

Thematic Pathway for Reaffirmation (TPR) of Accreditation

REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Pomona College

May 4 – May 7, 2021

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The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

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SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Accreditation History

Background

Located in a small community in Southern California, Pomona College, one of the nation's premiere liberal arts colleges and the original member of the Claremont College consortium, was founded in 1887 with a commitment to educate students in the liberal arts and sciences. Its mission to educate students of exceptional promise regardless of financial circumstances is enabled through a commitment to meeting one hundred percent of students' demonstrated financial need in financial aid packages of non-loan grant aid and student employment opportunities for a diverse student body. (CFR 1.1)

The Claremont College consortium is comprised of seven affiliate colleges and universities each with its own independent governance structure while leveraging the benefits of sharing facilities, intercollegiate programs and majors (e.g., Department of Asian American Studies, Department of Chicano/a and Latino/a Studies), support units, and co-curricular activities. The consortium includes Claremont Graduate University, Keck Graduate Institute of Applied Life Sciences, Scripps College, Claremont McKenna College, Harvey Mudd College, Pitzer College, and Pomona College. The 546-acre consortium is unique in U.S. higher education with its 8,500 students, 3,280 faculty and staff. Within the consortium, Pomona College is home to 1,671 undergraduate students from all 50 states and the District of Columbia, Guam, Puerto Rico, and 63 countries. Half of the domestic student population identify as American Indian/Alaska Native, Asian, Native Hawaiian/Pacific Islander, Black/African American, or Hispanic/Latinx and 17% are the first in their family to attend college. The college has 180 full-time faculty members contributing to a high-touch approach to teaching, learning, research, and mentoring with a student-faculty ratio of 8:1.

Pomona College offers 48 academic programs across all major disciplines in the arts, humanities, social sciences and natural sciences. Striving to inspire students to engage in inquiry and creative learning, the college provides students an opportunity to design a special major that crosses disciplinary boundaries to form new connections and knowledge production and highlights this unique opportunity as a hall of liberal arts education. Pomona's endowment contributes to students' opportunity to expand their learning through research with faculty mentors and domestic and international internships.

Recent accreditation history

Pomona College first received accreditation by Western Association of Schools and Colleges (WASC) in 1949 and received reaffirmation of accreditation in June 2011. In the 2011 Commission Action Letter (CAL), the college was commended on the progress made "in building its capacity to assess student learning and educational effectiveness and to develop a culture of inquiry that focuses on the outcomes of a liberal arts education." The Commission called to attention two areas for further development: 1. Developing a Sustainable Educational Effectiveness Function and 2. Enhancing Support and Plans for Diversity. The Commission requested an Interim Report due on March 1, 2015, that would demonstrate progress on the two issues. On June 12, 2015, a panel of the Interim Report Committee considered Pomona's Interim Report and found the report thorough, organized, and responsive to the Commission's 2011 recommendations. The June 26, 2015 Interim Report Committee Letter recommended that Pomona proceed with the Mid-Cycle Review in spring 2016 and requested the institution include progress on the same two issues in their institutional report for reaffirmation.

In November 2017, the Commission approved Pomona to participate in the newly adopted Thematic Pathway for Reaffirmation (TPR) where the Offsite Review (OSR) and Accreditation Visit (AV) would be replaced by a single visit in fall 2020. The fall 2020 visit was rescheduled to spring 2021 at the request of the institution.

B. Description of Team's Review Process

The team received Pomona College's Thematic Pathway for Reaffirmation institutional report and supporting materials on February 24, 2021. After reviewing the institutional report materials along with the 2011 Accreditation Visit team report and CAL, the team held its first team call on March 12, 2021 discussing the team's writing assignments and focus of the TPR review.

Each team member submitted their independent assessment of the institutional report on her/his individual worksheet and the assistant chair compiled each member's responses onto a team worksheet in preparation for the team's two-hour conference call on April 27, 2021. Before the conference call, the team generated a list of additional requested documents and individuals, groups, or committees they would like to meet with during the visit that were not already on the proposed visit schedule. The assistant chair worked with Pomona's accreditation liaison officer (ALO) on these additional requests. During the April 27th call, the team reviewed the consolidated team worksheet and additional documents received and identified potential areas to explore during the visit. The team also finalized the visit schedule and questions for each meeting planned throughout the visit. Prior to the start of the visit, the team chair held a call with Pomona's president as part of the WSCUC review process.

Each team member served as first author for particular sections of the report and second author for other sections. A preliminary draft of the report was compiled prior to the visit. Team members refined the team report based on findings throughout the visit. The full report draft was reviewed by the entire team and updates from the visit were incorporated prior to the final report.

Due to the ongoing COVID-19 travel restrictions and WSCUC's continued approach to remote visits, the visit was held virtually from May 4-7, 2021, beginning with the team's executive session the first day to review the visit schedule, and discuss additional materials received since the last team meeting and areas of focus for each meeting. Throughout the visit, the team took an exploratory

approach to each meeting with the goal of gathering evidence related to their lines of inquiry. Further, the assistant chair regularly monitored the confidential email account to ensure that all institutional representatives had an opportunity to participate fully in the visit.

