Response to March 2, 2022 Peer Panel Evaluation Report

Submitted to the Northwest Commission on Colleges and Universities, March 12, 2022



Introduction

This report is North Idaho College's response to a letter received from the Northwest Commission on Colleges and Universities dated March 2, 2022.

NIC appreciates the time and talents of the peer evaluation panel to review the evidence, prepare and participate in a focused visit, and compile their report. The college also extends a thank you to the members of the Commission's Executive Committee for their time in reviewing all the evidence in preparation for the inquiry. The college wishes to express gratitude to Dr. Sonny Ramaswamy, Dr. Ron Larsen, Dr. Pamela Goad, and to all the NWCCU staff involved with this process since the initial complaint was filed with the NWCCU.

During the investigation, the college has been transparent with our community by posting the two complaints, the letters from the Commission, NIC's response, all associated exhibits, and related presidential communications to the college on a specific webpage on NIC's website.

Since the evaluation visit, the college has progressed with several of the recommendations stated in the report, including scheduling opportunities for trustee training, planning for improved new board member orientation, engaging with the Pauly Group to assist with the processes of hiring a long-term president and filling three vacant dean positions.

NIC's introspection, facilitated by this process and the evaluative report, has, as you will see, strengthened the college and allowed for the further development of a successful way forward.

This response addresses each of the following major sections listed in the peer evaluation panel's report:

- 1. Governance Structure, Chief Executive Officer, and Administrative Positions (Standards 2.A.1-4 and ERs 9, 10, and 11)
- 2. Academic Freedom (Standards 2.B.1-2 and ER 16)
- 3. Institutional Integrity and Ethical Standards in Governance, Management, and Operations (Standard 2.D.3 and ERs 8 and 9)
- 4. Financial Resources (Standard 2.E.3 and ERs 16, 19, and 23)
- 5. Human Resources (Standard 2.F.3 and ER 12)
- 6. Physical, Technological, and Health Infrastructure (Standard 2.I.1 and ER 15)
- 7. Summary of Concerns
- 8. Conclusion

Some of the information contained in this response is excerpted from NIC's response to the first complaint and has been abbreviated, updated, and targeted to specific concerns expressed by the peer evaluation panel in their report.

Governance Structure, Chief Executive Officer, and Administrative Positions (Standards 2.A.1-4 and ERs 9, 10, and 11)

As reported in NIC's June 2021 response to the first complaint letter to NWCCU, the college acknowledged the authenticity of emails from a trustee to a student. In that series of emails in January 2021, the trustee expressed his readiness to personally "wade into" a student situation and to support

efforts to adjust a "poor grade... up." The trustee also stated that he was "battling the NIC 'deep state" and expected to register "victories" over entrenched "liberal" interests at the college.

The trustee used his personal email address to respond to this student and not his official NIC email address. He challenged the administration for releasing his personal emails as part of a public records request because he felt they were personal. NIC Policy 2.01.10 states, in part, that "When discussing community concerns, issues involving the college, and actions taken by the Board of Trustees and the administration, Trustees should carefully delineate between opinions that are personal and held as an individual citizen versus opinions that reflect officially approved policies or action of the Board or college."

Given the political nature of the 2020 board election and the content of the trustee's email communications (see Email exchange), the college agrees that there is reason for faculty to perceive that academic freedom is vulnerable to inappropriate pressure when this trustee's personal emails were discovered in a public records requests. The trustee was contacted by the student when the student perceived that all administrative avenues had been exhausted.

NIC is dedicated to promoting and protecting academic freedom, including in the situation identified in this passage. As previously outlined in the response to the first complaint letter, the college actively managed this specific situation and in doing so, was upholding academic freedom. The situation was a demonstration of how NIC's policies were properly enforced.

During the board meeting held on February 28, 2021, Chair Banducci asked the Faculty Assembly Chair about the board's impact on teaching and learning in the classroom. The Faculty Assembly Chair stated that although he was not personally aware of a direct impact on classroom learning environments, he noted that regardless of intended consequence, the action or inaction of the board may have a "ripple effect" that is consequential. See Video: Faculty Assembly chair responds to question about the board's impact in classroom, February 24, 2021 meeting (1:15:18 – 1:17:48).

