today, 77 of the nation's 105 recognized Historically Black Colleges and Universities (HBCUs) are under the regional accrediting authority of the Southern Association. They account for slightly less than 10% (77 out of 785) of the institutions accredited by the SACS. However, they continue to face challenges with their accreditor. From June 1996 through June 2002, SACS placed 188 institutions on *warning* or *probation*. Of that number, 25 were HBCUs. Closer analysis reveals that 21 of the 25 were private institutions, thus 21 of the 45 private HBCUs operating within SACS were sanctioned during this period (Davis, 2003, pg. 4).

**Statement of the Problem:**

The data suggest that private HBCUs are at an increased risk of being sanctioned by SACS. Equipped with this information, it becomes imperative to determine whether there are commonalities in the institutional actions of private HBCUs that led to the issuance of SACS sanctions. To develop a full understanding of the situation, it is also critical to examine the institutional actions that were taken to restore full accreditation.

Within the State of Texas, there are seven private HBCUs, four of which were involved in the reaffirmation process during the period 1996 - 2002 (Table B: SACS Reaffirmation Schedule for the Texas Historically Black Colleges and Universities).

**Table B: SACS Reaffirmation Schedule for the Texas Historically Black Colleges and Universities**

<b>Institution</b>	<b>Initial Accreditation</b>	<b>Last Scheduled Accreditation</b>	<b>Last Affirmation</b>	<b>Next Affirmation</b>
<b>Huston-Tillotson College</b>	<b>1943</b>	<b>2000</b>	<b>2002</b>	<b>2010</b>
Jarvis-Christian College	1967	1993	2003	2013
Paul Quinn College	1972	1997	1997	2007
St. Phillips College	1951	1995	1995	2005
Southwest Christian College	1973	1999	2001	2009
<b>Texas College</b>	<b>1970</b>	<b>1994/1996</b>	<b>2001</b>	<b>2005</b>
Willey College	1933	1993	2003	2013
<b>PUBLIC INSTITUTIONS</b>				
Prairie View A&M Univ.	1934	2000	2000	2010
Texas Southern Univ.	1948	2000	2000	2010

(Southern Association of Colleges and Schools Proceedings 1994-2002)

Two of the four colleges reviewed, Texas College and Huston-Tillotson College, were sanctioned by SACS during this period. Texas College was founded in 1894 in Tyler, Texas under the auspices of the Colored Methodist Episcopal Church (known as the Christian Methodist Episcopal Church). Upon its founding, the college became the state's third black institution founded by a black denomination (Heintze, 1985, pg. 34).

Texas College received its initial accreditation from SACS in 1970, but was denied reaffirmation in 1994 and placed on *probation*. The institution's *probation* was continued until 1996, when its membership with the Commission on Colleges was revoked. Included among the findings cited during the institutional review were failure to comply with *Criteria*: Section 3.1 -Planning and Evaluation; Section 6.3.1 -Financial Resources; Section 6.3.2 - Organization for the Administration of Financial Resources; Section 6.3.3 -Budget Planning; and Section 6.3.4 - Budget Control (see Appendix F for detailed recommendations from the Visiting Committee recommendations).

Huston-Tillotson College is the result of the 1952 merger of two private institutions in Austin, Texas: Samuel Huston College which founded in 1876 by the United Methodist Church and Tillotson College founded in 1877 by the American Missionary Association of the Congregational Church (known as the United Church of Christ). Samuel Huston College received its initial accreditation from SACS in 1943, and was followed by Tillotson College in 1944. Both began their accreditation activities at the time when the SACS was not offering full membership status to HBCUs, but continued their participation with SACS through the *Standards, Criteria* and now *Principles of Accreditation*.

Huston-Tillotson's accreditation was reaffirmed in 1990, but it was not initially successful during the 2000 reaffirmation cycle. It was placed on *warning* in January 2001, placed on *probation* in July 2001, and not restored to full accreditation until December 2002. Included in the findings cited during the institutional review were failure to comply with *Criteria*: Section 1.4 Conditions of Eligibility Eight - Planning and Evaluation Process and Thirteen - Adequate Financial Resources; Section 6.3.1 - Financial Resources; and Section 6.3.3 -Budget Planning (see Appendix E for a complete list of Visiting Committee recommendations).

The actions and events that led to the traumatic and institution-altering experiences of both of these institutions with SACS are the topic of this study. It is the expectation that the results will be used as a learning tool for other private Historically Black Colleges and Universities operating within the Southern Association.

### **The Institutional Accreditation Process:**

The membership of the Commission on Colleges is comprised of Chief Executive Officers, members of the faculty, and experienced administrators from member institutions who are elected by the CDA. The Commission meets semi-annually and is responsible for taking final action on granting, continuing or re-affirming institutional accreditation; maintaining oversight for the Committees of Criteria and Reports at Level I and Level II-VI institutions; reviewing visiting committee reports and institutional responses to recommend accreditation actions to the full Commission; to approve any revision in accrediting standards prior to submission to the CDA membership; to approve changes in policies and procedures; to elect a Chair of the Commission and the Executive Council of the Commission (SACS-Policies, Procedures and Guidelines, 1996 p. 65).

Accreditation, as defined by the Commission on Colleges, “is concerned with the improvement of educational quality throughout the region and ensuring to the public that institutions meet established regional standards” (SACS-Policies, Procedures and Guidelines, p. 1). By granting accreditation, the Commission validates the appropriateness of the institution’s mission and purpose as a college or university and formally asserts that it has sufficient resources, services and programs to successfully accomplish its stated mission and purpose on a continuing basis.

The granting of accreditation by the Commission results after a lengthy qualitative process that relies heavily on the use of professional judgment and includes a careful review and evaluation of the quality of education provided by the institution being reviewed. The evaluative process of accreditation begins at the institutional level through the completion of an internal assessment and evaluation, or self-study, and continues

through a site visit, which is conducted by administrators and faculty members from peer institutions, and concludes with a final evaluation by the Commission on Colleges.

The philosophy of the Commission is that membership (accreditation or re-accreditation, whichever is applicable) will only be denied to degree granting institutions that, in the professional judgment of peer reviewers, fail to execute a successful institutional self-study, fail to meet the Conditions of Eligibility, fail to comply with the *Criteria for Accreditation*, or fail to comply with any policy or procedure of the Commission. “The *Criteria for Accreditation* is uniformly applied to all applicant, candidate and member institutions regardless of type of institution” (SACS-Handbook for Institutional Self-Study, 1996, p. 4).

*Standards of the College Delegate Assembly (Standards) 1977-1984*

The implementation of the *Standards of the College Delegate Assembly* began in 1977, during which time they were applied to initial institutional applicants, member institutions and to the Institutional Self-Study Program. With the exception of *Standards One and Eight*, each *Standard* was presented in two parts: the statement of principles and the illustrative and interpretative requirements. There were a total of eleven *Standards* that an institution was expected to maintain: *Standard One* – Purpose; *Standard Two* – Organization and Administration; *Standard Three* – Educational Program; *Standard Four* – Financial Resources; *Standard Five* – Faculty; *Standard Six* – Library; *Standard Seven* – Student Development Services; *Standard Eight* – Physical Resources; *Standard Nine* – Special Activities; *Standard Ten* – Graduate Program; and *Standard Eleven* – Research. In addition to assessing compliance with the *Standards*, the Commission also examined

faculty qualifications, the state of academic freedom, library size and a number of other educational factors within an institution's operation.

*Criteria for Accreditation (Criteria) 1984-2004*

In 1984, the College Delegate Assembly replaced the *Standards of the College Delegate Assembly* with the *Criteria for Accreditation* as the foundation of the accreditation process. The new *Criteria*, while maintaining many of the core components of the previously utilized standards, placed a strong emphasis on the areas of institutional planning and evaluation. The introduction of the institutional effectiveness component had a significant impact on the process and the report produced from the self-study component of the accreditation cycle (SACS - Handbook for Institutional Self-Study, p. 6). Institutional Effectiveness is measured by the institution's ability to identify expected outcomes for its educational programs and its administrative and educational support services; its ability to assess whether it achieves these outcomes; and its ability to provide evidence of improvement based on analysis of those results (SACS – Principles of Accreditation, 2001, pg 26).

The *Criteria* contains a series of “must” and “should” statements that are organized in six categories, which represent significant components of the accreditation evaluation process: Section I - Principles and Philosophy of Accreditation; Section II - Institutional Purpose; Section III - Institutional Effectiveness; Section IV - Educational Program; Section V - Educational Support Services; and Section VI -Administrative Processes (SACS, *Criteria for Accreditation*, 1998, pgs. v-viii).

There are over four hundred “must” statements and sixty-one “should” statements contained in the *Criteria*. The *1992 Higher Education Amendments* mandated that

institutions meet the “must statements.” The “should” statements are advisory conditions that the Commission recommends for institutions, but they are not mandatory (SACS – Criteria for Accreditation, 1998, p. iii).

## CHAPTER II

### LITERATURE REVIEW

In conducting the review of the literature for this project, the researcher found few studies on the relationship between private HBCUs and the Southern Association of Colleges and Schools and their experiences with the accreditation process. With the exception of a 1996 dissertation by Melanie Carter entitled “From Jim Crow to Inclusion: An Historical Analysis of the Association of Colleges and Secondary Schools for Negroes, 1934-1965,” the literature that is available regarding SACS accreditation can be divided into four primary categories: the history of the Southern Association, instructions on how to prepare for the reaffirmation process, critiques on the effectiveness of the accreditation process with specific calls for revisions, and articles on specific actions taken by SACS. The literature on Historically Black Colleges and Universities is primarily focused on discussions of the history, role, and traditions of these institutions, with very little mention of accreditation or its potential impact on their future viability.

This chapter will provide an overview of the studies used to provide the background information for this research project. Specifically, the available literature on the Southern Association of Colleges and Schools, Historically Black Colleges and Universities, and the documented experiences between the two will be detailed.

#### **Accreditation History:**

To develop an understanding of the historical perspective and considerations of the accreditation process, the researcher used the books Accreditation: A Struggle Over Standards in Higher Education by William Selden, Understanding Accreditation by Kenneth Young, Charles Chambers, and H.R. Kells, and A Centennial History of the

Southern Association of Colleges and Schools 1895-1995 by James D. Miller. William Seldon's book Accreditation: A Struggle Over Standards in Higher Education provides a solid foundation on the history and development of the accreditation process in the United States and abroad. While the book itself is quite dated (1960), it shapes the framework for understanding the evolution of the accreditation process, including the original purpose, objectives and expectations of the process.

During the period between the Revolutionary and Civil Wars, American institutions of higher education experienced tremendous growth. Prior to the American Revolution there were nine colleges within the United States; by the start of the Civil War there were more than 250. Accompanying the sharp increase were a wide range of college admissions requirements and curricula which posed problems for secondary schools that were attempting to prepare students for higher education. Accreditation in the United States was originally created to address the issues of standardized admission requirements and curricula that resulted from the large increase in the number of colleges.

The New England Association of Colleges and Schools was the first of the six regional accrediting bodies. The founding of this organization, in 1885 marked the first attempt to bring together secondary schools and university administrators from the same geographic region to tackle the problems of college admission requirements and curriculum standards and to discuss the differences between colleges and secondary schools. These efforts were soon replicated by the five other regional accrediting bodies and resulted in nationwide coverage for all colleges and universities. Included in this group were the North Central Association (founded in 1886), the Middle States

Association (1889), the Southern Association (1895), the Northwest Association (1917), and the Western Association (1962).

The North Central Association was the first regional association to formally institute accreditation standards for both secondary schools (in 1905) and institutions of higher education (in 1913). Using standards that were similar to those employed by the Carnegie Foundation and the United States Bureau of Education, the North Central Association was the first organization to produce a list of its regionally accredited institutions (in 1913). The accrediting standards that were used at this time were “specific, factual and mechanical” (Selden, p. 37). The establishment of the list to document the names of institutions that had secured regional accreditation is an issue that took on heightened significance for HBCUs in their quest to become recognized by the Southern Association.

The spread of the accreditation process throughout the remaining regions was slow and spanned a period from 1913 to 1952, when the New England Association of Colleges and Schools, amid sharp debate and opposition, voted to formalize its accrediting standards. No longer driven by a narrow focus on college admission, the accreditation process evolved into one that “has helped to bring about an elevation in the quality of education and a broad acceptance of the general concept of what constitutes a good college or university (Selden, pgs. 37-38).

In 1906, the regional efforts were complemented by the National Conference Committee on Standards of Colleges and Secondary Schools. The four regional accrediting associations that existed at that time, the New England College Entrance Examination Board, the New England College Entrance Certificate Board, and the

National Association of State Universities agreed to a series of collaborative meetings to create a national forum to discuss and establish industry-wide standards around the issues of curriculum and admission policies. The Conference Committee lasted seventeen years. It was instrumental in the recommendation, development and adoption of universal terminology and definitions for the higher education community (Selden, pgs. 34 - 35).

In the book Understanding Accreditation, the authors Kenneth Young et al. carefully define accreditation with a full discussion of the history, purpose and expected benefits of the process, which closely mirrored the discussion provided by William Sheldon. While providing an explanation of the role of the institution in the accreditation process, the authors discuss the self-improvement and self-regulation features of the process. Accreditation is defined as a “process by which educational institutions work together and with others to establish standards, evaluate and improve educational quality, and provide public evidence of this quality. Self-regulation is the broader term, encompassing a wide range of collective actions to maintain responsible practices in all areas” (Young, pg. 55).

Included in the discussion of self-improvement and self-regulation is the introduction of the themes of institutional autonomy and accreditation perceptions. Institutional autonomy is presented as an underlying premise and expectation of the accreditation process. The authors describe accreditation as a process that respects and upholds the institution’s rights to autonomy in decision making and insists that the development of recommendations for institutional improvement and change include both an awareness and sensitivity to the differences in institutional mission, programs and circumstances (Young, pg. 65).

The second theme, introduced by the authors, that has significance for this study involved accreditation perceptions, specifically how institutions view the accreditation process. They argue that the accreditation process at large prestigious institutions is viewed and treated as an intrusion to normal operations, while at smaller, non-traditional institutions or institutions of marginal quality, accreditation is viewed as threatening. This second grouping of institutions heavily rely on their ability to maintain their accreditation status as a way of proving their worth and quality within the higher education community. As a result, these institutions work exhaustively to present the best institutional picture possible during the process and often discount or hide areas of non-compliance. The decision made by these institutions to conceal their problems is challenged by the authors because it denies the institutions the benefit of securing assistance during the accreditation process in identifying and correcting problems (Young, pg. 83).

The introduction of these two themes has powerful implications for this study because HBCU administrators do not believe that the SACS accreditation process incorporates any demonstrated respect for the autonomy of their institutions and do feel threatened by the process. There is a belief within the HBCU community that the accreditation standards are uniformly evaluated and measured with little regard for the differences that exist between institutions. More importantly, because of the strained history between HBCUs and SACS, these institutions view the accreditation process as punitive rather than helpful, and as a result work hard at explaining their deficiencies and areas of non-compliance.

Also included in Understanding Accreditation is a discussion regarding the problems surrounding the issue of secrecy and the reality that there are a limited number of experts available on any campus who fully understand the accreditation process. These issues are prevalent across institutional types because accreditation information is often not widely shared and when shared is filtered to include only selective information. Both of these issues existed and played critical roles in the accreditation activities that occurred at the two institutions included in this study.

A Centennial History of the Southern Association of Colleges and Schools 1895-1995 by James D. Miller provides a comprehensive history of the development and evolution of the Southern Association. The book provides analysis of the organization's leadership and the challenges faced in defining and revising measurable and achievable standards for institutions within its region. The book details the concerns of early critics and the organization's responses to the demands of changing times.

Included in the book is a chapter entitled "Black Education: Knocking for Admission," that provides a rare and critical review of the history and relationship between the Southern Association and the HBCUs operating within the southern states. The chapter describes the realities of the Jim Crow south and the role they played in determining the exclusion and eventual inclusion of HBCUs within the membership of the Association. Within the chapter, the author provides insight into the pervasive racist sentiments that were harbored by leaders within the SACS, and details the actions and decisions that resulted.

The initial decision to exclude HBCUs from participation and membership in the Commission on Colleges was based on the separate but equal public accommodations

and facilities practices upheld by the *Plessy vs. Ferguson* decision in 1896. This decision maintained and promoted a society and legal system that was deeply rooted in racism and segregation. Operating within the confines enforced by this system, HBCUs sought to establish a relationship with the Southern Association during the 1920's.

In 1928, concerned by the lack of any form of accrediting standards for black institutions, Mr. Thomas E. Jones, President of Fisk University asked SACS for assistance in establishing accreditation standards for black schools and colleges on behalf of Southern HBCUs. In response to this request, SACS appointed a three member committee to work with the Association of Colleges for Negro Youth (ACNY). Rather than entertaining the idea of accepting black institutions, the Southern Association sought and secured approval from the American Council on Education to recognize the ACNY as the accrediting agency for black institutions (Miller, pg. 123). This action was not favorably received by black educators who felt it provided blatant evidence of the unwillingness of SACS to accept black institutions.

In 1929, after continued prompting from black educators, SACS appointed a standing Committee on the Approval of Negro Schools (Committee). After securing a \$35,000 grant from the General Education Board, SACS appointed a full-time Executive Agent to inspect and review the institutions seeking accreditation status. During their first year of operation the Committee wrote to 85 black institutions regarding the services being provided and invited each of the institutions to request an inspection. Sixty institutions responded to the request and 35 of those institutions completed and returned inspection applications to the Committee. From the 35 applications submitted, the Committee selected nine for review, which represented only those institutions the

Committee believed would meet the established accreditation standards. The other 26 institutions who had applied were excluded.

Following the initial cycle of inspections, only one institution, Fisk University, was identified as having met all of the standards established by the Committee for accreditation. As a result of its accomplishment, Fisk University was listed on the “A” list, which was reserved for black institutions that had satisfied all of the accreditation standards. By 1943, there were 34 institutions included on the “A” list and 16 on the “B” list, which was reserved for institutions that did not meet one or more of the accreditation standards.

Many black leaders expressed their concern that “inclusion on the approved list hardly brought with it the same benefits that membership and accreditation conferred on whites-only institutions. This inequality was compounded for those institutions that only made it to the “B” list - which some black educators had been heard to suggest stood for “berated” (Miller, pg. 126). The fact that black institutions were presented on separate lists and were not considered for membership with SACS perpetuated the separate but unequal educational conditions of the south (Miller, pg. 126).

When the funding from the original General Education Board grant was exhausted, the Association of Colleges and Schools for Negroes (ACSSN) assumed financial responsibility for the inspections to ensure that SACS would not use fiscal concerns as the rationale to discontinue their inspection efforts. In 1952, SACS invited the ACSSN to hold its annual meeting at the same time and place as their annual meeting. The joint meeting was held at Le Moyne College (a HBCU) in Memphis, Tennessee. In March 1954, SACS expressed their intent to accept black institutions fully into their

membership by 1960 and established a timeline for the anticipated transition. While the *Brown vs. Board of Education* decision was reached months later in May 1954, it was not until 1957 that SACS admitted its first black institution into full membership (Miller pgs. 130-142).

During the period 1954 through 1957, black educators worked very closely with SACS to ensure that HBCUs would be afforded the opportunity for full membership. As presented in A Centennial History of the Southern Association of Colleges and Schools 1895-1995, there was continuous resistance within SACS regarding desegregation, as evidenced by the long and heated debates by the SACS Joint Sub-Committee on Colleges for Negro Youth. Author James Miller details the deliberations of the Joint Sub-Committee that continued until 2 or 3 in the morning on questions regarding which institutions to admit into membership (Miller pg. 142). These accounts provide additional insight into some of the reasons for the deeply rooted distrust of SACS among southern HBCUs that continues today. Specifically, these accounts provide a rationale for understanding why many African-American educators believe that SACS systematically selects which HBCUs should be accredited and maintained and which ones should be excluded.

### **Preparing for Reaffirmation:**

The published documents from the Southern Association that were used in this study include Handbook for Institutional Self-Study, Policies, Procedures and Guidelines, and the Criteria for Accreditation 11<sup>th</sup> Edition. The Handbook for the Institutional Self-Study details each of the steps required by any institution embarking upon the accreditation reaffirmation process. This publication includes information on the goals,

objectives and benefits of the self-study process and the Commission's expectations. The document contains proposed leadership roles and structures for executing the self-study and a planning timeline.

The Policies, Procedures and Guidelines publication fully details the operations and policies of the Commission on Colleges. This document provides background information on the Commission and its standard practices of operation. Finally, the Criteria for Accreditation publication details the 13 Conditions of Eligibility, the six sections of the *Criteria*, the 400+ must statements, the potential actions that the Commission may exercise using a variety of scenarios, and a timeline for the completion of the entire process. There are 13 Conditions of Eligibility, which represent the basic qualifications that an institution must satisfy to be accredited by the Commission on Colleges:

1. In obtaining or maintaining accreditation with the Commission on Colleges, an institution **agrees** to the following:
  - That it will comply with the Criteria for Accreditation of the College Delegate Assembly consistent with the policies and procedures of the Commission on Colleges.
  - That the Commission on Colleges, at its discretion, may make known to any agency of member or the public regarding such information, the nature of any action, positive or negative, regarding the institution's status with the Commission.
  - That it will comply with Commission requests, directives, decisions and policies, and will make complete, accurate and honest disclosure. Failure

to do so is sufficient reason, in or of itself, for the Commission to impose a sanction, or to deny or revoke candidacy of accreditation.

2. That the institution **must** have formal authority from an appropriate government agency or agencies located within the geographic jurisdiction of the Southern Association of Colleges and Schools to award degrees.
3. That the institution **must** have a governing board of at least five members, which has the authority and duty to ensure that the mission of the institution is being implemented.
4. The institution **must** have a chief executive officer whose primary responsibility is to the institution. The chief executive officer **must** not be the presiding officer of the board.
5. The institution **must** be in operation and have students enrolled in degree programs at the time of the committee visit.
6. The institution **must** offer one or more degree programs based on at least two academic years at the associate level, at least four year at the baccalaureate level, or at least one academic year at the post-baccalaureate level.
7. The institution **must** have a clearly defined, published statement of purpose appropriate to an institution of higher education.
8. The institution **must** have an appropriate plan, as well as a functioning planning and evaluation process, which identifies and integrates projected educational, physical and financial development, and incorporates procedures for program review and institutional improvement.

9. The institution **must** have published admission policies compatible with its stated mission.
10. All undergraduate degree programs of the institution **must** include a substantial component of general education courses at the collegiate level.
11. The number of full-time faculty **must** be adequate to provide effective teaching, advising, and scholarly or creative activity.
12. The institution **must** have sufficient learning resources or, through formal agreements or appropriate technology, ensure the provision of and ready access to adequate learning resources and services to support the courses, programs and degrees offered.
13. The institution must have an adequate financial base to accomplish its purpose at an acceptable level of quality on a continuing basis (SACS- Criteria for Accreditation, pgs. 9 -13).

The six sections of the *Criteria* include: Section I: Principles and Philosophy of Accreditation, Section II: Institutional Purpose, Section III: Institutional Effectiveness, Section IV: Educational Program, Section V: Educational Support Services, and Section VI: Administrative Processes (SACS, Criteria for Accreditation, 1998, pgs. v-viii). These documents provide a concrete understanding of the SACS accreditation process and the expectations of the institutions under review.

#### How the Process Works

The self-study is a primary component of the accreditation process. All institutions applying for initial, continuing, or renewed accreditation are required to complete a comprehensive self-evaluation of the institution's purpose, services and

programs. Upon completion of this initial phase of the accreditation procedures, a peer review team is selected and sent to the institution to assess institutional compliance with the *Criteria*, evaluate the institution's effectiveness in achieving its stated goals, and verify information contained in the institutional self-study.

After the visiting committee completes its draft report, it is sent to the institution to ensure that there are no factual errors and that the report fairly represents the institution. Once completed, the report is re-submitted to the institution to secure institutional responses to any recommendations made by the visiting committee. The final report and institutional responses are reviewed by the Chair of the visiting committee and then forwarded to the appropriate Committee on Criteria and Reports. The final steps in the accreditation process include the review and recommendation of actions by the Committee on Criteria and Reports. The Committee on Criteria and Reports is a standing committee of the Commission on Colleges whose role is to review Visiting Team reports and institutional responses to develop recommended accreditation actions for the full Commission. These recommendations are sent to Executive Council of the Commission for review and then forwarded to the Commission on Colleges for final action on the institution's accreditation status (SACS-Handbook for Institutional Self-Study, pgs. 4-5).

### Institutional Self-Study

The self-evaluation component of the accreditation process was first introduced in the 1950's and formally adopted by the Commission in 1957. This component was added to the process to address the significant changes that were occurring within higher education and to provide institutions with a method for evaluating themselves against

their stated missions. The Commission's expectation was that the institutional self-study process would be an integral part of the planning and evaluation procedures of an institution rather than a periodic occurrence. It was expected that an institution would fully utilize the institutional self-study process as an opportunity to demonstrate its full compliance with the *Criteria* (SACS-Handbook for Institutional Self-Study, p. 6).

At the institutional level, broad-based support and participation is required to ensure a successful self-evaluation process. Key to the success of the process is the appointment of an appropriate and effective Self-Study Director. The role of the Self-Study Director is to coordinate and manage the self-study process, keep institutional leaders informed of the progress made with the self-evaluation, serve as a liaison to the Commission on Colleges, and coordinate the arrangements for the Visiting Committee.

To support the work of the Self-Study Director a number of institutional committees must be appointed, including a Steering Committee – to coordinate and supervise the implementation of the self-study process, a Principal Committee, which has a number of supporting committees – to evaluate the institution's strengths and weaknesses and compliance with the *Criteria*, and an Editorial Committee – responsible for editing the draft and final self-study reports. It is recommended that the composition of these committees include representation from all facets of the institutional community, including students, faculty, staff, trustees and alumni (SACS-Handbook for Institutional Self-Study, pgs. 17-19). The entire self-study process typically spans two years and requires the time and resources of a number of key administrative and faculty members.

### Peer Review – Visiting Committee

The Visiting Committee is comprised of administrators, faculty and staff members who have been nominated by chief executive officers from member institutions, members of the visiting committees for other member institutions, and members of the staff of the Commission on Colleges (SACS-Policies, Procedures and Guidelines, p. 110). Individuals participating on the committee have demonstrated expertise in the various areas being evaluated during the visit. The committee's visit lasts four days and includes a series of interviews with institutional representatives, visits to campus facilities and classrooms, and time spent reviewing institutional documents, and exhibits prepared to demonstrate institutional compliance with the *Criteria*. During the committee's visit, the institution assumes full responsibility for securing hotel accommodations, transportation to and from institutional facilities, necessary supplies, and secretarial support. On the final day of the visit, the committee conducts an exit interview with the Chief Executive Officer and other designated institutional representatives.

### Accreditation Actions

After careful review of the visiting committee's report and responses prepared by the institution under review, the Commission votes to take one of the following actions on the reaffirmation of accreditation: grant reaffirmation with or without the requirement of follow-up reports; grant reaffirmation and place the institution on *notice* for a period of one year; defer reaffirmation until the next meeting of the Commission and seek additional information from the institution; deny reaffirmation and place the institution on *Warning or Probation* for a period of no more than two years; deny reaffirmation and

remove the institution from membership in the Commission on Colleges (SACS-Handbook for Institutional Self-Study, p. 78).

Any institution that loses accreditation immediately loses its eligibility to receive Federal Title IV funds as detailed in the Higher Education Act of 1965 (Leef and Burris, 2002, pgs. 10-11). With more than \$60 billion awarded annually through federal financial aid programs, the loss of eligibility would be a fatal blow to any institution whose student body places heavy reliance on the receipt of these financial aid funds to cover their educational costs.

It should be noted that the *Criteria for Accreditation* that were used in this study will no longer be standards for accreditation after 2004. During its annual meeting in December 2001, the Commission on Colleges adopted new accreditation standards that will be applied to institutions seeking re-accreditation effective with the 2004 reaffirmation cycle. The revised procedures include new “*Principles of Accreditation*,” which embody many of the themes previously captured within the “*Criterion for Accreditation*,” but are less prescriptive in the requirements that demonstrate compliance. Under the *Principles of Accreditation* the 400+ must statements have been replaced with 72 requirements and the comprehensive institutional self-study report has been replaced by two smaller reports, a Compliance Certification and a Quality Enhancement Plan.

**Accreditation Critiques:**

Can College Accreditation Live Up to Its Promise is a 2002 publication of the American Council of Trustees and Alumni that raises several key concerns about accreditation in the United States, namely: the effectiveness of accreditation in assessing educational quality, the costs associated with the accreditation process, and the legal

issues associated with accreditation. The authors Leef and Burris raise several questions that are critical to the institutions included in this study:

- Does accreditation give students, parents, and taxpayers any assurance of quality?
- Does the accreditation process have any undesirable consequences?
- Is there a better way to promote educational quality?

Of particular interest is the discussion concerning the escalating cost to institutions that participate in the regional accreditation process and the linkage between maintaining accreditation and eligibility for Federal Title IV funds. Using the results of a survey conducted by the Council for Higher Education Accreditation in 1997, the authors reported that the average cost for the accreditation visits ranged from \$1,000 per visit to \$5,000, and that direct and in-kind expenditures were \$63,000, with more than 20% of the institutions indicating that they had spent \$100,000 or more (Leef and Burris, pg. 33).

This data on the escalating cost of the accreditation process is of particular concern for the two institutions used for this study because both hosted numerous site visits and prepared several follow-up reports in their efforts to restore full accreditation status with SACS. Having both been cited for financial resource concerns, the additional cost associated with maintaining/regaining their accreditation placed additional financial pressures on them.

The linkage between accreditation and Title IV eligibility that was established by the 1965 Higher Education Act was another area of particular concern raised by Leef and Burris. The authors argued that by aligning Title IV eligibility with an institution's ability to maintain its accreditation status, regional accrediting agencies have become the gatekeepers to institutional eligibility for Federal funds. With approximately 85% or

more of the student populations receiving some form of Title IV financial aid funds, leaders at both of the institutions used in this study understand the financial implications the loss of eligibility would have on both the students and the institutions (Leef and Burris, pg 1).

The concerns raised by Leef and Burris about the relationship between federal financial aid and the accreditation process were also addressed in the United States Congress. In 2002, U.S. Representative Thomas E. Petri (R) of Wisconsin introduced U.S. House Resolution (H.R.) 5501, which called for separating federal financial aid and accreditation. In his bill, which was intended to amend the Higher Education Act of 1965, Representative Petri recommended transferring the responsibility for determining an institution's Title IV eligibility from the regional accrediting agencies to the U.S. Department of Education. "The purposes of this act are to (1) refocus the purpose of accreditation on providing comparative information about the quality of institutions of higher education, rather than determining student aid eligibility, which should properly be the responsibility of the Department of Education; (2) To end the virtual monopoly that today's accrediting agencies enjoy, and require them to operate in a competitive environment like any other industry" (H.R. 5501, 2001, p. 3). While this legislation was not passed during the 107<sup>th</sup> U.S. Congress, it did open the door for discussions on the appropriateness of the linkage between accreditation and eligibility, and the resulting monopoly status afforded regional accrediting agencies.

