

Iowa State Board of Education

Executive Summary

June 18, 2026

Agenda Item: Iowa Lakes Community College (ILCC) Accreditation Report

State Board Goal: Goal 4

State Board Role/Authority: Iowa Code section 260C.47(3) grants authority to the State Board of Education to determine whether the programs of a community college shall remain accredited.

Presenter(s): Amy Gieseke, Administrator
Division of Higher Education and Postsecondary Readiness

Scott Stokes, President
Iowa Lakes Community College

Robert Leifeld, Vice President of Administration
Iowa Lakes Community College

Attachment(s): One

Recommendation: It is recommended that the State Board grant conditional accreditation for Iowa Lakes Community College through March 2027.

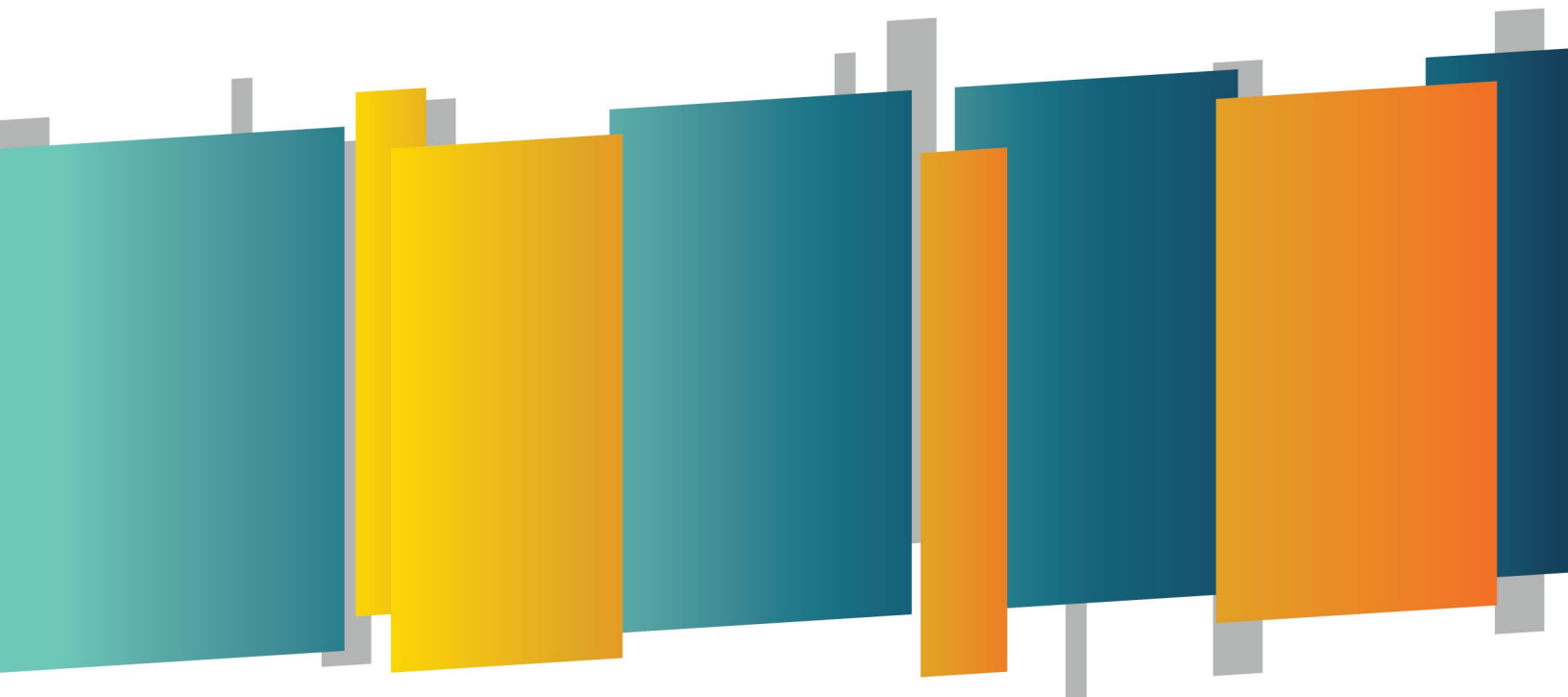
Background: As mandated by Iowa Code section 260C.47, the Bureau of Community Colleges conducted the interim accreditation evaluation of ILCC. The Department team and two external reviewers conducted a desk review, outcomes benchmark review and assurance interviews to evaluate ILCC. The attached report reflects the results of the interim evaluation, which included a site visit on November 8-9, 2023.

Accreditation Report Interim State Evaluation

Iowa Lakes Community College

Site Visit: November 8-9, 2023

Presented to the State Board of Education: June 18, 2026



State of Iowa
Department of Education
Grimes State Office Building
400 E. 14th Street
Des Moines, IA 50319-0146

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Contents

Accreditation Review Team Members..... 4

Purpose of the State Evaluation..... 5

Institutional Overview and Profile..... 5

State Evaluation Summary 6

Standards for Accreditation..... 6

 Prior State Evaluation..... 6

 Compliance with Higher Learning Commission (HLC) Criteria..... 6

 Standard 1: Faculty Qualifications 7

 Standard 2: Faculty Teaching Load..... 7

 Standard 3: Special Needs and Protected Classes 8

 Standard 4: Career and Technical Education Program Evaluation 9

 Standard 5: Facilities, Parking Lots and Roads 11

 Standard 6: Institutional Effectiveness and Outcomes-Based Planning..... 12

 Standard 7: Quality Faculty Plan 12

 Standard 8: Senior Year Plus Programs..... 13

 STICS Curriculum Review..... 14

 Compliance with Other Statutory State or Federal Requirements..... 15

Department Team Recommendation 16

Appendix A: Auditor of State’s Report Excerpt..... 17

 Recommended Control Procedures (pp. 47-49) 17

Accreditation Review Team Members

Amy Gieseke
Administrator, Division of Higher Education and Postsecondary Readiness
Iowa Department of Education

Heather Meissen
Administrative Consultant for CTE
Iowa Department of Education

Cale Hutchings
Chief, Bureau of CTE and Postsecondary Readiness
Iowa Department of Education

Erica Woods-Schmitz
Education Program Consultant, CTE
Iowa Department of Education

John Dawson
Math Professor
Kirkwood Community College

Megan Hills
Director of Strategic Initiatives and Assessment
Eastern Iowa Community Colleges

Purpose of the State Evaluation

The purpose of this review was a scheduled accreditation evaluation of Iowa Lakes Community College (ILCC) by the Iowa Department of Education (Department) as mandated by Iowa Code section 260C.47.

