

July 8, 2025

BY CERTIFIED MAIL

Mackie Moore  
Interim President  
Haskell Indian Nations University  
155 Indian Avenue  
Lawrence, KS 66046

Dear President Moore:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Haskell Indian Nations University (“the Institution”). This action is effective as of the date the Board acted, June 26, 2025. In taking this action, the Board considered materials from the most recent comprehensive evaluation, including, but not limited to: the Assurance Filing the Institution submitted, the report from the comprehensive evaluation team, the report of the Institutional Actions Council (IAC) Hearing Committee, and the institutional responses to these reports.

**Summary of the Action:** The Institution has been placed on Notice because it is at risk of being out of compliance with the Criteria for Accreditation. This action also resulted in the Board continuing and reaffirming the accreditation of the Institution. The Institution meets Core Components 3.A, 3.C, 4.A, 4.B, and 5.C with concerns. The Institution does not meet Assumed Practice D.4. The Institution is required to host a Notice Visit no later than December 2026 to determine whether the Institution has ameliorated the findings that led to the imposition of the sanction.

**Institutional Disclosure Obligation:** HLC policy<sup>1</sup> requires that an institution inform its constituencies, including Board members, administrators, faculty, staff, students, prospective students, and any other constituencies about the sanction and how to contact HLC for further information. The policy also requires that an Institution on sanction disclose this status whenever it refers to its HLC accreditation. HLC will monitor these disclosures to ensure they are accurate and in keeping with HLC policy. The Institution must submit drafts of its planned disclosures to these various audiences to its HLC Staff Liaison in advance of transmission and provide its Staff Liaison with a link to relevant information on its website. At a minimum, an institution must: i) provide a copy of this Action Letter to its governing board, administration, and faculty, ii) provide a copy of the enclosed Public Disclosure Notice to its currently enrolled students, and iii) prominently display the Mark of Accreditation Status where accreditation status is described on its website. Once disclosures have been made, the Institution must submit copies of its disclosure

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<sup>1</sup> INST.E.10.010, Notice.

documents as a single .pdf file to <https://www.hlcommission.org/sign-in/submit-documents-to-hlc/> (by selecting “Information about Institutional Disclosures”) no later than seven (7) business days following receipt of this Action Letter. HLC will retain this information as part of the Institution’s record.

**Substantive Change:** HLC policy<sup>2</sup> requires that an institution placed on Notice be subject to additional requirements for substantive change during the Notice period and for three (3) years following the removal of Notice.

**Notification Program:** HLC policy<sup>3</sup> states that an institution placed on Notice is ineligible for the Notification Program for Additional Locations for three (3) years following the removal of Notice, providing all other requirements for the Notification Program are met.

### **Board Rationale**

The Board based its action on the following findings made with regard to the Institution as well as the entire record before the Board:

Haskell Indian Nations University (“the Institution”) meets, but with concerns, Criterion Three, Core Component 3.A, “the rigor of the institution’s academic offerings is appropriate to higher education,” for the following reasons:

- While the Institution produces assessment reports that include data from all courses, this data on assessment of student learning is not analyzed via mode of delivery to ensure learners have comparable achievement in different modes of delivery.
- The Institution is in the process of developing quality control policies for distance education.
- The Institution is unable to assure adequate levels of quality instruction in online courses, in part because it does not have training and professional development for effective online teaching.

The Institution meets, but with concerns, Criterion Three, Core Component 3.C, “the institution has the faculty and staff needed for effective, high-quality programs and student services,” for the following reasons:

- The Institution is in the process of launching a formal professional development program to ensure faculty are effectively teaching distance education courses. A course has been developed but not yet implemented to support professional development.
- Some adjunct faculty at the institution are hired through a third-party contractor. While these faculty meet the Institution’s required instructor qualifications, the Institution has limited ability to require their participation in professional development programs, and the Institution is limited to using evaluation processes to assure their skills.

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<sup>2</sup> INST.G.10.010, Substantive Change.

<sup>3</sup> INST.E.10.010, Notice.

- The Institution is in the process of implementing various process changes and training to address concerns about financial aid operations, but these changes are not yet fully operationalized.

The Institution meets, but with concerns, Criterion Four, Core Component 4.A, “the institution ensures the quality of its educational offerings,” for the following reasons:

- The Institution currently lacks a systematic process for completing program review. The Institution is in the process of revising its program review process, including forming a program review committee.
- The Institution completes some program review reports, but systematic distribution and use of these program review reports is lacking.

The Institution meets, but with concerns, Criterion Four, Core Component 4.B, “the institution engages in ongoing assessment of student learning as part of its commitment to the educational outcomes of its students,” for the following reasons:

- The Institution has developed some learning outcomes. However, these outcomes are often complex and not measurable.
- While some programs at the Institution engage in assessment activities, across the Institution, there is a lack of consistency and alignment among institutional, program, and course outcomes and assessments.
- The Institution uses assessment data in some programs. However, data from assessments is not utilized for continuous program improvement across the Institution.
- The Institution has not demonstrated that assessment of student learning is systematic and institution-wide. The Institution is in the process of developing a campus committee focused on program review and assessment.