C. Institution's Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence

The team found the TPR report was well organized where the two selected themes of *Equity and Inclusion on a Diverse Campus* and *Liberal Arts in the 21st Century* clearly identified areas of critical focus for the institution. In particular, Pomona College was emergent in their commitment to improvements in the area of Diversity, Equity, and Inclusion (DEI) and transparent in their aim to provide a strong liberal arts education. Evidence provided to support their inquiry into the two themes was comprehensive, and while Pomona College reported on a number of significant actions, work was ongoing and there remained much to be completed in addressing the issues that they had identified in their thematic reviews.

Pomona's WSCUC Steering Committee was composed of 19 members with representation across academic affairs and student affairs, including a student representative. Pomona was approved by WSCUC in November 2017 to participate in the Thematic Pathway for Reaffirmation. The ALO initiated community conversations with college committees within the college's shared governance model. Through several conversations and discussions, a list of 10-12 possible themes emerged that were refined to the two selected themes in the institutional report with guidance from WSCUC. The two themes selected demonstrated Pomona's ongoing work in relation to aspiration goals. During the visit, the team learned that sections of the report were prepared by various stakeholders and shared across the institution.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

Since Pomona’s 2011 reaffirmation, the institution submitted an Interim Report in March 2015 demonstrating progress on two issues: 1. *Developing a Sustainable Educational Effectiveness Function* and 2. *Enhancing Support and Plans for Diversity*. In June 2015, a panel of the Interim Report Committee (IRC) found the report responsive to the Commission’s 2011 recommendations and requested the institution demonstrate progress on the same two issues in their institutional report for reaffirmation.

By the time of the visit, the team concluded that some progress had been made on the two issues expected of the institution from the 2011 CAL and reiterated in the IRC report. The team’s review of Pomona College’s progress in the two areas are highlighted in this section and tied to the recommendations outlined in the 2011 team report.

1. *Developing a Sustainable Educational Effectiveness Function*

Evaluate capacity for the collection, analysis, and distribution of data needed in support of the assessment of student learning. (CFRs 2.6, 2.7, 4.4, 4.5)

Pomona College has “worked to better coordinate the assessment activities that occur throughout the institution.” (Institutional Report, page 10) The college added an assessment professional in academic affairs, expanded the institutional research office, and as a result, enhanced their capacity to “plan assessment projects, collect, analyze, and disseminate data.” The team verified the addition of these positions during the visit but did not discern a faculty culture of evidence-based, data-driven assessment. While institutional-level assessments had occurred over the past five years (i.e., information literacy in 2015-16, oral communication in 2014-15, written communication in 2019-20, quantitative reasoning in 2017, and critical thinking in 2017), program-level learning outcomes assessment was lacking. The team’s review of annual assessment reports provided from chemistry, classics, geology, and gender and women’s studies, found that the reports did not include evidence or

data gathered from direct assessment of student learning. Instead, these reports were year-end summaries and recapped the progress of the department in achieving various goals, faculty teaching assignments, courses offered, departmental goals, and a recognition of student capstone projects.

Enhanced support for Teaching and Learning Committee (TLC) and resources for the participation in the national dialogue about documenting and improving student learning. (CFRs 3.1, 4.6, 4.7)

The institution expanded the faculty-led group from three to six members, which was verified by the team during the visit. During the visit, the team concluded that the TLC members were committed to participating in the national dialogue about best practices in teaching and learning, but did not support faculty at the program level with how to conduct course or program-level learning outcomes assessment. The TLC focused on professional development for faculty across the institution in a variety of areas, but training in the area of data-driven assessment of student learning was not one of their functions. The team found a disconnect across the multiple groups they met with in how the role of assessment shaped effective teaching practices to support a robust and equitable learning environment.

Appoint a director of assessment to support faculty in ongoing efforts to sustain their inquiry into student learning. (CFRs 3.1, 4.6, 4.7)

During the visit, the team met with the associate dean for academic affairs, academic success and assessment who was hired to support faculty in institutional-level assessment. While this position supported faculty efforts in student learning assessment, they were also responsible for leading other college initiatives around student success. In exploring how faculty were engaging in student learning assessment, the team reviewed departmental annual reports without evidence of learning outcomes assessment demonstrated. Further, from discussions with faculty during the visit, the team concluded that faculty were still apprehensive to foundational best practices in the area of student learning outcomes assessment and a culture of inquiry, assessment, and continuous improvement was still

emergent. The team suggests in Standard 2 a way to leverage the expertise in this role to enhance supporting faculty and college-wide learning assessment.