The peer evaluation panel's report mentioned evidence that faculty may perceive academic freedom to be under threat, and that some faculty have altered their syllabi and assignments in fear of retaliation. The administration is not aware of any formal grievance from faculty or any attempt by an elected board member to influence assessment of student work that is under the purview of faculty. The administration affirms faculty's use of disclaimers in syllabi as evidence of its support of faculty. Additionally, given the resolution of the situation with Chair Banducci, administration's actions demonstrate NIC's commitment to academic freedom.

Additionally, board members now refer inquiries and complaints directly to the president to delegate to the administration (See example emails: reference 1, reference 2, reference 3, and reference 4).

To help address the concern for the board to engage in training, the interim president and the board's newest trustee are participating in the Governance Leadership Institute, a training conference facilitated by the Association of Community College Trustees (ACCT) March 23-25, 2022. The administration will work with the board to provide the support and encouragement to revisit the actions recommended by ACCT consultants during the board's training session in June 2021.

With a goal of increasing board efficiency, the board of trustees recently adopted the interim president's recommendation to implement a consent agenda which expedites approval of routine, non-controversial agenda items. At their February 23, 2022 meeting, the board approved a consent agenda of five items.

The peer evaluation panel's report included information about the college reducing full-time positions. The college has this as a goal with an active plan in place to reduce staff positions through employee attrition, and in December 2019, the college also offered an early retirement incentive of which 14 employees took advantage.

There was a reference in the peer evaluation panel's report that faculty and staff reported a lack of trust with the interim president. At the time of the peer review, the interim president had been in place for 40 working days. This sentiment is not unusual for new leaders and the interim president has actively worked to build trust and increase morale. See messages from interim president and Communications related to NWCCU inquiry.

The peer evaluation panel reported that they heard comments that faculty and staff feel that decisions are being made with little input from constituent groups. Interim president Sebaaly consulted with college leadership, ASNIC (student government), and Staff Assembly leaders about the interim provost position. The only appointments made by the interim president were the interim provost and the interim vice president for finance and business. All but one of the interim deans were recommended for appointment by the outgoing vice presidents for student services and instruction. (See emails from outgoing VPSS and VPI with input into the selection of interim deans and respective chairs of search committees: Dean of CTE, Organizational Chart, Dean of Instruction, Dean of Enrollment Job Descriptions Email, Dean of Enrollment Services, President's Cabinet Meeting Notes)

Academic Freedom (Standards 2.B.1-2 and ER 16)

The first complaint letter to NWCCU from regional human rights commissions dated March 12, 2021, included Chair Banducci's January 2021 email exchange with a student about the student's experience in a class and the student's grade in the course. The student shared correspondence to the American Center for Law & Justice and Chair Banducci that referred to censorship by the faculty teaching the class in spring 2019. Further, the student initiated a conversation with another faculty member about the class and sought advice about dealing with the situation should it not be resolved through existing channels at the college, including to "reach out to the Board of Trustees" and if needed to get "legal aid."

As previously stated in the first response to NWCCU, the student did bring the matter forward to the Vice President of Instruction, who applied the published process for consideration of student appeals at that time (college catalog, 2019, pp. 27-28), and conducted a thorough investigation of the matter. The student was afforded the opportunity to meet to discuss their perspectives. All documents shared by the student were carefully reviewed, including the YouTube video the student was permitted to record of a presentation that was a key part of the class assignment. The VPI reached a conclusion on the complaint and communicated it in writing to the student with an invitation for further opportunity to discuss the findings.

Despite the student statement that "[n]othing was ever done" about the situation, the college took this complaint seriously, devoted hours of time to meetings, discussion, and provided written response that centered on the faculty members' reasonable and intentional management of the learning environment. This included affording the student an opportunity to present on a controversial topic, with wide, but not unfettered, latitude, consistent with the faculty responsibility to foster an opportunity for all members of the class to dialogue with one another.

At the time, the VPI determined that the faculty teaching the course upheld the student's ability to disseminate a perspective consistent with academic freedom as stated in NIC's policies. In addition, the faculty acted in good faith to further the ability of all students to productively engage in a manner that was well-aligned with the course goals. The student's displeasure with the outcome and subsequent pursuit of board involvement did not in any way alter the administration's defense of the freedom of faculty and the student to pursue knowledge, form conclusions, and share perspectives of truth. See Email exchange.

The student was dissatisfied with this decision and reached out to the trustee using the trustee's private email address. The trustee and the student exchanged their personal, private opinions that came to light in a public records request. The student was already in a position to receive a grade of an "A" in the course but was concerned that a particular assignment was graded lower because of their personal beliefs. The administration is aware that the student wrote a letter in May 2021 to Dr. Ramaswamy defending their reasons for initiating contact with the board member and providing additional context to the situation. Student Communication to NWCCU.

