



March 3, 2025

Dr. Karin Edwards
President
Clark College
1933 Fort Vancouver Way
Vancouver, WA 98663

Dear President Edwards:

Attached please find the Fall 2024 Policies, Regulations, and Financial Review (PRFR) Evaluation Committee's review of Clark College. The attached review documents areas where the institution was found to be in compliance with the NWCCU Standards for Accreditation and where additional opportunities for improvement exist. Please note that the Year Seven Evaluation of Institutional Effectiveness (EIE) Evaluation Team will receive a copy of this report, as will the NWCCU Board of Commissioners at your EIE evaluation by the Commission in roughly one year's time.

Please address any areas of needed improvement that the PRFR Evaluation Committee has noted as findings in this report in your EIE self-evaluation. Please feel free to reach out to your NWCCU Staff Liaison if you have further questions.

Type 1: Standards Substantially in Compliance but in Need of Improvement

- Finding Type 1: Fall 2024 Policies, Regulations, and Financial Review - The following standards are areas substantially in compliance but where improvement is needed. (2020 Standard(s) 2.D.1;2.G.7)

Future Evaluations

- Year 7 - Evaluation of Institutional Effectiveness Fall 2025
 - Recommendation 1: Fall 2024 Ad Hoc Report
 - Recommendation 4: Fall 2018 Mission Fulfillment and Sustainability
 - Finding Type 1: Fall 2024 Policies, Regulations, and Financial Review
- Ad Hoc Report Fall 2026

Thank you for your commitment to the process of peer evaluation and continuous quality improvement. If you have questions about any of the information in this letter, please contact your staff liaison, Dr. Ed Harri, at eharri@nwccu.org.

Sincerely,

Aaron Christopher
Vice President for Administration and Finance

cc: Dr. Cecelia Gayle Martin, Associate VP of Planning and Effectiveness
Ms. Denise Gideon, Board Chair
Mr. Michael Meotti, Executive Director, Washington Student Achievement Council



Peer Evaluation for: Clark College

Standard 2: Governance, Resources, and Capacity

The institution articulates its commitment to a structure of governance that is inclusive in its planning and decision-making. Through its planning, operational activities, and allocation of resources, the institution demonstrates a commitment to student learning and achievement in an environment respectful of meaningful discourse.

Standard 2.A.1

The institution demonstrates an effective governance structure, with a board(s) or other governing body(ies) composed predominantly of members with no contractual, employment relationship, or personal financial interest with the institution. Such members shall also possess clearly defined authority, roles, and responsibilities. Institutions that are part of a complex system with multiple boards, a centralized board, or related entities shall have, with respect to such boards, written and clearly defined contractual authority, roles, and responsibilities for all entities. In addition, authority and responsibility between the system and the institution is clearly delineated in a written contract, described on its website and in its public documents, and provides the NWCCU accredited institution with sufficient autonomy to fulfill its mission.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Institutional governance policies and procedures _Y_
- System governance policies and procedures (if applicable) _N/A_
- Multiple board governing policies and procedures (if applicable) _N/A_
- Board's calendar for reviewing institutional and board policies and procedures _Y_
- Bylaws and Articles of Incorporation referencing governance structure _Y_

Rationale:

All recommended evidence was provided and the narrative provided a clear, direct and thorough description of the college's governance structure.

Standard 2.A.2

The institution has an effective system of leadership, staffed by qualified administrators, with appropriate levels of authority, responsibility, and accountability who are charged with planning, organizing, and managing the institution and assessing its achievements and effectiveness.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Leadership organizational chart _Y_
- Curriculum vitae of executive leadership _Y_

Rationale:

All recommended evidence was provided and the narrative provided information about the President and Executive Cabinet and a high level description of the college's system of leadership.

Standard 2.A.3

The institution employs an appropriately qualified chief executive officer with full-time responsibility to the institution. The chief executive may serve as an ex officio member of the governing board(s) but may not serve as its chair.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Curriculum vitae of President/CEO _Y_

Rationale:

The report includes the President's curriculum vitae and a summary of her experience, qualifications and roles within the institution and community.