Institutional Overview and Profile

The Department officially recognized ILCC on October 28, 1966. The college was organized in January 1967, when the first board of directors met to begin planning ILCC's organization and development.

The Iowa Legislature established the Merged Area III community college district as a part of a statewide higher education plan. This area included all or parts of Clay, Dickinson, Emmet, Kossuth and Palo Alto counties, which encompassed 26 community school districts and two parochial school systems at the time. In 1968, the ILCC board approved the merger of Estherville Junior College and its facilities into the new district. The Estherville Community School District had operated the college since its founding in 1924. Four years after the merger, in 1972, ILCC constructed the current Estherville Campus facilities to serve transfer and career and technical education (CTE) programs. Today, this campus also houses the Northwest Iowa Regional STEM Hub.

In 1970, as ILCC prepared to develop its Estherville campus, the board approved merging with Emmetsburg Junior College. This move gave ILCC two major campuses in the area, significantly expanding its footprint. Emmetsburg CSD had operated Emmetsburg College since its founding in 1930. Like the Estherville campus, the Emmetsburg campus is home to transfer and career and technical programs.

ILCC has continued growing steadily and now comprises five campuses: Emmetsburg, Estherville, Spencer, Spirit Lake and Algona. All of these sites offer liberal arts and CTE programs. The Spencer Campus began operating in the mid-1970s and features a computer lab, community education services and a Student Advising /Success Center. It also serves as the central hub for the Northwest Iowa Small Business Development Center.

ILCC's Spirit Lake Campus opened in 1984, and moved into new facilities in 1995. Most recently, in 2023, the campus was reimagined to serve as a Regional Career Academy for area high schools. The campus offers both credit and noncredit programming, including industry training, and houses a computer lab and the Student Advising/Success Center.

Two years later, in 1986, ILCC opened its Algona Campus. Like its counterpart in Spirit Lake, the Algona Campus offers credit and noncredit programming. It also houses a computer lab, the Student Advising/Success Center, the Tietz Entrepreneurial Center and is home to the Retired and Senior Volunteer Program's main offices.

Today, ILCC is a public, two-year institution which offers more than 56 certificate and degree programs, as well as a variety of business and industry certifications. Co-curricular opportunities include more than 30 clubs and organizations, plus 16 athletic teams.

ILCC's service area is somewhat remote, encompassing 2,900 square miles and more than 66,900 residents. The college's early vision was that students would not have to travel more than 25 miles to attend classes, and to serve this large area, ILCC's five campuses include 30 facilities, occupying 555 acres of land. Consistent with its mission, the college also offers flexibly-scheduled classes across a variety of formats including in-person classroom instruction, hands-on CTE programming and online coursework to meet students' needs. This flexibility and variety bring programming directly to, or within a short drive of, any potential student in ILCC's service area.

These geographic factors, and ILCC's subsequent commitment to creating robust distance learning opportunities, are reflected in both enrollment figures and how the institution ranks among Iowa's other community colleges. In fall 2023, 2,749 students enrolled at ILCC, 42.8% of whom were high school students in joint enrollment programs. Nineteen percent of ILCC students were enrolled in CTE programs and 78% in arts and science programs. While ILCC ranked 14th in total enrollment among Iowa's 15 community colleges, it ranked eighth in success rate (the proportion of students who earn a degree, certificate or transfer to a four-year institution) and ninth in graduation rate, according to the Department's 2022 Community College Profile Report. Additionally, the college was 11th in the proportion of joint enrollment students served, and fourth in the proportion of distance learning enrollment.

Note: Information in this section was obtained from the ILCC website and the 2023 ILCC Community College Profile Report.

State Evaluation Summary

The Department's Bureau of Community Colleges conducted an interim accreditation evaluation of ILCC that included a desk review of written materials submitted by the college and on-site assurance interviews conducted on November 8-9, 2023. During the on-site visit, it was evident that ILCC staff and faculty were committed to continuous improvement and to student success. Additionally, there was strong staff and faculty retention at ILCC. The college also exhibited pride in being proactive and organized in all operational areas.

The Iowa State Board of Education (State Board) approval of reaccreditation has been delayed until June 2026 due to a special investigation requested by the U.S. Department of Education (USED) conducted by the Auditor of the State of Iowa (AOS) which is summarized in Appendix A. The Compliance with Non-Accreditation State or Federal Requirements section discussed below reflects the results of the USED investigation.

The Standards for Accreditation were evaluated in 2023 so, therefore, based on accreditation rules and processes in place at that time.

Standards for Accreditation

Prior State Evaluation

ILCC's fiscal year (FY) 2019 comprehensive accreditation report required the college to follow up on findings in two areas. In the area of faculty qualifications, the Department team found concerns with three faculty members' qualifications. Additionally, in the area of special needs, the Department team found inconsistency with the continuous nondiscrimination statement and its inclusion in all college publications. In response, the Department team made several recommendations. During the FY23 comprehensive accreditation visit, the Department team was impressed with the improvements ILCC made in all of these areas. As a result of the college's work to address previous recommendations and findings, there were no findings noted during this FY24 interim accreditation visit.

Compliance with Higher Learning Commission (HLC) Criteria

The Department team reviewed the most recent HLC report and information available at the time of the evaluation. HLC conducted ILCC's Reaffirmation of Accreditation in April 2023. ILCC's most recent HLC accreditation letter provided adequate evidence that the college has continuing institutional accreditation with no issues, concerns or findings documented.

The college's next Reaffirmation of Accreditation is during the 2029-2030 cycle.

Finding: No accreditation compliance issues were noted during the evaluation.

Standard 1: Faculty Qualifications

All community college-employed instructors who are under contract as of July 1, 2011, who teach in CTE or arts and sciences (including adjuncts) are required to meet minimum faculty standards (Iowa Code section 260C.48).