2. Enhancing Support and Plans for Diversity

The team recommends that the College develop and execute a plan with measurable outcomes for strengthening and supporting diversity. (CFRs 1.5, 2.2, 3.2, 4.1-4.3)

Pomona College's President's Advisory Committee on Diversity (PACD) developed a strategic plan entitled "Lighting the Path to 2025: A Vision for Diversity" that was adopted in 2015. The plan addressed several targeted areas for improvement with initiatives focused on creating an inclusive campus climate, inclusive pedagogy, and increasing diversity of faculty and staff. During the visit, the team discussed with faculty, students and other various institutional representatives the effectiveness of the plan and its impact throughout the institution. It was generally acknowledged that while the college continued to face some challenges related to climate, the plan appeared to have begun influencing the institutional culture in many positive ways. For example, changes made to faculty hiring practices had recently increased faculty diversity of full-time tenured/tenure track faculty members in the area of underrepresented minorities. Finally, the team inquired about the outcomes and metrics for success around Lighting the Path 2025 and learned that this initiative, as a plan for diversity, has been subsumed into the current 2020 Strategic Vision.

Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

Institutional Purposes

Pomona College reiterated and reaffirmed its commitment to the tenets of liberal arts education:

"A system of education that honors the intrinsic value and societal benefits inherent in acquiring a depth and breadth of knowledge of the arts, humanities, social sciences, and natural sciences."

The college identified as being among the “premier” and one of the most diverse liberal arts colleges in the country, with the college’s graduates meeting or exceeding the learning outcomes adopted by the Association of American Colleges & Universities (AAC&U). Moreover, with the small student-faculty ratio (8:1), there was an emphasis on high engagement with students through research and creative work.

The college revised its mission statement and formulated institutional and general educational objectives. In alignment with its continued commitment and stated values to achieve and maintain a diverse student body, Pomona College used its resources to offset many of the associated financial burdens that deter students from pursuing higher education. The institution continued to increase its student diversity profile. As mentioned in the institutional report, half of the student population identifies as domestic students of color and 17% were the first in their families to attend college. (Institutional Report, page 6)

Integrity and Transparency

The institution made accessible the policies governing grievances, complaints, human subject protections, and other matters that might adversely affect individuals and the campus community at large. Additionally, the board of trustees approved a “Statement on Free Expression” which reiterated the freedom of and protection in self-expression.

While affiliated with the Claremont College consortium, including sharing certain facilities and services, there was no evidence of interference or undue influence. Pomona College was governed by a board of trustees and functioned as a separate independent institution. (CFRs 1.3, 1.4, 1.5, 1.6, 1.7, 1.8)

Standard 2: Achieving Educational Objectives Through Core Functions

Teaching and Learning

Pomona College’s commitment to student learning and success was exemplified by their commitment to defining and delivering a 21st century liberal arts education and operationalized broadly

in their teaching, learning, and scholarship activities. The intentionality and coherency of the program and degree requirements and learning goals and objectives were accessible in the online Pomona College course catalog. Student learning outcomes for individual courses were articulated on course syllabi. (CFRs 2.2, 2.3, 2.4, 2.5, 2.6)

Led by the TLC in partnership with the Office of Institutional Research, the institutional-level assessment reports reviewed by the team highlighted the use of qualitative and quantitative methods and rubrics in the assessment of core learning competencies including oral communication and critical thinking. Systematic disaggregation of the data to monitor and address disparities in engagement and participation (e.g., high-impact programs) identified evidence that could be used to improve student performance such as the redesign of introductory science and mathematics courses and the introduction of Science, Technology, Engineering and Mathematics (STEM) cohorts. The report section under “Inclusive Pedagogy” discusses the issue around disaggregation and usage of data in greater detail.

While there were various committees in place that contributed to the learning ecosystem at the college (i.e., the Educational Quality Committee, Student Engagement and Academic Success, Teaching and Learning Committee, and Curriculum Committee), from the team’s interviews with each of these committees, the members who were present communicated to the team that learning assessment was not within the purview of their committee, often reiterating that they “were not an assessment committee.” For example, the Curriculum Committee’s duties included evaluating and approving course proposals, special majors and independent study proposals, as well as checking to see how courses fit into the program of the major. However, their approvals were not contingent upon the alignment of learning outcomes, nor how programs were using evidence of learning outcomes assessment to propose curricular changes. The TLC was primarily focused on institutional-level assessment and faculty development programming, and the Educational Quality Committee operated at a strategic level,

following the benchmarks set by the dean of the college. Additional clarification about the intention and responsibilities of each of these committees beyond what was articulated on Pomona's [Assessment page](#) would begin to signal how assessment of student learning outcomes were integrated and used to inform and guide curricular changes and decision making in the learning environment.

The team found that the college could further strengthen the institution's capacity and infrastructure for assessment by leveraging the associate dean of academic affairs for student success and assessment position that was created in response to the 2011 Commission Action Letter. Further, utilizing the expertise in this position to advance campus-wide assessment support, coordination, and integration across groups and initiatives, while designing needed professional development programs for faculty and staff, has the potential to move the college forward in their culture of assessment. (CFRs 2.4, 2.6)

The current program review *Self-Study and External Review Process* shared with the team listed "an assessment of student learning in the major in light of department and program learning outcomes through a review of the department's recent annual assessment of student learning" as core information in a program's self-study. The team did not find evidence of any outcomes-based assessment of student learning in the four sample self-studies shared with the team or in department annual reports. The team suggests outcomes-based assessment of student learning and development as expected by the WSCUC Standards be addressed in program review self-studies and annual assessment reports (see *WSCUC Program Review Resource Guide - Updated October 2015*). (CFRs 2.4, 2.7)