The Institution meets, but with concerns, Criterion Five, Core Component 5.C, “the institution engages in systematic and integrated planning and improvement,” for the following reasons:

- Due to ongoing changes at the federal level, the Institution is developing a more immediate and specialized plan, but it has yet to be implemented.
- The Institution’s current planning processes do not sufficiently incorporate data from assessment of student learning, operational evaluations, and other sources in a cohesive and meaningful format. The Institution has created a structure for collecting and analyzing data and information, but it does not yet have a consistent system for utilizing the information for future decision making. It will take time for the Institution to demonstrate the effectiveness of this system.

The Institution does not meet Assumed Practice D.4, “the institution maintains effective systems for collecting, analyzing, and using institutional information,” for the reasons listed above under Core Component 5.C.

The Board of Trustees of the Higher Learning Commission has determined based on the preceding findings and the evidence in the record that the Institution is at risk of being out of compliance with the Criteria for Accreditation.

### **Next Steps in the HLC Review Process**

**Notice Visit:** The Institution will host a Notice Visit no later than December 2026 to determine whether the Institution has ameliorated the findings that led to the imposition of Notice and to make a recommendation about whether to remove Notice or take other action.

**Notice Report:** The Board required that the Institution submit a Notice Report at least eight weeks prior to the Notice Visit providing evidence that the Institution is no longer at risk for being out of compliance with the Criteria for Accreditation and that it has ameliorated the issues that led to the Notice sanction.<sup>4</sup>

**Board Review:** The Board will review the documents associated with the evaluation at its June 2027 meeting to determine whether the Institution has ameliorated the findings of Met with Concerns and is no longer at risk of being out of compliance with the Criteria for Accreditation and thus whether Notice shall be removed, or if the Institution has not ameliorated the findings, or is no longer in compliance with the Criteria for Accreditation, whether other action should be taken under HLC policy, up to and including withdrawal of accreditation.

**Comprehensive Evaluation:** The Institution has been placed on the Standard Pathway with its next comprehensive evaluation (Year 4) in 2028-29.

### **HLC Disclosure Obligations**

The Board action resulted in changes that will be reflected in the Institution's Statement of Accreditation Status as well as the Institutional Status and Requirements Report. The Statement of Accreditation Status, including the dates of the last and next comprehensive evaluation visits, will be posted to the HLC website.

In accordance with HLC policy,<sup>5</sup> information about this action is provided to members of the public and to other constituents in several ways. This Action Letter and the enclosed Public Disclosure Notice will be posted to HLC's website not more than one business day after this letter is sent to the Institution. Additionally, a summary of Board actions will be sent to appropriate state and federal agencies and accrediting associations. This summary also will be published on HLC's website. The summary will include this HLC action regarding the Institution.

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<sup>4</sup> Please note: Revisions to HLC's Criteria for Accreditation and Assumed Practices will go into effect on September 1, 2025. Institutions will be evaluated against these revised HLC requirements for all reviews conducted after that date, including reviews related to previously assigned monitoring. Institutional reports submitted on or after September 1, 2025, or institutional reports or Assurance Arguments for visits that will take place on or after September 1, 2025, should be written to the revised version of the Criteria or Assumed Practices as applicable. More information, including a crosswalk between the current and revised versions of the Criteria, is available on HLC's website at <https://www.hlcommission.org/accreditation/policies/criteria/>.

<sup>5</sup> COMM.A.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements

At this time, HLC will reassign the Institution from its former HLC Staff Liaison Dr. Karen Solomon to Dr. Anthea Sweeney. Please be assured that Dr. Sweeney will work with Dr. Solomon to create a smooth transition.

On behalf of the Board of Trustees, thank you in advance for your cooperation. If you have questions about any of the information in this letter, please contact Dr. Sweeney.

Sincerely,

A handwritten signature in black ink, reading "Barbara Gellman-Danley". The signature is fluid and cursive, with the first name "Barbara" being the most prominent.

Barbara Gellman-Danley  
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Regents, Haskell Indian Nations University  
Milford Muskett, Vice President of Academics, Haskell Indian Nations University  
Evaluation Team Chair  
IAC Hearing Committee Chair  
Karen J. Solomon, Vice President and Chief Transformation Officer, Higher Learning  
Commission  
Anthea Sweeney, Vice President of Accreditation Relations, Higher Learning  
Commission  
Marla Morgen, Vice President and General Counsel, Higher Learning Commission  
Elizabeth Daggett, Director, Accreditation Group, Office of Postsecondary Education,  
U.S. Department of Education