Institutional Integrity and Ethical Standards in Governance, Management, and Operations (Standards 2.D.2-3 and ERs 8 and 9)

The peer evaluation panel report reflected concern about evidence of unethical conduct by the board, including a reference to the board's adoption of a modification to Communicable Diseases Policy 5.09 with little input from institutional and community stakeholders as required by NIC Policy 2.01.04. Since this modification was adopted by the board, a more comprehensive revision and a related procedure have been drafted by the administration with affirmation from the Panhandle Health District (as required in Idaho Code 31-2145). In compliance with the procedure to Policy 2.01.04, the drafts will receive a first reading by the College Senate during their March 2022 meeting.

The report also refers to the removal of public comment at several board meetings. At any time, any stakeholder of the college, (e.g., "public") can provide public comment to the board of trustees by submitting written comment to the board through the board clerk, or by emailing trustees. It has been the practice of the board of trustees to add public comment to its regularly scheduled, monthly board meetings.

From December 2020 to present, there have been only two regularly scheduled meetings of the board of trustees in which public comment was not offered: September 2021 and October 2021. This was during a tense time in which public meetings across the region experienced great disruption. North Idaho made national news on September 24, 2021, when the Coeur d'Alene School District Board of Trustees had to cancel a meeting after an anti-mask mob of over 200 people overwhelmed the meeting room. For the February 2021 meeting, the board requested public comment be submitted in writing. This was due to the challenges the college and the board were experiencing conducting meetings in the Zoom environment.

The agenda of any regular meeting of the board of trustees may include an opportunity for citizens to address the board on any item on the agenda and public comment shall be limited as determined by the board chair, per Board Policy 2.01.03. The decisions to eliminate public comment at two meetings in 2021 were made through discussions by the college's legal counsel, the board chair, and the president.

December 2020: Public Comment occurred. (Board Minutes) The open chat function on Zoom

was stopped mid-meeting, per directive from the college's legal counsel due to

inappropriate comments displayed on the Zoom chat.

January 2021: Regular monthly board meeting canceled.

February 2021: Public Comment occurred (Board Minutes) but changed to written submission

(and posted as such on the <u>board agenda</u>) due to a recommendation by college legal counsel because of disruptions at the January 2021 board meeting where a virtual participant streaked across the virtual board meeting and then another participant drew images of offensive and inappropriate content on the screen for all to see. The college then bought a Zoom webinar license to prevent future

disruptions of board meetings.

March 2021: Public Comment occurred (Board Minutes)

April 2021: <u>Public Comment occurred</u> (<u>Board Minutes</u>)

May 2021: Public Comment occurred (Board Minutes)

June 2021: Regular monthly board meeting canceled.

July 2021: The board does not traditionally meet in the month of July.

August 2021: Regular monthly board meeting canceled. Special board meetings occurred.

September 2021: Public Comment was not offered.

October 2021: Public Comment was not offered.

November 2021: Public Comment occurred (Board Minutes)

December 2021: Public Comment occurred (Board Minutes)

January 2022: Public Comment occurred (Board Minutes)

February 2022: Public Comment occurred (Board Agenda)

Financial Resources (Standards 2.E.3 and ERs 16, 19, and 23)

The college continues its solid financial standing, since the commendation received by NWCCU during the April 2020 Year-7 visit, with an <u>increased score</u> in the Composite Financial Index (CFI) from 6.5 to 7.6 in FY2021. The college's score in FY2020 was in the 90% of the National Community College Benchmarking Project. The college performed well with the Primary Reserve Ratio (PRR), a measure of financial strength and flexibility by indicating how long the institution could function using its expendable reserves without relying on additional net assets generated by operations. The college PRR increased from 1.67 to 2.23 in FY2021. Other major components of the CFI also improved from the prior year.

The college continues to move forward on the development of the FY2023 budget using the same collaborative budgeting process as in past years. (See Screenshot: Office of Finance and Business Internal Portal Page). For example, a budget forum was conducted for the entire NIC community that provided budget assumptions and information to aid in the development of departmental budget requests. The

budget forum was recorded and <u>slides</u> posted on the NIC website (See NICNow announcement: <u>Budget Forum</u>)

The college acknowledges that enrollment impacts its ability to service debt, and has calculated the minimum cash requirements required by the covenant of debt service. Should the college fall below the required 1.25 coverage requirement, the <u>Dormitory Housing Commission</u> (DHC) is required to notify the college and the board is obligated to increase the fee in order to maintain coverage.