To ensure compliance with the standard, the Department team provided ILCC with a random list of 20 faculty members who taught credit courses the previous year. The college then submitted personnel files for these faculty regarding qualifications, including supporting documentation such as college transcripts and employment applications, to illustrate related work experience and third-party licensure/certification, if applicable. The Department team then examined the files to determine whether the qualifications of each faculty member complied with Iowa Code for the courses they taught during academic year (AY) 22-23.

Following a thorough review of the 20 random faculty personnel files, the Department team met with ILCC's chief academic officer, executive dean, arts and sciences dean, dean of health education, CTE and workforce dean and executive director of human resources to learn about the college's faculty qualification review process, and to discuss a few concerns raised during the review. Most of the files proved the college utilized the appropriate faculty qualification review process. They also showed ILCC used the materials provided by the statewide Faculty Standards Council, which were drafted in an effort to establish statewide consistency and compliance with HLC and Iowa Code criteria. The college has good processes for ensuring qualifications are in place and well-documented, and that faculty files contain the instructor's most recent professional licenses. ILCC also uses its student information system to indicate which courses/prefixes instructors are allowed to teach, which is an excellent practice. The Department team was also impressed with the thorough process ILCC uses to determine alternative credentialing and tested work experience for CTE faculty members.

The Department team noted that one faculty member teaching in the biology prefix, which is considered a broad discipline with specialized subfields, did not have at least six graduate semester hours in the specific discipline. College personnel assured the Department team that the faculty member will not be allowed to teach this course until he takes another graduate-level course to obtain enough hours to be qualified. Also, there were a few instances where specific graduate semester hours were not identified on other instructors' transcript(s), or where it was not clear on their forms if a course was an arts and sciences, CTE or applied liberal arts and sciences course.

Although the documentation of faculty qualifications was strong, the Department team offers the following **recommendations**:

- Ensure that courses counting toward graduate semester hours are clearly indicated on transcripts and/or faculty qualification forms.
- Indicate on faculty qualification forms which types of courses the person is qualified to teach for disciplines that have courses designated as both arts and sciences and CTE. Also, indicate applied liberal arts and sciences courses on qualification forms.
- When an instructor is using content from one of their graduate-level courses as part of their ILCC instruction, and the title of the graduate course is unclear, the instructor should provide syllabi from that course to college administration. This additional documentation will help ensure the instructor meets the graduate credit requirements to teach a course at ILCC focused on that specific topic.

Finding: No accreditation compliance issues were noted during the evaluation.

Standard 2: Faculty Teaching Load

The teaching loads of full-time instructors must not exceed the faculty teaching load limits set forth in Iowa Code. This is the case for both CTE instructors and arts and sciences instructors. If the instructor

and the community college administration mutually consent then the instructor may be assigned additional teaching load (Iowa Code chapter 260C.48).

To confirm compliance with this standard, the Department team reviewed a random sample of 20 faculty members for whom ILCC provided documentation of their AY 22-23 teaching loads. A discussion with the chief academic officer, executive dean, arts and science dean, dean of health education, CTE and workforce dean and executive director of human resources about load processes clarified the steps taken by the college to load both arts and science and CTE faculty.

ILCC provided adequate teaching load documentation for the faculty under review. The college assured the Department team that all faculty are loaded according to arts and sciences credit hours, and that all course delivery modalities—in-person classroom instruction, distance learning and hands-on CTE courses—are loaded the same. The Department team was especially impressed with the processes ILCC uses to ensure faculty are teaching within load limits, including review of faculty loads by multiple staff members. Additionally, there is a strong mutual consent for overload, and this information is listed in the faculty contract. ILCC tries to reduce first-time faculty load, when possible, by assigning them to multiple sections of the same course to minimize course prep during the first year.

Finding: No compliance issues were noted during the evaluation.

Standard 3: Special Needs and Protected Classes

Community colleges shall provide equal access to the full range of program offerings and services including, but not limited to, recruitment, enrollment and placement activities for students with special education needs or protected by state or federal civil rights regulation. Students with disabilities shall be given access to the full range of program offerings at a college through reasonable accommodations (Iowa Administrative Code subsection 281-24.5(3)), with information regarding how to access such accommodations provided in a disability statement. In addition, community colleges shall have continuous and annual nondiscrimination statements ensuring access to educational programs and employment for state and federally protected classes. This nondiscrimination statement must list all state and federally protected classes; provide the name/title and contact information of the person(s) designated to coordinate equity, Title IX and Section 504 compliance and provide contact information for the Office for Civil Rights (OCR) regional office. The nondiscrimination and disability statements may be separate or the college may choose to combine them.

The Department team conducted a desk review prior to its ILCC onsite visit. As part of this process, they examined the Americans with Disabilities Act (ADA) and nondiscrimination policies, statements and practices published in ILCC's marketing and recruitment materials, handbooks, college catalog, website and sample course syllabi. During the onsite visit, the Department team reviewed additional documentation, and conducted interviews with faculty, students and staff associated with disabilities services, to ensure compliance with this standard.

The Department team saw evidence of numerous collegewide efforts to create a welcoming environment for all students, provide accommodations for students with special needs and provide opportunities for underrepresented students in particular programs of study. Some of these observed efforts include:

- ILCC has comprehensive Title IX procedure documentation. Additionally, the college incorporates required Title IX training into the Canvas Learning Management System (LMS).
- Since the last state accreditation visit, the college has worked to ensure that the continuous nondiscrimination statement is consistent across publications. ILCC also ensures the ADA and disabilities services statements are consistent in course syllabi by using Simple Syllabus software available through the ICCOC.
- Information on the ILCC website, including the nondiscrimination statements, is available in multiple languages. The college also tries to hire bilingual staff when possible.