Standard 2.A.4

The institution's decision-making structures and processes, which are documented and publicly available, must include provisions for the consideration of the views of faculty, staff, administrators, and students on matters in which each has a direct and reasonable interest.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Institutional governance policies and procedures (see 2.A.1) _Y_

Rationale:

The report describes "Employee Engagement, Empowerment, and Excellence" and "Equitable Student Experience" as priorities in the college's equity centered strategic plan, and presents evidence that illustrates inclusive decision-making. This includes key methods by which faculty, staff and students can share their views, whether directly to the Board of Trustees, through employee association mechanisms and through the college governance structure.

Standard 2.B.1

Within the context of its mission and values, the institution adheres to the principles of academic freedom and independence that protect its constituencies from inappropriate internal and external influences, pressures, and harassment.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Academic freedom policies and procedures (evidence could include samples of negotiated agreements with faculty and/or staff, where appropriate) _Y_
- Evidence that the students also have academic freedom _Y_

Rationale:

Appropriate evidence is presented for the college's commitment and adherence to the principles of academic freedom. The narrative describes an integrated and thorough approach to ensuring academic freedom for all campus constituents.

Standard 2.B.2

Within the context of its mission and values, the institution defines and actively promotes an environment that supports independent thought in the pursuit and dissemination of knowledge. It affirms the freedom of faculty, staff, administrators, and students to share their scholarship and reasoned conclusions with others. While the institution and individuals within the institution may hold to a particular personal, social, or religious philosophy, its constituencies are intellectually free to test and examine all knowledge and theories, thought, reason, and perspectives of truth. Individuals within the institution allow others the freedom to do the same.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Rationale:

The narrative describes a sensitive and principled approach by the college to support for independent thought for all campus constituents, saying that "higher education serves the common good rather than individual interests" and that the college "remains committed to fostering a vibrant intellectual community" that values diverse perspectives.

Standard 2.C.1

The institution's transfer-of-credit policy maintains the integrity of its programs and facilitates the efficient mobility of students desirous of the completion of their educational credits, credentials, or degrees in furtherance of their academic goals.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Transfer of credit policies and procedures _Y_

Rationale:

Transfer of credit policies and procedures are clearly described in the narrative for students transferring out, in, or making use of credit for prior learning. Such policies and procedures are clearly presented in student-facing materials. The college's participation in State-level organizations that guide and support transfer is well-documented.

Standard 2.C.2

The institution's policies and procedures related to student rights and responsibilities should include, but not be limited to, provisions related to academic honesty, conduct, appeals, grievances, and accommodations for persons with disabilities.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

Documentation of student's rights and responsibilities policies and procedures, which include:

- Academic honesty Y
- Conduct Y
- Appeals, grievances Y
- Accommodations for persons with disabilities Y

Rationale:

The college presents a robust and thoughtful set of resources, policies and procedures supporting student rights and responsibilities. These include student-facing policies and resources, the Disability Support Services web resources and the Community Standards approach to student conduct.

Standard 2.C.3

The institution's academic and administrative policies and procedures should include admission and placement policies that guide the enrollment of students in courses and programs through an evaluation of prerequisite knowledge, skills, and abilities to ensure a reasonable probability of student success at a level commensurate with the institution's expectations. Such policies should also include a policy regarding continuation in and termination from its educational programs, including its appeal and re-admission policy.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Policies and procedures for recruiting, admitting, and placing students Y
- Policies/procedures related to continuation and termination from educational programs including appeal process and readmission policies/procedures Y

Rationale:

The college presented substantial evidence in support of their compliance with the standard. Student-facing materials relevant to this standard are clear and thorough. The narrative describes clear processes for students to engage the institution, achieve appropriate placement, connect to supporting services, and both find support when struggling academically and navigate the academic standards processes.

Standard 2.C.4

The institution's policies and procedures regarding the secure retention of student records must include provisions related to confidentiality, release, and the reliable backup and retrievability of such records.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Policies/procedures regarding secure retention of student records, (i.e., back-up, confidentiality, release, protection from cybersecurity issues or other emergencies) Y

Rationale:

The college provided evidence that it participates in State, SBCTC and federal standards and compliance measures, nationally recognized cybersecurity practices and standards, including security audits, and that it provides faculty and staff security training and privacy rights information to students.

Standard 2.D.1

The institution represents itself clearly, accurately, and consistently through its announcements, statements, and publications. It communicates its academic intentions, programs, and services to students and to the public and demonstrates that its academic programs can be completed in a timely fashion. It regularly reviews its publications to ensure accuracy and integrity in all representations about its mission, programs, and services.