#### **Accreditation Actions Taken by the Southern Association of Colleges and Schools:**

There are countless articles from *Black Issues in Higher Education* and *The Chronicle of Higher Education* that deal with recent actions taken by the Southern

Association. With articles such as “Southern Accrediting Group Penalizes 21 Colleges” (McMurtie, 2002, p. 1), “Morris Brown College Loses Accreditation, Grambling State gets Probation Again” (Williams, 2002, p. 1), “Southern Association Strips 2 Black Colleges of Accreditation” (Williams, 2003, p. 1), and “Historically Black Barber-Scotia College Loses Accreditation (Karlin-Resnick, 2004, pg. 1) a considerable amount of press has been given concerning the actions of the Southern Association as they relate to HBCUs. As previously mentioned, these articles detail the actions taken by SACS against the institutions but provide only limited analysis of the conditions that led to them. These accounts present only one facet of the entire story as they fail to share the success stories about how the institutions were able to restore their accreditation status with the Southern Association.

- Morris Brown College – In December 2002, Morris Brown College in Atlanta, Georgia lost its membership in the Commission on Colleges as a result of continuous financial concerns at the institution. At the time of the SACS decision, the College was saddled with \$27million in debt and had been accused of using federal financial aid funds to pay overdue bills (Williams, 2002, p. 1).
- Grambling State University - In December 2001, Grambling State University was placed on *probation* for failure to maintain adequate financial records. At the time the *probationary* status was issued, the institution’s financial records were in such disarray that an annual financial audit could not be conducted. The Louisiana State Auditor’s Office was able to conduct audits for both the 2002 and 2003 fiscal years, and Grambling was removed from *probation* in December 2003 (Williams, 2003, p. 1).

- Bennett College - In December 2001, Bennett College was placed on *probation* for continued financial concerns. At the time of the sanction, the College had not completed a portion of its audit in time to demonstrate that it was properly keeping track of its financial aid funds. The College was removed from *probation* in December 2003 (McMurtie, 2002, p. 1).
- Talladega College - In December 2001, Talladega College was placed on *probation* for insufficient financial resources and for deficiencies identified in planning and evaluating the institution's academic programs. Under the leadership of a well-experienced president, the College substantially increased its financial base over a two-year period, and implemented an integrated institutional planning and evaluation process that resulted in their removal from *probation* in December 2003. (McMurtie, 2002, p. 1).
- Barber-Scotia College - In June 2004, Barber-Scotia College lost its membership in the Commission on Colleges as a result of a series of academic and financial problems. During the May 2004 commencement period, it is alleged that the institution awarded 28 baccalaureate degrees to adult evening students who had not met the graduation requirements (Karlin-Resnick, 2004, pg. 1).

### **Historically Black Colleges and Universities**

Susan Hill's The Traditionally Black Institutions of Higher Education 1860-1982, which was a project supported by the National Center for Educational Statistics (NCES), is an historical volume that presents vital educational statistics on the nation's 105 institutions that were designated as Traditional Black Institutions in 1976. The NCES defines "Traditionally Black Institutions" as those institutions that were founded for the

education of blacks prior to 1954. Included in the book are comparative statistics on enrollments, degrees awarded, financial resources and employee and facilities data.

The highlights of the project included data on the closing of five private Traditionally Black Institutions during the period 1976 through 1984, all but one of which were two year associates degree granting institutions. The enrollment data provided revealed that approximately 20% of the students attending these institutions were Anglo, Hispanic or foreign students, a trend that continues today at many HBCUs. The financial trends presented from the project mirror the current realities of these institutions where there is a high reliance on governmental support with a lower percentage of revenues from tuition and room and board charges than is experienced at majority institutions (Hill, 1982, pgs. ix – xix).

Michael Heintze's Private Black Colleges in Texas, 1865-1954 provides the specific historical accounts of the two institutions that are the subject of this research project. Heintze provides institution specific data in addition to comparative analysis of the curricula, faculty credentials, enrollments, financial resources and stability, and religious affiliations of the Texas institutions. While the book contains only one page which addresses the topic of accreditation with the Southern Association, an entire chapter deals with the financial resources of these institutions and the major role their denominational affiliations had in maintaining their stability. The financial role of the denominational partners surfaced as a theme during this project. Heintze points out in the conclusion of his chapter on financial resources that during the late nineteenth and early twentieth centuries these institutions received 70-90% of their budgets from their

denominational affiliations (Heintze, 1985 p. 152). Using the details provided by Heintze, the histories of the institutions included in this study are presented below.

### Texas College

“Texas College was founded in 1894, on 101 acres of land just north of Tyler, Texas” (Heintze, pg. 34). The college officially opened in 1895 and later received its official charter in 1907 under the sponsorship of the Colored Methodist Episcopal Church. In honor of a CME Bishop, Texas College was renamed Phillips University in 1909. The name change was short lived, and it was changed back to Texas College in 1917 as a result of the objections voiced by the college’s supporters. Texas College was one of five institutions founded by the CME Church beginning in 1873 for the purpose of educating freedmen (Heintze, pgs. 34-36).

When Texas College opened its doors in 1894 there were three students enrolled. Over the course of the next thirty years, the student enrollment grew to 341 students by 1927, and to above 800 students during 1942-1954. The distribution of students attending Texas College included 18% enrolled in elementary school, 51% enrolled in secondary school, and 31% enrolled as college students. The vocational courses offered during the early 1900’s were divided between male and female courses of study. Those identified for female students included cooking, dress-making, and sewing, while those for male students included agriculture, carpentry, and manual training (Heintze, pgs 70 - 84).

Contributions made by the institution’s denomination partner represented a significant portion of the revenue received during the later 1800’s and early 1900’s. During 1914-15, Texas College received \$3,500 from the CME Church, which

represented 53.7% of the college's annual operating budget. By 1926-27, the CME contributions had increased to \$22,815, which represented 76.7% of the annual operating budget. Comparatively, tuition and fee revenue during 1914-15 was \$265, 4% of the annual operating budget, and later increased to \$5,583 in 1926-27, 18.7% of the annual operating budget. Following the founding of the United Negro College Fund (UNCF) in 1943, Texas College became a recipient of a portion of the fundraising proceeds from that organization. UNCF provides support for 39 of the nation's 53 private HBCUs. During 1944-54, Texas College received \$232,804 from UNCF. (Heintze, pgs. 129-150).

### Samuel Huston College

Samuel Huston College began as Andrews Normal School and was founded in Dallas, Texas in 1876. After being unable to attract sufficient support, the institution relocated to Austin, Texas. The College was originally located on six acres of land purchased in 1883 by Richard S. Rust, secretary for the Freedmen's Aid Society, in east Austin. The land donation was immediately followed by a \$9,000 contribution from Samuel Huston of Marengo, Iowa for whom the college was later named (Heintze, pg. 38).

In 1890, Dr. Rueben Lovinggood was appointed President of the institution. Upon his relocation to Austin, Dr. Lovinggood found that the institution's facilities were comprised of a vacant five-room basement which was home for several small farm animals (pigs, goats and chickens). When the institution began there were eight students enrolled. By 1927, the College boasted an enrollment of 201 students. This grew to 560 by 1950, two years before the institution merged with neighboring Tillotson College. In 1915, the students were enrolled in elementary, secondary and college courses; however

by 1927, all of the students were enrolled as college students. In 1915, the vocational course offered for women included cooking and sewing, and there was only one course, tailoring, offered for men (Heintze, pgs. 38-77).

The Freedmen's Aid Society was the denomination partner that provided funding for Samuel Huston College. During 1914-15, the college received \$4,429, 15% of the institution's operating budget. By 1926-27, the church's contribution was \$20,000, 40.9% of the operating budget. Tuition and fee revenue during 1914-15 was \$4,053, 13.9% of the operating budget. During 1944-1951, the college received \$132,708 from UNCF (Heintze, pgs. 128-152).

### Tillotson College

Tillotson Collegiate and Normal Institute, which would later become Tillotson College, was chartered in 1877. The institution was founded by the American Missionary Association of the Congregationalist Church, now known as the United Church of Christ, to provide elementary, secondary or college education for blacks in the Austin area. The college's original benefactor was Reverend George Tillotson who was a Yale educated minister who donated \$16,000 toward the purchase of land to begin the institution (Heintze, pg. 26).

The first building erected at Tillotson College was Allen Hall. The opening of the institution was delayed because it took the college representatives four years to raise the necessary funds to complete construction for the building. Tillotson College did not open its doors until 1881 when Allen Hall was completed. There were 126 students enrolled in 1926. Enrollment grew to 616 students by 1950, two years before the institution would merge with Samuel Huston College. That year, the distribution of the students

included 31% in elementary, 53% in secondary, and 16% in college level courses. The vocational courses offered for women included cooking and sewing, and there were courses in manual training for men (Heintze, pgs. 47-72).

The American Missionary Society provided \$8,851 during 1914-15, 5.7% of the institutional operating budget. The contribution increased to \$22,815 during 1926-27, 76.7% of the operating budget. Tuition and fee revenue during these same years were \$2,693 (13%) and \$3,150 (12.6%) respectively. Between 1944-1951, Tillotson College received a total of \$164,632 from UNCF (Heintze, pgs. 127-151).

### Huston-Tillotson College

On January 26, 1952, neighboring Tillotson College and Samuel Huston College which were less than one mile apart, merged to form Huston-Tillotson College. The merger, which took more than eight years to finalize, was preceded by several collaborative efforts which dated back to 1930 and included sharing faculty and jointly sponsored speakers and artists. Faced with the challenges of rising operating costs and competition for the same pool of students, the leadership at both institutions recognized the long-term benefits of merging.

One of the immediate barriers the leadership teams had to tackle was securing the support and cooperation of the respective denominational partners. After a considerable amount of deliberation the AMA (Tillotson) granted its official support of the merger in July 1945. This was later followed by a decision by the Methodist Board of Education (Samuel Huston) in February 1947. “The two denomination partners agreed upon six general principles in bringing the two institutions together:

1. The pooling of the present and potential resources of the two colleges in a united effort to do better at what each is now doing inadequately and insufficiently.
2. The incorporation of a new college under the direction of its own trustees, representative of the alumni and patrons as well as the church boards now responsible for the separate colleges.
3. The adoption of a new name for the united college.
4. The selection of an adequate site.
5. The conservation of the interest of the churches represented by the two mission boards.
6. The securing of reasonably adequate financial aid for buildings and endowments for a bona fide, A-rated, liberal arts college of possibly 1,000 students” (Heintze, pgs. 145-146).

Using the six general principles as a guide, it was finally decided that the merged institution would be located on the Tillotson campus. While the fundraising efforts were under way to secure funding revenue to build additional classroom space and living facilities, both campuses were maintained. The Samuel Huston campus was renamed the West Campus, and Tillotson was renamed the East Campus. Today, the merged institution is located on the old Tillotson College campus.

A broader perspective on private Historically Black Colleges and Universities is provided in Stand and Prosper. Drewry and Doermann offer insightful background information on the history and development of these institutions. Through their discussion the authors explore the role of the Freedman’s Bureau and denominational groups who played a significant role in the initial development and funding of these

institutions. The book carefully details the evolution of black institutions from their role of “higher schools,” which were responsible for providing secondary school education for black students, to normal and industrial schools and finally true institutions of higher education. The final chapters of the book are dedicated to explaining the challenges that exist at these institutions, including those faced by the students, faculty and the administrators. Relying primarily on data from UNCF, the authors passionately tell the story of the private HBCU.

Included in the book is a full discussion of the financial challenges that have faced private HBCUs since their inception. A key point made is the fact that the financial well-being of these institutions is shaped to a large degree by the actions and spending decisions of external organizations and not by individual donors as is customarily the case at private institutions. While the revenue streams at most private institutions are driven by tuition and fees charges to students, complemented by alumni donations, the pattern at private black institutions is significantly different because of their history of serving low-income students who can not afford to pay high tuition prices. Table C below compares the distribution of revenue sources for private HBCUs to those of other private institutions (Drewry and Doermann, pgs. 254 -255).

**Table C: Percentage Distribution of Revenue Sources in UNCF Member Institutions and in U.S. Private Colleges and Universities, 1995-96**

<b>Sources of Revenue</b>	<b>UNCF Institutions</b>	<b>U.S. Private Colleges &amp; Universities</b>
Tuition and fees	37	42
Government support	26	17
Private Gifts	19	9
Endowment Income	3	5
Auxiliary Enterprises	15	27

(Source: The United Negro College Fund: Statistical Report 1998, pgs. 21-22)

A review of the table above demonstrates the high reliance of private HBCUs on governmental support and private gifts, which when combined represent 45% of total revenue compared to 26% at other private colleges and universities. The most significant component of governmental support is Title III grant funds. The Higher Education Act (HEA) of 1965 marked the beginning of the largest single long-term program of institutional aid for black institutions. Title III B of that legislation was designed to strengthen Historically Black Colleges and Universities to continue their unique role of educating black, educationally disadvantaged, and low-income students.

The Strengthening of Historically Black Colleges and Universities Program consists of two major components:

1. *Strengthening Historically Black Colleges and Universities* (HBCUs) is a formula grant program for HBCUs designed to help improve their programs and management and enhance educational opportunities for students. It also is intended to facilitate a decrease in reliance on governmental financial support and to encourage reliance on endowments and private sources. Part B funds may be used to establish or strengthen the physical plants, faculty support, academic instruction, student services, funds development, financial management, academic resources, and endowments of HBCUs. Up to 50 percent of the funds may be used for construction or maintenance.

A Part B eligible institution is any accredited, legally authorized HBCU that was established prior to 1964 and whose principal mission was, and is, the education of black Americans. A list of those HBCUs was published in the Federal Register of July 20, 1993. The appropriation is allotted among HBCUs according to the number of Pell Grant recipients among currently enrolled students (50 percent), number of graduates (25 percent), and percentage of graduates attending graduate or professional school in degree programs in which blacks are underrepresented (25 percent). The statute provides for a \$500,000 minimum allotment for each eligible institution.

2. *The Strengthening Historically Black Graduate Institutions Program* provides grants to the following five postgraduate institutions: Morehouse School of Medicine, Meharry Medical School, Charles R. Drew Postgraduate Medical School, Atlanta University, and Tuskegee Institute of Veterinary Medicine. All institutions are required to match award amounts in excess of \$500,000, except

for Morehouse School of Medicine, which is authorized to receive \$3 million. The Higher Education Amendments of 1992 provide for awards to the five originally funded institutions and authorizes awards to 11 additional historically black graduate and professional institutions should the program appropriations exceed 12 million dollars (Department of Education, 1965, p. 2).

Title III funds have provided invaluable resources to HBCUs, including both Texas College and Huston-Tillotson College, since the inception of the program. They have accounted for 5-10% of the operating budgets of recipient institutions. More importantly, because the statutory list of possible purposes for the use of Title III funds is so broad, these funds have been used virtually as unrestricted funds. They have been used to renovate classrooms, purchase lab/computer equipment, develop student retention programs/model, pay faculty salaries, and fund institutional advancement efforts. On black campuses Title III makes possible the growth and development experienced by majority white campuses (Drewry and Doermann, p. 259). Title III allocations in the federal budget for 2000 included a targeted \$179 million compared to \$80 million in FY 1993(Department of Education, pgs. 2-5).

As pointed out by the authors, the Title III program has withstood the scrutiny of many policymakers who have interpreted the *Brown* decision to mean that these colleges should no longer exist, and, if they do exist, they should not receive federal subsidies (Drewry and Doermann, p. 259). The program also survived the Reagan administration whose attempt to end it did not challenge the need for strengthening black colleges, but rather the label “developing” in the “developing institutions” portion of the act. Key members of the Reagan administration believed these institutions had indeed developed, and as such could be deprived of their Title III subsidies. In direct response, however,

Congress revised the statutory language in the 1986 reauthorization of the Higher Education Act, to create separate language for historically black colleges.

At the time of this study, the call for the end of the Title III program was less insistent, in part due to the recognized accomplishments of the institutions that have received the funds. Additionally, the fact that Title III now encompasses Hispanic-serving institutions and tribally controlled Native-American institutions, in addition to HBCUs, is no doubt more appealing to the broader American community. It is clear that Title III made a vital contribution to the substantial accomplishments of private HBCUs since its inception (Drewery and Doermann, p. 248).

Gifts and grants from corporate foundations provide approximately 20% of the annual income received at most private HBCUs as shown in Table C. Gifts from private foundations such as Ford, Kellogg, Kresge, Hewlett, Packard, and Gates come in the form of student scholarships, institutional grants and equipment. Companies such as IBM, Dell, and 3M have donated computer equipment and copiers, and have loaned corporate executives to private black institutions

There have been changes through the years, however, in the manner in which corporate gifts have been made to private institutions. Prior to 1950, the majority of corporate contributions was given as restricted gifts, and were directly related to the business of the donor. This practice continued until a 1953 court decision involving Princeton University that established a broader standard for corporate citizenship and giving. From then until the mid 1990's, unrestricted gifts to private institutions became common practice and represented more than 95% of all corporate gifts granted to private HBCUs. This provided the institutions enormous leeway (Drewery and Doermann, pg.

261). Since the mid 1990's the trend in corporate contributions has reverted back to the restricted gifts. As Table D demonstrates restricted giving increased from \$15,000,000 in 1995 to \$81,000,000 in 2000.

As depicted in Table D, the amount of private gifts granted to private HBCUs has increased tremendously in recent years. The increase has in large part been the result of efforts of the major fundraising arm for these institutions, the United Negro College Fund. This organization is credited with being the first effective collegiate fundraising consortium in the United States and is responsible for more than one-third of the private giving, received by its member institutions. All of the gifts received by UNCF are distributed to member institutions through formulas on a per-student basis (Drewery and Doermann, p. 266).

**Table D: Private Gifts to Private HBCUs 1995 and 2000**

<b>Type of Gift</b>	<b>1995</b>	<b>2000</b>
Unrestricted	\$44,100,000	\$63,800,000
% of Total Gifts	75%	44%
Restricted Gifts	\$15,000,000	\$81,000,000
% of Total Gifts	25%	56%
Five-year % increase	-	145%

(Source: United Negro College Fund 2001 Statistical Report)

Between 1995 and 2000, UNCF was responsible for sector-wide programs which provided \$130 million to improve technology infrastructure (funded by Microsoft, IBM and AT&T); \$42 million in a Lily Endowment Grant was distributed as block grants for faculty development and scholarships; and Bill and Melinda Gates established the \$1 billion Gates Millennium scholarship program, to allow African-American, Hispanic, Native American and Asian American students of high achievement to attend a college of their choice.

While the trends with private giving during late 1990's were very favorable for private HBCUs, economic conditions in the early 21<sup>st</sup> century have inhibited the abilities of many to continue this momentum. Both the recession and the war in Iraq have created

financial challenges for individual and corporate donors. Faced with reduced resources to distribute, many benefactors are forced to re-assess their levels of giving and the entities to which they will give. There is concern that HBCUs will be especially hurt by these trends.

The 2003 UNCF Statistical Report contains comprehensive data on member institutions. The data provides valuable comparisons across private HBCUs, including two institutions including reviewed in this study. Both are founding members of UNCF.

The report provides historical trends and data on the following topics:

- Enrollment
- Admission
- Degrees Awarded
- Faculty and Staff
- Student Financial Aid
- College Costs
- Institutional Finances

The highlights include an enrollment of 58,031 students attending UNCF institutions, an 8.5% increase for the period 1993 through 2002. 78% of these students were from the Southern region of the country. The top five states of origin were Georgia (6,816), South Carolina (6,000), Florida (5,361), Alabama (5,052) and North Carolina (4,955). There was a 30% increase in the number of students from Texas attending UNCF institution during the years 1998-1992, the largest percentage increase from any state (Hurst, 2004, pgs 6-7).

During 1992-2002, UNCF institutions realized a 39% increase in the number of freshmen applications from 56,796 applications for the fall 1992 semester to 80,066 applications the fall 2002. Unfortunately, during this same period there was also a decline in the percentage of accepted students who enrolled at the institutions, from 38% in 1992 to 30% in 2002. At the conclusion of the 2001-02 academic year, 8,218 degrees were awarded at UNCF institutions. Business and management represented the largest percentage of bachelor's degrees (26.7%), followed by social sciences (15%), biology

(9%) and education (8%). There were also 721 graduate degrees awarded, a 26% decrease over the previous academic year (Hurst, pgs. 8-12).

During fall 2002 there were 3,182 full-time faculty members at UNCF institutions with 60% holding terminal degrees in their respective fields of study. The distribution by faculty rank included 37% assistant professors, 25% associate professors, 16% full professors, 16% instructors, with the remaining 6% in other non-instructor ranks. Average faculty salaries lagged behind the salaries at all private four-year institutions across all of the faculty ranks. The largest difference, approximately \$30,000, occurred at the full professor rank. Full professors at UNCF institutions earned an average of \$50,013 compared to \$79,928 at all private four year institutions (Hurst, pgs. 14-17).

Approximately 92% of the students attending UNCF institutions receive some form of financial aid, compared to 69% of African-American students attending all private four year institutions. During the 2001-02 academic year \$538 million was awarded to the students attending UNCF institutions. A comparison of the family income levels for students attending UNCF institutions with those at all HBCUs and all private four-year colleges is shown in Table E.

**Table E: Family Income Comparison: Fall 2002**

<b>Family Income</b>	<b>UNCF</b>	<b>All HBCUs</b>	<b>All 4-Year Private</b>
Less than \$25,000	55%	39%	12%
\$25,000 - \$49,000	27%	29%	19%
\$50,000 - \$75,000	10%	17%	23%
More than \$75,000	7%	15%	46%

(Source: 2003 UNCF Statistical Report, pg. 20).

As the data demonstrates, only 17% of the students attending UNCF institutions have family incomes above \$50,000 compared to 32% at all HBCUs and 69% at all private four year colleges (Hurst, pgs. 19-21).

From 1997 to 2002, institutional scholarships increased by 49% in scholarship funds awarded. State scholarships and grants increased by 29%, Stafford Loans by 13% and Pell grants by 12%. While institutional scholarships increased the most over the period, the funding for this source of financial aid was achieved through tuition

discounting which has a direct impact on the amount of realized tuition and fee income generated by the respective institutions. The report also contained data regarding the significant difference in the average price to attend a UNCF, \$17,173 for the 2001-02 academic year as compared to \$27, 677 at all private four-year colleges. This price includes tuition and fees, room and board, transportation, books and supplies, and personal expenses. The difference indicates the attempts of UNCF institutions to keep prices low. As the family income data presented in Table E demonstrates, students at UNCF institutions are not positioned to handle more expensive college prices (Hurst, pgs. 21-25).

The data on institutional financial resources of the UNCF institutions revealed continued reliance on governmental support and private gifts as described by Drewery and Doermann, but tuition and fees is the largest category. For 2001-02, tuition and fees represented 36% of total revenue, with governmental support at 29% and private gifts at 19% as shown in Table F. As compared to 1997-98, there was a significant decline in endowment income while revenue generated from auxiliary enterprises remained constant.

**Table F: Trends in Revenue Sources for UNCF Institutions: 1997 -2002**

Sources of Revenue	1997-1998	2001-2002	% Change
Tuition and Fees	35%	36%	+1%
Governmental Support	24%	29%	+5%
Private Gifts	16%	19%	+3%
Endowment Income	8%	0%	-8%
Auxiliary Enterprises	12%	12%	N/A
Other Income	5%	4%	-1%

(Source: 2003 UNCF Statistical Report, pg. 26).

In 2001-02, 23% of total expenditures at UNCF institutions were for instruction and 22% for institutional support. Only 2% were for research (see Table G). From 1997-98 to 2001-02 scholarship expenditures decreased from 22% of the total to 11%. A comparison between UNCF institutions and all private four-year colleges revealed that UNCF institutions spend 9% less on instruction, 8% less on research and 3% less on academic support than their counterparts. UNCF institutions spend 3% more on public

service and library facilities, 9% more on institutional support and 9% more on scholarships (Hurst, pg. 28).

**Table G: Trends in Expenditures for UNCF Institutions: 1997-2002**

Source of Expenditure	1997-1998	2001-2002
Instruction	22%	23%
Research	2%	2%
Academic Support	7%	5%
Public Service & Library	2%	5%
Institutional Support	23%	22%
Scholarships	22%	11%
Plant Maintenance	7%	6%
Student Services	5%	9%
Auxiliary Enterprises	8%	11%
All other	2%	6%

(Source: 2003 UNCF Statistical Report, pg. 28).

With very few exceptions, the endowment assets at private HBCUs are quite small. In 2003, there were only nine UNCF institutions that had endowments in excess of \$20 million (market value). The average 2002 market value of the nine institutions was \$62 million. The average market value for endowments at the remaining thirty-one UNCF institutions was \$8.3 million (Hurst, pgs. 30 and 86).

As the data above demonstrates, the private HBCUs member institutions of UNCF lag behind other private four-year college in many of the categories. This is an issue of considerable concern for HBCU leaders. Unfortunately, the picture becomes even more dismal when reviewing the comparative statistics for the two institutions included in this study. In almost every comparison Huston-Tillotson and Texas College rank among the lowest institutions when compared with UNCF averages. Most notable among the 2001 statistics were the following:

- Degrees Awarded: There were 49 bachelors degrees awarded in 2002 at Texas College compared to 73 at Huston-Tillotson College. Both

institutions were among the ten institutions with less than 100 graduates. Texas College had the lowest number of graduates recorded (Hurst, pg. 56).

- Faculty Rank/Salary: At Texas College 44% of the faculty are instructors, and 37% were assistant professors. At Huston-Tillotson College, 42% of the faculty were assistant professors, and 22% were full professors, and another 2% were associate professors. The average salary for full professors at both institutions was less than the UNCF average of \$50,013; at Texas College the average salary was \$34,585 and it was \$45,144 at Huston-Tillotson College (Hurst, pgs. 72-73).
- Price: The total price (tuition/fees and room/board) to attend Texas College during the 2001-02 academic year was \$11,246 compared to \$14,849 at Huston-Tillotson College. Both institutions were below the UNCF average of \$17,173 and ranked among the lowest 13 institutions (Hurst, pg. 80).
- Endowment: The endowments at both institutions were below the \$8.3 million average for the 31 UNCF institutions with endowments under \$20 million (Hurst, pg. 86).

In June 2004, the Southern Education Foundation hosted a conference entitled “Financial Issues and Accreditation” for the Presidents and Chief Financial Officers at HBCUs as part of their Investing in HBCU Leadership Project. Among the conference materials distributed was an information booklet entitled *Managing Your Financial Health: Challenges Facing HBCUS – Issues of Specific Concern*. It provided not only valuable analysis of the actual challenges faced by HBCUs, but also included a listing of financial problem indicators that were suggested as “red flags” for senior administrators. Included among the financial problem indicators were

- Continuous cash flow shortfalls
- Lack of timely interim financial information
- Vendor complaints of delayed payments
- Borrowing from endowment or other restricted funds

- Delays in the collection of outstanding receivables
- Significant comments and weaknesses cited by the external auditor
- Deficits in unrestricted operations
- Losses from auxiliary activities
- Violation of debt covenants
- Issues related to federal funding agencies (McGuirt and Ross, June 2004, pgs. 9-10).

This list was compiled using data from a cross section of institutions within the Southern Association that have been cited for financial stability concerns.

Earlier reference was made to the question regarding the continued need for Historically Black Colleges and Universities. This is an issue that is often raised within the higher education community. Some believe the need for this types of institution no longer exists and that these institutions promote a segregated society rather than an integrated community. Authors Julian Roebuck and Komanduri Murty address this question and raise very strong defenses for their perceived continued need for these institutions in their book Historically Black Colleges and Universities: Their Place in the American Higher Education. The book provides a historical perspective on HBCUs complete with individual institutional profiles and then tackles issues of race relations and student development in a comparative analysis between majority “predominately white” institutions and HBCUs.

In the two chapters that deal specifically with racial issues, the authors examine the role, perception and experiences of both white and black faculty members and students on majority and HBCU college campuses. The author’s findings mirrored those of researchers Pascarella and Terenzini, who in 1992 also concluded that there are many positive features of the HBCU experience for black students. Included in Roebuck and

Murty's findings, was the fact that black students receive more emotional support on a HBCU campus and that these students perform better academically at HBCUs than at majority institutions (Roebuck and Murty, 1993, p. 203).

The overall conclusion reached by Roebuck and Murty is that HBCUs must continue to function because they still serve as institutions that provide educational opportunities for the many students who would not otherwise have an opportunity to obtain a college degree. The message contained throughout this book is germane to this study because many of the students who matriculate at and graduate from Huston-Tillotson and Texas Colleges would not have that opportunity if either of these institutions ceased to exist. Ironically, one of the biggest threats to their continued existence is their ability to successfully navigate the reaffirmation process.

### **HBCUs and SACS: A Historical Perspective**

In her dissertation, "From Jim Crow to Inclusion: An Historical Analysis of the Association of Colleges and Secondary Schools for Negroes (ACNY), 1934-1965," Melanie Carter provides a complete background on the development of the ACNY and the battle among southern HBCUs for recognition with the Southern Association. Using reports and correspondence from the ACNY, Carter provides the HBCU perspective on the continual exchanges between the ACNY and SACS. Included among the details of the frustrations experienced by HBCU leaders is vital information on the reality of the Jim Crow south and how the sentiments maintained within the Southern Association created early impediments for black institutions. The information contained in this dissertation paints a vivid picture of the climate in which black institutions learned to operate to protect their existence.

According to Carter, the first major setback in the HBCU quest to become recognized by SACS occurred in the late 1920's when SACS decided to recognize the ACNY as the accrediting body for African American schools in the Southern region. Alarmed by the decision, leaders within the black educational community questioned its underlying rationale. In defense of their actions, Guy E. Snavelly, president of SACS, asserted that the president of the ACNY, Thomas E. Jones, made it clear to him that there was no desire for collaboration between the two organizations. Instead, Snavelly suggested that Jones indicated the ACNY only wanted assistance in formulating and implementing standards for Negro schools. Based upon this request, Snavelly agreed to recognize and assist the ACNY. While the ACNY leadership quietly contended that creating separate accrediting bodies was never their intent, their disappointment was short-lived as they immediately began to initiate new strategies to secure accreditation recognition from SACS (Carter, pgs. 66-67).

At the 1929 annual meeting, SACS announced its decision to appoint a Committee on the Approval of Negro Schools, known also as the Highsmith Committee, after Henry Highsmith who served as chair. The decision to appoint a committee was driven by the results of the Klein Study, a 1928 Federal study that called for the development and implementation of a consistent rating mechanism for African American schools in the South. The funding for the visits to the African American schools was secured from the General Education Board and the Rosenwald Fund and resulted in no expenses being incurred by SACS. The General Education Board summarized its decision in its 1929-30 Annual Report:

Negro colleges have never been rated in the manner that colleges for white persons have been rated in order to obtain approval by associations organized for

the purpose of maintaining standards. Recently the Association of Colleges and Secondary School of the Southern States has interested itself in this problem, with a view eventually to grading Negro institutions included in the approved list of the Association. To pay the salary and traveling expenses of a director for this work and other expenses involved, the General Education Board made an appropriation of \$35,000 to be available over a three year period. Arthur D. Wright, formerly State Agent for the Negro rural schools in Virginia and now professor of education at Dartmouth College has been selected by the Association to direct this activity (Carter, pg. 69).

As previously mentioned, the Highsmith Committee distributed 85 inspection applications to HBCUs within the region in preparation for the inspections. The members of the Highsmith Committee then reviewed the thirty-five correctly submitted applications from the HBCUs that had requested inspections. The Committee selected nine institutions that they believed would meet the established standards for inspection. Included were Fisk, Morehouse, Johnson C. Smith, Shaw, Spelman, Talladega, Virginia State, Virginia Union and Winston-Salem. Of the nine, only Fisk was identified as having satisfied all of the established standards (Carter, pg. 70).

