

Ad-Hoc/Special Evaluation

Peer-Evaluation Report

**North Idaho College
Coeur D'Alene, Idaho**

October 14–15, 2024

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A confidential report of findings prepared for the
Northwest Commission on Colleges and Universities

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Introduction

A four-person peer evaluation team conducted a visit to North Idaho College (NIC) October 14-15, 2024, to address 10 NWCCU recommendations from the Spring 2022 Special Report, Spring 2023 Special Report, and Fall 2023 Special Report. Two NWCCU staff, including NIC's staff liaison, supported the team. Prior to the visit, the evaluators held three pre-visit teleconferences to review background materials, discuss the college's current report, and develop meeting and evidence requests for the onsite visit.

The college's 37-page Fall 2024 Special Report, posted August 30, was clearly written and directly addressed the recommendations under review, with appropriate examples to support the text's claims. Embedded links pointed to additional detail, including video clips of board meetings. An online evidence folder contained nearly 200 individual items.

The report's introduction (page 2) notes that the writing effort was led by NIC's two consultants from the Association of Community College Trustees (ACCT). The rationale for this arrangement was that it would encourage candor, support an orderly editing process, and would capitalize on the consultants' relationship with their primary client, the board itself. While the evaluators found the report to be substantially accurate, the team noted some trade-offs in NIC's approach. For one, by focusing on the trustees, the narrative tended to under-examine the roles of the president, senior administrators and governance groups in sustaining NIC's efforts. Additionally, it was at times difficult to distinguish the consultants' judgements from NIC's.

Visit Summary

The prior fall's evaluation team had focused its recommendations on board-level governance. As a follow-up to the fall 2023 report, NWCCU staff had provided the college with a Plan for North Idaho College, grouping NIC's remaining recommendations into four thematic areas: functioning as a governing board, strengthening relationships with the president, building inclusivity, and reducing institutional risks. The college's report integrated the plan's themes into its narrative.

Onsite, team members met in individual sessions with the president, select senior leaders, and four of the five board members. Group sessions included meetings with the board as a whole, along with leaders of the Faculty Assembly, Staff Assembly, Associated Students of North Idaho College (ASNIC), President's Cabinet, and College Senate. In addition, open forums were held for staff and faculty.

Earlier evaluators have noted the high level of professionalism, dedication, and positivity exemplified by NIC's faculty, staff, and students. The current team's experiences were no exception. Once again, the campus community was universally welcoming, candid, solutions-minded, and even good-humored during the visit. It's small wonder that, at the operations

level, NIC had good news to share — revived enrollments, high-achieving academic programs, and new initiatives in the community and in support of student success.

Progress on Recommendations

Recommendation 2: Spring 2022 Special Report - *The Board of Trustees adheres to institutional and Board policies, particularly those pertaining to appropriate roles and responsibilities, expectations, professional conduct and ethics, and grievance procedures (2020 Standard(s) 2.A.1;2.D.2; ER 9).*

Progress on Recommendation 2, Spring 2022

Over recent months, North Idaho College’s board has taken steps to promote adherence to appropriate roles and responsibilities, expectations, professional conduct and ethics, and handling of grievances. Though a collective achievement, the work has been catalyzed by the hands-on efforts of two consultants from the Association of Community College Trustees (ACCT), a two-trustee policy subcommittee, and the board chair.

During the evaluation visit, documents and onsite conversations confirmed that, among key accomplishments of late, the trustees have:

- Adopted policies on board roles, conduct, ethics, and evaluation
- Identified board goals and a plan for achieving them
- Incorporated recurring informational reports into their agendas
- Sustained a collaborative agenda-setting process between the president and chair
- Developed and adopted a board orientation policy
- Initiated an annual public affirmation to the proper roles of a trustee

The changes have led to improvements in decision-making. Notable among these are the procedurally smooth adoption of NIC’s FY 2025 budget, an equally smooth approval of NIC’s strategic planning goals, and completion of the president’s evaluation. Other examples — particularly around risk-reduction — appear elsewhere in this report.

In addition to these tangible milestones, the video record and onsite interviews point to corresponding improvements in board process and tenor. Recent board meetings have become shorter and more professional, with fewer last-minute agenda changes or document proposals. Parliamentary procedures have been followed more consistently and used more effectively to maintain an orderly flow of business.