According to NIC's financial advisor, the impact of the interest rate change for future borrowing is very negligible (.15%). In the past two decades, the only time that NIC has ever borrowed money was in conjunction with the DHC. Any other borrowing has to be approved by the voters with a supermajority of 66%.

The college maintains healthy capital investment reserve fund balances (at more than 25% of the annual general operating budget). NIC has no need to borrow outside the DHC projects. The debts of the DHC are not a legal obligation of the college. In accordance with <u>Idaho Code 33-2125</u>, the DHC is a separate legal entity from the college and the college cannot be required to satisfy the debt obligation. The obligation is reported in our audit because the DHC is, by accounting definition, a component unit of the college for reporting purposes.

It appears that the peer evaluation panel's concern is NIC's future financial stability. The college has performed well over the past decade with positive net income every fiscal year, adding to the fund balance. This financial consistency allowed the college to transfer some of the fund balance to the capital investment reserve to support future building projects without impacting the college's operating reserves.

The FY2023 budget is being developed with a projected 3% decline in enrollment and no use of reserves or other revenue sources. The 3% decline is in keeping with the overall national trend. The college plans to use caution with financial resources and will continue to make necessary adjustments moving forward through this period of uncertainty. Reserves are meant to help an institution manage unforeseen change in enrollment. The Interim Vice President for Finance and Business states that she "will never present a budget to the board of trustees that doesn't protect the college while still supporting its forward movement." (See email: Interim Vice President of Finance)

Human Resources (Standard 2.F.3 and ER 12)

Prior to the peer evaluation panel's visit, NIC had already moved aggressively to rebuild an experienced leadership team, by immediately engaging a consultant to lead a number of searches, which demonstrates an investment in improving the likelihood of successful searches. The college established search committees to ensure the participation of faculty, staff, students, and the community. These searches follow the established process for filling benefit eligible positions at NIC as documented in NIC policies and procedures, as well as guidelines established by Human Resources.

At the meeting in December 2021, the board voted to authorize the college to immediately engage Pauly Group, Inc. an academic search consulting firm, to begin a search for a long-term President (See document: Pauly Group Contract). Trustees Todd Banducci and Ken Howard were selected by the board to co-chair the search committee. The co-chairs have met multiple times with Dr. Angela Provart, President of Pauly Group, Inc., to discuss process, timeline, qualifications, salary, and search committee composition. Search committee members represent all categories of the prior NIC presidential search, which includes staff, faculty, students and various segments of the community that NIC serves. (See February 1, 2022 NICNow.) In the call to the college community for search committee volunteers, Dr. Provart included an update on the search and a general timeline to the college community, in which she

anticipated the board will select a president to begin in the upcoming summer or fall semester. Dr. Provart hosted forums to seek input and engagement from the college community and the community at large to hear the needs of NIC and the qualities sought in the next president. (February 23, 2022 NICNow.) Dr. Provart is finalizing the presidential profile and will begin recruiting for the position by March 15. She plans to schedule the first committee meeting prior to the end of March. (See email from Dr. Provart)

In November 2021, NIC contracted with Pauly Group, Inc., (See documents: Pauly Group Contracts), to conduct searches for three dean positions, Dean of Enrollment Services, Dean of Instruction - General Studies and Dean of Instruction - Workforce Education. A committee of individuals from across the college was established for each search to review application materials, select candidates for and conduct first- and second-round interviews, under the guidance of Dr. Provart. Finalists were selected for all three positions and are scheduled throughout the month of March for in-person interviews. The college is currently in the process of welcoming finalists to campus for these interviews, following the traditional format at NIC that includes an interview with the search committee, an open forum to which the college is invited, and meetings with other key stakeholders. An opportunity to provide written feedback on each finalist is provided to all who participate in the forum or who had other interactions with the candidates during their visits.

Physical, Technological, and Health Infrastructure (2.I.1 and ER 15)

The peer evaluation panel's report gives the impression that NIC took little or no action to prevent the spread of COVID-19 after the board voted to lift the mask mandate in August 2021. This is not accurate. The following information is presented to demonstrate that NIC currently meets, and has continually met, Standards 2.I.1 and ER 15.