In 1934, the Association of Colleges and Secondary Schools for Negroes (ACSSN) changed its organizational structure in response to the announcement from the General Education Board that it would discontinue funding of the Highsmith Committee. During the same period, SACS announced its plans to halt the inspection process as a result of their unwillingness to assume its cost. In 1938 when the funding from the General Education Board finally expired, the ACSSN initiated membership fees -- initially \$25 for four year institutions, \$15 for junior colleges and \$10 for high schools-- to pay for the inspections. The ACSSN paid SACS \$1,500 in 1938 and \$6,000 in 1950 for the inspections (Carter, pgs. 73-76).

One of the areas of major contention was the classification system used by the Highsmith Committee. The categories used for black institutions were the same as those used for white institutions, including the training and experience of the librarians, pupil-teacher ratio, library equipment, teaching load, length of school term, condition of school plant, and training of the faculty. However the way the categories were actually applied differed. The Highsmith Committee used the hierarchical rating system that Dr. Highsmith had previously used at the state department of North Carolina. Specifically, the system denoted the following: a black institution received an “A” rating if the institution was determined to fully measure up to standards of SACS; a black institution received a B: rating if it did not quite measure up to the standards of SACS, but that failure was identified in only one or two areas, or areas of relative unimportance, and where full compliance was expected within a year or two (Carter, pg 91). While black leaders continued to complain about the use of the classification system to the SACS leadership, it was not abolished until 1957.

Another area of contention between SACS and the ACSSN involved the application of the accreditation standards during and after the inspection process. There was a widely held belief that the accreditation standards were not equally applied to African American institutions throughout the inspection process. As evidence, black leaders pointed out that even after having achieved an “A” status, which meant that an institution had satisfied all of the standards, most black institutions were given a list of deficiencies, which suggested they had achieved the highest status with stipulations.

Once the deficiencies were noted there was a distinct difference in how they were addressed at black institutions compared to their white counterparts. At black

institutions, the inspection process ended at the conclusion of the inspection visit and there were no additional services provided to assist the institution in either achieving or maintaining its accreditation status. More importantly, the responsibility for resolving the deficiencies was the sole responsibility of the institution. At white institutions on the other hand, if deficiencies were noted, the institution was provided with consulting services to assist in maintaining or achieving its accreditation status (Carter, pgs. 97-102).

From 1941 to 1952, the Liaison Committee of the ACSSN advocated for membership of HBCUs in SACS. In 1949, SACS finally agreed to allow an ACSSN representative to address the SACS membership. In a speech entitled “Knocking at Your Door,” Dr. A.D. Beittle, the white president of Talladega College, appealed to the membership to offer membership to HBCUs. While SACS concluded that the timing was inappropriate, the Highsmith Committee made several recommendations during the 1951 SACS Annual Meeting that ultimately positioned the HBCUs for membership. The committee recommended that the annual meetings of SACS and the ACSSN be held at the time and at the same location and that a liaison committee be appointed (Carter, pgs. 110-115).

During 1952 – 1957, the efforts of the ACSSN on behalf of southern HBCUs were focused and persistent. In 1953 it confronted the denial of admission to black students at five state universities in Mississippi, Alabama, Georgia, Florida and South Carolina. It also dealt with SACS refusal to hold its annual meeting at the same time and location as the ACSSN annual meeting as previously agreed. While the *Brown vs. Board of Education* decision was reached in 1954, it took SACS another three years before it was ready to offer full membership to HBCUs. The Southern Association was founded

in 1895, yet it refused to grant accreditation recognition to the black institutions operating within its region for thirty-four years, and did not offer membership to the Commission on Colleges until 1957, sixty-two years after its founding.

## CHAPTER III

### METHODOLOGY

The research questions that drove this case study included: why were the two institutions placed on sanction with the Southern Association of Colleges and Schools; and secondly, how did the institutions restore their full accreditation. This research project involved a comparative case study approach, which included carrying out case studies at two institutions and then conducting a cross-analysis of the results. As detailed by Sharon Merriam, Qualitative Research and Case Study Applications in Education, the use of multiple case studies is a common strategy for enhancing the external validity or generalizability of the findings of a case (Merriam, 1998, pg. 40).

As discussed by Robert Yin, case studies are the preferred method when conducting research that deals with “why” and “how” questions. This method is also the preferred methodology for studying contemporary issues where the relevant behaviors can not be manipulated and where the investigator has no control over the set of events that occurred. Since, the events that occurred at the two colleges were shaped by institutional actions (or lack thereof) and the evaluation and decisions of SACS, and since the researcher had no influence or control over either the actions or the decisions, the final condition for using a case study methodology was thus satisfied (Yin, 1994, pgs. 6-9).

#### **Sample Selection:**

As previously mentioned, during the period 1996-2002, four of the seven private HBCUs within the State of Texas were involved in the accreditation reaffirmation process with SACS. Two of the institutions, Huston-Tillotson College and Texas

College, were sanctioned by SACS as a result. The 50% statistic created by these results (i.e. two sanctioned of the four reviewed) closely mirrors the 47% regional statistic reported by Dr. Leroy Davis, a SACS consultant for UNCF, during a July 2003 UNCF Professional Development Institute. Dr. Davis reported that 21 of the 45 private HBCUs reviewed by SACS between 1996 and 2002 had been sanctioned. Drawn by the daunting similarity in the statistical patterns, the researcher decided to analyze the accreditation histories of the two Texas institutions.

### **Interview Protocols:**

The development of the interview protocols was driven by the two primary research questions of the study, “why” the two identified institutions were issued sanctions by SACS and then “how” did they restore full accreditation status. In their book Understanding Accreditation Young, Chambers and Kells argue that 1) there are a limited number of accreditation experts on any campus, and 2) intense levels of secrecy surround the accreditation process. Based on these arguments the decision was made that leadership and communication should be used as the primary themes for the interviews. The researcher also developed questions that examined the respondents’ prior knowledge and experience with accreditation and/or the Southern Association, their access to reaffirmation documentation, and the role each played during the reaffirmation process. These interviews were also used to gather information on the institution’s organizational climate and structure, and on the perceived image of the institutions in the external community throughout the reaffirmation process (see Appendix I for the interview protocols).

### **Document and Data Acquisition:**

The researcher secured approval to access all institutional records related to the accreditation process at each institution from the colleges' presidents. Each president also identified the key personnel who were primarily responsible for maintaining accreditation records. The representatives at Texas College included the Vice-President of Academic Affairs and the Director of Institutional Research. At Huston-Tillotson College representatives included the Executive Assistant to the President and the Director of Library Services. The preliminary listing of documents that the institutional representatives were to secure was compiled, and included the following:

1. Organizational charts – At Huston-Tillotson College, the research focus was on the roles of leadership and communication throughout the reaffirmation cycles that occurred from 1988 to 2004. The research focus at Texas College mirrored that of Huston-Tillotson College and examined the reaffirmation activities that occurred during the period 1994-2004. This approach was used to examine the themes of leadership and communication to help answer the study's two research questions.
2. The SACS engagement letters, which included the dates of the site visits and the timeframes for the receipt and delivery of written communication between SACS and the two institutions.
3. Institutional self-study reports
4. Reports of on-site visiting committee
5. *Probation and warning notices* from SACS

6. Correspondence from SACS that detail the expected content and deadlines for institutional follow-up reports.
7. Institutional follow-up reports
8. Application for re-admission to membership (Texas College)
9. Special Appearance Requests
10. Reaffirmation notifications
11. Internal institutional correspondence regarding the accreditation process
12. Annual financial audits for the periods under review

The organizational charts, correspondence, and institutional follow – up and progress reports were used to develop the accreditation timelines for each institution. This was instrumental in planning the campus visits. The financial audit information was included among the documents secured because of the high rate of private HBCUs that have been sanctioned for financial concerns. According to Dr. Leroy Davis, (the SACS consultant for UNCF), fifty-two percent of the private HBCUs reviewed by SACS between 1996 and 2002 were sited for financial concerns (Davis, July 23, 2003, p. 4). Throughout this study, the researcher maintained an observation log (notebook) that was used to document events, encounters and obstacles experienced while completing the research.

Each of the campus representatives was asked to provide an initial list of prospective interviewees using their institutional knowledge of the accreditation process as the basis for the interview recommendations. A total of twenty-nine respondents were interviewed, eighteen at Huston-Tillotson College and eleven at Texas College. The interviews represented varying groups of institutional employees, including senior

administrators, faculty members, and other employees who had been employed by their respective institutions for more than twenty years. Four of the interviews were with current and previous CEOs, eight were with vice presidents, thirteen were with mid-level managers (Division Chairs, Registrars, Deans), and four were with faculty members. With two exceptions all of the interviews were audio-taped and later transcribed by the researcher. Written responses to the interview protocol were provided by the two interviewees who were not audio-taped.

### **Campus Visits:**

#### Huston- Tillotson College

Preparations for data collection and interviews at Huston-Tillotson were easily facilitated because the researcher was employed as the Dean of Enrollment Management at the time of the study. The researcher worked closely with the Executive Assistant to the President to identify interview participants, secure institutional accreditation documentation, and accurately document the institutional reaffirmation timeline. The document retrieval process was time intensive because the institution's reaffirmation documents were not centrally located or organized. The researcher secured approval to review institutional documents and conduct interviews with the institutional representatives in October 2003. All of the participants were provided copies of the research proposal and the interview protocol prior to their scheduled interviews, which were all conducted during February and March 2004.

#### Texas College:

Preparations at Texas College were more difficult. The researcher initiated weekly electronic communications with the President's Office in October 2003. These

continued through May 2004 when the visitation arrangements were finally confirmed. Visits were made during June and July 2004. Similar challenges were encountered in locating the institution's reaffirmation documents because the documents were not centrally located or organized. Working in collaboration with a former Vice President and the current Vice President of Academic Affairs and Director of Institutional Research, the researcher secured the names of prospective interviewees and access to institutional accreditation documentation. All of the participants were provided copies of the research proposal and the interview protocol prior to their scheduled interviews.

### **Organization of the Data\Collection\Analysis:**

#### Time Cycles:

The data derived from the case studies were organized using time "cycles" to define specific timeframes within each institution's reaffirmation process. The original intent of the project had been to review the period from 1996 through 2002 as it related to the reaffirmation cycles for both institutions. However, it became obvious early in the data collection phase that the challenges that existed for both institutions during the period under review were extensions of prior reaffirmation cycles. Therefore, the scope of the study was expanded to include an examination of reaffirmation activities at both institutions during the early 1990's.

#### Huston-Tillotson College

The three cycles used for the Huston-Tillotson College case study represented the following accreditation events: Cycle I – the institution was involved in the accreditation self-study process, and hosted the reaffirmation committee visit, Cycle II – the institution was required to submit follow-up reports and host special committee site visits as a result

of being placed on sanctioned status (*notice*), and Cycle III – the institution had begun to prepare for its 2010 accreditation cycle. The presentation of the Huston-Tillotson case study includes two accreditation cycles to capture events from the 1990 accreditation process that impacted the 2000 cycle.

- Cycle I - (1988 - 1992 and 1998-2000)

During these periods the institution completed self-study reports, hosted reaffirmation site visits and prepared institutional follow-reports before being notified in June 1992 that it had been placed on *notice* for failure to submit an FY91 financial audit. It was placed on *notice* again in July 2000 for failure to comply with Conditions of Eligibility Eight and Thirteen.

Condition of Eligibility Eight states that, “the institution must have an appropriate plan, as well as a functioning planning and evaluation process, which identifies and integrates projected educational, physical and financial development, and incorporates procedures for program review and institutional improvement” (SACS – Criteria for Accreditation, 1998, pg. 12).

Condition of Eligibility Thirteen states that, “the institution must have an adequate financial base to accomplish its purpose at an acceptable level of quality on a continuing basis. The institution must provide financial statements and related documents (as specified in Section 6.3.6) which accurately and appropriately represent the total operation of the institution” (SACS – Criteria for Accreditation, 1998, pgs. 12-13).

- Cycle II – (1992 – 1994 and 2000 -2002)

During these periods the College prepared follow-up reports and hosted SACS Special Committee Visits which were required to secure their reaffirmation for a new ten year cycle.

- Cycle III – (2002 – time of writing)

This period was used to examine the institution's preparations for the 2010 reaffirmation cycle.

### Texas College

The three time cycles used for the Texas College case study represented the following accreditation events: Cycle I – the institution lost its accreditation in December 1995 and was required to reapply for membership consideration before regaining its membership in 2001; Cycle II – the institution provided follow-up reports in response to concerns raised by SACS after regaining its membership status; Cycle III – in response to being placed on *probation*, the institution prepared progress reports and prepared for a November 2004 Special Committee visit.

- Cycle I - (1994-2001)

This period at the institution corresponded with the reaffirmation documents that were available. During this period the institution hosted numerous site visits and prepared follow-up and progress reports before being notified in December 1995 that the College's membership with the Commission on Colleges had been revoked. During this period the institution also completed self-study reports, prepared additional follow-up and progress reports, and hosted site visits before regaining its membership in December 2001.

- Cycle II (2001 – 2003)

This period represented the reaffirmation activities that occurred following the reinstatement of the College's membership with the Commission on Colleges in December 2001 through December 2003 when the College was again placed on *probation*. During this period the institution prepared progress reports.

- Cycle III (2004 – time of writing)

This period represented the timeframe from January 2004 when the College received its official notification that it had been placed on sanction through July 2004. During this period the College prepared additional progress reports and began preparations for a November 2004 Special Committee Site Visit.

### **Data Analysis:**

Huberman and Miles' three components of data analysis (data reduction, data display and conclusions drawing/verification) were used to organize and analyze the data collected for this study (Huberman and Miles, 1984, pgs. 21-23). These components were used to ensure that the data were of sufficient quality and could be used to generate findings and conclusions among the two institutions. To facilitate effective comparisons between the two institutional case studies, identical interview protocols and data collection procedures were followed. Using the two primary research questions as the foundation for the mapping and organization of the data, participant observations, interview transcriptions, and document analysis were used. The presentation of the findings of the case studies was designed to facilitate comparisons and analysis between the two institutions.

## Data Reduction

As suggested by Miles and Huberman, the data reduction process was begun during the data collection phase, and continued during data analysis. The data were summarized and organized in the following manner:

- Reaffirmation timelines were developed for each institution. This facilitated the development of the time cycles used in the case study analysis;
- SACS recommendations were summarized for each institution;
- Institutional financial records and audit report findings were reviewed to fully understand the institutional revenue and indebtedness patterns that were used by SACS to determine financial sufficiency;
- The participant observation notes were summarized;
- Interview transcriptions were coded.

The development of a comprehensive reaffirmation timeline required a thorough review of all of the accreditation documentation from each institution. The reaffirmation timelines included the dates for SACS site visits, deadlines for follow up reports, institutional interviews at the bi-annual SACS meetings, and the reaffirmation decisions rendered by SACS. These timelines allowed the researcher to summarize eighteen years of accreditation activity (1986-2004) for Huston-Tillotson College and twelve years of accreditation activity (1992-2004) for Texas College (See Appendix A for the Huston-Tillotson accreditation timeline and Appendix B for the Texas College accreditation timeline). After developing the reaffirmation timelines the researcher developed tables to summarize the recommendations issued. The recommendations were organized using the six sections of the *Criteria*: Section 1: Principles and Philosophy of Accreditation;

Section II: Institutional Purpose; Section III: Institutional Effectiveness; Section IV: Educational Programs; Section V: Educational Support Programs; and Section VI: Administrative Processes.

**Interviews:**

As previously mentioned the researcher used leadership and communication as the primary themes for coding the interviews. Information about the level of involvement of the respondents during the reaffirmation process, their access to reaffirmation documentation, and their prior reaffirmation experience was also coded and summarized to provide insight on their perspectives. During the interview process each interviewee was asked the questions from the interview protocol and then asked to provide a numerical value representing their level of satisfaction with the reaffirmation process using a five point scale (See Table H). The responses provided by the interviewees as support for their satisfaction ratings and the responses to the open ended questions were used to provide additional insight into the institutional accreditation processes.

**Table H: Five Point Scoring Criteria**

<b>Score</b>	<b>Level of Satisfaction</b>
5	Highest level of satisfaction with how the reaffirmation process was handled, leadership and site visit preparations.
4	High level of satisfaction
3	Acceptable level of satisfaction
2	Low level of satisfaction
1	Dissatisfaction

Using the three categories and time cycles mentioned above the researcher summarized the following interview questions for analysis purposes:

## Cycle I

Questions seven and fifteen of the Cycle I Interview Protocol were used to examine leadership. The respondents were asked to assess/rate how the institution's leaders managed the reaffirmation process. The five point satisfaction scale was used to record and summarize the responses for both of these questions. As previously mentioned, the responses to the open ended questions were used to provide support and additional background.

- Leadership:  
Question 7 – Please assess/rate how the reaffirmation process was handled on your campus? Who were the key players? How was the information disseminated?  
  
Question 15 – How would you assess/rate institutional leadership during this period?

Institutional communication was examined through the use of questions eight, nine and thirteen of the Cycle I Interview Protocol. Using these three questions the respondent's assessment of how effectively the reaffirmation information was shared on the respective campuses was determined. The topics covered in this section addressed issues of awareness, responsiveness, and levels of preparedness for the site visits. Yes and no responses were recorded for question eight. In question nine the respondents were asked to use the five point scale to rate their level of satisfaction with the preparations for the site visits. Question thirteen was open ended. The responses for all of the questions were analyzed.

Communication:

Question 8 – Was the entire campus aware of the reaffirmation process? If yes, how was the information communicated throughout the campus?

Question 9 - How would you rate the type of preparations that were made to prepare the campus and the community for the site visits?

Question 13: How did your campus respond upon receiving notification that you had been placed on *warning/probation*?

Respondents were asked about their specific knowledge of, access to, and involvement in the reaffirmation process.

- Level of Involvement/Document Access:

Question 3 – At what point did you become involved in the reaffirmation process?

Question 4 – Please describe/define reaffirmation.

Question 5 – Prior to your most recent experience what knowledge did you have about SACS and the accreditation process?

Question 6 – Did you have access to SACS documentation during the reaffirmation process?

Question 10 – Were you involved in the initial meeting with the SACS representatives?

Question 11 – Were you one of the individuals interviewed during the on-site visit?

Question 12 – Were you present during the exit meeting with SACS representatives at the conclusion of the site visit?

## Cycle II

During Cycle II the institutions were at different periods in the accreditation cycle and there were new employees at varying levels in the administrative structures on both campuses who were responding to the reaffirmation process. As a result, questions regarding the assessment/rating of the strategies used by institutional leaders and the assessment/rating of the institutional leaders were repeated. The five point scale was used to record the levels of satisfaction reported by the respondents. Question thirteen of the Cycle II Interview Protocol was added to examine the respondent's assessment of how the institution was viewed by the external community.

- Leadership:

Question 6 – Please assess/rate how the reaffirmation process was handled on your campus.

Question 11 – How would you assess/rate institutional leadership during this period?

Question 13 – During this period, how was your institution viewed within your local community?

- Communication:

The respondents were again asked if the entire campus community was aware of the reaffirmation process, or if the information was shared with only a few individuals. As a follow up, questions eight and nine of the Cycle II Interview Protocol were used to determine if the respondents knew how many follow up reports had been required (Q8) and how many times institutional representatives were required to be interviewed by the Committee on Criteria and Reports (Q9). The aim of all three questions was to examine the flow and amount of information shared with the campus communities. During this

cycle the respondents were also asked to share comments about the campus climate in (Q10).

Question 7 – Was the entire campus community aware of the problems with SACS or was the information shared only with a small group of individuals? If it was maintained by a small group, who were the members of that group?

Question 8 – How many follow-up reports did your institution submit to SACS?

Question 9 – How many times did members of your campus community appear before SACS during your *probationary* or *warning* status? Who represented the institution during these meetings?

Question 10 – Please describe the campus climate during this period.

- Level of Involvement:

Interviewees were again asked about their level of involvement in the process.

Question 2 – When did you become involved in the reaffirmation process?

Question 4 – Prior to your most recent experience what knowledge did you have of SACS and the accreditation process?

Question 5 – Did you have access to SACS documentation during the reaffirmation process?

### **Cycle III**

- Level of Preparedness:

The focus of this cycle was to assess the preparedness of the campus communities for their upcoming reaffirmation cycles. At Texas College the focus for this cycle was on the November 2004 Special Committee Visit which was to occur just after this study was completed. For Huston-Tillotson College the focus was on the 2010 reaffirmation cycle.

Question 4 – What lessons do you think that the institution has learned from this process?

Question 5 – Are you aware of the changes with the reaffirmation process?

Question 6 – Do you believe that your institution is prepared for the next reaffirmation process?

### **Participant Observations:**

The data collected from the participant observations were also summarized using the themes of leadership, communication and levels of involvement. Throughout the project an observation log was maintained to document all of the researcher's time spent conducting the study beyond the interviews. The participant observations included notes secured during institutional committee meetings, telephone conversations with institutional representatives, and actual observations from time spent on the campuses. In collecting and summarizing the data, the researcher focused on the role of the administrative team in resolving the reaffirmation challenges at each of the institutions. Specific attention was also placed on the demonstrated knowledge and experience of the administrators with the reaffirmation process. The participant observations were used to cross check the answers provided during the interview process. Once summarized, the results were included in the cycle analysis presented in the case studies.

### **Financial Audit Information:**

As previously mentioned financial audit information was included because of the high rate of private HBCUs that have been sanctioned by SACS for financial concerns. Data from the annual audits made available by each institution were summarized and

used to analyze annual revenue and institutional indebtedness. Significant audit findings were also analyzed.

#### Data display

To facilitate the comparison between the case studies, the time cycles were used as a framework for presenting the data. Within each of the time cycles the data were arranged as follows:

- Institutional reaffirmation timelines – At the beginning of each cycle was prepared a full history of the reaffirmation activities that occurred within the time period covered. SACS recommendations and decisions were also included within the timeline.
- Interview summary – The participant interviews were summarized into three sections using the themes of leadership, communication and level of involvement.
- Financial Considerations – The results of the financial and audit analysis were summarized by fiscal year in this section.
- Cycle Analysis – At the end of each cycle was an analysis of the period covered was prepared which summarized the details of each of the aforementioned sections and incorporated the data collected during the participant observations.

#### Conclusion Drawing/Verification

To complete the final phase of the Miles and Huberman data analysis model the findings and analysis from the document review, interview transcriptions, and the participant observations were summarized and checked as described below (Miles and Huberman, p. 22).

### **Validity/Reliability:**

To establish construct validity the researcher used multiple sources of evidence which included documentation prepared by the institutions for the Southern Association and documentation received from the Association. Included in this documentation were, the institutional self-study reports, annual financial audits, follow-up reports and responses and the membership application filed by Texas College. The interview transcriptions and participant observations that occurred throughout the research project were also used to develop answers for the research questions.

During the document review process, the self-study reports were reviewed to determine completeness of the documents and compliance with the accreditation criteria. Institutional recommendations contained within the self-study reports were reviewed to determine their feasibility. A review of the financial statements and audits was performed to examine patterns or anomalies within institutional revenue streams and to document audit findings and leadership changes in the position of Chief Financial Officer. Finally, the follow-up reports were reviewed to determine completeness and responsiveness to the SACS recommendations. To complement the multiple sources of evidence previously described and used in the study, representatives from both institutions were asked to review draft case study reports findings to ensure accuracy and proper representation.

To ensure internal validity the researcher continuously relied on multiple sources of data, which as previously mentioned included document review and analysis, interviews, and participant observations. Following the transcription of interviews member checks using the interview transcriptions were conducted. Finally, through the

use of frequent email communication, the researcher incorporated the comments from the interviewees concerning the study findings as they emerged (Merriam, 204).

The use of multiple case studies also assisted in the establishment of external validity. By conducting two separate case studies, the researcher was able to avoid the criticism associated with using the results from a single case study and making inappropriate generalizations. To ensure reliability, the researcher clearly documented the research procedures and techniques to assist other researchers in collecting and analyzing similar data, and hopefully obtaining the same findings and reaching the same conclusions.

## **CHAPTER IV**

### **FINDINGS AND ANALYSIS OF DATA**

#### **Introduction**

The findings and analysis of the institutional data that were collected from Huston-Tillotson College and Texas College for this project are presented in this chapter. The project data was collected during the period November 2003 through July 2004. The results of the twenty-six interviews conducted, notes from participant observations and the review of institutional documents (self-study reports, reaffirmation follow-up reports and financial statements and annual audits) were analyzed and used to ensure triangulation in the findings and to strengthen the analysis of the data presented. The data for each case study is presented with an overview of the significant events that occurred during the period, a review of the interview results, and a financial analysis. Following the three sections described is a cycle analysis that includes a full discussion of the period covered. The cycle analysis combines the impact of each of the three areas on the accreditation activities.

#### **Findings – Huston-Tillotson College**

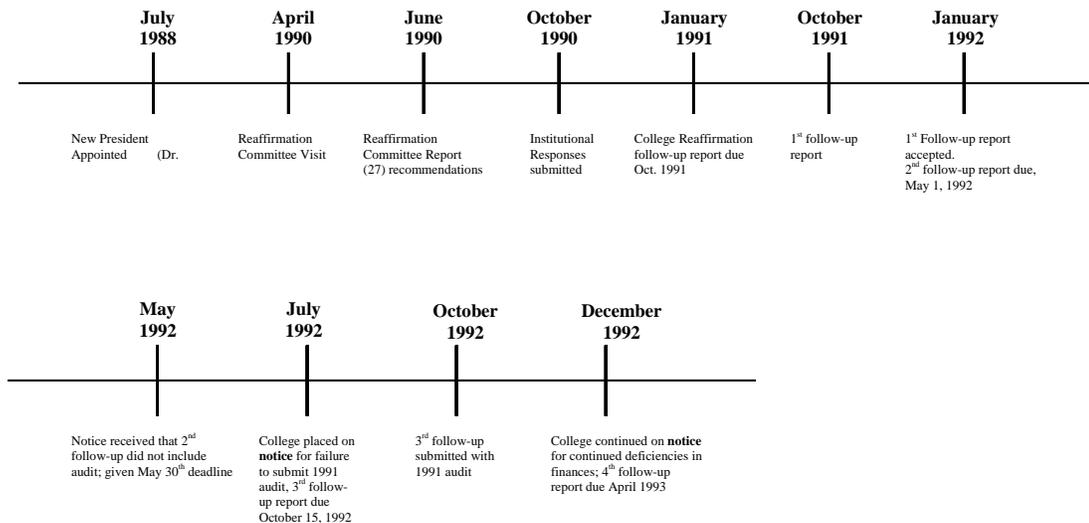
Two reaffirmation cycles were studied in the case of Huston-Tillotson College to capture the events of the 1990 reaffirmation cycle that resurfaced during the 2000 cycle. This also provided greater comparability between the two case studies, since the Texas College case spanned the period, 1992-2004. In conducting the research phase for this case study the researcher had greater access to both institutional documentation and interview participants for both reaffirmation periods at Huston-Tillotson as a result of her

employment status at the College. The project data for the Huston-Tillotson case study is presented using the two reaffirmation cycles, 1990 and 2000 as discussed in Chapter III.

**Cycle I:**

**Illustration 1**

**Cycle I (1988-1992)**



**Institutional Timeline - SACS Recommendations and Reaffirmation Decisions**

In January 1988 the College held a kick-off self-study training session for the members of the institutional reaffirmation committee that was conducted by an Associate Executive Director of the Commission on Colleges. Following the training session the College invited a senior administrator from Tuskegee University to campus to provide consulting services and training in the area of institutional effectiveness to further strengthen the institution’s self-study report. The eleven member Reaffirmation Committee visited Huston-Tillotson in April 1990. In their report the Committee made twenty-seven recommendations that included one recommendation in Section II – Institutional Purpose, one recommendation in Section III – Institutional Effectiveness,

thirteen recommendations in Section IV – Educational Programs, six recommendations in Section V – Educational Support Programs, and six recommendations in Section VI – Administrative Processes. (The full listing of recommendations is included in Appendix C). To address the recommendations cited, the College was required to submit its responses to the Commission on Colleges by October 1990.

In January 1991, the College received notification from the Commission on Colleges that the institution's accreditation had been reaffirmed and that a Follow-Up Report detailing progress made in addressing the cumulative deficit and institutional indebtedness (Recommendation 23) was due on October 15, 1991. The College successfully submitted the Follow-Up Report and was notified in January 1992 that a Second Follow-Up Report would be required by May 1, 1992 addressing the same issues. However, when the Second Follow-Up Report was submitted, copies of the 1990-91 fiscal year audit were not included, as had been requested by SACS. As a result, in July 1992, the College was placed on *notice* for failure to provide the required financial documentation.

### **Interviews:**

Of the eighteen interviews conducted at Huston-Tillotson College, eleven focused on the 1988-1992 segment of Cycle I. As mentioned previously, the interviews were analyzed to provide insight into the respondents' views concerning leadership and communication throughout the reaffirmation process and to assess the level of involvement of the respondents. Detailed below are the results from the interviews conducted for this cycle. The results are presented according to the three primary themes – leadership, communication, and level of involvement. The responses to the question

that asked the respondents to rate/assess their level of satisfaction were summarized using the five point scale described in Chapter III, with a score of five representing the highest level of satisfaction. The eleven respondents in this cycle included five senior administrators, four faculty members and two mid-level administrators.

### **Summary - Leadership Assessment Responses**

Question #7: Please rate/assess how the reaffirmation process was handled on your campus.

- All of the respondents reported high levels of satisfaction with how the reaffirmation process was handled on campus.

Question # 15: How would you assess/rate institutional leadership during this period?

- Six of the respondents including of the senior administrators and both mid-level administrators, reported high levels of satisfaction with the institution's leadership.
- The remaining five respondents, all four faculty members and the remaining senior administrator, reported acceptable levels of satisfaction.

Overall, the respondents were satisfied with how the reaffirmation process was handled during this cycle. The administration rated the institutional leaderships as highly satisfactory. The faculty were satisfied with the leadership during the period, but less so than their administrative colleagues.

### **Summary - Communication Assessment Responses**

Question 8: Was the entire campus aware of the reaffirmation process? If yes, how was the information about the process communicated throughout the campus?

- All of the respondents reported that they were aware of the accreditation activities. The respondents reported that the information was communicated through faculty/staff assemblies and frequent institutional memos from the administration.

Question 9: Please rate/assess the types of preparations that were made to prepare the campus community for the site visits?

- All of the respondents reported having a high level of satisfaction with the preparations that were made to prepare the campus community for the process.

Question 13: How did your campus respond upon receiving notification that you had been placed on “*notice, warning, probation* or loss accreditation?”

- Of the eleven respondents, three of the senior administrators reported responses of “concern” about being notified that the institution had been placed on sanction with SACS.
- The remaining eight respondents, i.e. the remaining two senior administrators, the two mid-level administrators and the four faculty members reported that they were unaware that the institution had been sanctioned.

### **Summary - Level of Access/Involvement Responses**

Question 3: At what point did you become involved in the accreditation process?

- All of the respondents reported that they became involved in the accreditation process at the initial stage.

Question 4: Please describe/define accreditation.

- All of the responses for this question were very detailed. The respondents demonstrated a high level of understanding of the accreditation process. This was

expected since all of the respondents were involved from the initial self-study. The responses provided included an understanding of the timetable for the accreditation process, the sanctions issued by SACS, and the follow up report requirements.