- ILCC has made great efforts with the Guided Pathways initiative, as evidenced by making broad, student-centered guided pathways, career academy pathways and stackable credentials available to students. Additionally, the college utilizes Pathways Pillar Teams, which ensure that students are advised properly on guided pathways.
- ILCC has implemented special needs initiatives connected to the college's mission. For example, ILCC ensures its website, materials and facilities are ADA compliant. The college also utilizes a veteran and military center, TRIO program and SAVE program to provide additional opportunities for students who need them. Recently, ILCC received a grant from the nonprofit Lumina Foundation, which it used to reduce barriers and better communicate with students. The college also uses data and dashboards to assess which services are best for students.
- ILCC has also made efforts to increase the number of scholarships available to students, including the college's foundation scholarships and Iowa's Last Dollar Scholarships.
- The college provides several leadership opportunities, clubs and activities for students. In interviews, students reported that faculty and staff are approachable and friendly, and that they appreciated the small class sizes at ILCC.

During its review, the Department team noticed a few needed updates to, and/or clarifications of, the college's nondiscrimination statement. For example, on page 26 of the student handbook, the purported web link to complaint forms actually takes users to the records and registration webpage. The team also noticed that across various materials, nondiscrimination statement titles said either "equity" or "nondiscrimination." Additionally, the continuous nondiscrimination statement listed a specific person's name as a contact for questions or concerns. If that person were to leave the institution, ILCC may want to consider replacing their name with generic contact information to help ensure consistency in the statement over time. During the site visit, the Department team also noted that the continuous nondiscrimination statement was missing from a few recruitment materials.

The Department team applauds ILCC's commitment to the success of all students. In order to enhance the college experience for all students, the team **recommends** the following:

- Even though the continuous nondiscrimination statement is present in most required places, the college should ensure that it is published in all recruitment materials. Additionally, the statement needs to be added to the "Career Connect Student Handbook," and to the "Concurrent Enrollment Faculty Liaison Guide."
- ILCC should provide a list of all CTE programs in the annual nondiscrimination statement, and indicate which of those programs have special admissions requirements. Also, the college should add language to the annual nondiscrimination statement indicating that the institution will take steps to assure that the lack of English language skills will not be a barrier to admission and participation as required by *Guidelines* Section IV.O; 34 C.F.R. §100.6(d).

Finding: No compliance issues were noted during the evaluation.

Standard 4: Career and Technical Education Program Evaluation

Iowa Code chapter 258, Iowa Administrative Code subsection 281-46.6(4) and Iowa Administrative Code chapter 281-21 include the state standards related to the offering of CTE programs. These standards include, among other components, requirements related to program and award length, program content, labor market demand, articulation and advisory committees. All CTE programs, including both new programs and modifications to existing programs, must be approved by the Department. Community colleges are required to review at least 20 percent of their CTE programs annually.

Community colleges must review at least 20% of their CTE programs annually, using the statewide standards provided in the aforementioned Department guides. The Department team reviewed ILCC's CTE program review process, schedule and a random sample of recent CTE program reviews, to ensure compliance with the state's CTE program review standards. For standards regarding program

advisory committees' composition, roles and responsibilities, the Department team reviewed a random sample of CTE advisory committee membership lists and meeting minutes to ensure compliance.

Based on the documents submitted for the desk review, ILCC follows a five-year plan to review all CTE programs. CTE faculty receive program review documentation and resources, and meet with instructional deans to discuss the process prior to the start of the program review. The college also utilizes a program review committee, with representation from CTE and arts and sciences faculty and administrators, admissions staff, the marketing department and advising staff. During the review, the committee evaluates program needs and assessments, and determines action items for the program faculty to complete. During the interview with the Department team, ILCC provided several examples of how programs are kept current, and how it uses the program review process to make financial decisions.

The Department team was impressed with the additional following practices related to program review at ILCC:

- The college provides ample resources to faculty and staff involved in program review, including a program review template, a guide to the process and previously-completed program review documents. Additionally, ILCC provides a "Program Review and Assessment Guidance" document provided in Canvas LMS. The college also follows up with program faculty every six to 12 months, to ensure that action items are completed.
- During the program review process, the committee uses online dashboards with student outcome data, such as: enrollment, retention, persistence and completion and employment. The college also is starting to disaggregate this data by different subgroups. ILCC's review process also does a nice job of assessing if program costs are proportionate to educational benefits received, especially for high-cost programs, and tracking students after they graduate.
- The college also incorporates an assessment of student learning into program review. For example, the program review template asks faculty to document program learning outcomes (PLOs). ILCC then maps PLOs to Institutional Learning Outcomes (ILOs), which are based on the college's general education learning outcomes. Additionally, the college asks faculty members to indicate whether courses introduce, reinforce or assess PLOs and ILOs, which is a good assessment practice. ILCC also asks CTE program faculty to review assessment data, and to analyze trends and impacts on student learning.
- ILCC makes efforts to recruit diverse student populations into CTE programs, as evidenced by women-specific events, such as the "Women in Aviation" event. The college also uses data disaggregated by gender and region in these recruitment efforts.
- ILCC has been working to get CTE programs across its campuses to collaborate on cross-college projects.
- The college incorporates industry feedback into program review. During advisory committee meetings, members discuss CTE program enrollments, course/program success and/or retention rates, learning outcomes, curriculum, future trends, equipment/resources and marketing. Additionally, program faculty have discussions with industry partners regarding short-term credentials, and aligning credit programs with non-credit credentials.
- Some programs have well-established Career and Technical Student Organizations (CTSOs), and ILCC has developed a plan to align appropriate CTSOs to degree-seeking CTE programs. The college's more established CTSOs have had great success at national-level competitions, and look to continue this work into the future.

The Department team has the following **recommendations** to improve the process even further:

- Update the CTE program review template so that it crosswalks with state standards. To achieve this objective, connect program review documents to operational plans, the strategic plan and the budget. Also, incorporate advisory committee feedback more formally into the program review process, and develop a rubric or form to standardize feedback to CTE programs.

- Ensure program review advisory committees are meeting twice per year, and continue efforts to recruit diverse committee members. Require all programs to use a meeting template, and consider adding question prompts to the template or providing training on how to use the template.
- Although the college provided examples of how different CTE programs and faculty attempt to remove barriers for students, it is **strongly recommended** that ILCC document how CTE programs are meeting the education needs of the employment community. Furthermore, the college should demonstrate how each program identifies the unique needs of particular student groups, and develop strategies to remove barriers as outlined in Iowa Code 258.4(7), Iowa Administrative Code subsection 46.6(4) and Iowa Administrative Code subsection 24.5(4). This work should especially focus on students with special education needs, or those protected by state/federal civil rights regulations.