In addition, the WSCUC Program Review Resource Guide suggests a five to eight year cycle for program review (page 5), as opposed to the Pomona's Self-Study and External Review typically taking place every ten or more years. Given how both the student body and faculty were becoming increasingly diverse and the college's aim to be "dynamically diverse," the implications of these emerging directions could inform modifications to program review guidelines and criteria to ensure they were timely and

responsive to the institutional mission. Correspondingly, as previously noted, a more comprehensive assessment infrastructure would also serve to identify opportunities to integrate assessment practices at all levels of the college, reinforce practices related to inclusive pedagogy, and link assessment results to broader quality assurance efforts. (CFRs 2.4, 2.7, 2.11)

Scholarship and Creative Activity

The college's aim to ensure a diverse faculty was evidenced in its revised criteria and hiring procedures for faculty and senior leadership. However, the response to the pressures and shifts in student enrollments had involved hires of temporary and visiting faculty which the college acknowledged was not a sustainable solution to ensuring continuity and quality of the curriculum. In particular, it will be important for Pomona College to provide all faculty with access to teaching and learning resources and services as well as time, space, and incentives to contribute to and support the longer term institutional priorities around equity and inclusion and a 21st century liberal education. (CFRs 2.8, 2.9)

Student Learning and Success

The curriculum overview presented in "Your Four Years" suggested an undergraduate pathway that highlighted offerings both inside and outside the classroom and opportunities for high-impact learning through engagement in undergraduate research, internships, and study abroad. The redesign of Liberal Arts Advising utilizing the advisor assignment algorithm and the development of advisor workshops and a revised communication plan all served to increase transparency, fostered a sense of belonging, and reinforced the existing campus network of academic and student support services. (CFRs 2.10, 2.12, 2.13)

Standard 3: Developing and Applying Resources and Organizational Structure to Ensure Quality and Sustainability

Faculty and Staff

Pomona was well staffed with a total of 180 qualified faculty and a staff of 518. The college carried out its mission with clear and public policies and practices for performance evaluation and professional development. The composition of the faculty and staff represented a broad diversity of individuals and backgrounds and will be addressed in greater depth in Component 8 of the report. (CFRs 3.1, 3.2, 3.3)

Fiscal, Physical, and Information Resources

The college had an inclusive and broad process for annual budgeting and implemented new financial planning software that enabled the campus to more productively participate in this process. The budgets were balanced and the college had sufficient resources through endowment and other revenue streams to fully support the campus mission, activities, and programs. The college engaged an independent auditor and produced and published complete and unqualified financial reports.

The relationship between institutional planning and budgeting was less clear. The 2007 Strategic Plan was updated with a 2020 Strategic Vision. This plan stipulated three areas of focus:

1. Transformational Knowledge and Creativity
2. Flourishing and Inclusion
3. Equity and Access

Subcommittees were established for each area and identified areas for action in support of each initiative. Those initiatives were being reviewed for funding sources as part of a plan for the upcoming capital campaign. Operating and capital budget projections were being redone to reflect an early understanding of the financial costs of these initiatives. The extent that these initiatives would require new or reassigned personnel was an area of ongoing review. The Wellness Center and the new Oldenborg Center were major capital initiatives in support of the strategic plan.

Financial planning typically responded to annual pressures and specific initiatives deemed appropriate and high priority in fulfilling the college mission. How it related to college-wide planning was unclear to the team. The institutional long-term capital plan was still in development.

The college evidenced ongoing investment in technology in support of its educational mission, including additional resources deployed as a result of the pandemic's impact on teaching and learning, and the administrative and ministerial functions necessary to support that mission. (CFRs 3.4, 3.5)

Organizational Structures and Decision-Making

The organizational chart evidenced a full complement of professional and leadership roles and numerous campus committees and groups. How they interacted was difficult to ascertain but their described responsibilities were broad and inclusive. (CFRs 3.6, 3.7)

The 33-member board of trustees represented a variety of professions, ages and demographics. The board met regularly, kept minutes of their meetings, and attended with due diligence to the responsibilities of stewarding the college. (CFRs 3.8, 3.9, 3.10)

Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

As a highly ranked and well-regarded liberal arts college, Pomona College acknowledged that its elite status "cannot be taken for granted." (Institutional Report, page 15) Pomona College further elaborated in its institutional report that "the college is committed to processes that allow for the systemic collection, analysis, and interpretation of data as well as the regularized dissemination of data to key stakeholders." (page 15) Pomona College recently took several steps to bolster its commitment to quality assurance, institutional leadership, and improvement since its last WSCUC review over a decade ago.