Question 5: Prior to your most recent experience what knowledge did you have about SACS and the accreditation process?

- Ten of the respondents (four senior administrators, two mid-level administrators and four faculty members) reported that they had prior knowledge of the accreditation process.
- The remaining respondent, a senior administrator, reported having no prior accreditation experience.

Question 6: Did you have access to the reaffirmation documents during the reaffirmation process?

- Nine of the respondents (five senior administrators, two mid-level administrators and two faculty members) reported having access to the documents.
- The remaining two faculty members reported having no access to the documents.

Question 10: Were you involved in the initial meeting with the SACS representatives?

- Four of the senior administrators and one mid-level administrator reported that they were involved in the initial meeting.
- The remaining respondents, one senior administrator, one mid-level administrator and the four faculty members were not involved in the initial meeting.

Question 11: Were you one of the individuals interviewed during the on-site visits?

- All five of the senior administrators, one mid-level administrator and one faculty member were interviewed.
- The remaining mid-level manager and three of the faculty members were not interviewed.

Question 12: Were you present during the exit meeting with the SACS representatives?

- Four of the five senior administrators reported that they were present during the exit meeting.
- The remaining seven respondents, one senior administrator, the two mid-level administrators, and the four faculty members were not present during the exit meeting.

### **Financial Considerations:**

#### **FY88 Audit - Conducted by Coopers & Lybrand**

- There were no significant findings identified in the financial audit and the College's revenue stream and liabilities remained constant over the previous fiscal year. The College realized a \$28,000 increase in unrestricted net assets for the fiscal year.

#### **FY89 Audit - Conducted by Coopers & Lybrand**

- There were no significant findings identified in the financial audit for the year and the College's revenue stream remained constant. During the fiscal year the College entered into two financial agreements with the Texas Methodist Foundation to secure additional resources to satisfy rising operational expenses. The first involved a revolving promissory note for \$160,000 with monthly interest

payments and semi-annual principal liquidation payments. The second involved a promissory note for \$1,340,000 with required monthly principal and interest payments payable until June 1993. The College realized a \$233,000 decrease in net unrestricted assets for the period.

FY90 Audit - Conducted by Coopers & Lybrand

- Four material weaknesses and seven reportable conditions were identified during the financial audit. The material weaknesses included:
  1. Journal entries should be adequately controlled and properly supported;
  2. Bank accounts should be reconciled monthly;
  3. Student Accounts Receivable detail should be reconciled to the General Ledger;
  4. Investments should be reconciled to the General Ledger on a monthly basis.

The reportable conditions included:

1. Timetables for month-end closing should be established and adhered to;
2. Cash Accounts should be adjusted for reconciling items on a timely basis;
3. Perkins Loans should be reconciled to the detail ledger;
4. The adequacy of the Accounts Receivable Allowance Account should be reconciled throughout the year;
5. Transactions relating to Federal Grants should be recorded correctly;
6. A Policy which would prohibit disbursements without proper support should be developed and implemented;
7. The Due To Federal Government account should be analyzed monthly.

- The College realized an increase in enrollment which resulted in a \$700,000 increase in tuition and fee revenue while all other revenue line items and institutional indebtedness remained constant. The College realized \$116,000 increase in net unrestricted assets for the period.

FY91 Audit - Conducted by Coopers & Lybrand

- Five material weaknesses and five reportable conditions were reported during the financial audit. The material weaknesses included:
  1. Journal entries should be adequately controlled and properly supported;
  2. Bank accounts should be reconciled monthly;
  3. Student Accounts Receivable detail should be reconciled to the General Ledger;
  4. Investments should be reconciled to the General Ledger on a monthly basis;
  5. An Accounts Payable sub-ledger should be maintained and reconciled to the General Ledger control account.

The reportable conditions included:

1. Timetable for month-end closings should be established and adhered to;
2. Perkins Loans should be reconciled to the detail ledger;
3. The adequacy of the Accounts Receivable Allowance Account should be reviewed throughout the year;
4. A Policy which would prohibit disbursements without proper support should be developed and implemented;
5. The Due to Federal Government account should be analyzed monthly.

- The College realized small fluctuations in several revenue streams which resulted in a net decrease of \$516,000 to unrestricted net assets for the fiscal year. The institution's indebtedness level remained constant.

### **Cycle Analysis:**

This cycle was described as a period of renewed hope and promise at the College which was sparked by the appointment of a new President, Dr. Joseph T. McMillan, who assumed the helm on July 1, 1988, replacing Dr. John Q. Taylor King, who had led the institution for more than twenty years (1965-1988). To ensure that the College could benefit from the expected energy and enthusiasm of a new President, Dr. King in correspondence to SACS dated January 6, 1986, asked that the College be granted a one year postponement of the kick-off of the self-study process from 1987 to 1988. SACS responded favorably to the request and granted the one-year postponement.

The institutional self-study chairperson was a well respected member of the faculty. The self-study process was primarily driven by members of the faculty and was completed on schedule as the College finalized preparations to receive the Reaffirmation Committee in April 1990.

The results of both the leadership and communication assessment responses confirm a high level of satisfaction with the preparations made for the site visit, the manner in which the process was handled and the institutional leadership provided. In addition to the favorable responses to the leadership assessment questions, 100% of the respondents reported being fully aware of the reaffirmation process.

When asked how the campus responded upon being notified that the institution had been placed on *notice*, eight of the eleven respondents reported that they were

unaware of the sanction. Several senior administrators were asked to explain the rationale regarding the decision not to disclose the sanction to the full campus community. One respondent reported the following:

I think we tended to keep the small details of our roller coaster status with accreditation as confidential and close to the Senior Administration as possible. Surely, the Senior Administration all knew and the Trustees knew, but we did not make a public statement and we certainly did not do anything that we perceived as jeopardizing enrollment by sending the message that the College was on the brink of closing. The death nail (sic) was very ominous at that time for Historically Black Colleges.

The twenty-seven recommendations that were issued as a result of the April 1990 Reaffirmation Visit were issues that were easily resolvable with proper documentation. Members of the President's Cabinet were tasked with developing the responses for the First Follow-Up Report. The Commission on Colleges accepted twenty-six of the twenty-seven responses in its October 1, 1990 report.

The only institutional response that was not accepted concerned the sufficiency of the institution's financial resources. As a result, the College was required to submit a Second Follow-Up Report by May 1, 1992. The College's financial situation at this time was unstable in terms of both actual resources and leadership. From 1987 to 1991, the College employed three different Chief Financial Officers, increased its level of indebtedness, reduced its cumulative deficit by a small margin and received numerous findings of material weaknesses and reportable conditions during financial audits. The material weaknesses and reportable conditions cited in the audits were primarily focused on untimely account reconciliations and the inaccuracies and lack of supporting documentation noted in the general ledger. The College was not positioned well to respond to the financial resources recommendation.

## Cycle II:

### Illustration 2

#### Cycle II (1992-1994)



### **Institutional Timeline - SACS Recommendations and Reaffirmation Decisions**

In July 1992, the College received notice from the Commission on Colleges that its Second Follow-Up Report that had been submitted in May 1992 had not been accepted and that it had been placed on *notice* as a result of its failure to submit an audit and management letter for the 1991 fiscal year as requested. In October 1992 the College submitted a Third Follow-Up Report and included copies of the FY91 financial audit and a schedule for the completion of the FY92 audit. At its annual meeting in December 1992, the Commission voted to continue the College on *notice* for its repeated deficiencies in the area of financial resources and required an additional follow-up report. The College's Fourth Follow-Up Report including copies of its FY92 financial audit, 1993-94 budget projections, and a five year budget proposal, was submitted in April 1993.

In July 1993, the College was notified that it had been removed from *notice* but was required to submit a Fifth Follow-Up Report detailing progress made in meeting its defined enrollment, income and expenditure goals. The College was also informed that a Special Committee would visit the institution during the fall semester to evaluate the effects that the growing deficits might be having on the quality of its educational programs, facilities and services. The five-member Special Committee included a college president, a director of library services, a chief fiscal officer, a dean of undergraduate studies and a special assistant to a president. Just prior to the Special Committee visit on October 18-20, 1993, the College submitted its Fifth Follow-Up Report.

The Special Committee visit resulted in seven recommendations: one recommendation in Section III – Institutional Effectiveness, two in Section IV – Educational Program, two in Section V – Educational Support Services, and two in Section VI – Administrative Processes (see Appendix D for detailed recommendations). In January 1994, the College was notified that its Fifth Follow-Up Report that was submitted in October 1993 had been accepted but that a Sixth Follow-Up Report was required to address the Visiting Committee’s recommendation to develop a financial plan (*Criterion 6.3.1*, see Recommendation 7, Appendix D). This report was submitted in October 1994. In January 1995, the College was informed that its Sixth Follow-Up Report had been accepted and that no further reports were required.

## Interviews

Detailed below are the results from the interviews conducted for this cycle. Eleven respondents were interviewed for this cycle including five senior administrators, four faculty members and two mid-level administrators.

### **Summary – Leadership Assessment Responses**

Question #6: Please assess/rate how the reaffirmation process was handled on your campus.

- Four of the respondents reported high levels of satisfaction with the manner in which the process was handled.
- The remaining seven respondents reported acceptable levels of satisfaction.

Question # 11: How would you assess/rate institutional leadership during this period?

- Five of the respondents reported high levels of satisfaction with institutional leadership during this period.
- The remaining six respondents reported acceptable levels of satisfaction with institutional leadership.

Question #13: During this period how was your institution viewed within your local community?

- Seven of the respondents, including three senior administrators and the four faculty members described the college's image within the community as "hopeful."
- Three of the respondents, one senior administrator and the two mid-level administrators described the college's image as "favorable."

- The remaining respondent, a senior administrator, used “promising” to describe the college’s image.

Further discussion with the respondents resulted in comments about the institutions serving as a “beacon of hope” within the local community and a place of pride, which resulted from its accomplishments and contributions to the East Austin community.

### **Summary – Communication Assessment Responses**

Question #7: Was the entire campus aware of the problems with SACS or was the information shared only with a small group of individuals? If it was maintained by a small group, who were the members of that group?

- All of the respondents reported that the campus was unaware of the problems with the reaffirmation process. The responses revealed virtually no awareness of the accreditation activities on campus during this period.

Question #8: How many follow up reports did your institution submit to SACS?

- Five of the respondents reported that they did not know how many follow up reports were submitted to SACS.
- Five respondents provided a correct answer of six reports submitted to SACS during the period.
- One respondent reported that four reports were submitted to SACS.

Question #9: How many times did members of your community appear before SACS during your *probationary* or *warning* status? Who represented the institution during these meetings?

- Seven of the respondents reported that they did not know how many times institutional leaders appeared before SACS.

- Two of the respondents that they were not sure about the number of times institutional leaders appeared before SACS.
- Two of the respondents provided the correct answer of three.

Question #10: Please describe the campus climate during this period.

- All of the respondents reported a positive campus climate during this period. It was noted that because the campus was unaware of the accreditation problems, the campus climate was very positive and not negatively impacted by the problems with SACS.

### **Summary – Level of Involvement Responses**

Question #2: When did you become involved in the reaffirmation process?

- All of the respondents reported that they became involved with the accreditation process at the initial stages.

Question #4: Prior to your most recent experience what knowledge did you have of SACS and the accreditation process?

- Ten of the respondents reported having previous experience with SACS and the accreditation process.
- One respondent reported having no previous experience.

Question #5: Did you have access to SACS documentation during the reaffirmation process?

- All of the respondents reported having access to SACS documentation during the reaffirmation process.

## **Financial Considerations:**

### **FY92 Audit – Conducted by Maxwell, Locke & Ritter**

- There were five reportable conditions identified during the financial audit. They included:
  1. Written accounting policies and procedures did not exist and the Accounting Department had experienced significant turnover;
  2. A revised system of internal accounting control was needed to include improved management information reporting;
  3. Supporting documentation for travel expenses was inadequate;
  4. Monthly reconciliations of departmental records to the General Ledger were inadequate;
  5. Postings to the General Ledger were incorrect, resulting in material errors.
- The College realized small fluctuations in several revenue streams which resulted in a \$400,000 net decrease in unrestricted assets for the fiscal year. The institution's indebtedness level remained constant.

### **FY93 Audit - Conducted by Maxwell, Locke & Ritter**

- There were three reportable conditions identified during the financial audit all of which were repeated from the FY92 audit:
  1. Written accounting policies and procedures did not exist and the Accounting Department had experienced high turnover;
  2. Supporting documentation for travel expenses was inadequate;
  3. Monthly reconciliations of departmental records to the General Ledger were inadequate.

- The College realized a \$500,000 reduction in revenue over the prior fiscal year but institutional indebtedness remained constant.

FY94 Audit - Conducted by Maxwell, Locke & Ritter

- There was one reportable condition identified during the audit that dealt with adequacy of the College's accounting and control procedures. The College realized a \$400,000 increase in revenue over the prior year and the institution's debt level remained constant.

**Cycle Analysis:**

When the Special Committee visited in October 1993, the campus community was largely unaware of the reason they were there. The Special Committee visit resulted in seven recommendations that did not require a written response. Instead, the College was advised that it would be required to address the recommendations during an interview with Committee on Criteria and Reports during the December 1993 SACS annual meeting. In an effort to demonstrate the institutional progress that was under way, members of the President's Cabinet prepared responses to the seven recommendations made by the Special Committee. The responses were submitted in November 1993, and all were accepted except the response concerning sufficiency of financial resources.

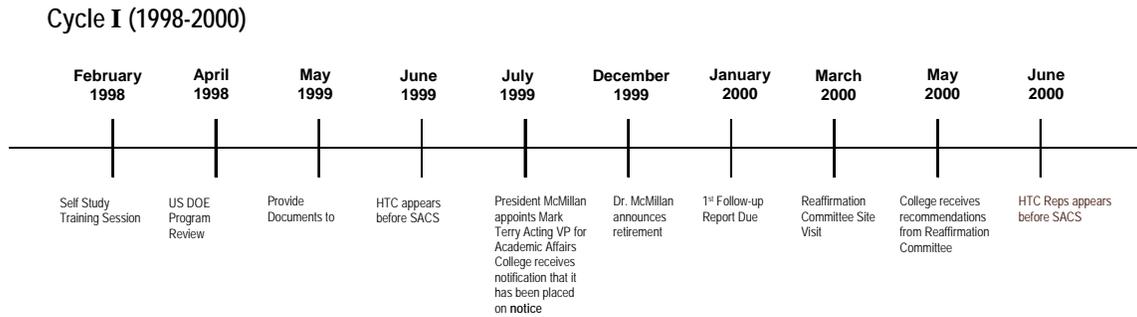
Under the split leadership of two Chief Financial Officers in 1993, the College's Fifth Follow Up Report was accepted by the Commission on Colleges with the requirement that a Sixth Follow Up Report be submitted in October 1994. At the close of the 1994 fiscal year the College had only one remaining reportable condition identified in the financial audit, had been able to increase tuition and fee revenue by \$500,000 over the prior year and ended two prior fiscal years with increases in net unrestricted assets. The

noted improvements in the accounting practices and operations within the College's business office coupled with the submission of a five-year budget proposal that included realistic enrollment and fundraising targets were accepted by the Commission, and the College was not required to submit any additional documentation.

The leadership assessment responses for this period still demonstrated a high level of satisfaction with the manner in which the reaffirmation process was handled and with the institutional leadership provided. On the question of how the College was viewed by the external community, the respondents used words such as "hopeful," "promising" and "favorable." The communication assessment responses clearly demonstrated the limited amount of information that was communicated to the larger campus community. All of the respondents answered "no" to the question concerning whether the entire campus was aware of the reaffirmation process during this period. The lack of accurate responses concerning the number of follow up reports that were submitted to SACS and the number of times that institutional representatives were interviewed by the Committee on Criteria and Reports provided additional insight into the lack of communication that existed on the campus at that time. During this period, the College submitted six follow-up reports and appeared before the Committee on Criteria and Reports three times. Unfortunately only five of the eleven respondents knew the number of reports required, and only two knew the correct number of visits. However, the campus climate during this period was described as positive because most of the campus community was unaware of the reaffirmation activities that were occurring.

## Cycle I:

### Illustration 3



### **Institutional Timeline - SACS Recommendations and Reaffirmation Decisions**

The planning and execution of activities for the 2000 reaffirmation period began as scheduled with a February 1998 training session for the Self-Study Steering Committee that was conducted by an Associate Executive Director of the Commission on Colleges. Unfortunately the momentum and spirit of collegiality and cooperation that existed at the beginning of the process was interrupted by the backlash that resulted from two significant events. The first event involved the senior administration's decision to self-report instances of fraud found in the College's Financial Aid Department to the U.S. Department of Education (DOE). In April 1998, DOE representatives conducted a Program Review. This review resulted in 29 findings concerning improper administrative oversight and a potential liability of \$1.6 million.

In November 1998, the Department of Education followed its communication protocol and contacted SACS to report the problems identified. In response to the DOE notification, the Commission on Colleges subsequently required the institution to submit

a Progress Report. In the report the College was required to detail the actions taken to prevent further problems in the administration of financial aid funds, plus the FY98 financial aid audit, a copy of the 1998 DOE Program Review Determination Letter, a statement addressing whether the College had been placed on reimbursement status by the DOE, a summary of the College's indebtedness, and a date that the Commission should expect to receive the FY99 audit. In May 1999, representatives of the College were requested to attend the June meeting of the Commission on Colleges to be interviewed by members of the Committee on Criteria and Reports. The institutional representatives included the President, the Chief Financial Officer, and the Assistant Dean of Financial Services (the researcher). Following that meeting, the College was informed that it had been placed on *probation* for failure to comply with Condition of Eligibility Thirteen and *Criteria* Section 6.3.1- Administrative Processes and Financial Resources.

In July 1999 the second significant institutional event occurred when the President appointed a new Acting Vice President of Academic Affairs whom many faculty members thought was unqualified for the position. In order to make the appointment, the President re-assigned the former Vice President, a popular figure who had served in that position for more than ten years. The appointment resulted in widespread complaints and intense media coverage as members of the faculty expressed their displeasure with the President's appointment. This decision created an environment of distrust and hostility on campus. It became one of the primary reasons that in December 1999 the President announced his decision to retire effective June 30, 2000.

In March 2000, while simultaneously working on the documentation for the Progress Report that resulted from the DOE controversy, the College hosted the Reaffirmation Committee. The twelve member Reaffirmation Committee was comprised of two college presidents, a chief academic officer, a chief financial officer, a vice president for planning and evaluation, a library director and six faculty members. Fifty recommendations resulted from the Reaffirmation Committee Visit. The recommendations included five recommendations in Section I – Principles and Philosophy of Accreditation, two recommendations in Section II – Institutional Purpose, nine recommendation in Section III – Institutional Effectiveness, fifteen recommendations in Section IV – Educational Program, five recommendations in Section V – Educational Support Programs, and fourteen recommendations in Section VI – Administrative Processes (see Appendix E for detailed recommendations). The institutional responses to the recommendations were due August 29, 2000. It is important to note here that the College’s representatives were simultaneously working on the Progress Report that resulted from the DOE controversy and the responses to the Reaffirmation Committee’s fifty recommendations; the first report was due on May 1, 2000 and the second on August 29, 2000.

In June 2000, the College was again invited to be interviewed by the members of the Committee on Criteria and Reports to address continued concerns regarding its financial stability. The institutional representatives that attended the meeting included the Chair of the Business Affairs Committee of the Board of Trustees, both the College’s current and incoming Presidents, the Chief Financial Officer, and the Dean of Enrollment Management (the researcher). One month later the College was notified that it had been

placed on *warning* for a period of six months for failure to comply with *Criteria* Section 1.4 (Conditions of Eligibility Sections Eight and Thirteen) and that the a Second Progress Report would be required. The Second Progress Report included documentation of a functioning planning and evaluation process and an adequate financial base to accomplish the institution's purpose on a continuing basis. The deadline for this report was September 20, 2000.

### **Interviews:**

Detailed is information from the interviews conducted for this cycle. Thirteen respondents were interviewed for this cycle including six senior administrators, four faculty members and three mid-level administrators.

#### **Summary - Leadership Assessment Responses**

Question #7: Please assess/rate how the reaffirmation process was handled on your campus. Who were the key players? How was the information disseminated?

- Twelve of the respondents reported high levels of satisfaction with the manner in which the reaffirmation process was handled.
- One respondent reported an acceptable level of satisfaction.

Question # 15: How would you assess/rate institutional leadership during this period?

- Five of the respondents, three senior administrators and two mid-level administrators, reported an acceptable level of satisfaction with institutional leadership.
- The remaining eight respondents, three senior administrators, one mid-level administrator and all four faculty members reported dissatisfaction with the institutional leadership provided during this period.

Overall, there was a high level of satisfaction with the manner in which the accreditation process was handled on campus, but there was general dissatisfaction with the leadership provided.

### **Summary - Communication Assessment Responses**

Question 8: Was the entire campus aware of the reaffirmation process?

- All of the respondents reported that they were aware of the reaffirmation process.

Question 9: Please assess/rate the types of preparations that were made to prepare the campus community for the site visits?

- All of the respondents reported high levels of satisfaction with the preparations that were made for the site visits.

Question 13: How did your campus respond upon receiving notification that you had been placed on “*notice, warning, probation* or loss accreditation?”

- Seven of the respondents, one senior administrator, two mid-level administrators and all four faculty members reported that the campus was concerned when notified of the SACS sanctions.
- Four senior administrators reported that the campus was surprised to learn of the sanctions.
- Two respondents, one senior and one mid-level administrator, reported that the campus was shocked.
- One faculty member reported that the campus had no reaction.

### **Summary - Level of Access/Involvement Responses**

Question 3: At what point did you become involved in the institutional reaffirmation process?

- All of the respondents reported that they became involved with the accreditation process at the initial stages.

Question 5: Prior to your most recent experience did you have previous experience with SACS or the accreditation process?

- Ten of the respondents, four senior administrators, two mid-level administrators, and all four faculty members, reported having prior experience with SACS and the accreditation process.
- The remaining three respondents, two senior administrators and one mid-level administrator, reported having no prior experience.

Question 6: Did you have access to the SACS documentation during the reaffirmation process?

- Eleven respondents, six senior administrators, three mid-level administrators and two faculty members, reported having access to the SACS documentation.
- The two remaining respondents, both faculty members, reported having no access to the SACS documentation.

Question 10: Were you involved in the initial meeting with the SACS representatives?

- Five of the respondents, four senior administrators and one mid-level administrator, reported that they were involved in the initial meeting.
- The remaining eight respondents, two senior administrators, two mid-level administrators and four faculty members, reported that they were not involved in the initial meeting.

Question 11: Were you one of the individuals interviewed during the on-site visits?

- Nine of the respondents, six senior administrators, two mid-level administrators and one faculty member, reported that they were interviewed.
- The remaining four respondents, three faculty members and one mid-level administrator, were not interviewed.

Question 12: Were you present during the exit meeting with the SACS representatives?

- All of the respondents reported being present during the exit meeting with SACS representatives.

### **Financial Considerations**

#### **FY98 Audit - Conducted by Maxwell, Locke & Ritter**

- The audit contained two significant notes worth mentioning because they highlighted issues that could have led to financial crisis. One included the DOE Title IV Program Review that was conducted during the fiscal year as a result of the malfeasance reported in financial aid operations. The Program Review resulted in a potential \$1.6 million liability for the institution. It was noted that the Final Program Review Determination Letter would be issued during the 1999 fiscal year.
- The other note discussed the College's debt level. During the 1998 fiscal year the College assumed \$780,000 in additional notes payable, and borrowed \$500,000 on lines of credit to assist with the cash flow problems that resulted from revenue shortfalls. However, the audit firm determined that it was not their expectation that the College would go out of business, and be forced to liquidate its assets. Given the financial concerns that existed at the institution during this period, the inclusion of this "going concern note" was critical for the College to maintain its

business relationships. The College ended the fiscal year with a \$378,000 decrease in unrestricted net assets.

FY99 Audit - Conducted by Garza/Gonzales

- The audit contained one significant note concerning the \$2,039,000 in additional notes payable and lines of credit assumed by the College during the year. It also addressed the DOE Final Program Review Determination Letter which stated that the College owed \$416,000 which was included in the FY99 accounts payable total. The College realized a \$900,000 reduction in revenue which resulted in a \$400,000 decrease in unrestricted net assets for the fiscal year.

**Cycle Analysis:**

This period in the College's reaffirmation history was a time of great turbulence and uncertainty. The campus community lost faith in its leadership and shared these concerns with both internal and external constituents. There was hostility on campus between members of the faculty and staff regarding the amount of information that was being shared externally, specifically with the press and among several local churches. Members of the campus community also shared this negative information with members of the Reaffirmation Committee during their visit. The very low level leadership assessment (Question 15) confirmed the lack of satisfaction with institutional leadership at this time. One of the senior administrative respondents expressed his assessment of leadership by saying:

Leadership does make a difference, and during this time leadership was poor. There was a lot of anger and questioning going on and this impacted the process.

A faculty respondent commented:

The atmosphere then was like a civil war on campus. People came to campus, went into their offices and closed their doors, or you couldn't come on campus any day and not hear something about what was going on. When the people came in from SACS they picked up on it right away.

Another senior administrative respondent commented:

I think that in the period in between the first and second time around, I think that I became jaded, I think I became haughty, I think that I became angry, and I think that I became tired. I think that I also grew impatient and I wore that on my face and shoulders and people saw that and reacted to it and even said I can show you as well as you can show me. We just kind of dug in our heels, and because of that I don't think that I was an effective leader the second time around.

At the time of the case study, many members of the campus community believed that the fifty recommendations that resulted from the March 2000 visit were the result of the anger and frustration that was expressed by the College's employees to the members of the Reaffirmation Committee during their visit (see Appendix E for detailed recommendations). During the interview process one of the respondents pointed out that twenty-six of the fifty recommendations issued by the Reaffirmation Committee were originally contained in the institution's self-study report. Many of the respondents speculated that the members of the institutional self-study committee used the Reaffirmation Committee visit as an opportunity to share their dissatisfaction with the College leadership. (While conducting the document analysis the researcher confirmed that twenty six of the recommendations were included in the institution's self-study report).

In question fourteen of the Cycle I interview protocol the researcher asked the respondents if they believed that all of the recommendations were legitimate and all of the respondents answered "no."

A faculty respondent commented:

I think that the financial concerns were legitimate. I think that the majority of the other issues were folks just grinding their own ax and getting back at some of the people in the administration.

A senior administrator commented:

No, I think that some of the recommendations were based on erroneous information and half-truths, but you know we had to deal with them because we had allowed some things to just grow and fester and that's why we got stuck the way that we did.

During this period, the College was also working to rebuild its relationship and credibility with the U.S. Department of Education following the fraud identified in the financial aid operations and the significant number of findings cited during the Program Review. As a result of the negative Program Review, the College was placed on "reimbursement" status. Under the reimbursement payment system, an institution is required to provide proof of eligibility for each student before financial aid is disbursed by DOE. Prior to being placed on sanction, the College operated on the cash advancement system, where it was allowed to access federal funds prior to providing DOE with eligibility documentation. Being placed on reimbursement status created significant cash flow problems for the College because a sample of student files had to be tested prior to release of federal funds.

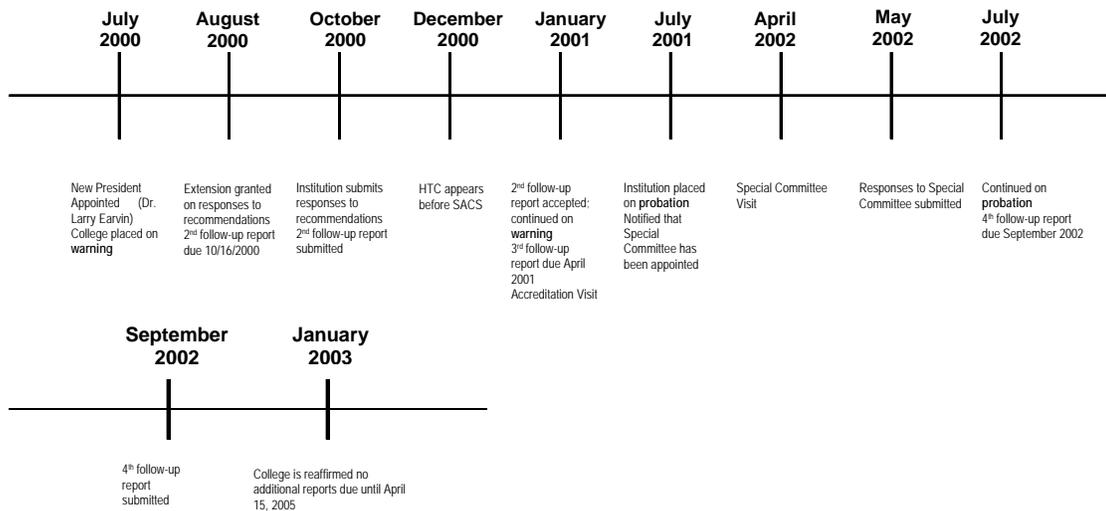
The financial position of the College during this period was a direct reflection of the events that occurred. As a result of continuous negative media attention and the uncertainty regarding institutional leadership, the College experienced a decline in student enrollment in each of the three years of the cycle. This resulted in lower tuition and fee revenue. To combat the cash flow challenges presented by the DOE

reimbursement payment system, the College’s indebtedness increased substantially as captured in the financial note in the FY98 annual audit. While the entire campus community was aware of the reaffirmation challenges, the respondents shared comments of “surprise” “concern” and “shock” regarding the notification that the institution had been placed on *warning*.

**Cycle II:**

**Illustration 4**

Cycle II (2000-2002)



**Institutional Timeline - SACS Recommendations and Reaffirmation Decisions**

The first accreditation related action of the College’s new President, Dr. Larry L. Earvin, who assumed his new role on July 1, 2000, was to request a postponement of the due dates for the two follow up reports required by SACS. The responses to the May Reaffirmation Committee Visit were due on August 29, 2000 and the College’s Second Progress Report regarding the financial concerns was due on September 20, 2000. The

College was granted an extension on both reports until October 16, 2000. Both reports were submitted by the due date. Subsequently SACS requested that institutional representatives be present at the annual meeting in December to be interviewed by the Committee on Criteria and Reports. The College's representatives were the President and the Business Manager.

In January 2001, the College received notice that the Second Progress Report that resulted from the DOE controversy had been accepted, and that no additional progress reports would be required, since the remaining issues were addressed in the follow up reports that resulted from the Reaffirmation Committee visit. The College was also informed that it had been continued on *warning* and was required to submit a Follow-Up Report to the Reaffirmation Committee recommendations in April 2001. In this report the institution was required to address two recommendations in Section I – Principles and Philosophy of Accreditation, one recommendation in Section II – Institutional Purpose, four recommendations in Section III – Institutional Effectiveness, ten recommendations in Section IV – Educational Programs, two recommendations in Section V – Educational Support Programs, and seven recommendations in Section VI – Administrative Processes.

In July 2001, the College was placed on *probation* for twelve months for failure to comply with *Criteria* Section 3.1 (Planning and Evaluation: Educational Programs); Section 3.2 (Planning and Evaluation: Administrative and Academic Support Programs); Section 4:8 (Academic and Professional Preparation – Baccalaureate); and Section 6.3.1 (Financial Resources). The College was further notified that a Second Follow-Up Report was required and should be submitted at least two weeks prior to the visit of a Special

Committee that had been appointed to conduct a visit in April 2002. The four member Special Committee was comprised of a vice president of special programs, an administrative vice president, an executive assistant to a president, and a chief financial officer.