Team Verification:

- Type 1 Finding – (Provided evidence suggests that the institution needs improvement)

Evidence:

- Policies/procedures for reviewing published materials (print or websites) that assures institutional integrity Y

Rationale:

The initial report described various resources and processes as evidence of how it communicates its intentions and offerings to students and the public. Additional materials provided by the college described its current set of

communications procedures as they exist now and supported the statement in the original report that the college “is developing a schedule to systematically review all materials.”

Standard 2.D.2

The institution advocates, subscribes to, and exemplifies high ethical standards in its management and operations, including in its dealings with the public, NWCCU, and external organizations, including the fair and equitable treatment of students, faculty, administrators, staff, and other stakeholders and constituencies. The institution ensures that complaints and grievances are addressed in a fair, equitable, and timely manner.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Policies/procedures for reviewing internal and external complaints and grievances Y

Rationale:

The institution provided substantial evidence that it “cultivate[s] a just and ethical environment for all members of its community.” (p. 22) The institution provides several reporting options for complaints and grievances, and those tools are available to the public. Supporting documents provide clear procedures and expected timelines for addressing reported concerns.

Standard 2.D.3

The institution adheres to clearly defined policies that prohibit conflicts of interest on the part of members of the governing board(s), administration, faculty, and staff.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Policies/procedures prohibiting conflict of interests among employees and board members Y

Rationale:

The college provided the recommended evidence and a clear and concise description of its adherence to Washington State ethics law and Board policy, as well as documents describing relevant training.

Standard 2.E.1

The institution utilizes relevant audit processes and regular reporting to demonstrate financial stability, including sufficient cash flow and reserves to achieve and fulfill its mission

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Policies/procedures that articulate the oversight and management of financial resources Y
- Latest external financial audit including management letter Y
- Cash flow balance sheets Y
- Audited financial statements Y
- Tuition and fees, educational, and auxiliary revenue for undergraduate and graduate enrollments Y
- Significant contracts/grants Y
- Endowment and giving reports Y
- Investment revenue Y

Rationale:

The college provided all recommended evidence and a May 2024 Budget Status Report. The narrative provides a high-level description of how the information is used by college leadership, in the context of the strategic plan, and how it follows and is in compliance with State and national fiscal requirements.

Standard 2.E.2

Financial planning includes meaningful opportunities for participation by stakeholders and ensures appropriate available funds, realistic development of financial resources, and comprehensive risk management to ensure short term financial health and long-term financial stability and sustainability.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Policies / procedures for planning and monitoring of operating and capital budgets, reserves, investments, fundraising, cash management, debt management, transfers and borrowing between funds _Y_
- Sample of meeting agendas, minutes, and/or other documentation as evidence of meaningful opportunities for participation by stakeholders _Y_

Rationale:

The initial report emphasized a description of the college's framework for input into financial planning, leaving a concern about how meaningful stakeholders' input was in the process. Further information provided by the college provided substantial evidence regarding the amount of input and the variety of opportunities stakeholders have to participate.

Standard 2.E.3

Financial resources are managed transparently in accordance with policies approved by the institution's governing board(s), governance structure(s), and applicable state and federal laws.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Description of internal financial controls _Y_
- Board approved financial policies, state financial policies, or system financial policies _Y_

Rationale:

The college provided the recommended evidence including examples of publicly shared financial data relevant to this standard.

Standard 2.F.1

Faculty, staff, and administrators are apprised of their conditions of employment, work assignments, rights and responsibilities, and criteria and procedures for evaluation, retention, promotion, and termination.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Human resource policies / procedures _Y_
- Policies/procedures related to teaching, scholarship, service, and artistic creation _Y_
- Policies/procedures for apprising employees of working conditions, rights and responsibilities, evaluation, retention, promotion, and termination _Y_

Rationale:

The college provided the recommended evidence and the narrative presents how each element of the standard is addressed, by employee group. The college's approach to this standard is thorough and thoughtful, and appears to be both supportive and beneficial to employees from the beginning of their employment through their time with the college.

Standard 2.F.2

The institution provides faculty, staff, and administrators with appropriate opportunities and support for professional growth and development.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Employee professional development policies/procedures _Y_

Rationale:

The college presented the recommended evidence and appears to have substantial in-house resources directed toward professional development; there is a strong focus on diversity, equity and inclusion, which is in line with the college's equity-centered strategic plan.