Quality Assurance Processes

In general, Pomona College was earnest in addressing each of the CFRs of Standard 4, to varying degrees of success, according to the institutional responses contained in the Compliance with WSCUC Standards worksheet, the institutional report, and meetings conducted during the visit by the team. The team was able to observe the investments in quality assurance processes at the institutional level for both academic and academic support areas. Evidence-driven assessments using senior projects were conducted over the last decade for the core competencies, and two areas of the general education program were also assessed. Five years ago, the college's Curriculum Committee undertook an interesting analysis of Pomona College's general education curriculum in an effort to align courses with institutional goals, but the committee recognized that the results so far have been inconclusive. What was evident to the team was the institution's attentiveness to the assessment of student writing across the college.

The team, however, did not find evidence of student learning outcomes assessment at the course or program levels. Further, the team found that program reviews lacked the use of analysis and evaluation of student achievement of learning outcomes. The team found that program reviews were not conducted frequently enough. As mentioned in Standard 2, the college's 10-year program review cycle was not consistent with WSCUC guidelines nor best practices, lacking timeliness and responsiveness to the changing needs of student learning. According to the college's IEEI, some programs had not been reviewed since 2009.

Concerns for Pomona College around assessment and program review date back to at least the July 5, 2011 Commission Action Letter when the college was advised that "making more effective use of results of assessment in program reviews will reinforce the value of assessment and promote the sustainability of the College's focus on learning outcomes." Following the institution's Interim Report four years later, the letter of June 26, 2015 noted, "At the time of the comprehensive review, Pomona

College should evidence substantial progress with using assessment results across all academic programs to inform improvements and achieve consistency in assessment quality and comprehensiveness.” The team reiterates the recommendations made by the commission in 2011 and the Interim Report Committee in 2015 in the areas of assessment and program review, and further recommends that program review processes be redesigned to reflect best practices, including but not limited to the integration of assessment data and analysis, and more frequent review cycles between five to eight years. (CFRs 2.4, 2.7, 4.1, 4.3)

The team examined the capacity and functions of the institutional research office and determined that, while it is comprised of two full-time administrators, and soft-funded by a grant from the James Irvine Foundation, it effectively handled the basic functions of the office. The institutional research office appeared to routinely conduct surveys and gather data to support the institution’s diversity indicators in support of the strategic plan for diversity, equity, and inclusion, and routinely compared notes to the Consortium of Financing Higher Education (COFHE) and Suite of Surveys as a way of externally validating and evaluating institutional data and key indicators against other elite, liberal arts universities. (CFR 4.2)

During the visit, the team was able to observe and better understand how institutional leadership used the results of inquiry, evidence, and evaluation for the purposes of improvement and institutional planning on a large scale level. The attention paid to assessment of the institution’s diversity initiatives was impressive. Conversely, the attention paid to Pomona College’s compliance with CFR 4.4 at the program level was perhaps the area needing the most improvement in Standard 4. The team concluded that much work needs to be done to engage faculty in the assessment of degree programs to ensure quality assurance processes in teaching and learning. (CFRs 4.1, 4.3, 4.4)

The team recommends greater and more significant involvement by program faculty in the processes of evaluating educational effectiveness for each degree offered by the institution. This

participation starts with a stronger commitment to a more frequent cycle of program review, and to an annual assessment reporting process in which program faculty collectively and annually analyze course and program learning outcome data for the purposes of quality improvement in the curricula. (CFRs 2.4, 4.3, 4.4)

Institutional Learning and Improvement

Finally, the team was able to observe during the visit in meetings with the president, dean of the college, and board of trustees that institutional leaders routinely engaged with faculty and staff in institutional reflection and planning based on shared data and evidence. The results of these collaborations had most recently produced Pomona College's strategic vision statement approved in May 2020 and the successes the institution has realized according to the diversity, equity, and inclusion plan. Overall, the team found evidence that Pomona College engaged in quality assurance at the institutional level, noting that considerable attention and improvement is still needed in the areas of program review and assessment, and in faculty participation in program level assessment. (CFRs 2.4, 4.3, 4.4, 4.5, 4.6)

Inventory of Educational Effectiveness Indicators (IEEI)

Pomona demonstrated a commitment to transparency in learning outcomes with program outcomes appearing on department websites. However, several programs had not undergone program review in over 10 years with many scheduled for 2021-2022. Based on the IEEI, program review appeared inconsistent across the institution and needed greater attention.

Compliance with Federal Requirements

In the past, the Department of Education (USED) required WSCUC to review and approve an institution's credit hour policy, processes and procedures. In 2019, the USED revised the federal definition of the credit hour and changed expectations of accrediting agencies to only approve an institution's definition to "reasonably approximate" that federal definition. The USED's new definition

also allowed institutions to take into account a variety of options in determining the amount of work associated with a credit hour. By the end of 2020, WSCUC had revised their credit hour policy to reflect the new federal definition. Despite the change in expectations of accrediting agencies, WSCUC decided to continue its credit hour review design, i.e. asking teams to review and comment on an institution's credit hour policy, processes and procedures, while emphasizing measurement of student learning and academic engagement, not "seat time," and being open to innovative approaches to understanding student work and engagement.