The Special Committee visit resulted in two financial recommendations in Section VI – Administrative Processes. Specifically, the College was required to demonstrate that it had sufficient financial resources to support all of programs (Recommendation 40/41 – The Committee recommends that the College possess sufficient financial resources to support all of its programs. The Committee recommends that the College demonstrate the financial stability essential to its successful operation). In July 2002, the College was continued on *probation* for repeated failure to comply with *Criteria* Section 6.3.1 Financial Resources, and was required to submit a Third Follow-Up Report by September 2002. In the third Follow-Up report the College was again required to demonstrate that it had sufficient financial resources to support all of its programs. At the December 2002 annual SACS meeting, the College was notified that it had been reaffirmed and was not required to submit any follow up reports until April 2005.

### Interviews

Detailed below is the summary information from the interviews conducted for this cycle. Sixteen respondents were interviewed for this cycle including six senior administrators, four faculty members, and six mid-level administrators.

## Summary – Leadership Assessment Responses

Question #6: Please assess/rate how the reaffirmation process was handled on your campus.

- Six of the respondents reported high levels of satisfaction with the manner in which the reaffirmation process was handled.
- Nine of the respondents reported acceptable levels of satisfaction.
- One respondent reported dissatisfaction with the manner in which the process was handled.

Question # 11: How would you assess/rate institutional leadership during this period?

- Six of the respondents reported high levels of satisfaction with institutional leadership during this period.
- Ten of the respondents reported acceptable levels of satisfaction.

Question #13: During this period how was your institution viewed within your local community?

- Eleven of the respondents, four senior administrators, four mid-level administrators and three faculty members used the word “struggling” to describe the institution’s image in the local community.
- The remaining five respondents, two senior administrators, two mid-level administrators and one faculty member used words such as “bleak, concerned, nervous, hopeful, and poorly managed” to describe the institution’s image in the local community.

## Summary – Communication Assessment Responses

Question #7: Was the entire campus aware of the problems with SACS or was the information shared with only a small group of individuals? If it was maintained by a small group, who were the members of that group?

- All of the respondents reported that they were aware of the reaffirmation process.

Question #8: How many follow up reports did your institution submit to SACS?

- Seven of the respondents reported that they did not know how many follow up reports were submitted to SACS.
- Six of the respondents reported the correct answer of four follow up reports.
- Three of the respondents reported an incorrect answer of six for the number of follow up reports submitted.

Question #9: How many times did member of your campus community appear before SACS during your *probationary* or *warning* status? Who represented the institution during these meetings?

- Twelve of the respondents reported that they did not know how many times members of the campus community appeared before SACS.
- Four of the respondents reported the correct answer of three.

Question #10: Please describe the campus climate during this period.

- All of the respondents expressed confidence and faith in the College leadership, which positively impacted the campus climate.

## Summary – Level of Involvement Responses

Question #2: When did you become involved in the reaffirmation process?

- All of the respondents reported that they became involved with the accreditation process at the initial stages.

Question #4: Prior to your most recent experience what knowledge did you have of SACS and the accreditation process?

- Eleven of the respondents, five senior administrators, two mid-level administrators and four faculty members, reported having prior experience with SACS and the accreditation process.
- The remaining five respondents, four mid-levels administrators and one senior administrator, reported having no prior experience.

Question #5: Did you have access to the SACS documentation during the reaffirmation process?

- All of the respondents reported having access to the SACS documentation.

### **Financial Considerations:**

#### FY00 Audit - Conducted by Garza/Gonzales

- There were no findings identified during the financial audit. The College realized a modest increase in institutional revenue coupled with a modest decrease in institutional expenses which resulted in a \$76,000 increase in unrestricted net assets for the fiscal year. The College also realized a significant decrease in both accounts payable and notes payable for the year while not incurring any additional debt.

#### FY01 Audit - Conducted by Garza/Gonzales

- There were no significant findings identified during the financial audit. The College realized a \$700,000 reduction in private gift and grant revenue in addition to significant increases in expenses for scholarships and plant operation and maintenance. The combined effect of these three activities was a \$1,004,086 decrease in unrestricted net assets. The College also increased its debt level during the fiscal year by borrowing on a \$575,000 line of credit.

#### FY02 Audit - Conducted by Garza/Gonzales

- There were no significant findings identified during the financial audit. While the College realized a \$600,000 increase in the tuition and fees and \$1.1 million in private gift and grant revenue, there were significant increases in several expense categories that resulted in a \$41,000 decrease in unrestricted net assets for the year.

#### **Cycle Analysis:**

During this period there was a renewed spirit of hopefulness that surrounded the reaffirmation process. Members of the campus community expressed confidence in the ability of the new leadership to resolve the reaffirmation issues. The assessments leadership were much higher than during the prior cycle. One respondent shared the following thoughts about the change in leadership:

The new President came from the inside and tackled the situation differently than the previous leader. Our old leader was an outsider for SACS, and so basically he did not always take their recommendations, and findings very seriously. He just sometimes felt, that well, we will just placate them, or he thought, I will just overpower them with words. "The new President, on the other hand, knew a lot of people who had been on the site visits, and he also knew a lot of people at SACS, and had served on site committees himself." He knew a lot of the politics, so he knew how to play the game a lot better.

The responses to the leadership assessment question six and communication assessment questions eight and nine provided additional insight into this segment of the reaffirmation process, however. The responses to question six demonstrated a high level of satisfaction with the manner in which the reaffirmation process was handled, but somewhat lower than the even higher levels of satisfaction reported in the previous cycles – especially the Cycle I's. The results from questions eight and nine were used to assess how much information was shared with the broader campus community about the follow up reports and the interviews with the Committee on Criteria and Reports. The responses revealed that while the entire campus was aware of the realities of the reaffirmation process the details of how the recommendations were being handled were being maintained by a smaller group. One faculty respondent commented:

Things were being kept with the administrative people, and it did not filter out very much to the regular faculty/staff. It was all being kept in-house. I felt it was very hush, hush. I would say that we knew that things weren't right, but we didn't understand why people were writing and re-writing things and why things weren't being accepted. Well, I guess they didn't trust any of us, and they didn't ask any of us for anything.

Another faculty respondent commented:

The entire campus community was aware that reaffirmation was going on. Now whether or not the entire campus was aware of the process by which it was going on is another question. I'm not sure that the entire campus community understood the process or even necessarily understood the issues that the College was having to respond to. We were told in town hall meetings what some of the specific recommendations were that we were having to deal with, but I don't think we were ever told how we were responding to those recommendations or even why we were responding to them.

The members of the President's Cabinet were the individuals tasked with preparing the responses to the follow up reports submitted during the period. The

recommendations that required policy or operational changes or changes in report presentation were resolved with the submission of the First Follow-Up Report. Examples included the incorporation of instructional goals and assessment measures into course syllabi, adherence to the institutional policy that limited the number of adjunct instructors to 35%, development of written policies for recruitment, admission, financial aid and eligibility of athletes, and development of adequate procedures to address written student complaints.

The recommendations that dealt with planning and evaluation required longer than one-year to demonstrate compliance because the reviewers required documented evidence that the evaluation results had been incorporated into the planning processes. Longer periods were also required for the institution to demonstrate financial stability. Between October 2000 and April 2002 the College was able to respond successfully to the original Reaffirmation Committee recommendations with the exception of recommendations from *Criteria* Section 6.3.1 regarding the sufficiency of financial resources.

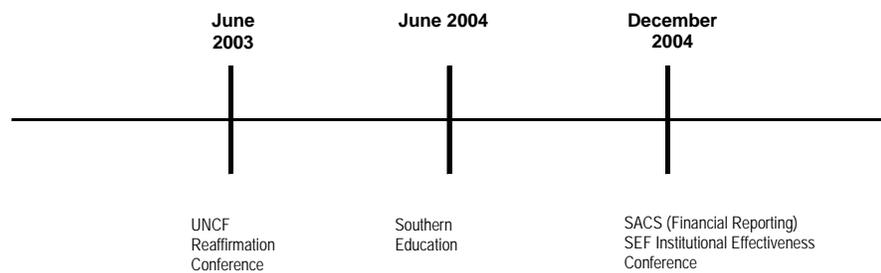
The College's financial position improved although the College had three different Chief Financial Officers during this period. It successfully increased its enrollment in each of the three years. This resulted in annual increases in tuition and fee revenue. The College realized an average of \$2 million annually in private gifts and grants. There were no significant audit findings cited. While the College ended both the 2001 and 2002 fiscal years with decreases in unrestricted net assets, the positive trends in enrollment and fundraising activities allowed it to increase expenditures conservatively

and modestly reduce its debt level. Considerable progress was also made within the accounting and financial management operations.

**Cycle III:**

**Illustration 5**

**Cycle III (2003-time of writing)**



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Institutional Timeline - SACS Recommendations and Reaffirmation Decisions

Following the notification of reaffirmation in December 2002, the College's administrators attended the following reaffirmation workshops and conferences in preparation for the 2010 reaffirmation cycle which will utilize the *Principles of Accreditation* rather than the *Criteria of Accreditation*:

- June 2003 – United Negro College Fund (UNCF) Reaffirmation Conference for Institutional Research, Fiscal and Enrollment Management Officers;
- June 2004 – Southern Education Fund (Fiscal) Reaffirmation Conference for Presidents, and Institutional Research and Fiscal Officers;

- December 2004 – Southern Association of Colleges and Schools – Financial Reporting in the *Principles of Accreditation*;
- December 2004 – Southern Education Fund Institutional Effectiveness Conference.

(The Southern Education Foundation (SEF) is a public charity-based organization that is headquartered in Atlanta, Georgia. It was founded in 1937, with a primary purpose of improving educational access, quality and opportunity for all people of the south, especially those disadvantaged by gender, poverty or color).

### Interviews

There were fourteen respondents that participated in the Cycle III interview phase, including four senior level administrators, six mid-level administrators, and four faculty members. Three questions were used during this cycle to assess the preparedness of the campus community for the 2010 reaffirmation process:

Question #5: Are you aware of the changes in the reaffirmation process?

Question #6: Do you believe that your institution is prepared for the next reaffirmation process?

Question #7: Do you think that all of your previous challenges have been completely resolved? If not, which ones do you think will resurface?

All of the respondents reported that they were aware of the changes within the accreditation process that now includes the *Principles of Accreditation* rather than the *Criteria for Accreditation*. There was only one affirmative response to both the question regarding the institution's preparedness for the upcoming reaffirmation cycle and the resolution of the previous accreditation challenges. The remaining thirteen respondents

did not think that the College was prepared for the upcoming reaffirmation process, or had resolved the previous accreditation challenges.

### **Financial Analysis**

#### **FY03 Audit - Conducted by Maxwell, Locke & Ritter**

- There were no significant findings identified during the financial audit. The College realized a \$1 million decrease in revenue as a result of a significant decline in private gifts and grants. The decrease in institutional revenue combined with significant increases in various expense categories, such as scholarships and deferred maintenance, resulted in a \$1.6 million decrease in unrestricted net assets. The College did not incur any additional debt during the period.

### **Cycle Analysis:**

At the time of the case study, the members of the College community were enjoying its accreditation status and had limited concern for the next reaffirmation process. As the interview results demonstrate, more than 90% of the respondents did not believe that the College was prepared for the next reaffirmation period, nor did they believe that the prior challenges had been resolved. All of the respondents expected that the College's fiscal problems would resurface during the 2010 reaffirmation process.

One of the faculty respondents shared the following thoughts:

The fiscal issues are going to resurface; that's what scares me because no matter what we do academically, or in our administrative units, if the resources have not improved and the money is not there, that recommendation is going to hang us before we have a chance to prove anything else.

Another commented:

Unless something dramatic happens, in terms of someone leaving us a lot of money, we will always be financially challenged. That's simply going to be with us. It is the rigor with which the financial resources are pursued by the accrediting agency that determine whether we will be cited for it again.

The struggle to restore full accreditation at Huston-Tillotson College during both earlier reaffirmation cycles was one marked by discovery, persistence and ultimately vision from a knowledgeable leader. The term discovery is appropriate because the institution's administrative leaders spent a considerable amount of time discovering the written/unwritten rules of the accreditation process, including what forms of evidence demonstrate progress, the consequences of responding inappropriately, and the cost of not getting it right the first time. Persistence was a factor because the College's administrators were vigilant in seeking advice and identifying consultants and resources continuously throughout both accreditation cycles. Finally, the vision provided by the College's latest president, Dr. Earvin, engaged "buy in" from all facets of the campus community (faculty, staff, students and alumni) and resulted in common goals that everyone was collectively working toward.

### **Findings – Texas College**

The analysis for the Texas College case began with Cycle I which represented the period from 1994 when Dr. Haywood Strickland assumed the position as President and CEO through December 2001 when the institution was granted membership in the SACS Commission on Colleges. Cycle II represented accreditation activities that occurred between December 2001 and December 2003 when the College was placed on *probation*. Finally, Cycle III represented January through July 2004 when the institution began

preparations for a Special Committee Visit in November 2004. There were, however, critical events that occurred at the institution prior to Cycle I which provide vital background information for understanding the series of accreditation-related activities that occurred at the institution during the subsequent years.

In September 1992, in response to concerns raised by, then President Dr. A.C. Mitchell Patton and members of the faculty and staff, a SACS Special Committee conducted a site visit. Dr. Patton requested the site visit with the hope that it would address and resolve concerns regarding the effective management of the College that had been raised by members of the Board of Trustees, faculty and staff. Unfortunately, the Special Committee visit resulted in the College being cited for non-compliance with four of the thirteen SACS Conditions of Eligibility. The issues raised were related to Conditions of Eligibility One, Eight, Nine and Thirteen. Unresolved matters regarding a fraudulent transcript, fiscal affairs, budgetary planning, and governance were identified as the underlying causes of the non-compliance. Specifically, the Conditions of Eligibility were:

- Condition One - In obtaining or maintaining accreditation with the Commission on Colleges, an institution agrees to the following:
  - a. That it will comply with the Criteria for Accreditation of the College Delegate Assembly consistent with the policies and procedures of the Commission on Colleges.
  - b. That the Commission on Colleges, at its discretion, may make known to any agency or member of the public requiring such

information, the nature of any action, positive or negative, regarding the institution's status with the Commission.

- c. That it will comply with Commission request, directives, decisions and policies, and will make complete, accurate and honest disclosure. (The College had not provided timely responses to the issues of non-compliance previously identified).
- Condition Eight – The institution **must** have an appropriate plan, as well as functioning planning and evaluation process, which identifies and integrates projected educational, physical and financial development, and incorporates procedures for program review and institutional improvement. (Institutional problems were identified with budget planning and governance).
  - Condition Nine – The institution **must** have published admission policies compatible with its stated purpose. (Institutional problems were identified including fraudulent transcripts).
  - Condition Thirteen – The institution **must** have an adequate financial base to accomplish its purpose at an acceptable level on a continuing basis. (Institutional problems had been identified with budget planning and fiscal affairs).

Following the Special Committee visit, the institution was placed on *notice* in December 1992. As a result of the sanction, the College was required to submit a Follow-Up Report by May 1, 1993 that addressed non-compliance with the following sections of the *Criteria*: Section 5.3.1 – Student Records, Section 6.1.2 Governing Boards, Section 6.3.1 – Financial Records, 6.3.2 – Organization and Administration of Financial Resources, Section 6.3.3 – Budget Planning, and Section 6.3.4 – Budget

Planning. In June 1993, the College was notified that the First Follow-Up Report had not been accepted and that it had been placed on *warning* for failure to comply with sections: Section 3.1 – Planning and Evaluation, Section 6.1.2 Governing Board, Section 6.1.5 – Administrative Oversight, Section 6.3.1 – Financial Resources, Section 6.3.2 Organization and Administration of Financial Resources, Section 6.3.3 – Budget Planning, and Section 6.3.4 – Budget Control. A September 15, 1993 due date was set for a Second Follow-Up Report (Strickland, pgs. 1-4).

Prior to the submission of the Second Follow-Up Report, the College was notified that a Special Committee would conduct a site visit in November 1993. The purpose of the committee visit was to assess the institution's progress in addressing compliance with the *Criteria for Accreditation*. Nineteen recommendations resulted from the visit covering the following *Criteria* sections: Section 1 - Principles and Philosophy of Accreditation, Section 2 – Institutional Purpose, Section 3 – Institution Effectiveness, Section 3.1 – Planning and Evaluation, Section 3.2 – Institutional Research, Section 4 – Undergraduate Programs, Section 5 – Educational Support Services, Section 6 – Administrative Processes, Section 6.3.1 – Financial Resources, 6.3.2 Organization and Administration, Section 6.3.3 – Budget Planning, Section 6.3.4 – Budget Control, Section 6.3.6 – Accounting, Reporting, and Auditing, and Section 6.3.7 – Purchasing and Inventory.

College representatives were also asked to appear before the Committee on Criteria and Reports at the December 1993 annual SACS meeting. At that time the sanction was elevated from *warning* to *probation* for a period of one year for because of the College's continuing demonstration of non-compliance with the *Criteria*. It was

given a May 2, 1994 deadline for a Third Follow-Up Report, and was required to address the recommendations that related to *Criteria* sections: Section 1.4 Conditions of Eligibility Eight, Nine, Twelve and Thirteen, Section 3.1 – Planning and Evaluation, Section 6.3.1 – Financial Resources, 6.3.2 Organization and Administration, Section 6.3.3 – Budget Planning, and Section 6.3.4 – Budget Control. Following the submission of the Third Follow-Up Report, College representatives were asked to appear before the Committee on Criteria and Reports in June 1994. At this meeting, the Commission decided to continue the institution on *probation* for six months for non-compliance with the *Criteria*. The College was later notified that another Special Committee would visit in September 1994 to assess progress in resolving the issues of non-compliance.

In July 1994, President Patton resigned. As he left the institution, he took with him many of the documents that had been prepared for the September 1994 Special Committee visit. The September committee visit was significant because it represented the third reaffirmation-related visit within two years and the second Special Committee visit. The Special Committee made 74 recommendations and 13 suggestions (the recommendations are detailed in Appendix F). Dr. Strickland assumed the presidency on November 1, 1994, only twenty days before the first follow-up report on the 74 recommendations was due.

Several of the respondents shared comments about this period. One of the senior administrative respondents said:

During that time people were writing letters to SACS about the school and about the President. Letters were being sent from the faculty, staff, students and members of the community about the things that they didn't like at the school. I guess the President thought that the best way to resolve it was to have SACS come in for a visit. That was a mistake and an error.

Another senior administrator commented:

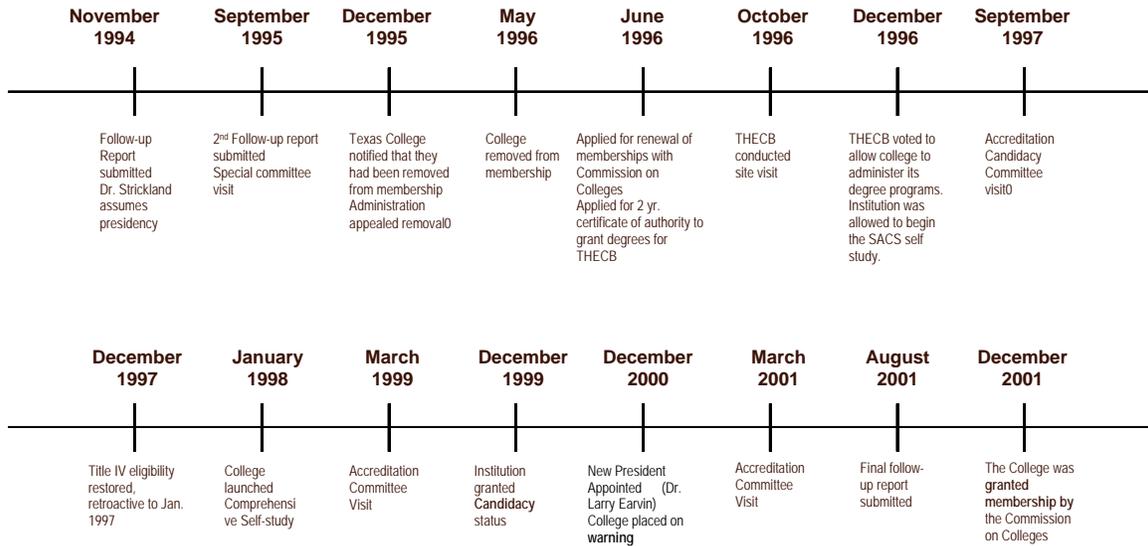
I don't think that the administration that was in place realized the severity of the situation and had more of a hope and wish and prayer than they did realism. I think that was the biggest issue, because no one really faced the problems head on and said, "we[ve] got serious problems." It was always someone else's problem and always SACS is doing something to them, and the reality was that SACS wasn't doing anything thing to them. Most of it was internal and the leadership was weak and ineffective.

You just do not get to the point where we were in 1994; there were a number of years that led to that and that's why we were so lucky to find someone with the skill set and experience that the new President had.

**Cycle I:**

**Illustration 6**

**Cycle I (1994-2001)**



**Institutional Timeline - SACS Recommendations and Reaffirmation Decisions**

On November 21, 1994, Dr. Strickland submitted the First Follow-Up Report to the September 1994 site visit. The report had been prepared by the College's Interim President, Dr. Ronald Cunningham, who served the College from July through November

1994. As a result of the Follow-Up Report, the Committee on Criteria and Reports requested an interview with institutional representatives at the annual SACS meeting in December. At that time the Commission on Colleges continued the College on *probation* for an additional twelve months for failure to comply with all six sections of the *Criteria*.

The College was given a September 1, 1995 deadline for submitting a Second Follow-Up report. The submission of the second report was followed by a Special Committee Site visit, September 18 – 21, 1995. As a result of that visit, the number of recommendations was reduced from 74 to 35. The 35 recommendations included three recommendations in Section I – Principles and Philosophy of Accreditation, one recommendation in Section II – Institutional Purpose, six recommendations in Section III – Institutional Effectiveness, one recommendation in Section IV – Educational Programs, thirteen recommendations in Section V – Educational Support Services and eleven recommendations in Section VI – Administrative Processes (the recommendations are detailed in Appendix G). However, at the annual meeting in December 1995, the decision was made to remove the College from membership in the Commission on Colleges.

On May 10, 1996, the College's accreditation was officially revoked. As a result of the College losing its membership in SACS, it also lost its eligibility for Federal Title IV (financial aid) funds and its membership in UNCF. One month later, President Strickland and his administrative team applied for membership renewal with the Commission on Colleges, and also applied for a two-year certificate of authority to award degrees in Texas from the Texas Higher Education Coordinating Board (THECB). The THECB Certificate Advisory Committee granted Texas College the authority to award

degrees for all of its eligible programs on December 13, 1996. Securing this authority was a critical victory because the SACS Commission on Colleges had earlier determined that the authorization for the College to begin the self-study process and receive an Accreditation Candidacy Committee visit was contingent upon receiving degree granting authority from the State. At the annual SACS meeting in December 1996, the Commission on Colleges voted to allow Texas College to begin a self-study and receive an Accreditation Candidacy Committee visit.

In September 1997, the Candidacy Committee completed its site visit and reported that the institution was in compliance with the Thirteen Conditions of Eligibility. In December, Texas College was granted candidacy status retroactive to January 1997 with regard to Federal Title IV eligibility. This allowed the institution to restore its eligibility to participate in federal financial aid programs (Title IV). In January 1998, the College began a comprehensive self-study process in preparation for an Accreditation Committee visit in March 1999. That visit resulted in twenty recommendations. The twenty recommendations included one in Section I – Principles and Philosophy of Accreditation, two in Section III – Institutional Effectiveness, five in Section IV – Educational Programs, and twelve in Section V – Educational Support Services (the recommendations are detailed in Appendix H).

At the December 1999 annual SACS meeting, the College's representatives again appeared before the Criteria and Reports Committee and were notified that the institution was continued on candidacy status. A Follow-Up Report was required by September 20, 2000. The committee specifically requested that the report address concerns regarding financial resources and effective financial oversight by the College's Board of Trustees.

On December 1, 2000, Dr. Billy Hawkins became the College's President. Following the December 2000 annual SACS, the College was informed that an Accreditation Committee would visit in March 2001 to assess its eligibility for SACS membership. This visit was scheduled because Texas College had begun its fourth year in candidacy status, which represented the time frame during which an Accreditation Committee is normally convened to make a membership recommendation under SACS procedures.

The March 2001 Accreditation Committee visit resulted in four recommendations, one in Section I – Principles and Philosophy of Accreditation and three in Section VI – Administrative Processes. Adequacy of financial resources was identified as the most significant concern. A Follow-Up Report was submitted on August 1, 2001. Included was a detailed analysis of the enhanced financial condition of the College including a list of contributors and plans for a \$7.5 million Capital Campaign. At the annual SACS meeting in December 2001, the College was informed that membership in the Commission on Colleges would be granted. The College was also notified that they would be required to submit a follow up report by September 2002.

### **Interviews:**

Of the eleven interviews conducted at Texas College, eight focused on Cycle I. Detailed below are the results from the interviews conducted for this cycle. As previously mentioned, the interviews were analyzed to provide insight into the respondents views concerning leadership and communication throughout the reaffirmation process and to assess the level of involvement of the respondents'. As was true in the Huston-Tillotson case, the responses to the interview questions that asked the respondents to rate/assess their level of satisfaction were summarized using the five point

scale described in Chapter III, with a score of five representing the highest level of satisfaction. The eight respondents in this cycle included five senior administrators and three mid-level administrators.

### **Summary - Leadership Assessment Responses**

Question #7: Please rate how the reaffirmation process was handled on your campus?

- All of the respondents reported high levels of satisfaction with how the reaffirmation process was handled on campus.

Question # 15: How would you assess/rate institutional leadership during this period?

- All of the respondents reported high levels of satisfaction with institutional leadership how the reaffirmation process was handled on campus during this period.

### **Summary - Communication Assessment Responses**

Question 8: Was the entire campus aware of the reaffirmation process? If yes, how was the information about the process communicated throughout the campus?

- All of the respondents reported that they were aware of the accreditation activities. The respondents reported that the information was shared through frequent faculty/staff meetings.

Question 9: Please assess/rate the types of preparations that were made to prepare the campus community for the site visits?

- All of the respondents reported having a high level of satisfaction with the preparations that were made to prepare the campus community for the process.

Question 13: How did your campus respond upon receiving notification that you had been placed on “*notice, warning, probation* or loss accreditation?”

- Of the eight respondents, three of the senior administrators and two mid-level administrators reported responses of “hopeful” upon being notified of the sanction.
- The remaining three respondents, including two senior administrators and one mid-level administrator, reported responses of “disappointment” about being notified that the institution had been placed on sanction.

### **Summary - Level of Involvement Responses**

Question 3: At what point did you become involved in the accreditation process?

- All of the respondents reported that they became involved in the accreditation process at the initial stage.

Question 4: Please describe/define accreditation.

- All of the responses for this question were very detailed and the respondents demonstrated a high level of understanding of the accreditation process. This was expected since all of the respondents were involved from the initial self-study. The responses provided included an understanding of the timetable for the accreditation process, the sanctions issued by SACS, and the follow up report requirements.

Question 5: Prior to your most recent experience did you have previous experience with SACS or the accreditation process?

- Six of the respondents, (five senior administrators and one mid-level administrator) reported that they had prior knowledge of the accreditation process.
- The remaining two respondents, both mid-level administrators, reported having no prior accreditation experience.

Question 6: Did you have access to the reaffirmation documents during the reaffirmation process?

- All of the respondents reported having access to the documents.

Question 10: Were you involved in the initial meeting with the SACS representatives?

- All of the senior administrators reported that they were involved in the initial meeting.
- The three mid-level administrators were not involved.

Question 11: Were you one of the individuals interviewed during the on-site visits?

- All five of the senior administrators were interviewed.
- The three mid-level administrators were not interviewed.

Question 12: Were you present during the exit meeting with the SACS representatives?

- All five of the senior administrators reported that they were present during the exit meeting.
- The three mid-level administrators were not present during the exit meeting.

### **Financial Considerations**

Financial audits for the 1994, 1995 and 1996 fiscal years were not available for this study. The analysis for the 1996 and 1997 fiscal years was based on the financial statements in the 1997 audit report that contained the FY96 results. However, accompanying management letters were not available.

### **FY97 Audit – Wesley Peachtree Group**

- Contributions from the Christian Methodist Episcopal (CME) Church represented 50% of the College's realized revenue for the period. Those contributions totaled

\$2 million and an additional \$1.5 million was received in private gifts and grants. The College realized a \$588,000 increase in net assets for the fiscal year.

#### FY98 Audit – Wesley Peachtree Group

- During this fiscal year, the College received \$3.5M in CME Church contributions and an additional \$990,000 in private gifts and grants. The College borrowed \$995,000 from its temporarily restricted funds and increased its accounts payable by \$600,000. (Temporarily restricted assets are assets that are restricted by the donor and can only be used for the purposes defined by the donor. While the time restrictions on these assets vary, the restrictions can typically be satisfied over short periods of time). The College was required to report the \$995,000 loan from the temporarily restricted funds as an account payable to be repaid during the next fiscal year. This was required because the funds were not unrestricted, and they should not have been used in this manner until the restriction requirements had been satisfied. The College realized a \$170,000 increase in net assets for the fiscal year.

#### FY99 Audit – Wesley Peachtree Group

- There were no significant findings identified during the financial audit. The College realized a \$2 million decrease in contributions from the CME Church and a \$600,000 increase in the institutional support expenditures. This resulted in a \$176,000 decrease in net assets for the period.

#### FY00 Audit – Wesley Peachtree Group

- There were no significant findings identified during the financial audit. The College realized a significant increase in total revenue during the period as a

result of receiving \$3.7 million in restricted government grants. Revenue from private gifts and grants decreased by \$900,000 during the period, and the College borrowed \$545,000 from its temporarily restricted funds. The College ended the fiscal year with a \$545,000 increase in net assets.

#### FY01 Audit – Wesley Peachtree Group

- There were no significant findings identified during the financial audit. The College realized a significant increase in total revenue during the period as a result of receiving \$5.8 million in restricted government grants and increases in both CME Church contributions and private gifts and grants. The College ended the fiscal year with a \$2 million increase in net assets.

#### Cycle Analysis:

This period in the Texas College accreditation history was defined by the deliberate actions and high intensity exhibited by the members of the administrative team during their quest to regain SACS accreditation. There was high satisfaction with the College leadership at this time. Several of the respondents commented on the high level of professionalism that was exhibited by the leadership team and the amount of effort exerted to restore the College's image and credibility in the Tyler community. One of the senior administrators shared the following comments:

We were working 18 hours a day for the most part, spending nights at the College, going home to take showers and then coming right back. We had a very close knit team at that time and that's how we got it done. When we first started, our relationship with the business community was horrible because of the unpaid bills and broken promises that had occurred [in the previous administration].

Another senior administrator commented:

Yeah, you have to understand that we owed the Tyler community nearly \$1.7 million in unpaid vendor bills, but we started paying those things off, and we

started doing what we said we would do, and they appreciated that. If we couldn't pay, we told them that we couldn't. We said, look we can pay you on this day, and by God on that day we did pay them, and that made a difference.

Communication across campus concerning the College's accreditation status was also considered good, and there were high levels of satisfaction with the preparations for the various site visits. All of the respondents commented favorably on the frequency and adequacy of the information that was provided to both the internal community and to external constituents during the accreditation process.

