



July 21, 2023

Dr. Sarah Bolton  
President  
Whitman College  
345 Boyer Avenue  
Walla Walla, WA 99362

Dear President Bolton:

Attached please find the Spring 2023 Policies, Regulations, and Financial Review (PRFR) Evaluation Committee's review of Whitman 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: Spring 2023 Policies, Regulations, and Financial Review - The following standards are areas substantially in compliance but where improvement is needed. (2020 Standard(s) 2.G.5;2.G.6;2.G.7)

**Future Evaluations**

- Year 7 - Evaluation of Institutional Effectiveness Spring 2024
  - Finding Type 1: Spring 2023 Policies, Regulations, and Financial Review

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. Gita Bangera, at [gbangera@nwccu.org](mailto:gbangera@nwccu.org).

Sincerely,

Ron Larsen  
Senior Vice President

cc: Dr. Helen Kim, Associate Dean for Academic Affairs  
Mr. Joe Davis, Chair of the Board of Trustees  
Mr. Michael Meotti, Executive Director, Washington Student Achievement Council



## Peer Evaluation for: Whitman 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.*

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#### 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

#### 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:

Whitman College is governed by a large and diverse Board of Trustees. BoT meets regularly, reviews policies, and carried out a major policy update in 2017.

#### 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

#### Evidence:

- Leadership organizational chart **\_Y\_**
- Curriculum vitae of executive leadership **\_Y\_**

#### Rationale:

A clear org chart presented. Leadership covers all areas of operations adequately. CVs of executive leadership are available.

#### 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

#### Evidence:

- Curriculum vitae of President/CEO **\_Y\_**

#### Rationale:

President Bolton is relatively new at Whitman (started 2022). She has a terminal degree in Physics from Berkeley and comes with representative administrative experience in higher ed. She serves on the BoT as an ex-officio member.

#### 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

#### Evidence:

- Institutional governance policies and procedures (see 2.A.1) **\_Y\_**



#### **Rationale:**

A clear charter of Whitman is available that includes guiding by-laws. Handbooks are available for faculty, staff, and students, each with sufficient detail to guide operations. Several routine meetings occur at all levels (administrative level, governance, unit level) to promote communication and making decisions. Budget processes and employee evaluation processes are clearly defined. Communication also occurs through listserves, newsletters, routine meetings, and input is received through various means, including surveys.

#### **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**

#### **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:**

Evidence of support for academic freedom for both faculty and students are available, as documented in their respective handbooks. Faculty have autonomy over course content and pedagogic approaches. Similar freedom is also extended to staff. There are explicit statements in support of freedom to express dissenting views.

#### **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**

#### **Rationale:**

The commitment to independent thinking, learning and expression is supported at the highest level through the statements of mission, vision, diversity. More details in this area are provided in the handbooks for faculty, staff, and students.

#### **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**

#### **Evidence:**

- Transfer of credit policies and procedures **\_Y\_**

#### **Rationale:**

Evidence of transfer of credit policies and procedures are available in the official catalog on pages 49-53 and also through a dedicated website that the college maintains. Transfer credit evaluation responsibilities reside with the registrar's office. Whitman also uses Transfer Evaluation System to ease the process.

#### **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**

#### **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 student handbook includes definitions, guiding principles, rights, responsibilities, consequences, appeals, and grievance processes for students. A generic search on Whitman's website also leads to the right landing page of the student handbook that covers these topics. Disability Support Service is a separate unit under academics and provides resources for both students and faculty.



### 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**

**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:**

Admissions are selective and admission criteria are well defined in the catalog and on the admissions website. Whitman is test-optional and placement is based on other criteria such as essays. Criteria for academic sanctions including warning, probation, suspension, and dismissal are included in the catalog.

### 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**

**Evidence:**

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

**Rationale:**

AACRAO student records management practices are adopted. Transcripts are electronic and protected by third party vendor. Multiple sites provide cybersecurity information. Authentication information includes creating unique IDs. Multi-factor authentication is available through Duo, is encouraged, but not required.

### 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: Compliant**

**Evidence:**

- Policies/procedures for reviewing published materials (print or websites) that assures institutional integrity **\_Y\_**

**Rationale:**

Whitman's website is very professional and information is easy to find. They publish newsletters, magazines, and posts through listserves and social media. All conform to their branded style guide that includes, among other things, accessibility criteria.

### 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**

**Evidence:**

- Policies/procedures for reviewing internal and external complaints and grievances **\_Y\_**

**Rationale:**

Ethical standards are included in the respective handbooks for faculty, staff and students. These include, but are not limited to, statements on conflict of interest, equal employment opportunity and non-discrimination, harassment and civility. Complaints can be filed through a web portal and grievance processes are outlined on the HR site.

### 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

#### Evidence:

- Policies/procedures prohibiting conflict of interests among employees and board members **\_Y\_**

#### Rationale:

Conflict of Interest policies exist. Forms are available to disclose and manage any real and perceived Conflict of Interest. Annual disclosures required for selected groups. None of the 23 trustees currently have any conflicts/conflict disclosures.