Finding: No compliance issues were noted during the evaluation.

Standard 5: Facilities, Parking Lots and Roads

Each community college must present evidence of adequate planning to the Department team, including a board-approved facilities plan (Iowa Administrative Code subsection 281-21.62(5)). The community college's plan must meet state and federal requirements as outlined in the state accreditation guide.

To assure compliance with this standard, the Department team reviewed ILCC's most recent facilities plan, (approved by the college's board of trustees in October 2019), and interviewed the vice president, chief financial officer, director of information technology, associate director of accreditation and grants and the assistant to the vice president, regarding the college's facility planning process and decision-making structure.

The Department team was impressed with ILCC's facilities, which incorporated up-to-date technology, and were student-focused. The 2022-28 Facilities Plan is very comprehensive, and is the most recent version of the plan. It consists of broad target areas, and is reviewed annually by college personnel. A board of trustees building subcommittee meets frequently to discuss projects and high-priority items. The college also gathers input from multiple stakeholders about facilities and technology. For example, faculty members provide feedback through program review, surveys and meetings, and students can weigh in during ILCC's Pizza with the President event. The college also maintains a technology plan, which includes a five-year replacement cycle for computers. To ensure ADA compliance, ILCC performs self-audits of campus facilities, and also works with an assurance provider to perform audits.

The Department team was especially impressed with ILCC's strong commitment to safety, as evidenced by the number of safety initiatives in place. For example, ILCC has a very comprehensive Critical Response Plan that addresses issues such as: ALICE (Alert, Lockdown, Inform, Counter, Evacuate) training, violence, weapons, accidents, ADA compliance, fires, bomb threats, spills and other training. The college also has a Pandemic Influenza Response Plan, and provides technology, Family Educational Rights and Privacy Act (FERPA), bloodborne pathogens, hazardous materials and Title IX Safe College training.

Overall, the Department team was impressed with facility conditions, the thorough planning around facilities improvements, safety initiatives and the responsiveness of the planning processes to meet the needs of stakeholders. During interviews, the Department team learned that some of the campuses are using student success centers instead of libraries. The team **recommends** that the college ensure library and student success center staffing is appropriate, and that appropriate academic resources are available to students as outlined in Iowa Administrative Code 281 subsection 24.5(5) and Iowa Administrative Code chapter 21.5.

Finding: No compliance issues were noted during the evaluation.

Standard 6: Institutional Effectiveness and Outcomes-Based Planning

Community colleges are required to update their strategic plans at least every five years as a guide for the college and its decision making (Iowa Administrative Code subsection 281-21.62(6)).

The Department team reviewed ILCC's most recent strategic plan, and interviewed selected staff to ensure compliance with this standard. ILCC utilizes a four-year strategic planning cycle, demonstrated by their 2024-28 plan. In addition to having a mission and vision, it also listed the core values of achievement, respect, integrity, service and excellence. The plan further incorporates core priorities, which include: lifelong learning, academic excellence, key partnerships, equal access and student access, respect and service. Each of the core priorities have measurable goals that are incorporated into an online dashboard. Some examples of measurable goals include: increasing constituents served by the college, increasing student success, expanding resources to support students and programs, expanding student engagement and facilitating communication and collaboration across the college. During the last state accreditation visit, the Department team expressed concern that ILCC's strategic plan contained a substantial number of sub-goals, potentially making it difficult to track these effectively. Therefore, the previous team recommended that the college consider ways to simplify the plan with fewer sub-goals. The Department team was pleased to see that ILCC updated its current strategic plan, only listing two to four goals per core priority.

Additional ILCC strategic plan strengths include cabinet member collaborating with departments to draft operational goals, set benchmarks and/or identify matrices that show progress toward achieving goals. All operational goals align with collegewide goals, which also coincide with the strategic plan's core priorities, and support ILCC's mission, vision and core values. The Department team was especially impressed with how the college-wide goals contained metrics, and how these metrics were connected to the college's mission, vision and values. The Department team also commends ILCC's efforts to use institutional effectiveness data to make informed decisions and improvements at the college. In interviews, faculty members stated they use results from ILCC's assessment of student learning, which ties back to the academic excellence core priority, to make decisions in their courses and programs. ILCC administration also uses student assessment results for college-wide decisions.

Finding: No compliance issues were noted during the evaluation.

Standard 7: Quality Faculty Plan

Iowa law mandates that community colleges plan for faculty hiring and professional development, with institutional Quality Faculty Plans (QFPs) needing to meet the standards outlined in Iowa Administrative Code subsection 281-21.62(7).

The Department team reviewed ILCC's QFP, and interviewed members of the college's QFP Committee, to ensure compliance with this standard. The Department team also reviewed QFP hours for the random sample of 20 faculty members for whom the college provided documentation.

The ILCC board of trustees last approved the college's QFP in September 2023. An 11-member QFP Committee consisting of six faculty members and five administrators maintains the plan. Faculty members are elected by the faculty bargaining unit, and administrators are appointed by the college's president. The Department team met with the committee to discuss key components of the QFP, and to ascertain that it meets compliance requirements. The committee meets at least once a semester to review the QFP. Updates to the body of the QFP go to the board of trustees for approval. Faculty members track their own professional development annually using a form, and reflect on these activities with their dean at the end of the academic year. Adjunct faculty members are not required to complete QFP forms, but they are required to complete a new faculty module in the Canvas LMS onboarding course. Adjunct faculty members are also invited to campus professional development days, and there is a special workshop that concurrent enrollment instructors are required to attend.

