



230 South LaSalle Street, Suite 7-500
Chicago, IL 60604
312.263.0456 | 800.621.7440
Fax: 312.263.7462 | hlcommission.org

February 13, 2025

Dr. David Travis
President
Lake Superior State University
650 W. Easterday Ave.
Sault Sainte Marie, MI 49783-1699

Dear President Travis:

Attached is the Additional Location Confirmation Visit Report that was completed following the location visit to Lake Superior State University (the institution). As reported, the additional location conforms to the description provided by the institution and no further monitoring by the Higher Learning Commission (HLC) is required.

Within the Additional Location Confirmation Visit Report, you will find brief comments on course and program offerings, financial resources and planning, instructional oversight, human and physical resources, assessment and evaluation, student services, and instructional resources. Please consider these comments as advice and suggestions for continued improvement of the additional location.

Thank you again for your flexibility and hospitality in arranging the Additional Location Confirmation Visit, which fulfills federal regulations related to substantive change. Per HLC policy, completion of the visit and fulfillment of the requirement will be noted in the institution's history record and the completed report will be included in the institution's permanent file.

Please contact accreditation@hlcommission.org with any questions or comments regarding the Additional Location Confirmation Visit or this report.

Sincerely,
Higher Learning Commission

cc: Kimberly Muller, Accreditation Liaison Officer
Steph Brzuzy, HLC Staff Liaison

Additional Location Confirmation Visit Report Form for Pell-Eligible Prison Education Programs

Institution name: Lake Superior State University

Name and street address of correctional facility: Chippewa Correctional Facility, 4269 W. M-80,
Kincheloe, MI 49784

Date of visit: 2/6/2025

Reviewer: Mark Kelland, Ph.D.

Review the information provided in the institution's change request, HLC's response and related materials. Also review evidence available based on your observations at the actual location and answer the following questions.

Identifying a "First" Program at a Location With Multiple PEPs

If the approved application indicated that the institution would launch multiple educational programs on the same initiation date, have the institution designate one of these programs as its "first" program solely for purposes of this evaluation. Document findings for each item listed below and indicate the institution's strengths and/or opportunities for improvement in controlling and delivering the educational program it designates as its "first" program at the correctional facility.

Submission Instructions

Submit the completed report as a single PDF file at hlccommission.org/upload. Select "Final Reports" from the list of submission options to ensure the report is sent to the correct HLC staff member.

1. Location, Program and Modality

Is the location at an HLC-approved address, and is the program offered as described in the original change request, including with respect to the modality used to deliver instruction?

☒ Yes ☐ No

Comments:

Lake Superior State University (LSSU) was approved for a Pell-Eligible Prison Education Program offering the Small Business Administration Associate Degree (including two embedded certificates) in June 2024, and the Chippewa Correctional Facility was approved as an additional location in April 2023. As proposed, LSSU is offering this program via face-to-face courses, and during the site visit this

reviewer observed the classroom space, library facility, and met with faculty and staff who provide instruction and instructional support. It was evident during the site visit that LSSU is offering a quality educational program in the manner proposed in the PEP application.

2. Instruction Resources, Program Resources and Student Support Services

Are instructional resources (e.g., technology and other teaching support), required program resources (e.g., academic materials or technical equipment) and student support services (e.g., registration, advising, career counseling, placement services and library access) made available as described in the original request?

☒ Yes ☐ No

Comments:

LSSU was quite thorough in planning this program, and they have successfully implemented the program as proposed. Nonetheless, they have been learning and encountering challenges as they gain practical experience. The Director of the STEP UP (Success Through Educational Pathways in the Upper Peninsula) team, who is also Director of Library and Academic Services, recognizes that continuous quality improvement is to be expected, and the entire team is fully committed to CQI. This was evident throughout the site visit, in conversations with administrators, faculty, staff, and Michigan Department of Corrections (MDOC) personnel. Indeed, all of the LSSU personnel who participated in the site visit indicated that being a part of this program, and going to the facility to support the students there, is as meaningful as anything else they have done in their careers.

Does the evidence confirm that the instructional resources, required program resources and student support services are appropriate for the program offered?