A mid-level administrator commented:

When the President got there, he established an Administrative Council and this council was comprised of all of the managers from the mid-level up through the cabinet level. This body met every month, and at that meeting, all of the information that related to SACS was shared with the group, and it was then the responsibility of the group members to share the information with their staff members. When something major came down the pipe, like the loss of accreditation, or whenever we were going to meet with SACS, or they were coming here, the President would call a campus wide meeting so that everyone could hear ... directly from the him what we were up against, exactly what we were going to do before the meeting, and then what the results were after the meeting.

A critical link during this period was the College's relationship with the CME Church which provided an average of \$2 million during each of the fiscal years where audits were available. The College also received an average \$1.1 million in private gifts and grants as a result of continuous public appearances and funding raising meetings held by the President. These contributions were significant during the 1996 and 1997 fiscal years when the College was ineligible for Title IV funding as a result of the loss of accreditation. They also helped to offset the decrease in revenue which resulted from the loss of membership in the United Negro College Fund. One of the senior administrators discussed the relationship between the CME Church and the College as follows:

They provided almost all of the fiscal leadership and support; without them the College would not have survived and would not have regained its accreditation.

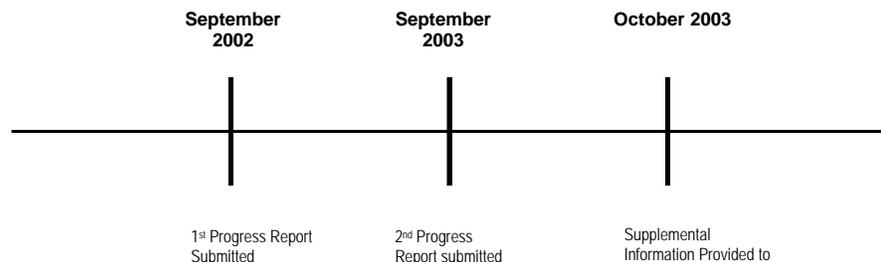
Another commented that:

The institution would not have survived without the church at all. During the period of time that we were without financial aid, it was the church that made contributions that were used to help the students pay their tuition. I think that they even went into their retirement fund to ensure that the institution remained solvent. The Bishop was extremely supportive, and everywhere that he went he talked about Texas College and the need for Texas College, and I guess he went out on a limb in a number of ways to be sure the school survived.

The events that occurred at the College during this period were a testament to the commitment of the many people who fought to keep this HBCU open and accredited.

### Cycle II:

### Cycle II (2002-2003) **Illustration 7**



### Institutional Timeline - SACS Recommendations and Reaffirmation Decisions

While the campus community was jubilant about the success in regaining membership in the Commission on Colleges, the celebration was short-lived because of the need to prepare the Progress Report, due in September 2002. In January 2003, SACS requested a Second Progress Report, due in September 2003, specifically addressing the

College's financial stability. The College was also required to submit copies of the financial and A-133 audits for the two most frequent fiscal years. (An A-133 audit is a compliance audit conducted on non-profit organizations that receive more than \$300,000 in federal funding). The College received a qualified opinion in the FY03 A-133 audit.

Immediately after submitting the Second Progress Report, the College was required to submit additional materials, including an update on the \$2,000,000 pledge from the Christian Methodist Church, copies of the institution's responses to the FY03 audit's management letter, an explanation regarding the untimely payments to employee retirement plans, details on the institutional discount rate calculation, supporting documentation to verify the reported increases in auxiliary enterprise revenue, and comments on the unqualified opinion issued in the A-133 FY03 audit.

### **Interviews:**

Detailed below is summary information from the interviews conducted for this cycle. Seven respondents were interviewed for this cycle including two senior administrators and five mid-level administrators.

### **Summary – Leadership Assessment Responses**

Question #6: Please assess/rate how the reaffirmation process was handled on your campus.

- Two of the respondents reported high levels of satisfaction with the manner in which the process was handled.
- The remaining five respondents reported acceptable levels of satisfaction.

Question # 11: How would you assess/rate institutional leadership during this period?

- One of the respondents reported a high level of satisfaction with institutional leadership during this period.
- Four respondents reported acceptable levels of satisfaction with institutional leadership.
- Two respondents reported dissatisfaction with institutional leadership.

Question #13: During this period how was your institution viewed within your local community?

- Two of the respondents, mid-level administrators, described the college's image within the community as "hopeful."
- Two other mid-level administrators described the college's image as "struggling."
- The remaining mid-level respondent used "viable" to describe the college's community image.
- The two senior administrators used "resilient" and "promising" to describe the college's community image.

As the data above demonstrates, the level of satisfaction with the manner in which the accreditation activities were handled was slightly above acceptable. However, the leadership provided was considered generally less than satisfactory. The respondents provided favorable comments regarding how they believed the institution was viewed within the local community, although they believed there was recognition of the College's struggles.

### **Summary – Communication Assessment Responses**

Question #7: Was the entire campus aware of the problems with SACS or was the information shared only with a small group of individuals? If it was maintained by a small group, who were the members of that group?

- Six of the seven respondents reported that the campus was unaware of the problems with the reaffirmation process.
- One respondent reported that the campus was aware of the problems with the reaffirmation process.

Question #8: How many follow up reports did your institution submit to SACS?

- Five of the respondents reported that they did not know how many follow up reports were submitted to SACS.
- Two respondents provided a correct answer of three reports submitted to SACS during the period.

Question #9: How many times were institutional representatives interviewed by the Committee on Criteria and Reports?

- Five of the respondents reported that they did not know how many times institutional leaders appeared before SACS.
- Two of the respondents provided the correct answer of zero.

Question #10: Please describe the campus climate during this period.

- Six of the respondents reported a campus climate that was filled with suspicion during this period. It was stated that because the campus had never been officially notified of the accreditation problems, employees were afraid to be caught discussing the situation.

- Only one respondent reported a positive campus climate during this period.

### **Summary – Involvement Responses**

Question #2: When did you become involved in the reaffirmation process?

- All of the respondents reported that they became involved with the accreditation process at the initial stages.

Question #4: Prior to your most recent experience what knowledge did you have of SACS and the accreditation process?

- Four of the respondents reported having previous experience with SACS and the accreditation process.
- Three of the respondents reported having no previous experience.

Question #5: Did you have access to the reaffirmation documents during the reaffirmation process?

- Five of the respondents reported having access to the documentation.
- Two of the respondents reported that they did not have access to SACS documentation during the reaffirmation process.

### **Financial Considerations:**

#### **FY02 Audit – Wesley Peachtree Group**

- There were no significant findings identified during the financial audit. The College realized a \$1.3 million increase in tuition revenue but did not receive any contributions from the CME Church. This resulted in a \$519,000 decrease in net assets for the period.

## FY03 Audit – Wesley Peachtree Group

- There were material weaknesses and reportable conditions identified during the financial audit. In addition, the audit addressed an issue of fraudulent behavior in the business office which was still under criminal investigation at the time of this case study. During the year the institution's indebtedness increased by \$1 million as a result of a new line of credit secured and additional accounts and notes payable. The College did not receive any contributions from the CME Church, but did realize a \$1.4 million increase in tuition revenue which resulted in \$300,000 in increased net assets for the period. A qualified opinion was issued on the College's A-133 Financial Aid Audit that was the result of significant instances of non-compliance in the administration of federal financial aid funds.
- The material weaknesses and reportable conditions included:
  1. Improper segregation of duties – there were a number of business functions that created opportunities for fraud.
  2. Fixed Asset Ledger Maintenance – the College did not periodically inventory its fixed assets. Further, the College did not have a capitalization policy for major purchases. Consequently, all purchases were initially expensed.
  3. Accounts Receivable and Accounts Payable Subsidiary Ledger Reconciliations – the College's subsidiary ledger for accounts payable and accounts receivable did not match the balance in the General Ledger.
  4. Invest Account Reconciliation – the investment account activity was not properly recorded in the General Ledger throughout the fiscal year, thus

rendering the College's internally generated financial statements incomplete.

5. Bank reconciliations – the bank accounts were not routinely reconciled each month.
6. Authorized Check Signer – the College used a dual signature stamp for authorizing checks. The auditor suggested that a dollar limit be established, after which manual signatures would be required.
7. Staff Training – the College had hired several new individuals or moved current employees to different positions. Formal training was recommended to ensure a better understanding of fiscal policies and procedures.
8. Cash Receipt Records – Cash receipts were poorly organized. Several receipts were missing or were not properly supported.
9. Improper Student Collection – the College's enrollment had increased significantly from the previous year. Student accounts receivable increased by over \$1 million suggesting that collection procedures should be improved.
10. Fidelity Bond Claims – the College experienced acts of fraud that were currently under investigation by Federal authorities.
11. General Ledger Maintenance – there was no consistency in recording General Ledger transactions.
12. Regulatory Approval for Success Program – the College had added the Success Program to its curriculum. Several of these students received

federal student financial aid. There was no evidence that regulatory approval had been obtained for these students from the U.S. Department of Education.

13. Budget Monitoring – there was no budget prepared for the fiscal year 2003, thus comparison of actual expenditures was made with the budget plan.

14. Unsupported disbursements – Documentation for several tested disbursements was incomplete or missing.

### **Cycle Analysis:**

During this period the College was struggling to maintain its financial position without the assistance of the CME Church that had donated an average of \$2 million each year during the prior Cycle. While tuition revenue increased during both fiscal years, the debt level increased by \$ 1 million FY 2003. The results of the leadership assessment responses demonstrated decreased satisfaction with the strategies utilized during the reaffirmation process and with the institutional leadership provided during the period.

One of the mid-level administrators stated that:

The leadership at the College right now is incompetent. I mean just plain incompetent. And that is why we are back on *probation*.

Another mid-level administrator commented:

I just feel like management has not placed this as a top priority. A lot of the things that we are doing now, we are doing in react mode. There is no planning going on.

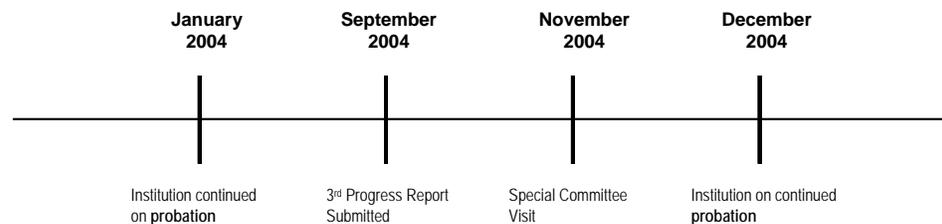
The communication assessment responses demonstrated that the campus community was unaware of the accreditation activities and that there was limited information communicated regarding the follow up reports. Only one of the respondents

reported that the campus was aware of the reaffirmation activities, and only two of the seven respondents knew the correct number of follow up reports submitted. It is important to note that there were no interviews requested by the Committee on Criteria and Reports during this period.

**Cycle III:**

**Illustration 8**

**Cycle III (2004-time of writing)**



**Institutional Timeline - SACS Recommendations and Reaffirmation Decisions**

In January 2004 the College received notification that the Commission had placed it on *probation* for a period of one year, authorized a Special Committee Visit for November 2004, and requested a Third Progress Report due in September 2004. The Third Progress Report was to address the issues of institutional integrity and financial resources. Specifically, the College was required to provided an update on the \$2 million CME Church pledge, which although made in 2001 had not been honored, to demonstrate progress in resolving prior year audit findings, and to provide evidence that budget controls had been implemented. SACS raised the issue of institutional integrity because

the \$2 million pledge was an important factor in the Commission's decision to grant initial accreditation to the College in December 2001, and the fact that no money had been collected caused great concern.

As of July 2004, there had been no additional communication received from the Southern Association, but institutional representatives had formed reaffirmation committees to secure the documents required.

### **Interviews**

There were seven respondents that participated in Cycle III interviews, including two senior level administrators and five mid-level administrators. Three questions were used during this cycle to assess the preparedness of the campus community for the 2010 reaffirmation process:

Question #5: Are you aware of the changes in the reaffirmation process?

Question #6: Do you believe that your institution is prepared for your next reaffirmation cycle?

Question #7: Do you think that all of your previous challenges have been completely resolved? If not, which ones do you think will resurface?

All of the respondents reported that they were aware of the changes within the reaffirmation process that now includes the *Principles of Accreditation* rather than the *Criteria for Accreditation*. Four reported that they believed that the institution was prepared its next reaffirmation cycle. On the question regarding the resolution of prior accreditation challenges, only two of the respondents expressed the belief that they had been resolved. The remaining respondents all expressed doubts.

### **Financial Considerations**

The FY04 financial audit was unavailable for inclusion in this analysis. As of mid-September 2004, the College had not received the \$2 million contribution from the CME Church.

### **Cycle Analysis:**

During this period at the College there was an enormous amount of secrecy and mistrust regarding the reaffirmation process. At the time of this writing, there had been no formal or informal communication between administrators and the broader community regarding either the sanctions imposed by SACS or the Special Committee visit scheduled for November 2004. Many of the employees learned that the College had been placed on *probation* from an article in the local newspaper and from colleagues from other institutions who attended the annual SACS meeting in December 2003. While four of the seven respondents reported that they believed that the College was prepared for the upcoming Special Committee visit, the researcher found little evidence to support that view.

### **CASE STUDY COMPARISONS**

The comparison between the two institutional case studies consisted of analysis of the two research questions and the assessments of leadership and communication. The first research question was, why were the two institutions sanctioned by the Southern Association of Colleges and Schools? The findings and analysis suggest that there were four primary answers to this question, including: campus turmoil, failure to provide

appropriate responses and support in follow up and progress reports, non-compliance with federal programs, and the lack of financial stability.

The second research question was, how did the institutions restore their full accreditation? The primary answers to this question included resolution of audit findings, improved financial stability, demonstrated use of administrative and academic program evaluation results, and, most important, new dynamic leadership. Below are the summaries of the individual case studies that demonstrate these conclusions.

### **Research Question 1: Why Were the Two Institutions Sanctioned by SACS?**

#### Huston-Tillotson College

During the 1990 reaffirmation cycle the institution was initially successful in securing its reaffirmation after submitting its First Follow-Up Report in October 1990. After that, the College was required to submit additional reports to demonstrate progress in reducing its cumulative deficit and debt level. The College was placed on “warning” as a result of failure to submit the FY1991 annual audit with the Second Follow-Up Report. Consequently it was required to submit the FY91 audit with the Third Follow-Up Report and to provide a schedule for transmitting subsequent year audits.

The College began the 2000 reaffirmation cycle responding to issues centered around financial stability as a result of the fraudulent behavior identified within the Financial Aid Department in 1998. In July 1999, it was placed on *notice* for failure to comply with *Criteria* 6.3.1 concerning financial resources. In July 2000, it was placed on *warning* for failure to comply with *Criteria* Section 1.4 (Conditions of Eligibility Eight and Thirteen) which followed the 2000 Reaffirmation Committee Visit. The primary focus of Condition of Eligibility Eight was the institution’s planning and

evaluation process, and the focus of Condition of Eligibility of Thirteen was the maintenance of an adequate financial base to accomplish the institution's mission and purpose. As mentioned previously, there was a widely held belief on campus that the recommendations and *warning* were the results of the anger and tension that existed at the College during the 2000 Reaffirmation Committee visit.

### Texas College

Texas College was placed on *notice* in December 1992 following the visit of a Special Committee that had been requested by then President Patton. The College was sanctioned for failure to comply with *Criteria* 5.3.1 Student Records; 6.1.2 Governing Boards; 6.3.1 Financial Resources; 6.3.2 Organization for the Administration of Finance Resources; 6.3.3 Budget Planning and 6.3.4 Budget Controls. In July 1993, it was placed on *warning* for failure to respond effectively to the previous recommendations and *Criteria* 3.1 Planning and Evaluation. In December 1993, the College was placed on *probation* for continued failure to resolve the problems listed above. It remained on *probation* until its accreditation was revoked in December 1996. Although the details (follow up reports) for this period were unavailable the interview results and participant observations indicated that many of the recommendations of the Special Committee were the direct result of information shared by angry and frustrated College employees prior to and during the visit.

In January 2004, the College was placed on *probation* for failure to provide adequate updates on the status of the \$2 million CME pledge, and on the progress in resolving the financial problems that had led to the qualified opinion in the A-133 Financial Aid Audit. That audit included significant instances of noncompliance in the

administration of financial aid funds and allegations of fraud in the management of the federal College Work-Study program. At the time of the research visits, the fraud allegations were still under investigation.

While there was no evidence to suggest that campus turmoil was the primary reason for the sanctions placed on either institution, a review of the site committee recommendations and interview responses indicates that the issues raised by college employees led to an increase in the number of recommendations issued in both cases. The failure to provide carefully prepared responses complete with required supporting documentation demonstrated negligent administrative behavior. It was the responsibility of each institution's administration to provide adequate responses and supporting documentation. It is not surprising that their failure to provide adequate reports resulted in sanctions for both institutions.

There were blatant instances of noncompliance with federal Title IV regulations at both institutions. Non-compliance with federal regulations should not be tolerated on any campus, but on campuses where more than ninety percent of the student population receives some form of federal financial aid, it should be expected that heightened internal controls would be enforced to prevent occurrences of fraud and abuse. The fraud and abuse that occurred created a valid rationale for the sanctions.

Finally, the inability to demonstrate financial stability was a major theme for both institutions. As a result of significant fluctuations in tuition and fee revenue and fundraising initiatives which represented the two most significant sources of unrestricted funds, the revenue streams at both institutions did not provide a stable financial environment.

## **Research Question 2: How Did The Institutions Restore Full Accreditation with SACS?**

As mentioned previously, the primary answers to this question revolved around the resolution of prior year audit findings, demonstrated use of administrative and academic program evaluation results, improved financial stability, and, most significantly, the appointment of new, experienced leadership.

### Huston-Tillotson College

To resolve the warning status during the 1992-1994 period, members of the campus community focused their attention on the timely completion and submission of the Third and Fourth Follow Up Reports that included the FY1992 and FY1993 financial audits. A considerable amount of attention was also placed on clearing the material weaknesses and reportable conditions identified in prior year audits and on demonstrating progress in reducing the cumulative deficit.

The *probation* status during 2002-2004 was resolved through the implementation of a planning and evaluation program and the use of the program's results to improve the College's operations. Additional work was done to demonstrate financial stability. As previously mentioned, the College also realized an increase in tuition and fee revenue each year (enrollment increased) each year, increased revenue from private gifts and grants to an average of \$2 million per year and resolved all financial difficulties mentioned in the annual audits. Collectively, these efforts provided the necessary evidence to SACS that the College was making demonstrable progress in the area of financial management and stability.

## Texas College

The road back to accreditation was much longer for the administrators at Texas College. During the six year ordeal, they were required to: revise several academic programs, develop and implement a planning and evaluation system, and re-establish relationships with the U.S. Department of Education, once the College was again eligible to participate in Title IV programs. They also had to re-establish credibility with vendors and creditors and convince them the College's bills would be paid. The financial viability of the College was primarily driven by the Christian Methodist Episcopal Church, which donated an average of \$2 million annually, and the \$1.1 million in private gifts and grants that were raised each year. There was also continuous focus on resolving prior year audit findings and reducing institutional indebtedness.

During the *probationary* period from 2003 to the time of this writing, the focus was on demonstrating compliance with the administration of financial aid funds, resolving the FY2003 audit findings, and securing the \$2 million pledge from the CME Church. During 2003-04, enrollment rose to 1,035, 400 students more than enrolled in 2002-03. This had a significant impact on tuition and fee revenue. The College's administrators expected to be able to demonstrate fiscal stability in the September 22, 2004 Follow-Up Report.

The common theme in both the "why" and "how" research questions, was the challenge of demonstrating financial stability. In both case studies these were the recommendations that took the longest time to resolve and required the most attention in the follow-up and progress reports. Both institutions experienced significant fluctuations in tuition and fee revenue and fundraising revenue categories. The review of the

financial statements showed that financial stability at both colleges depended on the revenues from private gifts and grants. The institutions were financially stable when fundraising was productive. Unfortunately, this stability was not sustained for long periods of time.

There was a significant difference in how the two institutions tackled this challenge. At Texas College, the CME Church played a critical role in helping it maintain its financial position by contributing more than \$2 million annually during 1996-2002. At Huston-Tillotson College neither the United Methodist Church nor the United Church of Christ increased their annual contributions in light of the accreditation concerns. The annual contributions from both denominational partners remained constant at \$600,000 and \$100,000 annually. Instead, Huston Tillotson College emphasized increasing support from the corporate sector. The result was an average \$2 million in private gifts and grants during the period studied. Unfortunately both of these institutions have small donor pools and have difficulty in maintaining these levels of giving for long periods of time. This is why financial stability was a recurring theme for both institutions in their accreditation problems.

The most significant factor in the ability of both institutions to restore full accreditation was the appointment of new leadership. At both institutions there was a change in presidents during the *probationary* periods. These became pivotal moments in the respective reaffirmation processes. In 1994 at Texas College, the President that was selected to lead the institution back to accredited status came to the position with more than twenty years of higher education experience, including employment with the

Southern Association of Colleges and Schools. As one mid-level administrator expressed:

This man, our President, was a tried and true veteran of the process, and we knew that with his leadership, we would be successful.

In 2000, Huston-Tillotson selected another “accreditation veteran” as its president. He had served on several Reaffirmation and Special Committees, including the Special Committee that reviewed Huston-Tillotson College in 1993. The trustees of both institutions demonstrated their understanding of the severity of the accreditation situations through the appropriate appointment of these experienced leaders, and both decisions resulted in success.

#### **Leadership and Communication Assessments:**

The leadership and communication assessments also provided evidence of commonalities between the two case studies.

#### Huston-Tillotson College

The leadership assessment results varied substantially between the 1988-1992 period when there was a very high level of satisfaction, and the 1998-2000 period when there was a very low level of satisfaction. The drastic difference resulted from the change in institutional climate and culture that resulted from decisions made by the presidents. During both periods, all of the respondents reported having knowledge of the reaffirmation process. They were very satisfied with the manner in which the reaffirmation process was handled.

The leadership assessment results were very similar during for the 1992-1994 and 2000-2002 timeframes. During both periods interview respondents reported moderate

levels of satisfaction with both the institutional leadership and with the manner in which the accreditation activities were handled. The communication assessment varied. During 1992-1994, very few people on campus were aware of the College's accreditation problems. In contrast, during 2000-2002, everyone was aware of problems, but they did not know much about the specifics activities including the follow up reports or the interviews with the Committee on Criteria and Reports.

### Texas College

The interviews for the 1994-2002 period indicated a very high level of satisfaction with both the institution's leadership and the manner in which the reaffirmation process was handled. The campus community was highly aware of the reaffirmation process and there was a high level of satisfaction with the preparations for the site visits.

During the 2002-2003 period the level of satisfaction with the manner in which the accreditation was handled was much lower, and satisfaction with institutional leadership was lower still. The communication assessment results demonstrated that the level of awareness of the College's accreditation was very low.

The interviews at Huston-Tillotson and Texas College revealed that the institutional leadership on both campuses made decisions to share or withhold the details of the reaffirmation processes from the broader campus communities. During the 1992-1994 period at Huston-Tillotson and the 2002-04 period at Texas College, the leaders chose to make no formal announcements regarding the sanctions from SACS. During all of the periods, except 1994-2002 at Texas College, it was evident that the leaders did not share the details regarding the follow up reports or the interviews with the Criteria and

Reports committees. The two institutional leaders were asked to explain their rationales for withholding the details about the reaffirmation challenges. The responses included:

I favored a small, keep-it-close-to-the-chest method of operating. Therefore, there was no need to alarm the entire campus because I knew that we had the situation under control.

There was never any intent not to share the details. I think that our sole focus was on resolving the issues at hand, and there may have been times that we were not fully forthright, but there was never a decision made to conceal the events that were taking place.

As a member of the President's Cabinet, the researcher was surprised by the comments made by the respondents, and the interview ratings regarding the lack of communication at Huston-Tillotson College. During the 2002-2004 period, it was the researcher's experience that there was no deliberate attempt to limit the amount of information being shared with the campus community. The complexities of the recommendations and the limited amount of time provided to respond required an enormous amount of energy from the staff members working to resolve them. Consequently information flow was inhibited.

The final commonality between the two institutions was both troubling and problematic. At both institutions the relevant accreditation documents (site committee reports, follow up and progress reports, and other SACS correspondence) were dispersed among many offices and not maintained in any order. Given the high administrative turnover evidenced at both institutions, the failure to maintain comprehensive accreditation files in a central location made planning difficult. At both institutions there were many repeated findings in successive reaffirmation cycles that could have been

prevented if prior cycle records had been readily available and reviewed before beginning the subsequent process.

In summary, four issues contributed to the difficulties experienced by Huston-Tillotson and Texas College during their accreditation sagas. They included the lack of comprehensive institutional reaffirmation files, the impact of campus turmoil, inadequate/inappropriate institutional responses for follow up and progress reports, and financial stability. The colleges improved their accreditation status by solving financial problems, improving financial stability, and hiring new leadership experienced in accreditation matters. A full discussion of each of these issues is included in Chapter V.

## CHAPTER V

### SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

#### **Summary**

The significant rise in the number of Historically Black Colleges and Universities that have been sanctioned by the Commission on Colleges of the Southern Association of Colleges and Schools has drawn recent attention to the accreditation reaffirmation process. Using workshops and conferences as the primary vehicle to communicate the need for concern and to share strategies to successfully navigate the reaffirmation process, organizations such as the United Negro College Fund, the Southern Education Fund and the National Association for Equal Opportunity in Higher Education have begun to raise national awareness of the crisis at hand. Ultimately however, the true responsibility for maintaining and safeguarding institutional accreditation lies with the institutions themselves. The Historically Black Colleges and Universities that operate in the region covered by SACS must themselves become proactive and develop systems for understanding their own accreditation histories and the problems that have resulted in sanctions in order to plan for accreditation success. The patterns that emerged at two institutions were used to form the conceptual framework of this study.

#### **Purpose**

The accreditation and reaffirmation process is designed to provide validation of the appropriateness of the missions and purposes of institutions of higher education and to confirm that they have the resources necessary to provide the programs and services detailed in their mission statements. Unfortunately there has been a limited amount of research conducted on the reaffirmation experience. With the exception of the “how

to” publications developed by the Southern Association, the literature on reaffirmation and accreditation is limited, and there is little information on the institutional reaffirmation experience, either positive or negative.

From 1996 to 2002, forty-seven percent (21 of 45) of the private HBCUs within the Southern Association received some form of accreditation sanction, (either *notice, warning, probation, or membership revocation*). In Texas two of four private HBCUs reviewed during this timeframe received sanctions. The purpose of this study was to identify the institutional problems that led to the issuance of the sanctions and the steps taken to restore full accreditation, and to present the project’s findings and patterns as a tool for similarly situated institutions to use in planning for their reaffirmation processes. Accordingly, the study’s research questions were:

1. Why were the two institutions issued sanctions by the Southern Association of Colleges and Schools?
2. How did the two institutions restore their full accreditation status with the Southern Association of Colleges and Schools?

### **Methodology**

The methodology for this research involved a comparative case study approach, which included two individual case studies and a cross analysis of the two. Within the State of Texas, there are seven private HBCUs, four of which were involved in the reaffirmation process during the 1996-2002 period. The two institutions selected for this study, Huston-Tillotson College and Texas College, were the two institutions that were sanctioned by SACS during this time.

The interview protocol for this study focused on the two research questions and examined institutional leadership and communication during the reaffirmation processes. As mentioned previously, there were a total of twenty-nine interviews conducted, eighteen at Huston-Tillotson College and eleven at Texas College. The interviewees included four current and previous presidents, eight vice presidents, thirteen mid-level managers (Division Chairs, Registrars and Deans) and four faculty members.

The data was presented using time “cycles” to define specific timeframes within each institution’s accreditation process. Three cycles were used for both institutions. For the Huston-Tillotson College case study, the Cycles represented the following periods:

- Cycle I - represented the years 1988-1992 and 1998-2000,
- Cycle II - represented the years 1992-1994 and 2000-2002, and
- Cycle III – represented the years 2002 – time of writing

At Texas College, the Cycles represented the following periods:

- Cycle I – represented the years 1994-2001,
- Cycle II – represented the years 2001-2003, and
- Cycle III – represented 2004 – time of writing.

The data analysis techniques of Hueberman and Miles which include data reduction, data display and conclusions drawing/verification were used to develop the case studies.

Preparations for the data collection at Huston-Tillotson College were facilitated through frequent communication and contact with the College’s Executive Assistant to the President and the Librarian, both of whom had been long term employees of the institution. The actual collection of data occurred during November 2003. Preparations

for the visitations at Texas College were not as easily facilitated. A visitation schedule was not confirmed until May 2004. The actual visits occurred during June and July 2004.

Interviews, participant observations, and document review (self-studies, follow-up and progress reports, financial statements and audits, and SACS correspondence) provided the data for this study. Coding, reflection, mapping and transcription were used to analyze each case study. In addition member checking strategies were employed by sharing the initial findings and case study summaries with institutional representatives to verify the accuracy of the information reported.

### **Key Findings:**

Four factors were found to contribute to the difficulties experienced by Huston-Tillotson and Texas College during their accreditation sagas. They included the lack of comprehensive institutional reaffirmation files, the impact of campus turmoil, inadequate/inappropriate institutional responses in follow up and progress reports, and financial stability.

1. The lack of comprehensive institutional reaffirmation files inhibited the ability to plan effectively for and respond to the recommendations and concerns of the Commission on Colleges. At Texas College, a former president removed institutional reaffirmation documentation that severely handicapped his successor in preparing responses for a follow up report. At Huston-Tillotson College, Reaffirmation Committee recommendations were repeated in two consecutive cycles as a result of the inaccessibility of files from prior reaffirmation processes. In several instances, the administrators at Huston-Tillotson College reported “new” processes in response to recommendations made by visiting committees

- that were identical to processes previously utilized and reported to SACS in prior responses.
2. Campus turmoil affected the reaffirmation process. At both institutions there was evidence that college employees used Reaffirmation and Special Committee visits as a vehicle to vent frustrations about administrators and institutional processes. The result at both institutions was increased numbers of recommendations from the Committees. Many of these issues would have been better handled internally.
  3. The inadequate/inappropriate institutional responses that were submitted to the Commission on Colleges by both institutions resulted in the issuance of sanctions. For example, in 1992, both institutions were placed on notice. The decision to sanction Texas College was the result of the failure to demonstrate substantive progress in addressing the recommendations of a Special Committee. At Huston-Tillotson College, the sanction was issued because the College's administrators failed to include the FY1991 audit reports in the Second Follow-Up Report as requested by SACS.
  4. Both institutions were continuously challenged to demonstrate financial stability. Both experienced high turnover in the position of Chief Financial Officer, volatile revenue and debt patterns, material weaknesses and reportable conditions in annual audit reports, and non-compliance with federal regulations. The underlying causes for the recurring financial stability concerns at both institutions mirror those identified by KPMG presenters at a Financial Issues and Accreditation Conference in Atlanta, Georgia sponsored by the Southern Education Foundation, Inc in June 2004. The KPMG list of problem indicators

was compiled using data from a cross-section of institutions within the Southern Association that had been cited for financial stability concerns. Table I shows that Huston-Tillotson College exhibited eight of the problem indicators for financial concern, and Texas College exhibited nine.