While these trends are encouraging, however, the team struggled to find convincing evidence that they are durable. To begin with, none of these changes is long-lived, particularly in comparison to the two-plus years of NWCCU sanctions on these matters. The college’s report

relies almost exclusively on a single board meeting — May 22, 2024 — as evidence of these refinements in action. Even that meeting was interrupted by an operations-level attempt, ultimately voted down, to de-fund college memberships in community organizations. Board meeting videos continue to show improvement in June, July, August, and September. But the old patterns of operational overreach, occasional incivility, off-agenda topics, and muddled document-handling are evident in meetings as recent as January, February, March, and April. An additional concern to the evaluators was the sense that, while the campus community was appreciative of the changes, people often expressed only tentative faith that they were sustainable. Instead, phrases like “anxious hope” and “timid optimism” were common, indicating a need for more sustained trust-building. Finally, as noted elsewhere in this report, the college’s progress on other governance-related recommendations remains mixed.

To be sure, some tools are in place to sustain the board’s recent trajectory. Most immediately, the planned orientation of new board electees, facilitated by the ACCT team, will be an important step in maintaining momentum and assuring that the board continues to adhere long-term to its new policies, processes, and practices. North Idaho College’s strong participatory governance system is another asset that can support NIC’s continued recovery. Beyond that, only a sustained record of good practice can decisively heal the distrust and dysfunction of prior years.

Recommendation 1: Spring 2023 Special Report - The Board and College President should continue training and development activities to improve governance, ensure that policies on ethics and general conduct are followed, and demonstrate a sustained commitment to the requirements and standards of NWCCU member institutions manifested through concrete actions over time (2020 Standards ER 2; ER 8; ER 22).

[Progress on Recommendation 1, Spring 2023](#)

Other sections of this report examine North Idaho College’s training and development activities to improve governance, related policies, and general conduct. The available evidence confirms that the college has undertaken these efforts in a spirit of sustained commitment to the requirements and standards of NWCCU member institutions. At one level, the work itself speaks to that commitment. Additionally, the institution has been responsive to NWCCU requests and has been transparent about those matters, regularly posting correspondence on NIC’s public website. Throughout the fall 2024 visit, campus constituents expressed a shared desire to regain and retain good standing with NWCCU.

Recommendation 2: Spring 2023 Special Report - The Board of Trustees must resolve the issues underpinning all "No Confidence" resolutions and demonstrate a willingness to work with and support faculty, staff, and students when their concerns are communicated (2020 Standards 2.D.2; ER 7).

Progress on Recommendation 2, Spring 2023

NIC's Fall 2024 Special Report asserts that by addressing accreditation-related concerns, the board is *de facto* addressing the earlier votes of no confidence. The board chair articulated this position in board meetings held in March and May of 2024. However, when members of the evaluation team asked NIC staff, faculty, and administrators if they agreed, they almost universally did not. In fact, they contended that the NIC board had not ever addressed the votes of no confidence. Nor is there any evidence that the board has engaged in meaningful dialogue with the constituent groups who generated the no-confidence statements. Rather, interviewees cited examples of board members speaking to them in a dismissive or condescending manner. Members of employee constituent groups stated that they had little confidence that the current board would consistently act in the best interest of the college long-term. Furthermore, they stated that the loss of trust will extend to the next board that will emerge after the November 2024 elections. The new board will have to work to gain the confidence of employee constituent groups.

The student representatives who met with members of the evaluation team were new to the college and were not the same students who generated votes of no confidence. As a result, they did not have an intellectual or emotional attachment to the student-generated votes of no confidence. They stated that some of the issues mentioned in the votes (e.g. hiring of two presidents) had been resolved over time.

Members of employee constituent groups expressed a desire that the board publicly accept responsibility for the words and actions which led to the votes of no confidence, commit to improved behavior, and then demonstrate improved patterns of behavior over time. While there is no expectation that current board members will apologize for the past, there is recognition of the board's recent progress around policy matters and board member behavior. There is also guarded hope for continued improvement with new board members. This hope rests largely on the board's commitment to new member orientation, the steps taken by college administration to implement such an orientation, and a collective desire for the contract of the ACCT consultants to be extended. Ideally, these resources will help maintain a behavioral standard of professionalism far above what the college has experienced, with greater safeguards against local politics. In addition, faculty and staff express a desire for board accountability measures to assure that future constituent-group concerns, including any votes of no confidence, are addressed in a documented, respectful, and timely manner.