☒ Yes ☐ No

Comments:

The program does not require any resources aside from what would be required for any typical educational program. Both the faculty and the students indicated that they are receiving the resources and support they need, given the restrictions that are a reality within MDOC facilities. As LSSU continues to learn and improve their services, one challenge of interest is conducting internet research. The reference librarians have developed a reference request worksheet. Students can fill out the worksheet, librarians conduct an internet search for resources (e.g., scholarly articles), and faculty or staff then deliver the educational materials to the facility. This process is not perfect, given that the student cannot be there to refine the search in real time. Nonetheless, the process has proven to be of value, and LSSU continues to improve the process as they gain experience with it.

3. Continued Delivery of the Program

Does the evidence confirm that the institution effectively plans for its continued delivery of educational program at the correctional facility?

☒ Yes ☐ No

Comments:

LSSU has taken a comprehensive approach to ensuring the sustainability of this program, with regard to both budgeting and support amongst LSSU personnel. With regard to budget, LSSU is considering multiple sources of revenue. Currently, by focusing on controlling costs (e.g., the use of adjunct faculty and having full-time faculty teach on overload), and making use of Open Educational Resources when possible, LSSU has been able to support the program through Pell funds alone. Looking ahead, the STEP UP team has been working with LSSU's foundation to provide additional financial support. LSSU also plans to begin offering a bachelor's degree in this program, which would provide access to funding sources from the State of Michigan, which at this time are only available for 4-year academic programs. LSSU also plans to grow the program significantly. They began with a cohort of 20 students, and are planning to expand the second cohort to 25 students, and then grow to four cohorts.

LSSU has also been working to enhance the profile of the PEP programs, in order to encourage and identify the additional faculty and staff who will be required to support the program as it grows. They intend to establish an institutional support network, which will also help with onboarding and training as new personnel join the STEP UP team and/or PEP faculty ranks.

In addition, MDOC is fully supporting this program. The College Facility Coordinator (an MDOC employee) is actively collaborating with LSSU's STEP UP team, and the Chippewa Correctional Facility is modifying housing units and educational facilities to support its educational programs. This will facilitate the above-mentioned plan by LSSU to expand the number of student cohorts in the PEP.

Has the institution indicated an intent to discontinue its educational program at the correctional facility?

☐ Yes ☒ No

If yes, please indicate an approximate timeframe for such intended action:

4. Instructional Oversight

Does the evidence confirm that the institution effectively oversees instruction at the correctional facility?

☒ Yes ☐ No

Comments:

Simply put, there is no difference in instructional oversight at Chippewa Correctional Facility as compared to LSSU's main campus. The facility is fairly close to the main campus (~20 miles away), some of the faculty are full-time LSSU faculty, and instructional staff (e.g., tutors) travel to the site as well. Deans follow standard LSSU policies and procedures regarding faculty qualifications and performance reviews, as well oversight regarding items such as section syllabi (syllabi provided to this reviewer were fine). The Dean of the College of Business, Engineering, Computer Science, and Mathematics regularly visits the facility, and conducts classroom visits as appropriate. During the visit, this Dean indicated that everything is done as a team effort, and the STEP UP team works hard to resolve any issues in a timely manner. As noted below (Question 6), the faculty are fully satisfied with the support they receive.

5. Assessment and Evaluation

Does the evidence confirm that the measures and techniques employed by the institution for assessment and evaluation of its educational program at the correctional facility are equivalent to those on the main campus?

☒ Yes ☐ No

Comments:

Assessment and evaluation in the PEP is no different than in sections on LSSU's main campus. Deans review course learning outcomes and syllabi to ensure that those learning outcomes are measurable and focused on student learning. All faculty are required to submit their course-level assessment data in the Nuventive Assessment Management System. Faculty teaching at additional locations are asked to attend the Annual Assessment Update along with all faculty at the main campus. Data from additional locations are reviewed and compared to on-campus data, and when deficiencies are noted, faculty involved are required to participate in contractual evaluative processes.

It should be noted that the faculty teaching in the PEP have reported that their students are doing significantly better overall than students on the main campus. This does not mean, however, that everything goes smoothly. The students indicated, as was reported by LSSU, that the math class presented particular challenges for some of the students, especially those who didn't finish high school when they were younger. LSSU is providing math tutors, and the students have found this very helpful. With this assistance, every student in the first cohort was able to pass their first math class.