**Table I Financial Problem Indicators**

<b>Financial Problem Indicator</b>	<b>Huston-Tillotson College</b>	<b>Texas College</b>
1. Continuous cash flow shortages	X	X
2. Lack of timely interim financial information	X	X
3. Vendor complaints of delayed payments	X	X
4. Borrowing from endowment and other restricted funds	X	X
5. Delays in collection of outstanding receivables	X	X
6. Significant comments and weakness cite in annual audit	X	X
7. Deficits in unrestricted operations	X	X
8. Losses on auxiliary activities		X
9. Violation of debt covenants		
10. Issues related to federal funding agencies	X	X

(Milton McGuirt - KPMG Presentation, June 4, 2004 – Southern Education Fund Reaffirmation Conference)

Four factors were also found to contribute to the restoration of full accreditation status with SACS. They included the resolution of audit findings, improved financial stability, demonstrated use of administrative and academic program evaluation results, and new leadership.

1. In an effort to restore full accreditation status with SACS both institutions were required to address and resolve their audit findings. In most instances this involved developing or enhancing departmental policies and procedures and securing training for staff members.
2. The demonstration of improved financial stability at both institutions included a heavy emphasis on securing unrestricted private gift and grant revenue. At Huston-Tillotson College, the focus was on corporate donors to raise unrestricted

revenue to demonstrate financial stability during the 2002-2002 probationary period. Texas College, on the other hand, relied on its denominational partner, the CME Church, during 1997-2001, when it was working to regain its accreditation. (It is important to note, however, that following the reinstatement of Texas College's accreditation in December 2001, the Church stopped providing this support. The Church's failure to honor the \$2million pledge made in December 2001 was one of the major factors why SACS placed Texas College on probation in January 2004). For both institutions, having the ability to secure additional unrestricted funding contributed significantly to their ability to demonstrate financial stability.

3. Both institutions placed a considerable amount of effort in demonstrating the use of administrative and academic program evaluation results in their planning processes. It took several years to demonstrate the use of the evaluation results in the annual planning process.
4. Hiring experienced presidential leaders who were familiar with the reaffirmation process was paramount to the success of both institutions in solving their accreditation problems. In both instances the presidents' familiarity with SACS officials and the reaffirmation process forged the path for successful reaffirmation.

## **Conclusions and Implications**

The history between the Commission on Colleges of the Southern Association of Colleges and Schools and Historically Black Colleges and Universities is one that is rooted in suspicion and concern. The realities of these tensions coupled with the fact that there are many who now question the continued need for Historically Black Colleges and Universities requires that these institutions become proactive in preparing for and successfully navigating the accreditation reaffirmation process. To respond effectively to the high levels of administrative turnover and the limited human and financial resources available, HBCUs should first develop comprehensive institutional records to preserve the history of the institution and to support more efficient planning for critical institutional activities such as accreditation reaffirmation. Campus leaders that are unaware of their institutions' accreditation history are bound to repeat mistakes and will "reinvent the wheel" unnecessarily.

Institutional leadership must take an active role in developing processes and venues to resolve institutional turmoil and conflict. In those instances where the conflict involves the chief executive officer, members of the governing board must initiate processes for resolution before the issues become external concerns which may ultimately compromise the future viability of the institution. Institutional leaders must also communicate the inappropriateness of members of their campus community using the accreditation process as a vehicle for communicating dissatisfaction with administrators or administrative processes.

Given the gravity associated with the loss of accreditation and the implications of extended sanctions, campus administrators must take the time to prepare follow up and

progress reports carefully, and they must be sure that responses include all required documentation. These institutions can not afford to blatantly disregard a report requirement or respond inappropriately or incompletely to a recommendation. Such actions can/will lead to sanctions and possibly to loss of accreditation.

Historically under-funded, these institutions must meet the number one challenge facing private HBCUs across the region, the ability to demonstrate financial stability. While these institutions may never have sizable endowments, large donor pools, significant long-term contributors or a paying student clientele, they can work to manage their financial operations better. The enhancement of the institutional financial operations must include stronger emphasis on compliance with federal programs, resolution of audit findings, compliance with debt covenants, and suspension of borrowing from endowment funds.

HBCUs, specifically private HBCUs, should conduct rigorous self-evaluations to determine if any of the financial problems identified by KPMG are present. If they are, strategies should be developed for their resolution. Through the development of comprehensive institutional files/records, continuity can be maintained in financial reporting even when there is high turnover in chief financial officers. Presidents from these institutions must understand that they can not isolate themselves before, or during, the reaffirmation process. They must avail themselves to professional development opportunities. They should establish communication with colleagues at comparable institutions who have successfully navigated the process, and especially those that have been developed strategies for success.

Finally, the governing board members at these institutions must act responsibly in the appointment of presidential leadership. Small, non-selective, private Historically Black Colleges and Universities require committed, knowledgeable and experienced leadership. These institutions can not be used as training grounds for new and inexperienced leaders; the challenges are too great and the stakes are too high. The researcher believes that there is a continued need for institutions like Huston-Tillotson and Texas College because they serve a student population that would otherwise be left out of the higher education equation. These institutions must therefore work to preserve their legacy.

### **Recommendations for Future Research**

- The findings and conclusions of this study suggest further research possibilities.
1. Since this project provided substantive findings concerning the reasons why Historically Black Colleges and Universities have been sanctioned, further study is recommended to review a sample of comparable majority institutions that have been sanctioned by SACS. This would provide increased comparability and might make the results more generalizable.
  2. A similar study could be conducted on the other private HBCUs within SACS who have lost their accreditation status. An examination of the causes for their loss of accreditation and the actions that have been taken to restore their membership status could provide additional comparability for the results of this project.
  3. It is recommended that a similar study be conducted on two private HBCUs of similar size within SACS whose accreditation was reaffirmed without sanction to

- further allow for comparability and to develop best or recommended practices for similar institutions.
4. A study that compares the experiences of HBCUs with SACS and the experiences of HBCUs with other regional accrediting agencies, such as the Middle States Association of Colleges and Schools or the North Central Association of Colleges and Schools, would be helpful to determine regional differences.

### **Summary**

During the period 1996-2002, 47% of the private HBCUs in SACS were sanctioned. The statistics within Texas mirrored the regional statistics because two of the four private Texas HBCUs (50%) were sanctioned during this period. The purpose of this study was to analyze and document the factors that led to the sanctions at Huston-Tillotson and Texas College and the factors that led to both institutions restoring their full accreditation with SACS. As demonstrated through in the study's results, administrative decisions at both institutions provided the underlying causes for the sanctions, including the lack of comprehensive accreditation files/documents, unresolved campus turmoil, inadequate/incomplete responses to SACS recommendations, and a lack of financial stability.

Given the critical role that HBCUs have played within the African American higher education communities, it is imperative that they better prepare themselves for the accreditation process. From their inception until 1991, HBCUs have been responsible for awarding 70% of all baccalaureate degrees awarded to African Americans in the United States. While less than 20% of the nation's African American college students attend HBCUs, these institutions are responsible for awarding one-third of the

baccalaureate degrees earned by African Americans (Roebuck and Murty, pgs. 42-43). The role of the HBCU is broader than simply being an institution of higher learning; historically these institutions have served as repositories for black culture and heritage, have provided leadership and role models for their local communities, and have produced graduates such as Thurgood Marshall, Martin Luther King, Jr., Jesse Jackson, and Former Secretary of Labor Alexis Herman, all of whom have played a role in changing the course of American life.

Looking forward to a nation and state that are projected to become majority - minority within the next decade, the need for institutions that serve special populations is ever increasing. In Texas, the minority population will exceed 50% by 2010. As many of the nation's flagship institutions debate the legality and constitutionality of race-based admission policies, minority students will need to consider all of their higher education options. The need for HBCUs continues and the administrators at these institutions must prepare themselves to navigate the accreditation reaffirmation process successfully in an effort to maintain their institutions' legacy.

## APPENDIX A

### Huston-Tillotson College Accreditation Timeline (1986-2003)

- January 9, 1986 – President, Dr. John Q. Taylor King received approval for the request to postpone SACS self-study for one year period. Self-study then scheduled to begin in 1988, with the site visit scheduled for spring 1990 and action on accreditation to be taken in December 1990.
- January 13, 1988 – President King submitted a status report on Huston-Tillotson College's Plan to comply with Section III of the Criteria for Accreditation: Institutional Effectiveness.
- January 28, 1988 – College conducted Self-Study Session with Dr. E. Jean Walker, Associate Executive Director of the Commission on Colleges and Schools. Institutional members that attended included: cabinet members, faculty members, and self-study steering committee members.
- July 1, 1988 Dr. Joseph Turner McMillan became President of Huston-Tillotson College.
- October 1989 – Sherman Jones, Executive Vice-President of Tuskegee University visited to provide consulting services on institutional effectiveness and to draft the Education and Student Support chapter of self-study report.
- February 1990 – College received notice that Dr. Walker would be taking an extended leave of absence due to illness and that Dr. Sites would be working with the college during the reaffirmation process.
- In June 1990, the College received the report of the reaffirmation committee which included (27) recommendations. (See Appendix C for complete listing of recommendations). Institutional responses to Reaffirmation Committee report were due to SACS by **October 15, 1990**.
- January 22, 1991 – the College received notification that its accreditation had been reaffirmed. A follow-up report was requested by **October 15, 1991**. The follow-up report was to include progress made by the College in addressing the cumulative deficit and institutional indebtedness and the other recommendations.
- January 1992 – College was informed that the first follow-up report had been accepted, and was requested to submit second follow-up report by **May 1, 1992**. The focus of this report included the progress made in addressing the cumulative deficit and institutional indebtedness.

- February 1992 – College sent apologies for not submitting its Institutional Profile report as a result of a late financial audit.
- May 1992 – College received correspondence regarding the absence of the financial audit and management letter from the April 1992, Second Follow-Up Report. The College was required to submit financial audit via overnight express mail upon receipt at the end of May, so that could be reviewed at the June 18<sup>th</sup> & 19 SACS meeting.
- July 1992 – the College was placed on **notice** for not submitting the 1991 financial audit and was required to submit a third follow-up report, due **October 15, 1992**. The October follow-up report was required to include 1990-91 and 1991-92 financial audits and management letters.
- October 14, 1992 – the College submitted its third follow-up report complete with the 1990-91 audit, and a schedule for the completing of the 1991-92 audit.
- December 1992 – the College is placed on **notice** for continued deficiencies in Section 6.3.1 (Financial Resources) and required to submit a fourth follow-up report.
- March 1993 – Patricia Hayes, President of St. Edward’s University, submitted recommendations to the College on how to proceed with SACS. The recommendations that were provided dealt with how to best present the financial position of the College to SACS.
- April 1993 – the College submitted its fourth follow-up report that included the 1992 audit, a 1993-94 budget projection, and a five-year budget outlook.
- July 1993 – the College received notification that its fourth follow-up report had been accepted and that the College had been removed from **notice**. The College was required to submit a fifth follow-up report complete with the FY1993 audit and details of progress made in meeting enrollment targets, fund-raising and expenditure goals. The College was also informed that a Special Committee had been authorized to visit the College in the fall of 1993. Included in the July 12, 1993 correspondence was the following language: “the Committee on Criteria and Reports wanted us to communicate to you that if, at the time of the Special Committee visit and subsequent review by the Committee in December 1993, the institution is either not in compliance with the Criteria Section 6.3.1 (Financial Resources) or has not met the projected reduction in \$750,000 of the cumulative deficit as of the 1992-93 audit report, this Committee will recommend placing the institution on Warning” (James Rogers, personal communication, July 12, 1993).
- August 27, 1993 – the College received notification that Dr. Julius Scott of Paine College would be serving as the Chair of the Special Committee, scheduled to visit, October 18 -20, 1993.

- September 1993 – President, Dr. Joseph Turner McMillan explained assignments to the members of his cabinet and assigned them with the responsibility for coordinating the second “self-study” process and making arrangements for the visiting team.
- November 1993 – College received the recommendations from the Special Committee. (See Appendix D for complete listing of recommendations)
- November 1993 – the College submitted its responses to the report of the special committee.
- January 1994 - the College was informed that its fifth follow-up report had been accepted and that a sixth follow-up report would be required by **October 10, 1994.**
- January 1995 – the College received notice that its sixth follow up report had been accepted and that no further follow-up reports were required.
- May 1997 – College received correspondence regarding the impending 1998 self-study process.
- July 1997 – College received notice about self-study kick off meeting tentatively scheduled for February 12, 1998.
- January 1999 – SACS notified the institution that they have been contacted by the United States Department of Education concerning problems identified in the administration of financial aid funds.
- January 1999 – the College received notification that Dr. William L. Proctor of Flagler College would chair the Reaffirmation Committee scheduled to be conducted February 14 – 17, 2000.
- March 1999 – after receiving copies of the 1998 audit, SACS requested additional information:
  1. A statement indicating steps that the College had taken to prevent further problems in the administration of its financial aid problems;
  2. A copy of the 1998 financial aid audit;
  3. A copy of the USDOE Final Program Review Determination Letter;
  4. A statement indicating whether the institution had been placed on reimbursement status with the Department or other unusual arrangements;
  5. A copy of the institution’s FY 1999 budget showing (a) actual revenue/expenditures year-to-date, and (b) projected end-of-year balances.
  6. An indication of the institution’s total indebtedness;
  7. The date when the FY1999 audit would be available.

Due date for the receipt of the materials was April 30, 1999 (Tom Benberg, personal communication, March 5, 1999).

- May 1999 - the college received official notification that institutional representatives would be interviewed by the Committee on Criteria and Reports during the June 1999 SACS meeting in Asheville, NC. The institutional representatives that attended the meeting included: Dr. McMillan, President; Bryan Dome, Chief Fiscal Officer and Bronte Jones, Assistant Dean of Financial Services. In addition, the College was required to provide the following documentation by May 12, 1999:
  1. Statement indicating steps that the College had taken to prevent further problems in the administration of its financial aid problems;
  2. FY1997 and FY1998 audits and management letters;
  3. FY1997 and FY1998 financial aid audits;
  4. USDOE Final Program Determination Letter;
  5. Institutional response to USDOE Final Program Determination Letter;
  6. USDOE letter removing the institution from reimbursement;
  7. Updated Statement of Activities forecast through the end of the year;
  8. An indication of the institution's total existing indebtedness broken out for capital items and for operations, including lines of credit;
  9. Actual enrollment in FTEs for FY1997 and FY1998 together with projected enrollment in FTEs for FY2000
  10. Such other pertinent information that would bear in the institution's financial stability and sufficiency as described in the Criteria for Accreditation, 1998 Edition, Section I, Condition of Eligibility Number Thirteen, and Section VI, subsection 6.3.1 (Tom Benberg, personal communication, May 4, 1999).
  
- July 1999 – the College received notification that it had been placed on **notice** for a twelve month period for failure to comply with 6.3.1 (Administrative Processes and Financial Resources). The College was also required to provide the following items at least four weeks prior to a Reaffirmation Committee visit scheduled for February 2000.
  1. Two most recent audit reports and management letters;
  2. Most recent A133 or A128 financial aid audit;
  3. Statement of financial activities;
  4. Statement of indebtedness;
  5. FTE enrollment for FY 1998, 1999 and 2000 with projections for 2001;
  6. Correspondence showing status with USDOE (James Rogers, personal communication, July 9, 1999).
  
- August 1999 – the College received formal notice of the revised dates for the on-site Reaffirmation Visit and the appointment of Dr. Keith Keeran as the Chair of the Reaffirmation Committee. The site visit was scheduled for March 26-29, 2000.

- May 2000 – the College received the recommendations of the Reaffirmation Committee. (See Appendix E for detail on recommendations) Institutional responses to Reaffirmation Committee report were due to SACS by **August 29, 2000**.
- June 2000 – the College was informed that institutional representatives would be interviewed by the Committee on Criteria and Reports at the June SACS meeting in Savannah, GA. The institutional representatives that attended the meeting included: Mr. William Bobo, Chair of the Business and Audit Committee of the Board of Trustees, Dr. Larry Earvin, President- Elect, Dr. McMillan, President, Bryan Dome, Chief Fiscal Officer and Bronte Jones, Assistant Dean of Financial Services.
- July 1, 2000 Dr. Larry Earvin became President of Huston- Tilloston College.
- July 2000 – the College received notification that it has been placed on **warning** for six months for failure to comply with Criteria: Section 1.4 (Conditions of Eligibility Eight and Thirteen). The institution was required to submit a second follow-up report due **September 20, 2000**.

The College was required to provide documentation of an appropriate plan, as well as functioning planning and evaluation process, which integrated projected educational, physical and financial development and incorporated procedures for program review and institutional improvement. The institution was also required to provide documentation of an adequate financial base to accomplish the institution's purpose at an acceptable level of quality on a continuing basis. Finally, the college was to provide copies of the last two financial audits and management letters, and the most recent A133 or A128 financial aid audit (James Rogers, personal communication, July 7, 2000).

- August 2000 – the College received notification from SACS that its request for an extension on the follow-up reports due on August 29, 2000 and September 20, 2000 had been granted. Both follow up reports were due on **October 16, 2000**.
- November 2000 – the College was informed that institutional representatives would be interviewed by the Committee on Criteria and Reports at the December SACS meeting in Atlanta, GA. The institutional representatives that attended the meeting included: Dr. Larry Earvin, President and Beverly Brown, Business Manager.
- January 2001 – the College received notice that SACS had accepted the College's second follow-up report and continued the College on **warning** for six months for failure to comply with *Criteria* Section 1.4 (Condition of Eligibility Eight). A follow-up report was due on **April 23, 2001**.

- January 2001 – the College hosted Margaret Sullivan, Director of the Consulting Network of the Commission on Colleges, to conduct a training session on institutional effectiveness.
- July 2001 – the College received notification that it had been placed on **probation** for twelve months for failure to comply with *Criteria*: Section 3.1 (Planning and Evaluation: Educational Programs); Section 3.2 (Planning and Evaluation: Administrative and Educational Support Services); Section 4.8 (Academic and Professional Preparation- Baccalaureate); and Section 6.3.1 (Financial Resources). **Note:** The College was also notified that a Special Committee would visit the College and that it was required to submit a follow-up report at least two weeks prior to the Special Committee visit, but no later than April 22, 2002.
- November 2001- The Fiscal and Strategic Technical Assistance Program (FASTAP) team from UNCF scheduled a visit to help ensure that the institution's processes were in compliance with SACS standards. (FASTAP, is a UNCF consulting team, that assists its member institutions resolve fiscal, financial aid, and planning issues) (Drewery and Doermann, pg. 266).
- January 2002 – the College received notification that a Special Committee had been appointed to conduct a site visit April 22-24, 2002.
- May 2002 – – the College received the recommendations of the Special Committee. The recommendations included one combined recommendation in Section VI – Administrative Processes. Specifically, the College was required to provide evidence that the institution had sufficient resources to support all of its programs and that it has the financial stability essential to its successful operation (Tom Benberg, personal communication, May 13, 2002). The institutional responses were due to SACS by **May 31, 2002**.
- July 2002 – the College received notification that it has been continued on **probation** for six months for failure to comply with *Criteria* Section 6.3.1. Specifically, the College was required to provide evidence that it had sufficient resources to support all of its programs and the financial stability essential to its successful operation (James Rogers, personal communication, July 3, 2002). A follow-up report was due **September 16, 2002**.
- September 2002 – the College received acceptance of its request for an extension on the due date for the latest follow-up report. The new due date was **September 30, 2002**.
- January 2003 – the College received notice that has been reaffirmed and that the next follow-up report was due **April 15, 2005**.

## APPENDIX B:

### Texas College Accreditation Timeline (1992-2004)

- September 16-18, 1992 - SACS consulting committee visited the college and cited the following issues of non-compliance:

Condition 1. In obtaining or maintaining accreditation with the Commission on Colleges, an institution agrees to the following:

- a. That it will comply with the *Criteria for Accreditation* of the College Delegate Assembly consistent with the policies and procedures of the Commission on Colleges.
- b. That the Commission on Colleges, as its discretion, may make known to any agency or member of the public requiring such information, the nature of any action, positive or negative, regarding the institution's status with the Commission.
- c. That it will comply with the Commission requests, directives, decisions and policies, and will make complete, accurate and honest disclosure.

Condition 8. The institution must have an appropriate plan, as well as a functioning planning and evaluation process, which identifies and integrates projected educational, physical and financial development, and incorporates procedures for program review and institutional improvement.

Condition 9. The institution must have published admission policies compatible with its stated purpose.

Condition 13. The institution must have an adequate financial base to accomplish its purpose at an acceptable level on a continuing basis (Haywood Strickland, 1997, pgs. 1-2).

- December 1992 - The institution was placed on **notice** for:

5.3.1 Student Records

6.1.2 Governing Boards

6.3.1 Financial Resources

6.3.2 Org. for the Admin. of Financial Resources

6.3.3 Budget Planning

6.3.4 Budget Controls (Haywood Strickland, 1997, pg 2).

- May 1, 1993 - **Status report was due.**

- June 1993 - The institution was placed on **warning** for six-months for failure to comply with:

- 3.1 Planning & Evaluation
- 6.1.2 Governing Board
- 6.1.5 Administrative Organization
- 6.3.1 Financial Resources
- 6.3.2 Org. for
- 6.3.3 Budget Planning
- 6.3.4 Budget Control (Haywood Strickland, 1997, pg. 2).

- September 15, 1993 – **Progress report was due.**
- November 10-12, 1993 - Special committee visit that resulted from being placed on **warning** in June 1993.

There were (19) recommendations that resulted from the special committee visit:

- 1. Principles and Philosophy of Accreditation,
- 2. Institutional Purpose,
- 3. Institutional Effectiveness
- 3.1 Planning and Evaluation,
- 3.2 Institutional Research,
- 4. Undergraduate Programs,
- 5. Educational Support Services,
- 6. Administrative Processes,
- 6.3.1 Financial Resources,
- 6.3.2 Organization for the Administration of Financial Resources,
- 6.3.3 Budget Planning,
- 6.3.4 Budget Control,
- 6.3.6 Accounting, Reporting, and Auditing, and
- 6.3.7 Purchasing and Inventory Control (Haywood Strickland, 1997, pg. 3).

- December 1993 - College placed on **probation** for one-year for:

- 1.4 Conditions of Eligibility Eight, Nine, Twelve, and Thirteen
- 3.1 Planning and Evaluation,
- 6.3.1 Financial Resources,
- 6.3.2 Organization for the Administration of Financial Resources,
- 6.3.4 Budget Control (Haywood Strickland, 1997, pg. 3).

- May 2, 1994 - **Follow up report due.**

- June 1994 - Texas College appeared before the SACs Criteria & Reports Committee and was **continued on probation** for six months for failure to comply with all six sections of the *Criteria*.
- July 1994 - President Patton resigned taking many of the materials needed for the September visit.
- September 1994 - Reaffirmation/Special Committee visit occurred. Visit resulted in (74) recommendations & 13 suggestions from all six sections of the criteria (see Appendix F for detailed recommendations).
- November 21, 1994 - follow up report to the September 1994 Special Committee visit submitted.
- September 1, 1995 - second follow up report was due.
- September 18-21, 1995 - the Special Committee visited resulting in (35) recommendations (see Appendix G for detailed recommendations).
- December 15, 1995 - Texas College appealed the removal from membership on the grounds that the Commissions action was arbitrary, that is, unreasonable and not based on, or consistent with, the published criteria for accreditation. At the time of the appeal, the college provided evidence that it had resolved many of the 74 recommendations and should be considered for continued membership. The Commission stated that since this information had not been available at the time of the decision, it could not be considered.
- May 10, 1996 - the College was removed from membership with the Commission on Colleges.
- June 1996 - the College applied for renewal of its membership with the Commission of Colleges of the SACS. At the same time, Texas College applied and received a two-year certificate of authority from Texas Higher Education Coordinating Board (THECB) to award degrees in the state of Texas

The process to receive this authority took six months to complete and included:

1. Preparation of a written application responding to 24 standards
  2. Site visit by a reviews team
  3. Examination & recommendation by the Certification Advisory Council
  4. Final decision by the coordinating board (Haywood Strickland, 1997, pg. 13).
- October 22-23, 1996 - the THECB conducted an on-site visit at the College and determined that the institution met 23 of 24 THECB standards. The college did not satisfy standard 12- Financial Resources & Stability. “The committee concluded on Standard 12 that the College did not appear to have an adequate

financial base to accomplish its purpose at an acceptable level on a continuing basis (Strickland, 1997, pg. 13).

- December 13, 1996 - Certificate Advisory Committee voted 5-0 that the college would be authorized to administer each of its eligible degree programs. This decision was critical because the College's ability to begin the SACS self-study was contingent upon receiving this certificate of authority.
- December 1996 - SACS voted to allow the College to begin a self-study and receive an Accreditation (Candidacy) Committee Visit.
- September 1997 - the Visiting Accreditation Candidacy Committee found that the College was in compliance with the 13 basic Condition of Eligibility for membership. (Dr. James Dean, Chair of the Committee)
- December 1997 - the college received candidacy status which made the institution eligible to participate in the Federal Title IV financial aid programs. The institution's eligibility was retroactive back to January 1997.
- January 1998 - the College launched a comprehensive self-study.
- March 29 – April 1, 1999 - the Accreditation Committee visit resulted in 20 recommendations (see Appendix. K for detailed recommendations).
- December 1999 - the institution appeared before SACS and was granted candidacy status for a maximum of two years. A follow up report was due September 20, 2000 addressing Sections 1.4 and 6.1.2 and documenting compliance with Condition of Eligibility Thirteen – effective financial oversight by the Board of Trustees.
- December 11, 2000 – the college received notification that an Accreditation Committee would visit March 11- 14, 2001.
- March 11- 14, 2001 - there were four recommendations that resulted from the Accreditation Visit:
  1. Section 5.4.3.2 Student Government, Student Activities and Publications
  2. Section 6.3.1 Financial Resources
  3. Section 6.4.2 Building, Grounds and Equipment Maintenance
  4. Section 6.4.3 Safety and Security
- August 2001 - the institution submitted the final follow-up report addressing the above mentioned recommendations including a schedule of contributors/donors to the College.

- December 2001 - the College was reaffirmed and required to submit a progress report September 2002.
- January 2003 – The institution was informed by SACS that a second follow up report would be required by September 2003 to address Section 6.3.1- Financial Resources. It was also informed that it might be placed on probation if it is determined that it did not maintain compliance with the standards for a maximum of two years. (James Rogers, personal communication, January 10, 2003).
- October 6, 2003 – The institution was asked to provide the following documentation to compliment the second progress report by October 15, 2003.
  1. Institutional response to the FY03 management letter from the auditors.
  2. A complete report on the \$2 million pledge from the CME Church.
  3. An explanation of the institution’s unfunded institutional financial aid.
  4. Additional responses to various business operations questions (i.e. unrestricted net assets, cash balances, instruction expenditures, and auxiliary enterprises) (Tom Benberg, personal communication, October 6, 2003).
- January 27, 2004 - the institution received notification that it had been placed on probation for a period of one year for failure to comply with the following sections of the *Principles*: Section I – Institutional Integrity, Sections 3.10.1 and 3.10.4 (Financial Resources). The institution was required to provide evidence that it was ensuring integrity in its accreditation activities with Commission on Colleges by providing an update on the \$2 million dollar pledge from the CME Church. Additionally, the Commission expressed concern about the increased levels of debt and accounts receivable. The institution was required to provide evidence that budget controls were being implemented and that it had a budget that had been approved by the Board of Trustees. The progress report was due on September 22, 2004 ( James Rogers, personal communication, January 27, 2004).

## APPENDIX C:

### Huston-Tillotson College - 1990 Reaffirmation Committee Recommendations (27):

#### Section II: Institutional Purpose

1. That the College use the statement prescribed by the Southern Association of Colleges and Schools when referring to its status of accreditation in all official publications (1.6) \*

#### Section III: Institutional Effectiveness

2. That the institution continue to refine and strengthen procedures for planning and evaluation by immediately proceeding to bring the long-range plans for education, facilities and finance into a five-year comprehensive master plan in support of “Institutional Vision” noted in the *Strategic Plan 1990-95* and the capital needs identified in *Facilities Master Plan*. (3.1)

#### Section IV: Educational Program

3. That the institution submits the newly developed Comprehensive Master Plan to the Commission on Colleges by May 1, 1990. (3.1)
4. That the institution develop and further define the institutional research function with primary attention to the nature of the role and the allocation of sufficient staff and resources to ensure continuous study, analyses, and appraisal of institutional purposes, policies, procedures and programs. (3.2)
5. That the institution specify, in all official publications of the College, the maximum and minimum credit hours required for each degree program. (4.1.2)
6. That the College engage in an extensive review of organizational structure of the Developmental Studies Program in order to more clearly identify the leadership and coordination responsibilities for the implementation of policy for the function. (4.1.3)
7. That the institution evaluate the adequacy of the current assessment tools now being utilized for placement into the Developmental Studies courses (as well as standardized measurement instruments utilized to assess outcomes at the junior and senior year level) in order to determine the reliability of the present instruments or the need for the identification and utilization of more appropriate assessment procedures. (4.1.3).
8. That the faculty of the Division of Humanities, Social Sciences and Math/Science assist in the development of outcome expectations and the levels of proficiency required for successful completion of Developmental Studies conducting a comprehensive analysis and determination of “threshold levels” of competency which attest to the possession of minimum skills (4.1.3)

**Huston-Tillotson College - 1990 Reaffirmation Committee Recommendations (27):  
(Cont'd)**

9. That the College require all departments to undertake an extensive analysis of offerings in order to assure the development and implementation of an orderly sequence of courses leading to all degrees offered by the institution (4.1.3)
10. That the institution complete the development of evaluation plans for the major programs and assure that all evaluation plans include---but not be limited to---strategies for determining objectives, appropriate assessment tools and utilizing the results of assessment to improve the overall quality and effectiveness of the education program. (4.1.4).
11. That the College review and revise all course outlines to provide clearer understanding of the goals and requirements of each course, the nature of the course content and the methods of evaluation to be employed. (4.1.4)
12. That the percentage of courses taught by persons holding the doctorate (or appropriate terminal degree) be raised to 25% in the departments of Physical Education and Recreation and in Business Administration and Economics. (4.4.2.2)
13. That the institution take the steps to ensure that 40% of the course credits above the associate degree level in the areas of Education and Business Administration be taught by faculty members holding the appropriate terminal degree. (4.4.2.2)
14. That the institution prepare and implement a plan to use the results of faculty evaluations for the improvement of instruction and the educational program (4.4.8)
15. That the institution develop and appropriately disseminate comprehensive policies and conditions for the employment of part-time faculty members. (4.4.9).