NIC has maintained and expanded efforts to create a safe and healthy learning and working environment throughout the COVID-19 pandemic. These efforts continue through today and demonstrate that the college continues to prioritize the well-being of employees and students.

Early in the pandemic, NIC appointed a COVID Response Director, this position tracks and monitors data on the impact of COVID-19 to NIC. This director regularly engages with the Panhandle Health District, COVID-19 Idaho Higher Education System Coordination group, and local health professionals, and monitors updates provided by the Idaho Department of Health and Welfare to keep the NIC Rebounds Team and the administration well informed. This director also provides updates on community COVID data, including the health district, hospital and school districts, as part of reports delivered at every weekly administrative meeting.

The COVID response director leads the NIC Rebounds Team in regularly scheduled meetings. The Rebounds Team is a cross-functional group that was established at the beginning of the pandemic to research, compile data, and develop mitigation measures to create a safe and healthy learning and working environment through the COVID-19 pandemic. (See announcement: May 18, 2020) This group continues to meet regularly, in support of NIC's continued operations. This team develops and recommends protocols, procedures, and mitigation strategies to minimize the spread of COVID-19 and makes weekly recommendations to college leadership for decisions. (See documentation: COVID-19 Protocols and Procedures.)

The NIC Rebounds Team and college administration surveyed employees at the end of the spring 2021 semester to gauge the comfort of employees with decisions being considered regarding COVID-19 protocols (See website: Survey Result and New Mask Protocols, May 17, 2021 and student survey February 2021). NIC made the decision early in the summer, prior to the board's mask and policy decisions in August, to remove physical distancing setups in classrooms to allow regular capacities in

classes for Fall 2021. This decision is consistent with the responses in the employee survey and with the practices instituted by regional and local school districts.

Contact tracing, mandatory quarantines and isolations continue for employees and students, in accordance with CDC guidelines and college guidelines put in place at the beginning of Fall 2020 semester. During the COVID Delta variant surge in fall 2021, in-house contact tracing became too burdensome to continue to operate effectively. The decision was made to outsource the function to Rapid-Trace. NIC has a contract in place for contact tracing to continue through May 2022.

The COVID Response Director, Rebounds Team, and college leadership continually monitor NIC employee and student case data to make informed decisions regarding strategies to mitigate the spread of COVID-19. The onset of the Omicron variant coincided with the beginning of the Spring 2022 semester. Case numbers were closely monitored on a daily basis to measure the effect on NIC operations. Through the recommendations of the Rebounds Team, and ensuing discussion of those recommendations at a meeting of college leadership, the decision was made to institute a temporary pivot plan to mitigate exposure and maintain effective operations by reducing the physical presence on-site, including: temporary closure of the NIC Children's Center, rotating staff in office environments with others working remotely, transitioning to remote instructional delivery wherever possible, reducing event capacity, and canceling in-person tours of campus. (See message: NIC Pivoting to Remote Delivery, January 20, 2022)

This pivot plan was presented to the Board of Trustees on January 19, 2022 with no objections. It was fully executed beginning January 24, 2022 and ended on February 7, 2022, as initially scheduled and due to evidence that the surge was declining (See link: Daily Quarantine Graph Spring 2022).

NIC has implemented, and continues to employ, through the changes in leadership and administration, many strategies to mitigate the spread of COVID-19, which include:

- Providing disposable surgical and KN-95 masks and sanitizing stations at building entrances for all employees, students, and visitors who wish to access them.
- Nightly fogging of higher-traffic common areas throughout campus buildings.
- Employing disinfecting practices.
- Providing both rapid and PCR tests to employees and students.
- Installing barriers in high traffic reception desks and offices.
- Installing upgraded air handling systems which meet or exceed CDC recommendations in all campus buildings.
- Maintaining seating charts and taking daily attendance to support effective contact tracing.
- Providing vaccination clinics for NIC constituents and the public, in partnership with Panhandle Health District.
- Dedicating quarantine rooms in the residence hall and contracting with local hotels for overflow.
- Equipping classrooms and offices with remote technology enabling instruction and daily business to occur virtually.
- Modifying vehicle use guidelines to adjust for reduced seating capacity.
- Establishing the "Masks Welcome" and #ProtectTheNest campaigns to encourage safe and healthy choices (See message: NIC Offering Testing and New Contract Tracing Process, January 3, 2022).
- Offering faculty alternative modes of instruction.
- Continuing to offer Zoom as an alternative to in-person meetings.