Recommendation 3: Spring 2023 Special Report - *The college and its Board must take action to resolve the uncertainties regarding both the leadership and accreditation status of the institution in order to improve retention of existing employees and fill current vacancies (2020 Standard 2.F.3)*

Progress on Recommendation 3, Spring 2023

The board has resolved many of the uncertainties regarding college leadership by allowing the contract for Interim President Gregory South to expire, resulting in the college employing only one president.

In addition, NIC has taken steps to increase employee retention by allowing employees to work a flexible schedule, implementing a remote work pilot program for staff, approving a general wage increase, and hosting community-building activities for employees.

In spite of these efforts, however, employee turnover continues to be a concern. Using National Community College Benchmarking Project data, NIC's report (page 13) shows an FY 2023 departure rate (18.1%) nearly double the national average (9.6%). As a result, despite some improvements in retention and hiring, NIC still has high number of vacant positions, creating sustainability concerns for those employees who are left. The college struggles to fill certain openings, especially those that require experience in higher education and specific skill sets such as financial aid processing. In team interviews onsite, respondents cited low wages, the high cost of housing in the local real estate market, and unresolved accreditation issues as examples of challenges. Others spoke to the impacts of NIC's turbulence on employee workload, including more complex questions from admissions applicants, heightened oversight from professional-accreditation bodies, and a pervasive sense that routine operational and curricular decisions must be parsed in anticipation of board scrutiny. Meantime, "employer reputation" remains one of the top three concerns cited in NIC's Voluntary Exit Feedback surveys. Sustained work by the board to address and resolve governance concerns underlying accreditation sanctions would likely make it easier for the institution to attract and retain high-quality individuals.

Recommendation 5: Spring 2023 Special Report - *The Board must advance specific policies, procedures, and take timely and definitive action to mitigate or eliminate risks identified in the NWCCU Show Cause letter, dated February 9, 2023. (ER 9)*

Progress on Recommendation 5, Spring 2023

Risk 1: Three lawsuits, one settled and two active

North Idaho College has resolved all lawsuits cited in NWCCU's February 9, 2023 Show Cause letter. The first, a wrongful-termination suit filed by former President MacLennan, was settled on January 6, 2022. A second lawsuit filed against the board by Michael Gridley that challenged the contract between the college and attorney Art Macomber, as well as that of former Interim President Greg South, was dismissed with prejudice on June 12, 2024. Finally, an appeal filed by the board of trustees to the Idaho Supreme Court over a Kootenai County Judge's decision to reinstate NIC President Nick Swayne was dismissed with prejudice on June 7, 2024. The board voted to drop the appeal at its May 22, 2024, meeting.

Since the NWCCU Show Cause letter, an additional lawsuit was filed against the NIC Board of Trustees on February 21, 2024, by a former NIC employee and remains outstanding. College officials indicated that this suit did not pose a significant material threat to the institution.

Risk 2: Frequent changes in leadership with little to no input from relevant stakeholders, and without following institutional policies and procedures.

As stated in the response to Recommendation 10, Spring 2023 Special Report, the college currently has one president, Dr. Nick Swayne. All senior-level members of the college cabinet are filled. The college has plans to fill the provost position (currently filled on an interim basis), though officials differed on the exact timeline for that national search. College officials confirmed that, in filling its vacancies, NIC has been following its standard hiring process that includes relevant stakeholders.

Risk 3: Uncertainty as to who is the Chief Executive Officer at North Idaho College, with a regular president placed on administrative leave (Swayne) and an interim president (South) appointed concurrent with the regular president.

Dr. Swayne was recognized as North Idaho College's president at the December 20, 2023, trustees meeting. Subsequently, the contract for Interim President Gregory South was not renewed when it expired on June 30, 2024.

Risk 4: Declining enrollments, including termination of partnership with STEM Charter Academy, with concomitant reduction in tuition revenue.