**Section V: Educational Support Services**

16. That the College implement a comprehensive collection development plan, for the library, consistent with the five-year master plan of the College, including an assessment of the books, periodicals, indexes, and other information resources required to meet the needs of existing academic programs and a strategy for determining and meeting the needs of new curricula offerings to support the overall educational programs of the institution. (5.5.2)
17. That the institution establish policies and priorities for computer usage which are consistent with the purpose and goals of the institution. (5.4)
18. That the institution develop specific goals for each unit in Student Development Services and that these goals be used as part of the total assessment program of the College. (5.5)

**Huston-Tillotson College - 1990 Reaffirmation Committee Recommendations (27):  
(Cont'd)**

19. That the College develop and publish policies that provide a clearly written statement regarding the role and control of student publications. (5.5.2.2)
20. That the College develop and implement a procedure to insure that there are complete back-up files of all academic records, and that the College take all appropriate steps to insure physical security of all student records. (5.5.2.4)
21. That the institution establish a policy concerning the kind of information which will be made a part of the permanent record of each student, as well as a policy governing the retention and disposal of records. (5.5.2.4)

**Section VI: Administrative Processes**

22. That the Board of Trustees of the College better understand its collateral responsibility to secure financial resources for the College and that the Board strengthens its role to raise money for the College. (6.1.2)
23. That the institution develop and implement future financial and fund-raising plans to specifically address its accumulated fund balance deficit and the outstanding note due in 1993, including efforts directed toward the vigorous solicitation of funds from foundations, corporations, and alumni. (6.3)
24. That the College review its staffing needs in the Business Office. (6.3.2)
25. That the institution take steps to ensure that in future years, the audit report and management letter be finalized in a more timely fashion and that the 1989 management letter be submitted to the Commission on Colleges with the College's response to the *Reaffirmation Committee Report*. (6.3.6)
26. That the Board of Trustees of the College review and appropriately amend the Investment Policy Statement of the institution, after appropriate consultation with other institutions of higher education and/or experts in college investments. (6.3.10).
27. That the College develop one comprehensive policy which encompasses all of the *Criteria* statements related to externally funded grants and contracts. (6.5)

## **APPENDIX D:**

### **Huston-Tillotson College - 1993 Special Committee Recommendations (7):**

#### **Section III: Institutional Effectiveness**

1. The Committee recommends that the institutional research function be made an essential element in internal planning and evaluating the institution's success in carrying out its purpose. (3.2)

#### **Section IV: Educational Program**

2. The Committee recommends that the College take appropriate steps to ensure a student enrollment of adequate size to support an effective educational program.
3. The Committee recommends that the College use every available option to address faculty salaries and benefits as soon as possible.

#### **Section V: Educational Support Services**

4. The Committee recommends that library collections and databases be sufficient to support the educational, research, and public service programs of the institution. (5.2.3)
5. The Committee recommends that the College provide library staff adequate to discharge technical responsibilities and to provide appropriate access to the collections, facilities, and services of the library. (5.2.4)

#### **Section VI: Administrative Processes**

6. The Committee recommends that the College review its administrative and organizational structure, and develop and implement plans creating a more economic and efficient framework for institutional operations. (6.1.5)
7. The Committee recommends that the College develop and implement a financial plan to specifically address the immediate and long-term cash requirements of the College, eliminate interfund liabilities, and to insure that sufficient financial resources are available to support all of its programs. (6.3.1)

## APPENDIX E:

### Huston-Tillotson College - 2000 Reaffirmation Committee Recommendations (50)

#### Section 1: Principles and Philosophy of Accreditation

1. The committee recommends that the College develop an adequate institutional follow-up plan to address the issues identified in the self-study.
2. The committee recommends that the College develop adequate procedures for addressing written student complaints.
3. The committee recommends that the College develop an appropriate plan, as well as a functioning planning and evaluation process, which identifies and integrates projected educational, physical and financial development, and incorporates procedures for program review and institutional improvement.
4. The committee recommends that the institution develop an adequate financial base to accomplish its purpose at an acceptable level of quality on a continuing basis.
5. The committee recommends that in brochures and advertisements the College describe its relationship with the Commission on Colleges only according the required statements in the *Criteria for Accreditation*, including specific contact information.

#### Section II: Institutional Purpose

6. The committee recommends that appropriate publications accurately cite the current statement of purpose.
7. The committee recommends that the institution demonstrate that its planning and evaluation processes, educational programs, educational support services, financial and physical resources, and administrative processes are adequate and appropriate to fulfill its stated purpose.

#### Section III: Institutional Effectiveness

8. The committee recommends that the planning and evaluation for these activities be systematic, broad based, interrelated and appropriate to the institution.
9. The committee recommends that the institution develop and implement procedures to evaluate the extent to which these educational goals are being achieved.
10. The committee recommends that the institution develop guidelines and procedures to evaluate educational effectiveness, including the quality of student learning and of research and service.

**Huston-Tillotson College - 2000 Reaffirmation Committee Recommendations (50)  
(Cont'd)**

11. The committee recommends that the use of results of these evaluations be used to improve educational programs, services and operations.
12. The committee recommends that the fiscal affairs unit establish a clearly defined purpose which supports the institution's purpose and goals; formulate goals which support the purpose of the unit; develop and implement procedures to evaluate the extent to which these goals are being achieved in each unit; and demonstrate use of results.
13. The committee recommends that each administrative and educational support service unit establish a clearly defined purpose which supports the institution's purpose and goals; formulate goals which the purpose of each unit; develop and implement procedures to evaluate the extent to which these goals are being achieved in each unit; and use the results of the evaluations to improve administrative and educational support services.
14. The committee recommends that institutional research be an integral part of the institution's planning and evaluation process.
15. The committee recommends that an institution regularly evaluate the effectiveness of its institutional research process and the use of its findings for the improvement of its process.
16. The committee recommends that the institution assign administrative responsibility for conducting institutional research, allocate adequate resources, and allow access to relevant information.

**Section IV: Educational Program**

17. The committee recommends that the institution demonstrate that it has the financial resources to support an effective educational program.
18. The committee recommends that the institutions require that at least 25% of semester hours for graduation be earned at the College.
19. The committee recommends that every program have at least one full-time faculty member qualified to teach in each major (See 4.8.2).
20. The committee recommends that all course syllabi specifically state the instructional goals, including appropriate assessments that measure the goals.
21. The committee recommends that a plan for systematic evaluation of the effectiveness of the instructional program be developed and implemented with the results being used to ensure quality instruction and institutional effectiveness.

**Huston-Tillotson College - 2000 Reaffirmation Committee Recommendations (50)  
(Cont'd)**

22. The committee recommends that the orientation and advisement program be evaluated regularly to enhance assistance to students.
23. The committee recommends that the institution make available to students and public and accurate and current catalogue.
24. The committee recommends that the institution demonstrate that it employs sufficiently qualified faculty to accomplish its purpose.
25. The committee recommends that the institution demonstrate that all faculty possess at least a master's degree plus 18 hours in the discipline or the masters in the discipline.
26. The committee recommends that the College insure that all its faculty personnel files contain the necessary documentation as outlined in its personnel procedures and as stipulated in 4.8.2.2.
27. The committee recommends that the College take the necessary actions to ensure that 25% of discipline course work in each major be taught by faculty holding the terminal degree in the teaching discipline.
28. The committee recommends that the College adhere to its established policy which properly limits the number of adjunct faculty to 35% of total faculty.
29. The committee recommends that the institution develop clearly stated criteria for salary increases.
30. The committee recommends that the College provide a faculty of adequate size support its mission.
31. The committee recommends that the College demonstrate that a procedure for the equitable and reasonable assignment of faculty responsibilities be developed and implemented.

**Section V: Educational Support Programs**

32. The committee recommends that the statement of purpose for the library be published in the publications of the College.
33. The committee recommends that Cooperative Agreements be formalized and evaluated on a regular basis.

**Huston-Tillotson College - 2000 Reaffirmation Committee Recommendations (50)  
(Cont'd)**

34. The committee recommends that the written statement of goals and objectives for the intercollegiate athletic program receive appropriate input from the faculty, and be given official institutional approval.
35. The committee recommends that evaluation of the athletic department be undertaken as part of the self-study conducted as part of its reaffirmation of accreditation.
36. The committee recommends that the College provide clearly stated written policies pertaining to the recruitment, admission, financial aid and continuing eligibility of athletes.

**Section VI: Administrative Processes**

37. The committee recommends that the institution demonstrate that it has brought together its various resources and allocated them effectively to accomplish institutional goals.
38. The committee recommends that the institution demonstrate that board members be dismissed only for cause and by procedures involving due process.
39. The committee recommends that the institution demonstrate that all aspects of fundraising are incorporated into the planning process and evaluated regularly.
40. The committee recommends that the College possess sufficient financial resources to support all of its programs.
41. The committee recommends that the College demonstrate the financial stability essential to its successful operation.
42. The committee recommends that preparation and execution of the annual budget be preceded by sound educational planning.
43. The committee recommends that procedures be implemented to annually evaluate the budget process.
44. The committee recommends that interim budget statements be rendered on a periodic basis to department heads for their guidelines in staying within budgetary allocations.
45. The committee recommends that the College provide an additional statement of financial position using one of the highest levels of disaggregation illustrated in F.A.R.M.

**Huston-Tillotson College - 2000 Reaffirmation Committee Recommendations (50)  
(Cont'd)**

46. The committee recommends that the additional statement be included either in the audit report as an audited supplemental schedule or independently certified if not included in the audit report.
47. The committee recommends that a plan for the upkeep of College property be put in place.
48. The committee recommends that a maintenance plan, at a minimum, address routine preventive and deferred maintenance of buildings, equipment, and grounds.
49. The committee recommends that a maintenance plan be operational and annually evaluated.
50. The committee recommends that the environmental and safety plan be evaluated annually.

## **APPENDIX F:**

### **Texas College - 1994 Special Committee Recommendations (74)**

#### **Section: – Principles and Philosophy of Accreditation**

1. The committee recommends that in lieu of repeating the self-study process, the institution use its resources to provide a thorough and comprehensive response to the recommendations and suggestions of this report.
2. The committee recommends that the institution develop an appropriate plan, as well as a functioning planning and evaluation process, which identifies and integrates future educational, physical, and financial development and incorporates procedures for program review and institutional improvements.
3. The committee recommends that the institution publish and distribute its admissions standards in current institutional documents.
4. The committee recommends that the institution provide sufficient learning resources to support the courses, programs, and degrees offered.
5. The committee recommends that the institution establish an adequate financial base to support all of its programs

#### **Section II: Institutional Purpose**

6. The committee recommends that Texas College review its statement of purpose to ensure that it represents the official posture and practice of the institution.
7. The committee recommends that the college identify the official statement of purpose or mission and the college documents be revised so that all appropriate documents contain the same mission statement.

#### **Section III: Institutional Effectiveness**

8. The committee recommends that the institution demonstrate that its planning and evaluation processes, educational programs, educational support services, financial and physical resources, and administrative processes are adequate and appropriate to the institution's stated purpose and role.
9. The committee recommends that Texas College evaluate the results of the education offered to its students and use the results of the evaluation to formulate plans for improvement of the academic programs.
10. The committee recommends that the College develop and implement a broad-based, continuous planning and evaluation process.

## **Texas College - 1994 Special Committee Recommendations (74) (Cont'd)**

11. The committee recommends that the institution establish adequate procedures for planning and evaluation.

12. The committee recommends that Texas College define its expected educational results and describe how the achievement of these results will be ascertained; ensure that the procedures for planning and evaluation contain, in addition to the statement of purpose, education goals clearly consistent and linked to that purpose; develop and implement procedures for evaluating the extent to which these education goals are being achieved; and demonstrate that the results of the evaluations are being used to improve institutional programs, services and operations.

### **Section IV: Educational Programs**

13. The committee recommends that the college demonstrate the comparable quality of its educational programs.

14. The committee recommends that the College demonstrate sufficient financial resources to support effective educational programs.

15. The committee recommends that the College make available to students and the public a catalog with accurate information concerning purposes, objectives, entrance requirements and procedures, rules and regulations for conduct, programs and courses offered, degree requirements, Full-time and degrees held, costs, and other items relative to attending the institution or withdrawing from it.

16. The Committee recommends that the admissions policies of the College be state clearly, published and made available to all constituencies, including potential students.

17. The Committee recommends that the College take steps to assure that the admission policies are evaluated regularly.

18. The Committee recommends that the College modify its policy to state that courses transferred in, or accepted, for credit toward a degree must be completed at an institution accredited as degree-granting by a post-secondary commission at the time the courses were completed.

19. The committee recommends that the institution clearly define what is meant by a major and state the number of credits required.

20. The Committee recommends that the institution clearly define the process by which the curriculum is reviewed and evaluated.

## **Texas College - 1994 Special Committee Recommendations (74) (Cont'd)**

21. The Committee recommends that instruction be evaluated regularly and evidence be collected to demonstrate that efforts are being made to improve instruction.
22. The Committee recommends that means be developed for students and faculty to have a clear understanding of the goal and requirements of each course, the nature of the course content and the methods of evaluation to be employed.
23. The Committee recommends that the College demonstrate it has an orderly process for recruiting and appointing faculty.
24. The Committee recommends that the College describe its recruiting and appointing procedures in a published document.
25. The Committee recommends that the College determine that an applicant's proficiency in oral and written communication in the language in which the course(s) is being taught is such that the appointment is appropriate.
26. The committee recommends that the College takes steps to assure that both full-time and part-time faculty meets all criteria for academic and professional preparation.
27. The Committee recommends that the College keep in files for all full-time and part-time faculty members' official documents of academic preparation or in exceptional cases, official documentation of professional and work experience and other qualifications.
28. The Committee recommends that in the areas of history faculty members holding the terminal degree teach at least 25 percent of the course credit hours.
29. The Committee recommends that the College establish and publish comprehensive policies concerning the employment of part-time faculty members.
30. The Committee recommends that the College provide appropriate orientation for part-time faculty members.
31. The Committee recommends that the institution develop a satisfactory program of faculty compensation that includes annual reviews of salaries based on clearly stated criteria for salary increments.
32. The Committee recommends that the institution follow stated policy concerning ongoing employment of faculty.
33. The Committee recommends that the institution provide faculty members the opportunity to continue their professional development throughout their careers and to demonstrate that such development takes place.

## **Texas College - 1994 Special Committee Recommendations (74) (Cont'd)**

34. The Committee recommends that the functions of the Director of Curriculum Review and Reform be clarified and made consistent with the functions of the faculty as described in the FACULTY HANDBOOK.

35. The Committee recommends that the institution develop a procedure for the equitable and reasonable assignment of faculty responsibilities.

36. The Committee recommends that the institution demonstrate that it uses the results of faculty evaluations for the improvement of the faculty and of the educational program.

### **Section V: Educational Support Services**

37. The Committee recommends that the institution ensure the provision of adequate learning resources and services needed to support its purpose and programs.

38. The Committee recommends that acquiring materials and establishing services be priority in meeting the needs of the users.

39. The Committee recommends that the library be evaluated regularly and systematically to ensure that it is meeting the needs of its users and supporting the programs and purpose of the institution.

40 (A). The Committee recommends that the adequate facilities to house, service and make the library collection easily accessible be made available.

40 (B). The Committee further recommends that the College provide adequate up-to-date audiovisual equipment.

41. The Committee recommends that the College provide sufficient print and non-print library resources to meet the needs of its users.

42. The Committee recommends that a policy governing resources elimination be developed and implemented.

43. The Committee recommends that the institution demonstrate that the current support staff is adequate to serve the needs of its users.

44. The Committee recommends that policies concerning contractual security and faculty status for librarians be clearly defined and published in the FACULTY HANDBOOK

45. The Committee recommends that the effectiveness of the cooperative arrangement be evaluated regularly.

## **Texas College - 1994 Special Committee Recommendations (74) (Cont'd)**

46. The Committee recommends that the College provide up-to-date equipment and instructional support services to support its curriculum.
47. The Committee recommends that the College develop appropriate policies for the allocation of computing resources and the assignment of priorities.
48. The Committee recommends that the College organize an administrative unit responsible for planning and implementing student support services.
49. The Committee recommends that all personnel files be updated to contain official records of academic preparation for student support personnel.
50. The Committee recommends that all student development services and programs be evaluated as part of the Institutional Effectiveness Process.
51. The Committee recommends that the institution resources in support of student services be allocated on the basis of predetermined needs and adequate to support the goals of the College.
52. The Committee recommends that the College provide clearly written statements of the College's supervisory responsibility for student media.
53. The Committee recommends that the institution develop policies on the retention and disposal of student records.
54. The Committee recommends that the College evaluate the Athletics Program as part of the Institutional Effectiveness Process.

### **Section VI: Administrative Processes**

55. The Committee recommends that the administration reassess and restructure its expenditures by category, to bring expenditures better in line with the primary mission of the College.
56. The Committee recommends that the administrative designations be accurate, descriptive and appropriate.
57. The Committee recommends that the Board of Trustees assure that all appropriate constituencies are involved in presidential searches.
58. The Committee recommends that the Board of Trustees ensure that members are adequately informed about the financial condition and stability of the institution.

## **Texas College - 1994 Special Committee Recommendations (74) (Cont'd)**

59. The Committee recommends that there be a clear distinction in writing or practice between the policy-making function of the Board of Trustees and responsibilities of the administration and faculty to administer and implement policy.
60. The Committee recommends that current organizational charts be coordinated in order to provide consistency and eliminate duplication and that they be distributed.
61. The Committee recommends that greater care be exercised to assure that printed materials are accurate and internally consistent.
62. The Committee recommends that the College develop policies and procedures governing fundraising and that such policies be widely disseminated.
63. The Committee recommends that Texas College demonstrate that it possesses sufficient financial resources to support its programs. Additionally, the Committee recommends that Texas College demonstrate financial stability.
64. The Committee recommends that Texas College employ appropriate personnel and design systems for the business office consistent with the purpose, size and volume of transactions at the College.
65. The Committee that the College prepare an appropriately detailed annual budget which is preceded by sound educational planning. Procedures for budget planning must be evaluated regularly.
66. The Committee recommends that the College develop a comprehensive budgeting process and render interim budget statement on a periodic basis to departmental heads. Budget revisions must be made when actual conditions require and must be communicated to those affected within the College.
67. The Committee recommends that the College record outstanding transactions for 1993-94 so that the 1993-94 Audit can be finalized by the Independent Certified Public Accounts.
68. The Committee recommends that the College develop and publish in the Catalog and other appropriate documents a refund policy for the refunding of fees which is in keeping with generally accepted refund policies.
69. The Committee recommends that the College develop a written statement for its Investment Policies and Guidelines for presentation to and approval by the Board of Trustees.
70. The Committee recommends that the Investment Policies and Guidelines approved by the Board be evaluated regularly.

## **Texas College - 1994 Special Committee Recommendations (74) (Cont'd)**

71. The Committee recommends that the College provide adequate physical resources, including buildings and equipment which must be adequate to serve the needs of the College in relation to its stated purpose, programs and activities.

72. The Committee recommends that the College develop a plan for the upkeep of its property: the routine maintenance, preventive maintenance, deferred maintenance of buildings, equipment, and grounds. This plan must be maintained on an annual basis, should provide for institutional maintenance, and specify how deferred maintenance is to be performed.

73. The Committee recommends that the College develop a comprehensive safety plan. This plan should give special attention to the provision and use of safety equipment in laboratories and other hazardous areas; easy egress from buildings in the event of fire or other emergency. Further, the plan must be regularly evaluated.

74. The Committee recommends that the College develop and maintain a current written physical facilities master plan that provides for the future development of the College and relates to other institutional planning efforts.

## **APPENDIX G:**

### **Texas College - 1995 Special Committee Recommendations (35)**

#### **Section I: – Principles and Philosophy of Accreditation**

1. The committee recommends that the institution demonstrate compliance with condition of eligibility 8.
2. The committee recommends that the institution demonstrate compliance with condition of eligibility 12.
3. The committee recommends that the institution demonstrate compliance with condition of eligibility 13.

#### **Section II: Institutional Purpose**

4. The committee recommends that the institution demonstrate that its evaluation process, Educational Support Services, and financial and physical resources are adequate and appropriate to the institutions stated purpose and role.

#### **Section III: Institutional Effectiveness**

5. The Committee recommends that the institution evaluate the results of the education offered to its students and use the results of the evaluation to formulate plans for the improvement of the academic programs.
6. The committee recommends that the institution complete the development of guidelines and procedures to evaluate educational effectiveness, including the quality of student learning.
7. The committee therefore recommends that the institution conduct a careful review of the evaluation procedures for evaluating all elements of the academic program, with special attention being given to developing procedures for evaluating the Academic Foundation.
8. The committee recommends that the institution evaluate its success with respect to student achievement making full use of available data and collecting additional data as needed as appropriate.
9. The committee therefore recommends that the administrative and educational support services of the institution formulate goals and objectives which support the purpose of that unit, then develop and implement procedures to evaluate the extent to which these goals and objectives are being achieved, and finally, use the results of the evaluation to improve administrative and educational support services.

## **Texas College - 1995 Special Committee Recommendations (35) (Cont'd)**

10. The committee recommends that the institution allocate adequate resources (includes access to appropriate professional development opportunities) to institutional research and that a data storage and retrieval system be implemented to facilitate timely access to relevant information.

### **Section IV: Educational Programs**

11. The committee reiterates the recommendation from the 1994 SACS Committee, that the institution demonstrate sufficient financial resources to support an effective educational program, including adequate library/learning resources, instructional materials/equipment, and physical facilities.

### **Section V: Educational Support Services**

12. The committee strongly recommends that acquiring materials and establishing services continue to be a priority in meeting the needs of the users.

13. The committee recommends that the College continue its efforts in upgrading its physical facilities that house, service and make the library collection easily available.

14. The committee recommends that the Collection Development Policy be expanded to include faculty involvement in building and collection.

15. The committee further recommends that a plan be devised to develop and implement the collection based on the curriculum programs of the institution and the Collection Development Policy.

16. The committee recommends that these formal agreements be evaluated on a regular basis to ensure effectiveness.

17. The committee recommends that the College demonstrate that it does not use cooperative agreements to avoid responsibility for providing adequate and readily accessible library resources and services.

18. The committee recommends that the College demonstrate that it provides adequate staff for library even during absences of assigned staff.

19. The committee recommends that the College demonstrate that it provides adequate equipment and instructional support to meet its curricular needs.

20. The committee recommends that appropriate security procedures be installed and monitored focusing initially on preparing backups of all computerized data and storing that data in a secure place.

### **Texas College - 1995 Special Committee Recommendations (35) (Cont'd)**

21. The committee recommends that the policy on information technology be evaluated regularly to ensure that academic and administrative needs are adequately addressed.

### **Texas College - 1995 Special Committee Recommendations (35) (Cont'd)**

22. The committee reiterates the previous committee's recommendation that all personnel files be updated to contain official records of academic preparation for student affairs personnel.

23. The committee recommends that student development services and programs be regularly evaluated.

24. The committee reiterates the previous committee's recommendation that the College provide a clearly written statement of the College's supervisory responsibility for student media.

### **Section VI: Administrative Processes**

25. The committee recommends that the administration continue to reassess and restructure its expenditures by category to bring expenditures in line with the mission and goals of the College.

26. The committee recommends that the Board of Trustees ensure that all trustees are adequately informed throughout the year about the financial condition and stability of the College.

27. The Committee recommends that the institution complete the files for all administrative officers to demonstrate that the administrative officers possess the credentials appropriate to their area of responsibility.

28. The committee recommends that the institution demonstrate that it possesses sufficient financial resources to support its programs.

29. The committee recommends that the institution demonstrate financial stability.

30. The committee reiterates the 1994 Special Committee's recommendation that the institution continue through full implementation of an annual budget based on the strategic goals of the College and involve members from the College Community.

31. The committee reiterates the 1994 Special Committee's recommendation that the institution provide interim budget statements on a periodic basis to departmental heads for their guidance in staying within budgetary allocations.

32. The committee recommends that the institution assess its internal control system and insure the effectiveness of the internal control procedures.

**Texas College - 1995 Special Committee Recommendations (35) (Cont'd)**

33. The committee reiterates the recommendation of the 1994 Special Committee and recommends that the Board of Trustees adopt a set of written Investment Policies to be evaluated on a regular basis.

34. The committee reiterates the 1994 Special Committee's recommendations that the institution continue its efforts to provide adequate physical resources to serve the needs of the College in relation to its stated purpose.

35. The committee reiterates the recommendation of the 1994 Special Committee that the institution continue the development of a College Facilities Master Plan.

## **APPENDIX H:**

### **Texas College – 1999 Accreditation Committee Recommendations (20)**

#### **Section I: Principles and Philosophy of Accreditation**

1. The committee recommends that the college demonstrate that it has an adequate financial base to accomplish its purpose at an acceptable level of quality on a continuing basis.

#### **Section III: Institutional Effectiveness**

2. The Committee recommends that the college demonstrate that it uses the results of evaluations to improve the faculty and educational programs as stipulated in Recommendation 8.

3. The committee recommends that the college demonstrate that it develop plans and uses the results of evaluations, as appropriate, to improve administrative and educational support services as stipulated in Recommendations 9, 10, 14, 17, 18 and 19.

#### **Section IV: Educational Programs**

4. The committee recommends that the college demonstrate that it possesses the financial resources necessary to support an effective educational program.

5. The committee recommends that the college implement a policy which requires that twenty-five percent of the semester credit hours counted toward graduation will be earned through instruction at Texas College.

6. The committee recommends that at least twenty-five percent of the discipline course hours in computer science be taught by faculty members holding the terminal degree.

7. The committee recommends the institution clarify criteria upon which salary increases are to be made.

8. The committee recommends that the college demonstrate that it uses the results of faculty evaluations for the improvement of the faculty and the educational program.

#### **Section V: Educational Support Services**

9. The committee recommends that the college demonstrate that it evaluates the effectiveness of cooperative library agreements.

10. The committee recommends that policies for the allocation and use of Information Technology Resources Systems be clearly stated and consistent with the institutional

## **Texas College – 1999 Accreditation Committee Recommendations (20) (cont'd)**

purpose and goals, and that these policies be evaluated regularly to ensure that academic and administrative needs are adequately addressed.

11. The committee recommends that the institution demonstrate that it is in compliance with the student loan default requirements of Title IV.
12. The committee recommends that the college demonstrate that it possesses sufficient financial resources to support all of its programs and that it demonstrate the financial stability essential to its successful operation.
13. The committee recommends that the college demonstrate that it has appropriately staffed the business and financial functions of the college.
14. The committee recommends that the College demonstrate that procedures for budget planning are regularly evaluated.
15. The committee recommends that the preparation and execution of the detailed annual budget be preceded by sound planning with regard to revenue projections.
16. The committee recommends that interim budget reports be prepared on a periodic basis, that they show the actual and budgeted expenses by department, and that they be distributed to budget unit heads.
17. The committee recommends that the College demonstrate that its investment policies are regularly evaluated.
18. The committee recommends that the college adopt operationalize a deferred maintenance plan that includes estimated costs for repair and replacement.
19. The committee recommends that the college demonstrate that its safety plan is evaluated annually.
20. The committee recommends that the college document that an administrator has been assigned overall responsibility for overseeing the daily environmental, health and safety issues of the campus.

**APPENDIX I:  
Interview Protocol**

**Interview Summary – Cycle I**

Interviewee: \_\_\_\_\_

Date: \_\_\_\_\_

**Five Point Scoring Criteria**

Score	Level of Satisfaction
5	Highest level of satisfaction with how the reaffirmation process was handled, leadership and site visit preparations.
4	High level of satisfaction
3	Acceptable level of satisfaction
2	Low level of satisfaction
1	Dissatisfaction

**Cycle I:**

Interview protocol for interviewees involved in the self-study and reaffirmation site visit

1. What is your current employment status?
2. What was your role in the reaffirmation process for your institution?
3. At what point did you become involved in the institutional reaffirmation process?
4. Please describe/define reaffirmation.
5. Prior to your most recent experience what knowledge did you have about SACS and the accreditation process?
6. Did you have access to SACS documentation during the reaffirmation process?  
 yes       no
7. Please assess/rate how the reaffirmation process handled on your campus? Who were the key players? How was information disseminated?  
 1       2       3       4       5

**APPENDIX I:  
Interview Protocol**

**Interview Summary – Cycle I (Cont'd)**

8. Was the entire campus community aware of the reaffirmation process? If yes, how was information about the process communicated throughout the campus?  
\_\_\_\_yes      \_\_\_\_no
9. Please assess/rate the preparations that were made to prepare the campus and the campus community for the site visit.  
\_\_\_\_1      \_\_\_\_2      \_\_\_\_3      \_\_\_\_4      \_\_\_\_5
10. Were you involved in the initial meeting with the SACS representatives?  
\_\_\_\_yes      \_\_\_\_no
11. Were you one of the individuals interviewed during the on-site visit?  
\_\_\_\_yes      \_\_\_\_no
12. Were you present during the exit meeting with SACS representatives at the conclusion of the site visit?  
\_\_\_\_yes      \_\_\_\_no
13. How did your campus respond upon receiving notification that you had been placed on “warning/probation?”
14. Do you believe that all of the findings were legitimate concerns? Had you anticipated any of the findings?
15. How would you assess/rate institutional leadership during this period?  
\_\_\_\_1      \_\_\_\_2      \_\_\_\_3      \_\_\_\_4      \_\_\_\_5

**APPENDIX I**  
**Interview Protocol**

**Interview Summary – Cycle II**

Interviewee: \_\_\_\_\_

Date: \_\_\_\_\_

**Five Point Scoring Criteria**

<b>Score</b>	<b>Level of Satisfaction</b>
5	Highest level of satisfaction with how the reaffirmation process was handled, leadership and site visit preparations.
4	High level of satisfaction
3	Acceptable level of satisfaction
2	Low level of satisfaction
1	Dissatisfaction

**Cycle II**

Interview protocol for interviewees involved during the sanctioned status periods

1. What is your current employment status?
2. When did you become involved in the reaffirmation process?
3. What was your role in assisting your institution deal with its sanctioned status with SACS?
4. Prior to your most recent experience what knowledge did you have of SACS and the accreditation process?
5. Did you have access to SACS documentation during the reaffirmation process?  
\_\_\_\_yes      \_\_\_\_no
6. Please assess/rate how the reaffirmation process was handled on your campus.  
\_\_\_\_1      \_\_\_\_2      \_\_\_\_3      \_\_\_\_4      \_\_\_\_5

**APPENDIX I**  
**Interview Protocol**

**Interview Summary – Cycle II (Cont'd)**

7. Was the entire campus community aware of the problems with SACS or was the information shared only with a small group of individuals? If it was maintained by a small group, who were the members of that group?
- \_\_\_\_yes      \_\_\_\_no
8. How many follow-up reports did your institution submit to SACS?
9. How many times did members of your campus community appear before SACS during your probationary or warning status? Who represented the institution during these meetings?
10. Please describe the campus climate during this period?
11. How would you assess/rate institutional leadership during this period?
- \_\_\_\_1      \_\_\_\_2      \_\_\_\_3      \_\_\_\_4      \_\_\_\_5
12. Were there many changes within the administrative structure during this period?
- If so, please describe the changes and the impact that you perceive these changes had on the campus community.
- \_\_\_\_yes      \_\_\_\_no
13. During this period, how was your institution viewed within your local community?

**APPENDIX I**  
**Interview Protocol**

**Interview Summary – Cycle III**

Interviewee: \_\_\_\_\_

Date: \_\_\_\_\_

**Cycle III**

Interview protocol for interviewees involved after accreditation was re-affirmed

1. What is your current employment status?
2. Who was present when the institution learned of its re-affirmed status?
3. How was the information disseminated throughout the campus and local communities?
4. What lessons do you think that the institution has learned from this process?
5. Are you aware of the changes within the reaffirmation process?  
\_\_\_\_yes    \_\_\_\_no
6. Do you believe that your institution is prepared for your next reaffirmation process?  
\_\_\_\_yes    \_\_\_\_no
7. Do you think that all of your previous problems have been completely resolved? If not, which ones do you think will resurface?  
\_\_\_\_yes    \_\_\_\_no
8. What role do you think leadership will play in your next reaffirmation cycle?
9. Do you dread your next reaffirmation? Why? Why not?  
\_\_\_\_yes    \_\_\_\_no

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