### 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

#### 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:

Financial practices are sound with independent annual audits. They follow generally accepted accounting principles (GAAP). Though overall net assets showed a significant reduction (~\$170M) due to market loss, the college followed its published guidelines for fund reserves (>2.5%). Institution made good use of COVID relief funds and have expended those. Their cash position improved. Enrollments fluctuated dipping in 2020, picked up in 2021, and dropped some bringing the 2022 enrollment close to 2018 number, just shy of 1,500 students as indicated on the IR factbook. Prior audit reports highlight some areas of weakness in enrollment data reporting that the college subsequently addressed. The college wrapped up the year with a positive composite score of 2.2. Overall, Whitman has a strong balance sheet.

### 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

#### 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:

Budget planning process flows through the President's Budget Advisory Committee that provides opportunity for participation. Meeting information is available on a public facing website. Key financial variables are included in financial modeling and projection using tools that are available. Processes for fund transfers between unrestricted fund sources exist to balance budgets. Financial reports provided to trustees are available on the website.

### 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

#### Evidence:

- Description of internal financial controls **\_Y\_**
- Board approved financial policies, state financial policies, or system financial policies **\_Y\_**

#### Rationale:

Internal controls including annual independent audit processes exist. Whitman's Constitution and By-Laws are publicly available and they guide financial management. BoT has different committees with budget oversight. The Chief Financial Officer provides practical and strategic level management of budget, investments and audit.



### 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**

**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:**

Job posting sites include relevant hiring information. Annual evaluation processes exist. Provost website includes information for faculty evaluations, and for some professional development opportunities.

### Standard 2.F.2

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

**Team Verification: Compliant**

**Evidence:**

- Employee professional development policies/procedures \_Y\_

**Rationale:**

Professional development opportunities exist, and these are robust for faculty development through the Center for Teaching & Learning, sabbatical processes, mentorship programs, retreats, and more. Staff development opportunities available in the form of orientation, supervisory trainings, and through annual reviews.

### 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**

**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:**

IR fact book documents numbers and trends in faculty and staff FTE, which is commensurate with student enrollment numbers. The HR website includes information for job responsibilities at the time of hire and during orientation. Org. chart is available. Annual evaluation processes exist that have also shifted to triennial for more frequent feedback.

### 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**

**Evidence:**

- Administrator/staff/faculty evaluation policies/procedures \_Y\_

**Rationale:**

Documentation available in the respective faculty and staff handbooks. Faculty complete annual activities reporting prior to evaluations. The evaluation process is also clarified on the Provost's website.

### 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**

**Evidence:**

- Listing of programs and services supporting student learning needs **\_Y\_**

**Rationale:**

Numerous resources listed through various units to support student success.

**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**

**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:**

A 483-page catalog available in pdf form that has relevant information. Exclusively having the catalog in pdf form is limiting, especially for browsing through relevant information. The college also reports that it will use Clean Catalog to create future catalogs digitally.

**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**

**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 **\_N\_**
- Descriptions of unique requirements for employment and advancement in the occupation or profession shall be included in such materials **\_Y\_**

**Rationale:**

The university prepares students to pursue several careers. Career advising is provided through a separate career center. It also offers several academic degrees. Some academic degrees and course sequences serve as pathways to advanced licensure programs such as an LPN. It was not clear whether there were degrees with licensure offered at Whitman.

**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**

**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:

All relevant information is provided on the financial aid website. This is a large part of Whitman's profile and recruitment strategy. Relevant information on what is available, how to apply is available.

#### 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: Needs Improvement

##### 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 **\_N\_**

#### Rationale:

Loan repayment monitoring is on an annual basis through the financial aid office. Students receive financial aid presentation when enrolling and exit check at the end of the year. Whitman reports a cohort default rate for the five years prior to COVID ranging from 0% - 1.4% in their report but I could not find it on their financial aid website.

#### 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: Needs Improvement

##### 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 **\_N\_**
- Professional development policies / procedures for advisors **\_N\_**

#### Rationale:

Advising has seen many changes with move from student affairs to academic affairs, move to advising prominently by faculty, discontinuation of peer-advising, and many new interventions are proposed. There needs to be more information on the plans for monitoring the efficacy of advising going forward, and the policies and procedures for advisors. Careful monitoring of advising and changes in advising is important.

#### 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: 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 **\_N\_**
- Policies/procedures make it clear that these processes protect student privacy **\_N\_**
- Notification to students at the time of registration of any additional charges associated with verification procedures **\_N\_**
- Academic policies/procedures for instructors to implement requirements for *regular and substantive interaction* in distance education courses/programs **\_N\_**

#### Rationale:

Section 2.G.7 is missing from the report.

#### 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

#### 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:

Penrose Library staff work with faculty on library resource development. They review collections routinely to optimize through 'green glass' and also invest in OER that contributes to affordability and student success.

### Standard 2.1.1

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

#### 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:

Campus Framework plan is the facilities master plan. Plans to reduce deferred maintenance exist. The college is working to make facilities more accessible. EOPs and EHS efforts are well documented.

### Concluding Comments

Whitman's report was overall well prepared. Whitman should continue to monitor enrollments closely as that is a large part of the financial planning. Changes in the advising model and advising interventions will play an important role for the institution to address some of the fluctuations in retention and graduation rates. We appreciate the noted plans to modernize the catalog.