After years of enrollment and related tuition revenue decline, NIC experienced an uptick in 2023 summer session enrollment that contributed approximately \$75,000 in tuition revenue to the FY 2024 budget, which also included a one-time surplus of \$2,000,000 associated with \$1,750,000 in salary reduction salvage and \$250,000 of interest income (see FY 2024 June Preliminary Income Statement). Dedicated recruitment and retention of students by NIC administration, faculty, and staff combined with the strategic expansion of the college's marketing efforts netted sizable enrollment increases for summer and fall 2024, up 16.4% and 4.0% respectively (see June 26, 2024, board meeting minutes). Starting in FY 2024, it appears the percent of NIC's revenue derived from FTE (credit only) decline in tuition and fees has stabilized at 19%, and it is anticipated that enrollment management and marketing efforts aligned with the college's strategic plan will continue an upward trajectory. Early estimates for FY 2025 suggest a one-year tuition and fee budget increase of \$524,975 (Tab 4, FY 2025 Budget, May 22, 2024, Board Book).

Risk 5: Continued exodus of faculty, staff, and senior administrators

See response to Recommendation 3, Spring 2023 Special Report, above.

Risk 6: Decision with little to no input to expand the athletics program and to change athletic conferences with potential added costs

The remaining risks associated with this decision are discussed in Recommendation 11, Spring 2023 Special Report, below.

Risk 7: Multiple No Confidence Resolutions from the Associated Students of NIC, NIC Faculty Assembly, and NIC Staff Assembly.

This risk is addressed in Recommendation 2, Spring 2023 Special Report, above.

Risk 8: Risk of significant financial stress including but not limited to:

A: Expanded payroll for two presidents, interim provost, and special assistant to the interim president, along with moving expenses, and other contracted charges and/or obligations

When the contract for Interim President Gregory South was not renewed and expired on June 30, 2024, the college resolved the last of the payroll, expense, and contract liabilities associated with his tenure.

B: Significantly increased insurance costs with higher deductibles, Moody's Bond Rating review for potential downgrade

As of April 10, 2024, Moody's Bond Rating for North Idaho College was downgraded to Baa1 with a negative outlook. While this remains a concern, Moody's identified three areas for improvement: (1) a prolonged period of institutional governance stabilization, better management credibility, and improved risk management, evidenced by predictable board actions, policies, and procedures; (2) sustained enrollment growth and net tuition revenue; and (3) material improvement in EBIDA margins that contribute to financial reserve growth through retained operating surpluses. The board's work on policies and procedures, combined with current enrollment and net tuition revenue increases, points to a positive start toward these goals.

College officials note that NIC has no plans to issue bonds. Consequently, the Moody's rating, though a concern, poses limited material threat. Likewise, as in FY 2023, NIC's insurance costs have been accommodated within the FY 2024 institutional budget.

C: Declining donor support

In FY 2022, the NIC Foundation reported \$48,870 in fundraising contributions (NIC 2022 IRS Form 990). In FY 2023, fundraising contributions increased to \$73,321 (NIC 2023 IRS Form 990). Through a combination of fundraising and solid investment income, the net asset valuation of the North Idaho College Foundation has grown from \$36.4 million (FY 2022) to \$45 million (FY 2024). After a February 2024 announcement of \$1,105,017 in student scholarship support, it is anticipated that additional scholarship support will exceed a record-breaking \$1.2 million by the end of FY 2025 (see Notification Letter AY 2024-25). In addition, participation in recent fundraisers has been well received. NIC's

report notes, for example, that the 31st Annual Really BIG Raffle, scheduled for July 10, 2024, sold all 5,000 of its \$150 tickets by May 31, generating gross earnings of \$750,000.

Recommendation 6: Spring 2023 Special Report - *The Board of Trustees works in partnership with college president, leadership, and stakeholders to identify, create, and execute internal and external strategic initiatives with clear goals, metrics, and milestones for achievement of the same. (2020 Standard(s) 1.B.4)*

[Progress on Recommendation 6, Spring 2023](#)

The president has led college staff in launching an inclusive strategic planning process that included contracting with the Collaborative Brain Trust to assist with conducting an environmental scan and establishing a Strategic Planning Steering Committee with staff, faculty and student representation. Groups of students, faculty, and staff who spoke with evaluators all described how they were represented, informed about, and participated in the process and seemed satisfied with it. The first stage of the process was to articulate a set of five strategic goals. College staff presented the goals to the trustees, who approved them without alteration during the May 2024 board meeting. Objectives under each goal have been already established. Over the upcoming months, teams of faculty, staff, and students will establish action plans, deliverables, and timelines. There seems to be an overall feeling of optimism about the new plan's adoption scheduled for November or December 2024. The plan is viewed as an important tool that will provide a positive data-based framework and vision for moving NIC forward to a bright and productive future.

