



March 3, 2025

Dr. Cynthia Pemberton  
President  
Lewis-Clark State College  
500 8th Avenue  
Lewiston, ID 83501

Dear President Pemberton:

Attached please find the Fall 2024 Policies, Regulations, and Financial Review (PRFR) Evaluation Committee's review of Lewis-Clark State 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.

**No Findings Identified**

**Future Evaluations**

- Year 7 - Evaluation of Institutional Effectiveness Fall 2025

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,

Aaron Christopher  
Vice President for Administration and Finance

cc: Dr. Fred Chilson, Provost/Vice President for Academic Affairs  
Dr. Linda Clark, SBOE Chair  
Mr. Joshua Whitworth, Executive Director, Idaho State Board of Education



## Peer Evaluation for: Lewis Clark State 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.*

---

#### 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 (Sufficient evidence that indicates compliance)

#### Evidence:

- Institutional governance policies and procedure   Y
- System governance policies and procedures (if applicable)   Y
- Multiple board governing policies and procedures (if applicable)
- Board's calendar for reviewing institutional and board policies and procedures   Y
- Bylaws and Articles of Incorporation referencing governance structure   Y

**Rationale (provided to institution):** LC State demonstrates effective governance, with the responsibilities of the Idaho State Board Education (SBOE) and the State Board clearly defined. LC State is one of 8 institutions governed by this board. SBOE calendar, bylaws and other documentation is available online.

#### 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 (Sufficient evidence that indicates compliance)

#### Evidence:

- Leadership organizational chart   Y
- Curriculum vitae of executive leadership   Y

**Rationale:** The Executive Cabinet includes qualified, credentials individuals in key positions for finance, administration and academics. The larger administrative team includes a President's Cabinet that includes representative leadership from all areas.

#### 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 (Sufficient evidence that indicates compliance)

#### Evidence:

- Curriculum vitae of President/CEO   Y

**Rationale:** LC State is led by Cynthia Pemberton, Ed.D., who has been president since 2018 and previously served as Provost at two institutions.

#### 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 (Sufficient evidence that indicates compliance)

##### Evidence:

- Institutional governance policies and procedures (see 2.A.1)   Y

**Rationale:** Decision-making policies are clearly outlined and available. Participatory governance is in place for faculty, professional staff, classified staff and students.

#### 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 (Sufficient evidence that indicates compliance)

##### 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:** Academic freedom policies for LC State and from SBOE are available.

#### 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 (Sufficient evidence that indicates compliance)

**Rationale:** In addition to the academic freedom policies, LC State includes a statement regarding academic freedom for students in all course syllabi.

#### 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 (Sufficient evidence that indicates compliance)

##### Evidence:

- Transfer of credit policies and procedures   Y

**Rationale:** Policies and procedures are posted online.

#### 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 (Sufficient evidence that indicates compliance)

##### 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:** Student rights and responsibilities are outlined in the annual handbook. Services are provided by Student Affairs and Accessibility Services.

### 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 (Sufficient evidence that indicates compliance)

**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:** LC State provides admissions standards and procedures online via its Academic Standings webpage. Information on suspension, appeal, and readmission is included with a flowchart.

### 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 (Sufficient evidence that indicates compliance)

**Evidence:**

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

**Rationale:** The Registrar serves as data steward and LC State follows FERPA guidelines and national best practices. The IT department protects networks and educates LC State staff and faculty on tech security. A more expansive Cybersecurity and Information Tech Risk Management policy is forthcoming.

### 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 (Sufficient evidence that indicates compliance)

**Evidence:**

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

**Rationale:** LC State's Communications & Marketing Department provides accurate, clear, consistent communication to the community through centralized communications and content policies and review procedures for departments.

### 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 (Sufficient evidence that indicates compliance)

**Evidence:**

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

**Rationale:** Along with an overarching conflict of interest/ethical conduct policy, LC State has procedures for employees and students to report grievances and concerns.

### 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 (Sufficient evidence that indicates compliance)

**Evidence:**

- Policies/procedures prohibiting conflict of interests among employees and board members Y

**Rationale:** LC State adheres to the Idaho Division of Human Resources Conflict of Interest policy and has an internal policy as well.

**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 (Sufficient evidence that indicates compliance)

**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:** LC State shows evidence of audit processes and regular reports that illustrate financial stability.

**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 (Sufficient evidence that indicates compliance)

**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:** LC State has an integrated assessment, planning, and budget process that has been continuously assessed and refined since its design in 2001. There is documentation of the budget process and parties involved.

**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 (Sufficient evidence that indicates compliance)

**Evidence:**

- Description of internal financial controls Y
- Board approved financial policies, state financial policies, or system financial policies Y

**Rationale:** The Idaho SBOE receives quarterly updates from LC State. LC State participates in system-wide committees and complies with SBOE policies.

**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 (Sufficient evidence that indicates compliance)

**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:** Clear policies and procedures are provided to employees.

#### Standard 2.F.2

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

##### Team Verification:

- Compliant (Sufficient evidence that indicates compliance)

##### Evidence:

- Employee professional development policies/procedures **\_Y\_**

**Rationale:** LC State offers professional development training on a variety of topics along with intensive supervisor training. Employees receive tuition benefits and LC State administers a Center for Teaching and Learning.

#### 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 (Sufficient evidence that indicates compliance)

##### 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:** LC State provides evidence of sufficient and qualified staffing.

#### 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 (Sufficient evidence that indicates compliance) **\_Y\_**

##### Evidence:

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

**Rationale:** LC State faculty, staff and administrators are evaluated annually. Procedures and policies for different employee types are posted.

#### 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 (Sufficient evidence that indicates compliance)

##### Evidence:

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

**Rationale:** LC State offers TRIO, CAMP, and services through an Office of Native American, Minority and Veterans' Services, along with orientation and academic counseling.

#### 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 (Sufficient evidence that indicates compliance)

**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:** LC State publishes an annual General Catalog digitally that includes all of the above information.

**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 (Sufficient evidence that indicates compliance)

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

**Rationale:** LC State provides information about licensure requirements for medical assistant, nursing, radiographic science, social work, and teacher education.

**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 (Sufficient evidence that indicates compliance)

**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:** LC State provides information about various opportunities online and in-person.

**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:**

- Compliant (Sufficient evidence that indicates compliance)

**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 \_Y\_

**Rationale:** LC State provides the required policies and information.

### 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:

- Compliant (Sufficient evidence that indicates compliance)

#### 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 \_Y\_
- Professional development policies / procedures for advisors \_Y\_

**Rationale:** LC State employs professional academic advisors who are provided professional development and training opportunities.

### 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:

- Compliant (Sufficient evidence that indicates compliance)

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

**Rationale:** LC State uses identity protection and data protection measures for distance education and all student interaction via email or phone.

### 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 (Sufficient evidence that indicates compliance)

#### 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:** LC State's librarians serve as liaison to divisions and are involved in campus committees including curriculum review. Collection assessment is performed. Services are robust.

### Standard 2.I.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 (Sufficient evidence that indicates compliance)

#### 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:** LC State follows SBOE policy for real and personal property and has a campus master plan. Space assignment, capital requests, safety and technological infrastructure are all addressed, with some updated policies currently undergoing review.

#### Concluding Comments

LC State has provided clear evidence of compliance with all standards. Report is clear and complete, although having evidence dispersed throughout would have enhanced the review.