Does the evidence confirm that the measures and techniques employed by the institution for assessment and evaluation of its educational programs at the correctional facility are designed to ensure that the Pell-eligible prison education program meets the same standards as substantially similar programs that are not prison education programs at the institution?

☒ Yes ☐ No

Comments:

The most compelling evidence regarding this question is that one of the faculty who met with this reviewer is teaching the same course at both the Chippewa Correctional Facility and on the main LSSU campus. In his experience, the students in the PEP are more experienced in life, more dedicated to their studies, and more highly motivated to get the most they can out of their education. Therefore, he does his best to challenge them, sometimes treating them more like graduate students than undergrads. The students are well aware of this, and indicated to this reviewer that this was a distinct source of pride for those students, and they are even more eager to continue their studies.

Indeed, all of the faculty present during the site visit indicated that the students in the PEP were eager to learn and more than willing to challenge their professors. Consequently, the professors must themselves be fully prepared for class, and they feel free to delve into more material than they might have time for during classes on the main campus.

6. Staff and Faculty

Does the evidence confirm that the institution has reasonable policies and procedures to appropriately ensure that there are qualified and sufficient staff and faculty available to students enrolled in the PEP at the correctional facility?

☒ Yes ☐ No

Comments:

The STEP UP team works closely with academic Deans, particularly the Dean overseeing the Lukenda School of Business, to identify faculty and staff willing to teach in this program, and Deans follow LSSU policies and procedures to ensure all personnel are appropriately qualified. The faculty and staff present during the site visit are dedicated and highly motivated to continue this work. Moving forward, in order for the program to grow as planned, identifying new faculty may be challenging. However, the STEP UP team is actively working to enhance the profile of this program and thereby encourage more personnel at LSSU to aspire to participate in the PEP.

As for institutional commitment, the current LSSU Strategic Plan has within Priority 3/Goal 3.2 a strategy (3.2.6) to "...develop new academic programs serving non-traditional populations..." Accordingly, this Pell-Eligible PEP serves LSSU's strategic plan, and can be expected to continue receiving the institutional commitment necessary.

Does the evidence confirm that the institution oversees, supports and evaluates personnel charged with delivering its educational program at the correctional facility (including with specific attention to modality of instruction)?

☒ Yes ☐ No

Comments:

As noted above, the oversight, support (including professional development), and evaluation of faculty and staff is no different at this facility than on the main campus, and many of the personnel participating in this program are full-time employees on the main campus (with this as part of their regular work, or as overload). They felt fully supported, and noted in particular the value of their onboarding process and the "very helpful" training provided by MDOC. In addition, they valued participating in regular meetings with the STEP UP team. One concern noted was the amount of time required to teach at the facility for those who were full-time faculty. Although the facility is fairly close, it does add an hour to make the roundtrip drive to the facility (and winter in the UP can add to that significantly, as noted on the day of the site visit). This is something the faculty feel LSSU must address, particularly as they work to increase the number of cohorts, and consequently need additional faculty who are willing to commit to this assignment.

7. Student Services

Does the evidence confirm that the institution delivers, supports and manages necessary student services that are adequate for any unique needs of the student population incarcerated at the additional location?

☒ Yes ☐ No

Comments:

Overall, LSSU appears to be doing an excellent job of providing quality instruction and academic support for this population of students. However, certain needs for this population are, indeed, quite unique in higher education. Therefore, it is incumbent upon MDOC to address certain issues, which they appear to be doing quite well at this facility. MDOC is renovating housing facilities to expand classroom space and provide room for multiple cohorts of students to live in proximity to one another and to the educational spaces. This will facilitate the student's abilities to study in general, but also to study together. LSSU

works closely with the MDOC College Facility Coordinator, and together they are clearly dedicated to serving the best interests of the students, while also attending to the rules and regulations that are a reality for this population and in this facility.