Pomona has a credit hour policy that does define how student work and time engaged in learning is measured. According to the credit hour policy, "Pomona College does not award academic credit based on a contact hour or credit hour formula. One course credit represents the holistic sum of time, effort, intellectual growth, and academic performance within and outside of classroom-based learning. Pomona College does not view learning as being defined by, or limited to, instructional time alone." This definition does seem to align with the WSCUC credit hour policy, albeit where Pomona relied on a generous interpretation of their policy as a reasonable approximation of the WSCUC policy.

The team did surface some issues with Pomona's periodic review of the application of their credit hour policy. Pomona does not include a review of credit hour assignments when new courses and programs are approved, nor do they do regular, stand-alone audits. Instead, Pomona reviews the application of their credit hour policy as a part of their program review process. This is problematic for two reasons: for one, Pomona's program review cycle is ten years which is not frequent enough to regularly ensure that credit hour assignments are accurate and reliable; for another, the team found that Pomona does not always adhere to their program review policy and identified several programs that had not been reviewed within ten years. The team strongly urges Pomona to revise its credit hour policy to reflect effective and timely review and evaluation of the reliability and accuracy of credit hour assignments across courses and programs.

Component 8: Institution-specific Themes

A. Theme: Equity and Inclusion on a Diverse Campus

As part of Pomona College's Thematic Pathway for Reaffirmation, the institution selected two themes. The first theme outlined in the thematic pathway proposal was "Equity & Inclusion on a Diverse Campus." For this theme, Pomona College selected three subordinate themes: faculty and staff hiring, inclusive pedagogy, and inclusive campus climate.

In the thematic pathway section of the institutional report (Component 8), Pomona College first provided a larger institutional context for its work in the area of diversity, equity and inclusion over the past few years. The team found the college's accomplishments in the creation of the strategic document "Lighting the Path to 2025," the increase in percentage of Pell recipient students from 15% in 2010 to 23% in 2019, and the increase in non-white students from 53% in 2010 to 67% in 2019 were noteworthy. Moreover, as Pomona College continues to demonstrate its commitment to student diversification, and with the changing demographics across the country and within California, the team suggests that it uses multiple institutional profiles for benchmarking. The team encourages Pomona College to engage its institutional research office in a more complex and comprehensive reflection that will provide a deeper, richer, and more complete understanding of its societal context. This understanding will better inform institutional planning, decision making, and goal setting in the area of diversity demographics. (CFRs 1.4, 4.2, 4.6, 4.7)

Faculty and Staff Hiring

Pomona College cited prior work and emerging goal areas for faculty and staff hiring: creating more diverse candidate pools; hiring greater numbers of faculty and staff competent in the support of diverse populations; providing diversity, equity, and inclusion training for managers; and instituting new tenure and promotion guidelines that require candidates to demonstrate the ways in which they have made a commitment to equity and inclusion. Pomona College noted in their thematic pathway proposal

that their assessment of and outcomes for faculty and staff hiring would involve no hiring targets but result in a commitment to develop and sustain search and recruitment practices that promote diversity; and to hold themselves and the institution accountable for those goals through routine reporting and disaggregation of data.

The institutional rationale for becoming a “dynamically diverse” campus was developed in detail in “Lighting the Path to 2025, section 1.2 (“The Diversity Imperative”). The team noted the following reasons why having a diverse staff and faculty is important: educational research has demonstrated the importance and effectiveness of role-models, mentoring and advising by diverse faculty for diverse students; measures of student success for diverse students such as retention and graduation rates have shown to be improved when students are supported by faculty of similar race/ethnicity. Additionally, an institution’s ability to recruit a more diverse student demographic often hinges on the diversity of the faculty.

Staff

Pomona College’s description of context for the thematic pathway surfaced an inconsistent pattern when defining staff. At times the institutional report referred separately to senior administration and staff, but one section referred to the percentage of female senior administrators as a characteristic of staff diversity. The team recommends that the college keep separate the discussions of staff diversity and senior administration diversity, consistent with the guidance provided in the IRC’s response to the 2015 Interim Report. The team found the institution would benefit from further consistency and clarity in how roles are categorized and counted when tracking institutional progress in diversity.

The team confirmed the institution’s commitment toward greater diversity in their conversation with the board chair. Further evidence of this commitment was found in the 2017 hiring of the institution’s first African American female president, and in the institutional report where it was noted

that, in 2018, women made up 58% of Pomona College's senior staff. The team commended Pomona College for its progress in the area of diversification of executive leadership. It was noted by the team, however, that this progress was made in spite of a lack of policies, shared practices, or stated commitments in the recruiting and hiring of executive leadership. Consistent with the WSCUC Equity and Inclusion Policy, the team encourages the institution to consider whether policies in these areas might be helpful. (CFRs 1.4, 3.6, 3.9, 4.6)

Pomona College identified three initiatives related to staff diversity: utilizing search firms and consultants with a successful track record of creating diverse search pools; use of best practices in tapping exceptional talent from local and national candidate pools (e.g., advertising in *Diversity in Higher Education*); and training for managers and staff around hiring practices. The college did not provide demographics on staff race and ethnicity in the institutional report. The team requested those data during the visit and appreciated the responsiveness by the human resources office in providing current staff demographics by the end of the visit. Unfortunately, the data did not include previous years' data for comparison, thus, the team was not able to see if any progress had been made in the area of staff diversification. Much work needs to be done in the analysis and institutionalization of goals in the area of staff diversity. Further, the college lacked assessment data to demonstrate how the three initiatives proposed by human resources resulted in diversifying the demographics of its staff. It was also unclear from the institutional report when the initiatives were launched, and whether they were the extent of the institution's efforts in the area of staff diversification. (CFR 1.4)

Faculty

Among the many compelling reasons for increasing the diversity of the faculty, the institutional report highlighted the following: "a diverse faculty creates the capacity to move a field or discipline substantively forward in term of its scholarship and issues of professional practice." Context is important to help the campus community understand the rationale for the work they are doing.