The Department team was impressed with the following aspects of ILCC's QFP:

- There is extensive onboarding for new faculty members. Examples include: new employee orientation; a formal mentoring program; a Canvas LMS orientation course, which covers topics such as the history of community colleges, classroom management, curriculum planning, assessment and technology and a New Teacher's Workshop, an annual event that covers topics such as teaching online, writing syllabi, organizing assessment activities, improving student learning and teaching effectively.
- The college has put incentives in place for faculty to undertake continued professional development. These incentives include an approval process that asks faculty members to tie their professional development activity to ILCC's strategic plan and budget.
- The instructor competencies listed in the QFP are comprehensive, and include mastery of subject matter, student learning, instructional planning and delivery, classroom learning environment, communication, assessment, technology use and community college philosophy. The plan also lists ways faculty members can demonstrate these competencies.
- The QFP Committee has substantial discussions about the plan and professional development activities during its meetings. They also review 20% of the plans each time they meet, to make sure they are robust.
- The college maintains a subscription to the Magna Monday Morning Mentor program, which delivers focused training for faculty and staff. This program is available to all faculty members, including concurrent enrollment instructors, for free, and counts toward professional development in the QFP. All faculty members, including adjunct faculty, also have the option to attend the ICCOC spring conference for professional development.

To further improve ILCC's QFP, the Department team has the following **recommendations**:

- Although the overall plan nicely details instructor competencies, and connects the institution's core values and goals, consider linking instructor competencies with the college's strategic plan priorities. Doing so will help connect instructional professional development with institutional goals and objectives, by adding these items to faculty members' QFP forms.
- Formalize a list of activity examples faculty can complete for professional development, and include opportunities outside of on-campus professional development days.
- Continue developing a more formal electronic tracking system for professional development, to ensure better historical record keeping of QFP compliance.
- Implement and document a more formal process for faculty members who underperform with college QFP requirements.

Finding: No compliance issues were noted during the evaluation.

Standard 8: Senior Year Plus Programs

There are a variety of requirements for Senior Year Plus (SYP) programs offered to high school students jointly enrolled in Iowa's community colleges. These requirements are included in Iowa Code 261E. The Department utilizes the National Alliance of Concurrent Enrollment Partnerships (NACEP) accreditation process to ensure compliance with statutory requirements.

ILCC's concurrent enrollment program, Career Connect, has maintained NACEP accreditation and is approved through AY 29-30. The program is overseen by the Career Connect Director, Career Connect Coordinator and High School Partnership Specialist, and services 12 Iowa school districts. Career Connect provides programming in various ways, including face-to-face at high schools and career academies, and online. The program currently has 37 concurrent enrollment faculty teaching 1,947 students.

It was clear from both the desk review and on-site interviews that ILCC's SYP program operates very well, and adheres to all state and NACEP standards. Program staff coordinate and monitor programming within the college's service area to ensure the continuity of program processes and procedures. This work includes using faculty liaisons, who make certain the rigor of SYP courses taught

at area high schools matches that of comparable courses taught on ILCC's campuses. Overall, the Department saw substantial evidence in the college's course prerequisites and admissions policies, add/drop policies, grading policies and course accommodations, demonstrating that ILCC does not place undue restrictions on concurrent enrollment students.

The Department team was particularly impressed with the following elements of ILCC's concurrent enrollment program:

- The student handbook is comprehensive, and provides a detailed list of all college services concurrent enrollment students can use. Available student services are also listed on the "Orientation Fact Sheet" and orientation PowerPoint. ILCC also provides documents titled "Tips for Parents" and "Tips for Students," which is a good practice.
- The instructor handbook and faculty liaison handbook are also comprehensive, and it is very clear that these documents align with NACEP standards.
- ILCC ensures consistency between concurrent enrollment courses and college courses. For example, the college uses Simple Syllabus software to make certain high school instructors teaching concurrent enrollment courses use the same syllabi as those used at the college.
- The "Guided Career Pathways" document on ILCC's website clearly shows which courses at the high schools apply toward the college's CTE programs and transfer majors. ILCC also provides students a document outlining which concurrent enrollment courses they can take to earn an associate of arts degree while still in high school.
- All concurrent enrollment instructors are required to complete the new teacher workshop Canvas LMS course. Specific professional development opportunities and materials for concurrent enrollment instructors and faculty liaisons include: an instructor checklist, faculty liaison checklist, New Concurrent Enrollment Program Instructor and discipline-specific workshops, ILCC Career Connect course and staff development processes document, instructor semester checklist and deadlines document and "Magna Monday Morning Mentor" professional development. All of those resources are excellent. Concurrent enrollment instructors are also included in the college-wide assessment process, and are invited to the college's assessment day.
- ILCC utilizes career and college transition counselors, who have conversations with students about concurrent enrollment courses, to help reach underrepresented students.

ILCC has a strong, robust concurrent enrollment program. The Department team recommends the following to further enhance the SYP experience for students:

- Review and update language in the concurrent enrollment materials. For example, it needs to be clearer in the "Resources Provided" document that students do not pay for textbooks. ILCC also needs to include language in its concurrent enrollment contract describing the exclusion of a teacher/instructor under suspension or revocation of an educational license, or statement of professional recognition, issued by the Bureau of Educational Examiners, as outlined in Iowa Administrative Code Chapter 281 subsection 22.3(1). There are other minor examples where language needs to be updated, and the Department's consultant for program quality will work with ILCC staff on the specific details regarding documentation clean-up.
- Disaggregate student participation and outcomes data related to SYP programming, and work with school districts to identify and close achievement gaps.

Finding: No compliance issues were noted during the evaluation.

STICS Curriculum Review

The Department utilizes the State of Iowa Curriculum System (STICS) web-based platform for its program approval process and maintains a database of approved programs and courses. STICS performs compliance checks on all programs offered by each college. Iowa Administrative Code subsection 281-21.3(2) offers further information.

The Department team conducted a compliance check of ILCC's programs to ensure they meet state standards. Additionally, the Department team compared ILCC's approved academic programs in the state's database with those provided in the college catalog. Overall, minimal edits were needed to align the college catalog with STICS. There was one instance where an award was out of compliance, due to discrepancies in technical core percentage requirements. Additionally, some CTE awards listed in STICS were not listed in the catalog, because they are no longer offered by ILCC. The college assured the Department team these awards would be removed once the changes were approved during the curriculum review process. The Department team was impressed with how ILCC corrected nearly all curriculum discrepancies prior to the accreditation visit.