While the draft version of the strategic plan includes investments to increase student enrollment and retention, a glaring omission was the plan's lack of reference to athletics. The evaluators struggle to understand why it was not included, given the millions of dollars the college is committing to the growing its athletic program. In the evaluators' opinion, it would be beneficial for the final plan to incorporate all initiatives, including athletics, that are significant to the institution and require significant resources.

Recommendation 7: Spring 2023 Special Report - *The Board and College President should ensure that they adhere to the inclusive articulation in the college's planning and decision-making processes. The Board and College President should demonstrate a commitment to an environment respectful of meaningful discourse, in their official capacities and when interacting with each other. (Standard 2-Preamble)*

[Progress on Recommendation 7, Spring 2023](#)

The institution has made progress strengthening participatory governance and inclusivity as articulated in the college's planning and decision-making processes. This is evidenced in the relatively recent strategic planning process, including but not limited to the board's May 2024 approval of NIC Strategic Planning Goals, as well as the updating and streamlining of existing

policies and the adoption of some new policy. These examples demonstrate that the NIC trustees have begun to understand differences in their role as a governance body and the role of NIC faculty, staff, and administration at the operational levels in planning and decision-making. The president too has established trust through participatory governance with employee stakeholder groups and has concurrently maintained a productive working relationship with the NIC board chair.

The evaluation team heard many compliments on the leadership of the NIC board chair. Despite uncertainties expressed related to the chair's motivation, progress has resulted to an extent because he has led in a respectful and a professional manner. He increased the level of decorum, and used parliamentary procedures in a manner that has improved meeting productivity and effectiveness. In addition to his professional experience and past leadership, he appears to have internalized specific ACCT training and the results have helped NIC heal.

However, the board as a whole and the president, together, have yet to demonstrate a sustained commitment to mutual respect and meaningful discourse in their official capacities. Although the tenor of board meetings the past few months has been mostly professional and respectful, additional time is needed to establish a pattern of meeting behavior that inspires confidence in the durability of these relatively recent behavioral changes. Moreover, the evaluation team was presented with recent examples where interactions between the president and individual board members continued to be negative and unproductive. Despite past experiences, the president has been earnest in building a positive relationship with the board chair and other board members, as well as with the ACCT consultants. Even so, forging a truly unified, mutually supportive presidential and board-wide relationship remains a work in progress and will require effort, more time, and respectfully authentic communication. Long-term confidence in the board from constituents does not exist at present and could be strengthened by sustained efforts to demonstrate mutual respect and meaningful discourse at the board/CEO level.

Recommendation 10: Spring 2023 Special Report - The Board of Trustees must act to unequivocally identify one CEO/President for the institution, with a valid contract and a clear understanding of conditions of employment, rights, responsibilities, and criteria and procedures for evaluation, retention, and termination (ER 10, Standards 2.A.3, 2.F.1).

[Progress on Recommendation 10, Spring 2023](#)

The institution's sole president, Dr. Nick Swayne, holds a valid contract, and functions with an understanding of his employment, rights, and responsibilities. Under the tutelage of the ACCT consultants, the board and president developed, adopted, and implemented a presidential evaluation process, demonstrating that they can use criteria and procedure for evaluation, retention, and termination.

However, although the president and board acknowledge they completed the adopted process, they have differing perspectives on its usefulness. The evaluation process could be further improved from the perspective of presidential growth, development, and board support. This punctuates the team's observation that the president and the collective board continue to experience divisiveness and distrust between them.

Recommendation 11: Spring 2023 Special Report - The college should resolve current litigation, governance, and accreditation issues that have had a current and immediate impact on actual, current, and budgeted expenditures and which, if unresolved, will impact long-term financial stability of the institution (2020 Standards 2.E.2; ER 19).

Progress on Recommendation 11, Spring 2023

Elsewhere in this report, the evaluators note North Idaho College's recent progress to reduce the fiscal impacts of litigation, governance, and accreditation issues arising from board actions over recent years. Still, financial concerns persist around NIC's decision to re-join the National Junior College Athletic Association (NJCAA). In addition to its impacts on participatory governance, the decision placed a multi-million-dollar burden on NIC's budget and a substantial hidden tax on NIC's academic and student support services.