Standard 2.F.3

Consistent with its mission, programs, and services, the institution employs faculty, staff, and administrators sufficient in role, number, and qualifications to achieve its organizational responsibilities, educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic programs.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Documentation about engagement and responsibilities specified for faculty and staff, as appropriate _Y_
- Personnel hiring policy/procedures _Y_
- Academic organizational chart _Y_
- Administrator/staff /faculty evaluation policies/procedures _Y_

Rationale:

The college presented evidence of a highly integrated system for evaluating staffing needs, ensuring equitable hiring practices and ensuring the success of academic programs through academic program review and evaluation of faculty and staff.

Standard 2.F.4

Faculty, staff, and administrators are evaluated regularly and systematically in alignment with institutional mission and goals, educational objectives, and policies and procedures. Evaluations are based on written criteria that are published, easily accessible, and clearly communicated. Evaluations are applied equitably, fairly, and consistently in relation to responsibilities and duties. Personnel are assessed for effectiveness and are provided feedback and encouragement for improvement.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Administrator/staff/faculty evaluation policies/procedures _Y_

Rationale:

The college provided the recommended evidence.

Standard 2.G.1

Consistent with the nature of its educational programs and methods of delivery, and with a particular focus on equity and closure of equity gaps in achievement, the institution creates and maintains effective learning environments with appropriate programs and services to support student learning and success.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Listing of programs and services supporting student learning needs _Y_

Rationale:

The college provided the recommended evidence and presented it within the context of student success Key Performance Indicators drawn from their equity-centered strategic plan. Assessment of the KPIs will support decision-making as the college implements that new strategic plan.

Standard 2.G.2

The institution publishes in a catalog, or provides in a manner available to students and other stakeholders, current and accurate information that includes: institutional mission; admission requirements and procedures; grading policy; information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion based on normal student progress and the frequency of course offerings; names, titles, degrees held, and conferring institutions for administrators and full-time faculty; rules and regulations for conduct, rights, and responsibilities; tuition, fees, and other program costs; refund policies and procedures for students who withdraw from enrollment; opportunities and requirements for financial aid; and the academic calendar.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

Catalog (and/or other publications) that provides information regarding:

- Institutional mission _Y_
- Admission requirements and procedures _Y_
- Grading policy _Y_
- Information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion _Y_
- Names, titles, degrees held, and conferring institutions for administrators and full-time faculty _Y_
- Rules and regulations for conduct, rights, and responsibilities _Y_
- Tuition, fees, and other program costs _Y_
- Refund policies and procedures for students who withdraw from enrollment _Y_
- Opportunities and requirements for financial aid _Y_

- The academic calendar _Y_

Rationale:

The college provided the recommended evidence. Information about individual elements in the standard are available both in the catalog and across the college’s website.

Standard 2.G.3

Publications and other written materials that describe educational programs include accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered. Descriptions of unique requirements for employment and advancement in the occupation or profession shall be included in such materials.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

Samples of publications and other written materials that describe:

- Accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered _Y_
- Descriptions of unique requirements for employment and advancement in the occupation or profession shall be included in such materials _Y_

Rationale:

The college provided the recommended evidence, by example, in the original narrative, indicating compliance with the standard. Additional information included a link to the public-facing website of “Professional Licensure and Certification Disclosures.”

Standard 2.G.4

The institution provides an effective and accountable program of financial aid consistent with its mission, student needs, and institutional resources. Information regarding the categories of financial assistance (such as scholarships, grants, and loans) is published and made available to prospective and enrolled students.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Published financial aid policies/procedures including information about categories of financial assistance _Y_
- Information to students regarding repayment obligations _Y_
- Policies / procedures for monitoring student loan programs _Y_

Rationale:

The college provided the recommended evidence.

Standard 2.G.5

Students receiving financial assistance are informed of any repayment obligations. The institution regularly monitors its student loan programs and publicizes the institution’s loan default rate on its website.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Published financial aid policies/procedures including information about categories of financial assistance _Y_
- Information to students regarding repayment obligations _Y_
- Policies / procedures for monitoring student loan programs _Y_
- Loan default rate published on website _Y_

Rationale:

The narrative provides a clear, thoughtful and comprehensive description of the support provided to students regarding their repayment obligations; the report includes the recommended evidence.