Following research in the 2012-13 academic year, the college made four changes to faculty hiring procedures: all candidates for tenure track searches were required to provide a diversity statement along with their teaching statements; the established expectation for all searches was that the racial/ethnic diversity of the candidate pool was at least as diverse as the recent Ph.D. recipients in the discipline; every searching department had to meet with the diversity officer before files are reviewed to emphasize the importance of diversity, equity, and inclusion in Pomona's core mission; all faculty search procedures now explicitly stated how diversity, equity and inclusion would be used as criteria in evaluating and ranking candidates.

To monitor and pursue diversity and equity in the faculty hiring process, the college created a faculty associate dean position referred to as the diversity officer (DO). The DO trained the search committee; ensured that a position was advertised in diverse media and included appropriate diversity statements; made sure that equitable processes were followed throughout the search; and addressed the composition of the search committee. The institution noted during the visit that a diversity rubric had recently been designed to help search committees evaluate candidates, that suggested interview questions were being proposed; and those areas of a candidate's portfolio would be identified for encouraging greater discussion of DEI issues.

Pomona College reported that faculty diversity increased as a result of these initiatives. In 2012-13, underrepresented minorities (Black, Latinx, American Indian/Alaska Native or Native Hawaiian) represented 13% of the full-time tenured/tenure track faculty members. That number rose to 18% in 2019-20. The team commended Pomona College for the improvements made in the area of faculty diversity demographics over this time period. (CFRs 1.4, 3.1)

In closing, the institutional report made note that gender parity continued to be an issue in many disciplines, and that the divides between student diversity and faculty diversity, and between student diversity and college leadership diversity, continued to be wide. The team appreciated the

efforts, thoughtfulness, and thoroughness with which the college addressed the issue of faculty diversity over the last eight years and encourages continual progress and evidence in diversifying the institution.

(CFR 3.1)

Inclusive Pedagogy

The college explored a second area in inclusive pedagogy under its goals for diversity, equity, and inclusion (DEI). It asked, “What is the capacity of the college to create welcoming, inclusive learning environments and support the flourishing of a diverse range of students?” In addition to their focus on hiring a diverse faculty, Pomona outlined their work in this area of DEI through institutionalizing a commitment to inclusive pedagogy, expanding the depth and range of faculty development opportunities, defining metrics to track and evaluate inclusive pedagogy, and assessing student outcomes and academic success. (CFRs 2.8, 3.2, 3.3)

Commitment to inclusive pedagogy through faculty development

Pomona’s commitment to teaching and being responsive to an increasingly diverse generation of students was grounded in the defining characteristic of a residential liberal arts college, spirit of inquiry toward curricular and pedagogical experimentation, and faculty development opportunities. Universal design for learning emerged as one practice that faculty adopted toward creating inclusive learning environments. Through the Teaching and Learning Committee (TLC), faculty had the opportunity to participate in various workshops and trainings focused on creating inclusive classroom spaces. TLC workshop topics included, “Diversity and Inclusion Roundtable: International Perspectives,” “What Makes a Learning Space Inclusive?” featuring a student panel, “Learning with PAYS: Lessons from Pomona College’s Access Program,” “The Translingual Classroom: Strategies for Navigating Linguistic and Cultural Diversity,” and “Analyzing Difference in the Classroom.” Through the dean’s office, external speakers and recognized field experts were invited to enhance faculty professional development opportunities in equity and inclusion. Race and equity scholars and experts such as Dr. Estela Mara

Bensimon and Dr. Shaun Harper were invited to speak on recruiting and hiring a diverse faculty, and Jerry Kang, Vice Chancellor for Equity, Diversity, and Inclusion at UCLA presented on understanding implicit bias.

While the institutional report and exhibits shared with the team pointed to the number and quality of opportunities available for faculty to engage in these workshops and trainings, it was unclear what percentage of faculty participated in these opportunities and whether these trainings resulted in their intended outcomes and changed practices. During the visit, the team met with representatives involved in DEI initiatives and learned from the group that more needs to be done in informing the community about development opportunities.