It was apparent from interviews that ILCC has very sound curriculum practices, which was also echoed in the most recent HLC report. The college's curriculum review process is very faculty-driven, with the advisory committee voting on curriculum changes, followed by a Faculty Curriculum Committee vote. Proposed changes then go before the Academic Council for consideration. The council then recommends the updates to the ILCC president. As a good practice, new program changes are also presented at the ILCC board of trustees meeting. The Department team was especially impressed with the following:

- ILCC does a nice job laddering certificate and diploma awards in programs.
- The college catalog pages for each award are very transparent and comprehensive, listing the starting salary/average salary, projected employment growth, programmatic accreditation (if applicable) and whether or not special certifications are available for each award. Additionally, each catalog page lists whether or not there is an internship or practicum for the program.
- ILCC increased the number of transfer majors available to students from eight to 16 over the past year.

The Department team noted during the desk review that the "Transfer Degree Options" on page four of the "Guided Career Pathways" document posted to the ILCC website lists options that are not actual transfer pathways. According to Iowa Administrative Code 281 subsection 21.3(2), community colleges shall exclusively use the term "transfer major" to record the completion of an approved transfer major program on the student's official transcript and other academic records, publish in the college catalog and market the transfer major program to current and potential students and the general public. Additionally, a community college shall not transcript, catalog or market an associate of arts or associate of science program using other terms which contain or are synonymous with the terms "transfer" or "major" or which imply a specialization within a subject area. Thus, it is **strongly recommended** that ILCC change the language to say "academic pathway" or "advising pathway," or to list the actual transfer majors similar to the chart on page five of the "Guided Career Pathways" document.

Finding: No compliance issues were noted during the evaluation.

Compliance with Other Statutory State or Federal Requirements

The U.S. Department of Education (USED) requested a special investigation be conducted by the State of Iowa Auditor (AOS) regarding concerns over Federal Student Aid (FSA) compliance. The AOS conducted a special investigation covering the period of July 1, 2019, through February 29, 2024, and released the final report on February 24, 2026. The AOS report identified \$109,574 in federal questioned costs for a school required to take attendance and \$203,121 in federal questioned costs for a school not required to take attendance which resulted in eight recommendations to strengthen ILCC's internal controls which are included in Appendix A of this report.

The Department team **recommends** ILCC review each of the AOS report recommendations and develop standard operating procedures to incorporate the recommendations into college practices. ILCC shall **submit** to the Department a summary of actions taken by the college as a result of the AOS special investigation by March 31, 2027. In addition, the Department team asks that copies of further

correspondence between the college and USED related to this investigation be shared with the Department.

Further, Iowa Code section 11.6, requires colleges to perform an annual financial audit and to file a report with the Auditor of the State by March 31. The audit report must include basic financial statements, required and supplementary information and the Schedule of Findings and Questioned Costs. The Department team **recommends** ILCC take action to strengthen internal financial reporting and ensure annual financial audits are completed and submitted to the AOS by the March 31 deadline each year.

Finding: Understanding ILCC could not proceed with audits for two years during the AOS special investigation from February 2024-February 2026 and concurrently needed to identify a new auditor after a request to AOS was declined, the college has not complied with this requirement for FY23, FY24 or FY25. ILCC indicates that it has retained an auditor to complete the annual financial audit for the missing years and has submitted a timeline for finalizing all outstanding audits.

In accordance with that timeline, the college is required to **submit** financial audits to AOS for FY23 by June 30 2026, for FY24 by January 1, 2027, and for FY25 by March 31, 2027. Following the FY25 audit completion, ILCC will begin work on the FY26 audit, with an anticipated completion date of September 30, 2027. At that point, ILCC will return to a standard audit schedule with FY27's audit being submitted on time, by the March 31, 2028, deadline.

Confirmation of each audit's submission shall be **submitted** to the Department as completed by the required date. Additionally, ILCC shall **submit** monthly financial reports to the Department for review until all audits have been completed. ILCC shall also **schedule** quarterly meetings between Department staff, college staff and the external auditor to provide an update on the status of outstanding audits.

Department Team Recommendation

The Department recommends conditional approval of accreditation for ILCC. Per Iowa Code section 260C.47, the Department will establish a corrective action plan with the ILCC Board of Directors to address the identified audit report deficiencies which includes the college providing a status report of their outstanding FY23, FY24 and FY25 annual audits and anticipated FY26 audit delay to the State Board in spring 2027.

Assuming successful completion of the FY23, FY24 and FY25 audits by March 31, 2027, the Department will bring forward a recommendation for full accreditation to the State Board in spring 2027.

To ensure ILCC returns to its regular accreditation cycle, the next state comprehensive accreditation evaluation is scheduled for AY 2029-2030.

Appendix A: Auditor of State's Report Excerpt

Recommended Control Procedures (pp. 47-49)

During the investigation, we reviewed the compliance controls used by Iowa Lakes Community College for financial aid eligibility based on attendance and withdrawal return calculations. An important aspect of internal control involves establishing procedures that ensure compliance and accountability for assets susceptible to loss from errors or irregularities. These procedures enable the actions of one individual to serve as a check on another, thereby providing a measure of assurance that errors or irregularities will be detected within a reasonable time during normal operations. Based on our findings and observations detailed in this report, the following recommendations are made to strengthen the College's internal controls.

A. Ineligible Financial Aid Disbursed to Students Not Beginning Attendance – FSA requires students begin attendance in all classes to be eligible for financial aid. The College is disbursing ineligible financial aid because they do not verify students began attendance in all classes.

Recommendation – The College should establish a process to verify students began attendance in all enrolled classes by the end of the refund period each academic term. Unattended classes should be removed from students' enrollment. For those that do not begin attendance in any enrolled class for any academic term, they should be removed from all classes, so they don't receive failed grades or have R2T4 calculations performed.

Once class enrollment is adjusted for attendance, financial aid should be verified for automatic adjustments based on students' attended enrollment level. Once the attendance verification process is established at the beginning of each academic term, R2T4 withdrawal calculations can rely on financial aid being eligible when performing calculations.

B. Financial Aid Over (Under) Payments – Financial aid over (under) payments occurred because the College failed to adjust incorrect FSA awards before disbursement. Enrollment changes and incorrect Pell awards for students' cost of attendance and estimated family contribution caused financial aid over (under) payments.