There is also a group of students who comprise the Student Voice Council. This group of five students serves as a liaison of sorts between the students, MDOC personnel, and LSSU. They also help to guide the cohort of students in order to support one another as they pursue education in a correctional environment. Many of the students, both on this council and others who met with this reviewer, expressed fear of failure as they began their college education. The council, and many of the students in general, support one another to be successful. Interestingly, one of the LSSU professors, who is new to teaching, said that the students are supportive of her. That is the extent to which these students consider their education to be a very special opportunity.

8. Student Satisfaction

During your interactions with students who are incarcerated at this location, how did they describe their level of satisfaction related to the following topics? Feel free to provide a summary of representative comments (without identifying students).

Instructional quality:

The students spoke very highly of their instructors. They said the faculty are seeing to the student's education, and doing a "wonderful job." When asked who their favorite instructor was, there were different answers, indicating that all of the faculty are engaging the students and providing excellent instruction. The students were pleased that professors treated them with respect, and the students are then able to use that sense of accomplishment to be role models for their children or younger siblings. Despite challenging academic material, the students praised the faculty for helping them to be successful. Students also described the program as "fulfilling" and "inspirational."

Access to instructors and faculty for questions and guidance:

The students spoke of how their instructors were available to help, and how it coordinated with tutoring when facing challenging material. They also felt a sense of pride that their instructors challenged them, and told them their academic performance certainly rivaled, or even exceeded, that of students on the main campus. Many of the students indicated a desire to continue working toward a bachelor's degree, indicating that their instructors had inspired an appreciation for continued education.

Access to required program materials:

This particular question never came up in discussion with the students, even though they were using additional materials (recent Wall Street Journal articles) during a portion of a class session that was observed during the visit. Thus, it must be concluded that the students have no concerns in this area. The faculty, and sometimes staff, provide materials ahead of time when possible, and deliver materials needed on an ad hoc basis during the semester. This seems to be working well.

Student support services:

The main student support service talked about was tutoring, particular for math. The students spoke highly of how helpful the math tutor was during the student's struggles with their first math course. When it came to support overall, the students often talked about themselves, as an educational cohort. Pursuing an education in prison is seen as a negative by some prisoners, and many of the students

spoke of a fear of failure. But they support one another, and more and more there are other prisoners who ask them how it's going, and how can the others get into the program. This sense of camaraderie will likely be enhanced when MDOC completes the renovations to the housing unit/educational unit currently underway. The Chair of the Student Voice Council emphasized this sense of being a "tight-knit unit," and said they are excited about the program moving forward.

*Note: Although it does not constitute a direct response to these prompts, the eight students who met with this reviewer spoke very proudly about having the opportunity to be in this program. They truly appreciate that this is an opportunity for them to turn their lives around, and many are first-generation college students. They recognize the MDOC personnel and LSSU personnel as often being the first people in their lives to give the students a real chance to make a positive contribution to society and to their community. The students are grateful that relatives can now be proud of them, and they speak highly of everyone in the program who is supporting them. As one student noted, it is important to do something in prison, so that prison doesn't do you.

Summary Recommendation

Select one of the following statements. Include, as appropriate, summary statement of findings.

- ☒ **Confirm approval.** Overall, the pattern of this institution's operations at the correctional facility, particularly related to its first Pell-eligible prison education program, appears to be sufficient.
- ☐ **Confirm approval with concerns.** Overall, the pattern of this institution's operations at the correctional facility, particularly related to its first Pell-eligible prison education program, needs some organizational attention, as detailed in the individual comments in the previous section. The institution is expected to follow up on these matters without monitoring by HLC. The next scheduled comprehensive evaluation will serve to confirm that the matters identified have been addressed.

Identify specific areas needing organizational attention.

- ☐ **Confirm approval with interim monitoring.** The overall pattern of this institution's operations at the correctional facility, particularly related to its first Pell-eligible prison education program, requires HLC monitoring.

Indicate recommendation for HLC follow-up. Detail specific concerns, the rationale for those concerns, and identify the form of monitoring recommended. Identify any applicable HLC requirements that support the rationale provided.

Other Matters (optional)

Complete this section only if, in the course of a review where multiple educational programs are being offered simultaneously, you observed evidence that raised concern related to any educational programs **other than** the program designated as the institution's "first" Pell-eligible prison education program for approval purposes. (Leave blank if not applicable.)