At its September 27, 2023, meeting, the board authorized NIC to meet NJCAA's "full-fare" cost of participation, covering tuition, books, housing (including meals), and one round-trip flight home, regardless of residency. Estimated at \$40,000 per athlete, that commitment would grow NIC's athletics budget from \$2.2 million to \$6.2 million, a \$4 million increase. An April 2024 budget presentation to the board fixed the expected impact at \$4,117,253 for FY 2025, contributing significantly to a predicted \$5.2 million deficit for that fiscal year. The presentation noted that unanticipated tuition revenue, salary salvages, and a forgone transfer of \$1,965,644 into the institution's capital reserve had alleviated a shortfall in FY 2024. The same approach, including another reallocation of capital reserve contributions totaling \$2.6 million, was planned for FY 2025.

Meantime, faculty note increased demand for online, hybrid, or athlete-driven course scheduling to accommodate class absences due to increased travel, posing an especially difficult challenge for hands-on courses like lab sciences. Additionally, faculty and staff have scrambled to provide adequate academic support services and other infrastructure to meet student needs. Particularly for international recruits, needed services include language assistance, legal travel support (visa, passport, basic transportation), personal care needs, weekend and holiday housing/meals, and general community connectedness. These efforts come with associated costs, none of which are accounted for in the athletics budget or faculty/staff workloads.

NIC's current budget model, with athletics at the center, remains a risk to the college and is not sustainable in terms of governance, finance, and personnel. As recently as May 2024's board

meeting, the vice president for finance and business affairs warned that the continued use of the reserve fund will deplete reserves below the recommended levels. Likewise, in an environment of rebounding enrollments, fewer staff lines can presumably remain vacant.

A budget model adjustment, coordinated with NIC's strategic plan and practiced with the principles of participatory governance, can ensure sustainability by (1) restructuring a practical, long-term athletics budget; (2) restoring annual capital reserve funds; and (3) realistically addressing necessary staffing levels. Ideally, the work can re-engage faculty and staff in ways that honor their expertise and professionalism, thereby rebuilding trust and returning the collective focus to NIC's mission.

Recommendation 2: Fall 2023 Special Report – *The Board of Trustees, should provide evidence of ongoing development related to board governance, roles and responsibilities, effective participation, conflict of interest identification and ethics that is sustainable (Standards 2.A.1, 2.D.3).*

Progress on Recommendation 2, Fall 2023

Over recent months, North Idaho College's trustees have engaged in a substantial training effort, facilitated by NIC's two consultants from the Association of Community College Trustees (ACCT). Records show that, between February and August 2024 alone, the consultants have held a half-dozen sessions with the trustees, focusing on board policy, goal-setting, roles, ethics, self-evaluation, and other substantive governance topics. Constituents attend these sessions as observers. The training agenda has also included parliamentary procedure, providing tools to improve the efficiency and decorum of meetings. In interviews, the consultants noted that, outside the formal sessions, they often take individual questions from participants.

During the visit, board members, the president, and constituent groups often spoke to the value of the ACCT trainings in guiding recent improvements. Board members and others expressed a desire to continue the learning agenda. Of particular significance to its potential sustainability, the work has included the development of an onboarding curriculum for future trustees. Though the ACCT team appears willing to consider an extension of their work past its current December 2024 endpoint, they are appropriately sensitive to the risks of over-reliance on third-party guidance.

Conclusion

The current evaluators found evidence of governance improvements at North Idaho College. Among these were a record of consultant-guided board training activities, a set of updated governance-related board policies, a reduction in institutional risks, more efficient board meetings, and a tentative sense of improved morale across campus.

At the same time, the team saw reasons to be cautious about the durability of those changes. For one, their history is itself too short — perhaps a few months, at best — to constitute convincing assurance that the shifts are permanent, particularly in light of the two-plus years of elapsed time since NWCCU’s initial sanctions. Further, in interviews onsite, no one expressed high confidence in the sustainability of the board’s current trajectory. Finally, as detailed in other sections of this report, NIC’s rate of progress on individual concerns has been mixed, leaving a number of items in need of continued, urgent attention. As NIC’s report (page 36) concludes, “the board needs to continue to exhibit behaviors that will give further evidence of meeting the Eligibility Requirements and Standards set forth by the NWCCU in order to return to good standing.”