Recommendation – The College should strengthen internal controls over the financial aid award process before disbursement by:

- Ensuring financial aid is adjusted at the end of the refund period for deleted classes and students not beginning attendance.
- Improving Pell award accuracy by using the internal system rather than staff identifying and manually entering Pell scheduled awards.
- Emphasizing accuracy if staff manually enter the scheduled Pell award by using the student's cost of attendance and estimated family contribution to select the correct Pell award for the student.
- Using automated checks to identify over (under) awards before financial aid is disbursed at the beginning of the academic terms.

C. School Required to Take Attendance – The College asserts it is not a school required to take attendance even though it meets the definitions within 34 CFR 668.22 for a school required to take attendance. Because of the assertion, it does not use its attendance reports to identify students' last dates of attendance for return calculations.

Recommendation – The College should work with the USDE to determine whether they are school required or not required to take attendance. Once determined, the College should comply with 34 CFR 668.22 in accordance with the determination by updating financial aid policies and procedures to formally classify the College as a school taking or not taking attendance. If taking attendance, processes should be developed to link to and use the College’s attendance reports to remove students from classes not attended and obtain the last date of attendance for all R2T4 calculations.

D. Improper Financial Aid Returns – The College is not ensuring proper and supported return calculations as required by FSA compliance. If the College is a school required to take attendance, it is not: using the student’s last date of attendance for R2T4 withdrawal dates, charging students’ accounts for their portion of return amounts, and using correct calculation elements, such as eligible financial aid, total term days covering students’ enrolled classes, and allowed institutional charges. Financial aid is often identified as fully earned with no return amount.

If the College is a school not required to take attendance, it is not ensuring that the date the student notified the College of withdrawal from all classes is being used as the R2T4 withdrawal dates for all official withdrawals. The failed grade last date of attendance is also not used for the R2T4 withdrawal date for all unofficial withdrawals.

Recommendation – The College should implement the following:

- For a school required to take attendance: use the student’s last date of attendance from Canvas LMS attendance reports for all R2T4 calculations, including automatically obtaining the last date of attendance for failed grades from these reports at the end of the academic term.
- For a school not required to take attendance:
 - Use the date the student notified the College of withdrawal from all classes that is supported by the student’s complete withdrawal record for all official withdrawal R2T4 calculations.
 - The last date of attendance from the Canvas LMS attendance reports should be automatically entered in the Ellucian Grade Report.
- Regardless whether the College is school required or not required to take attendance:
 - Discontinue having faculty enter a failed grade last date of attendance in the Ellucian Grade Report. The failed grade last date of attendance is required to be supported by school records.
 - Use correct R2T4 withdrawal elements, including students’ eligible financial aid, accepted financial aid that has not been disbursed, start and scheduled end dates that include all enrolled classes of students, allowed institutional charges from the students’ accounts, and ensure the documented return amounts match the amounts posted to students’ accounts.
 - Identify and charge the student’s share of the return amount when charging the College’s share to the student’s account.

E. Unreported R2T4 Amounts for COVID – Although the COVID waiver has expired, the College did not ensure return calculations were proper and supported during the waiver period. Return amounts were either reported incorrectly as financial aid fully earned or reported incorrectly to the USDE due to improper withdrawal dates and/or incorrect calculation elements.

Recommendation – Once it has been determined whether the College is a school required or not required to take attendance by the USDE, the College should report the correct COVID R2T4 amounts identified from the engagement to the USDE. Financial aid processes should be adjusted during waiver periods, so FSA compliance is satisfied.

F. Athletes Full Deletion After Attendance – The College is deleting student athletes from all classes after they have begun attendance. Financial aid is either not disbursed or fully reversed. In one case, tuition and fees and other charges were refunded after the ILCC’s published refund period. However, once a student has begun attendance, financial aid is earned and must be disbursed. The College did not identify post-withdrawal situations identified in the R2T4 calculation for two students.

Recommendation – The College should ensure student athletes comply with FSA requirements the same as all other students, which includes disbursing earned financial aid when students have begun attendance in any class. Students who delete all classes after beginning attendance should be treated as withdrawals rather than full deletions. College policies and processes should be updated so that full deletions occur only if students do not begin attendance by the end of the refund period with the student identified as a “no show” student. R2T4 calculations should identify post-withdrawal disbursements when financial aid has not been disbursed, and the student has begun attendance. The College’s refund policy should be enforced for every academic term with tuition and institutional refunds not allowed after the refund period unless the College has documented a reason to refund the student’s tuition, fees, and other charges.

G. Overstated Tuition Revenue from Non-Attendance – The College is not adjusting tuition and fee charges because it does not adjust student enrollment for attendance by the end of the refund period. Because financial aid is required to be adjusted for attendance, students should be removed from classes not attended. Since the College is not removing students from classes not attended, tuition and fee charges are not reduced, resulting in tuition revenue being overstated in the College’s financial statements. The College only reduces tuition and fee charges and financial aid for students who do not begin attendance in any class. Financial aid eligibility requires students to begin attendance in all classes to earn their financial aid.

Recommendation – The College should comply with FSA requirements for students beginning attendance by updating policies and processes to remove students from classes not attended by the end of the refund period. The update will ensure students are not disbursed ineligible financial aid, tuition and fee charges are refunded based on attended enrollment, and return calculations are based on eligible financial aid.

H. Missing Daily Statistics Reports – The College’s daily Dropout Detective Statistics reports are missing from the secure server from September 12, 2021 through September 13, 2023.

Recommendation – The College should restore missing daily Statistics Reports from backup systems, if available. If no backup reports exist, reports should be regenerated from student course records by applying external and independent forensic procedures to authenticate them. All Canvas LMS-generated reports supporting enrollment certification, financial aid eligibility, and R2T2 calculations should be backed up until records are no longer subject to audit. Immediate protection of all Canvas LMS student course records and reports should be implemented by limiting administrative super-user access to view-only status. Changes to student course records should be made by the course instructor who taught the course and provided academic engagement data for the student. The College should disclose the missing reports and gap period to the USDE and include a corrective action plan for how reports will be backed up and protected from modification, loss, and deletion going forward.