Standard 2.G.6

The institution designs, maintains, and evaluates a systematic and effective program of academic advisement to support student development and success. Personnel responsible for advising students are knowledgeable of the curriculum, program and graduation requirements, and are adequately prepared to successfully fulfill their responsibilities. Advising requirements and responsibilities of advisors are defined, published, and made available to students.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Description of advising program, staffing, and advising publications (Student handbook or Catalog; links to webpages – please note specific pages or areas) _Y_
- Systematic evaluation of advising _Y_
- Professional development policies / procedures for advisors _Y_

Rationale:

The college provides a comprehensive description of its advising program, including how students first connect to advising, how advising varies by student pathway, and how they remain connected to advising. Advisors are trained on academic programs and stay connected by several means; they also take an Appreciative Advising course and go through a certification process. A substantial system of evaluation is described data generated from that system is used to inform future training; post-appointment surveys and data from observation of advising meetings also generate data used to improve future advising experiences.

Standard 2.G.7

The institution maintains an effective identity verification process for students, including those enrolled in distance education courses and programs, to establish that the student enrolled in such a course or program is the same person whose achievements are evaluated and credentialed. The institution ensures that the identity verification process for distance education students protects student privacy and that students are informed, in writing at the time of enrollment, of current and projected charges associated with the identity verification process.

Note: Institutions should refer to NWCCU Distance Education Policy for guidance and definitions related to the required evidence.

Team Verification:

- Type 1 Finding – (Provided evidence suggests that the institution needs improvement)

Evidence:

- Policies/procedures for ensuring the student who registers in a distance education course/program is the same student who participates in the course and receives credit _Y_
- Policies/procedures make it clear that these processes protect student privacy _Y_
- Notification to students at the time of registration of any additional charges associated with verification procedures _Y_
- Academic policies/procedures for instructors to implement requirements for *regular and substantive interaction* in distance education courses/programs _Y_

Rationale:

The college approaches the identity verification portion of the standard by several means. It uses a sampling technique to identify students for additional identity verification steps; it has hired a 3rd party to assist in the process; it has an Identity Theft and Protection Committee; and it has implemented multifactor authentication for network protection. The college does not have a policy on regular and substantive interaction and plans to address that in the future.

Standard 2.H.1

Consistent with its mission, the institution employs qualified personnel and provides access to library and information resources with a level of currency, depth, and breadth sufficient to support and sustain the institution's mission, programs, and services.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

- Procedures for assessing adequacy of library collections _Y_
- Library planning committee and procedures for planning and collection development _Y_
- Library instruction plan; policies/procedures related to the use of library and information resources _Y_
- Library staffing information; policies/procedures that explains faculty/library partnership for assuring library and information resources are integrated into the learning process _Y_

Rationale:

The narrative describes a comprehensive, student-centered set of library services; student, faculty and staff access to substantial collections of library materials, equipment and other resources; and a commitment to the college's equity-centered strategic plan. The documents presented as evidence are comprehensive and focused on the college's instructional mission.

Standard 2.I.1

Consistent with its mission, the institution creates and maintains physical facilities and technology infrastructure that are accessible, safe, secure, and sufficient in quantity and quality to ensure healthful learning and working environments that support and sustain the institution's mission, academic programs, and services.

Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

Evidence:

Facilities master plan, including:

- Equipment replacement policies/procedures Y
- Procedures for assessing sufficiency of physical facilities Y
- Policies and procedures for ensuring accessible, safe, and secure facilities Y
- Policies/procedures for the use, storage, and disposal of hazardous waste Y
- Technology master plan and planning processes Y

Rationale:

The college presents substantial, detailed and current facilities and technology master plans, well supported by related policies and procedures. The safety-related elements of the standard are clearly addressed and well-supported by the evidence provided.

Concluding Comments

The PRFR committee would like to thank Clark College for providing a comprehensive, concise, informational, transparent, and well-documented report. The materials presented here, to your students and the public are thoughtful and clear, and they suggest a college that is student-centered, with equity and student success being first and foremost in all that you do. We appreciate your responsiveness in our (minimal) requests for additional information and hope sincerely that our comments and observations are useful to you as you move forward.