NIC continues to be recognized by Panhandle Health District as taking responsible and prudent actions to mitigate the spread of COVID-19, and particularly in comparison to other organizations in the North

Idaho region. The actions taken by NIC throughout the COVID-19 pandemic demonstrate that NIC has consistently prioritized a safe and healthful learning and working environment.

Summary of Concerns

- #1: North Idaho College asserts that the college is in compliance with Standard 2.A.2 and ER 11. The Board of Trustees executed their right to terminate the former president without cause per the current contract of the former president. (See: President's Contract, and Board Minutes)
- #3: The language provided in the body of the document does not align with what is presented in summary of concern #3. The report captures the peer panel's observation of the interim president by stating, "appointment of an interim president who is perceived to be inexperienced and has not yet garnered the respect of campus."
- #4/#9: While acknowledging that the peer panel heard individuals' feelings regarding the actions of board of trustees, the college disagrees with the panel's conclusion that NIC is out of compliance with Standards 2.B.1-2, and ER16. As previously mentioned, (page 2) the institution operationally supports academic freedom by upholding "responsibility to maintain an atmosphere that promotes, and sustains academic freedom and independence that protects its constituents." The concern is not about academic freedom but with ethical behavior of the board and accountability as indicated by concern #5.
- #6: The college agrees with the recommendation that NIC demonstrates compliance with 2.E. 1-3, and ER 19 and 23.
- #7: The college disagrees with the assessment listed on this concern as the body of the report (page 13) states that NIC "is substantially in compliance with 2.F.3."
- #8: The college has presented evidence to show compliance with 2.I.1

Conclusion

This response was written with great respect and gratitude to the North Idaho College students, faculty, and staff who have persevered during this past year with the issues brought to light with alleged violation of NWCCU Standards and Eligibility Requirements.

The college firmly agrees with the comments from the peer review team that reflect the commitment of the administration, faculty, and staff to North Idaho College. These comments include:

"The panel commends the faculty, staff, and administrators of North Idaho College for their deep commitment to student success and to upholding the important mission despite the great disruption created by the Board of Trustees."

"The Staff and Faculty leadership bodies have remained stalwart in their commitment to academic freedom and integrity of the institution."

"The current leadership and staffs in the units of finance, human resources, development, and academic and student affairs are working diligently to maintain the operations of the college for the benefit of student learning."

The below excerpt from the peer review report highlights the true nature of the overarching concern:

"The panel observed a widespread perception that issues of current and future instability lie with the disruptive actions taken by the NIC Board of Trustees, which threaten the vitality of an important community educational institution."

This next statement is very difficult to substantiate, but important to share. Many at NIC were disappointed that the visit in January 2022 was not in person. The personal interactions with faculty, staff, and students along with firsthand observations would have revealed to the peer evaluation panel a greater magnitude of how great NIC is to the community and the valuable work that continues to occur daily at the college, just like NWCCU affirmed in the 2020 Year-7 visit.

The college's goal of this response is to show how operations at NIC continue to thrive through ongoing governance concerns. The investigation of the peer review panel expanded into other operational areas such as academic freedom, human resources, finance, physical, technical, and health infrastructure.

While there is concern that "disruptions of the board" are now impacting operations, the root of the problem remains a governance concern. College leadership is very aware of this concern and remains committed in its efforts to continue to separate college operations from board governance.

This response was created through a collective effort of college leaders to provide evidence and additional contextual information that NIC meets all Standards and Eligibility Requirements with the exception of those directly applicable to the governance of the college (Standards 2.A.1 & 2.D.2, and ERs 8 and 9).

North Idaho College has met and continues to meet the Standards 2.A.2-4, 2.B.1-2, 2.D.3, 2.E.1-3, 2.F.3, and 2.I.1 and ERs 10, 11, 16, 19, 20, and 23 (collectively the "Standards"). The college respectfully requests that if the commissioners do not agree with NIC's assessment regarding the college meeting Standards then NIC asks that Commissioners at minimum delay any decision related to those Standards that are more applicable to operations requirements until an evaluative team has the chance to visit NIC in person. This is a reasonable and fair request given NIC's history of strong performance and a willingness to demonstrate continuous improvement.

On behalf of the faculty, staff, and students of NIC, thank you for your commitment to this process and for your time and effort as you make a determination. The college has great faith in your review and that the future of the institution, especially for the current and future students at NIC will be well served by your ultimate determination.