



July 9, 2026

As part of a regularly scheduled peer review by the Middle States Commission on Higher Education, Hilbert College was found to meet the following standards for accreditation: Standard I (Mission & Goals), Standard III (Design & Delivery of the Student Learning Experience), Standard IV (Support of the Student Experience), Standard V (Educational Effectiveness Assessment), and Standard VI (Planning, Resources, and Institutional Improvement).

This process also identified items we need to address regarding Standard II (Ethics and Integrity) and Standard VII (Governance, Leadership, and Administration), including but not limited to (1) the avoidance of conflict of interest or the appearance of such conflict in all activities and among all constituents (Standard II and Complex Substantive Change Procedures); (2) a legally constituted governing body that has primary responsibility to the accredited institution, meets regularly, and does not allow political or financial relationships with a related entity, or other undue influences to interfere with governing responsibilities (Standard VII and Related Entities Policy and Procedures); (3) establishes and complies with a written conflict of interest policy designed to ensure the impartiality of the governing body by addressing financial and governance matters such as payment for services, contractual relationships, employment, family, financial, related entity relationships, or other interests that could pose or be perceived as conflicts of interest (Standard VII, Complex Substantive Change Procedures, and Related Entities Policy and Procedures); and (4) a governing body that is informed in all of its operations by principles of good practice in board governance (Standard VII).

The College takes the Commission's concerns seriously and is committed to addressing them in a manner responsive to MSCHE's expectations. Indeed, Hilbert takes both actual and perceived conflicts of interest as it pertains to the acquisition of Valley Training Centers, LLC ("Valley") very seriously and wants to eliminate them as both a matter of good governance and to ensure compliance with the Commission's standards of accreditation and policies. To that end, Hilbert has already taken steps to correct and implement changes necessary to eliminate the conflicts of interest, including reviewing and revising the bylaws of Franciscan Services Inc., reviewing and revising existing conflict of interest policies, and strengthening the service agreement between Hilbert and Valley. We expect these changes to be approved by the respective board on or before August 3, 2026 and will be enacted subject to regulatory approvals if required.

We are very confident that we will reach a conclusion that addresses the priorities of Middle States and those of Hilbert College and Valley College.

SINCERELY,

MICHAEL R. CORNELL
Interim President