In 2016, faculty passed a motion that called for “good teaching that is attentive to the diversity of the student body” that resulted in revising the criteria for reappointment, promotion and tenure (RPT). The revision recognized service to include activities such as curricular design, mentoring, and participation in relevant professional development programs that support a diverse student body. Within Pomona’s governance structure, the Faculty Personnel Committee and cabinet, comprised of full professors at the college, along with the Educational Quality Committee of the board were charged with confirming these new criteria were met when faculty are reviewed for tenure and promotion. While revising and establishing new criteria for RPT was a notable step in creating an inclusive teaching and learning environment, Pomona recognized that the policy lacked metrics in how inclusive teaching would be evaluated, resulting in a gap in how faculty are expected to demonstrate these new practices, particularly in tenure review. The team found the college’s approach to drive change through the 2016 TPR policy revision was a significant and commendable step in recognizing faculty who are advancing equity and inclusion at the college and translating policy into clear demonstratable practices. The team learned during the visit in their meeting with the Faculty Personnel Committee that the committee was taking an organic and flexible approach to evaluating these new criteria, but had been impressed with

what they saw so far from faculty. The committee also shared with the team that these new changes were “too fast for some and too late for others” but anticipated that resistance to the new policy change would decrease over time.

Inclusive Practices

Pomona’s report highlighted two inclusive practices in the student learning experience. The report presented data on student participation in high-impact programs disaggregated by race/ethnicity, gender, and first-generation status from a senior survey conducted in 2018. Data showed students who identified as underrepresented minorities (URM: Black, Latinx, American Indian/Native American, Native Hawaiian or other Pacific Islander) participated in an internship at a higher rate than their counterparts, but were less engaged in research with faculty. These students also served as peer mentors or head mentors at a higher rate than their students who did not identify in this group. First-generation students also participated in an internship and served as a peer mentor or head mentor at a higher rate than non-first-generation students. While providing a snapshot of student participation in high-impact programs was a helpful data point in considering how opportunities for transformative learning were equitably experienced, disaggregating groups within the URM category and examining interlocking identities may provide a clearer picture of participation across student profiles. Further, beyond monitoring these measures as an indicator of inclusion, it was not evidenced how frequently this survey was administered to track changes over time, whether trends were captured, how these data were used to inform changes in high-impact programs and participation, who had access to these data, who used these data, and how these data were triangulated with other student experience data or enrollment data to examine for themes and patterns around access to high-impact practices. A significant opportunity exists for deeper collaboration across the institution around this inclusive practice in order to foster increased equity and student success around these measures. (CFRs 4.1, 4.3)

The college took an additional approach to examining inclusive pedagogy through its examination of the effectiveness of a cohort model for first-generation Latinx and Black students enrolled in science and mathematics. Those involved in the cohort demonstrated higher rates of persistence in their major than those who were not enrolled in a science and mathematics cohort. Additionally, evidence showed that students who identify as URM were enrolled in introductory courses in the science and mathematics discipline performed better in course sections that were redesigned with equity and inclusion as defined by supportive structures (e.g., more hands-on activities, attention to sequencing and pacing, and mandatory review sessions).

Pomona College acknowledged that a key aspect to the success of these practices was collaborative, cross-campus partnerships involved in these efforts that were time and labor intensive with challenges in expanding and scaling. The team affirmed both the college's practices in developing inclusive pedagogical practices that were yielding positive student success measures and the need to consider how to sustain, evaluate, and scale those practices in a continued collaborative model for all students regardless of discipline. The team did not find evidence of student feedback on those new pedagogical approaches and how student voice would be incorporated in the process of assessing, refining, and expanding those practices beyond introductory courses and to other disciplines outside of science and mathematics. (CFR 3.7)

Inclusive Campus Climate

Evidence of Pomona College's commitment to equity and inclusion was seen in the wide-ranging programs across campus. Those initiatives were designed to address the needs of various stakeholders including faculty, staff, and students and were implemented at multiple levels -- individual courses, programs and departments, and institution-wide. The foundation of the work was the recognition that a welcoming and supportive environment is critical for students to not only succeed but to thrive and flourish.

Since the early 2000s, the college's work on DEI has largely been advanced by various committees often consisting of students, faculty, and staff from across the college. Those committees served to encourage relationship-building and increased communication and likely empathy for the needs and experiences of different constituencies across campus. However, recognition of the limitations of this committee-based approach, namely the lack of authority and resources, was acknowledged (e.g., President's Advisory Committee on Diversity's (PACD) final report) and reiterated by members of various committees during the team visit. The expansion of the associate dean of the college and diversity officer role reporting directly to the president as special advisor was a promising step to ensure that the college's history around DEI issues did not reside in term limited committee members but were aligned with the institutional mission with an eye toward long-term oversight, coordination, accountability, and sustainability over time.

Several assessment efforts were initiated to better understand the concerns expressed by students and faculty regarding trust and community, namely the Gallup campus-wide survey of students and faculty, the 2019 Enrolled Student Survey and Staff Engagement Survey, Pomona College Campus Climate Study in fall 2020, and data compiled by the Office of Institutional Research on student attitudes disaggregated by demographic characteristics. Collectively, that evidence identified potential areas for further exploration and design, several of which had already been organized and implemented such as the Sustained Dialogue initiative, the Speaking Partners program, and the "Know Your History" program.

It was noteworthy that the needs of staff were also recognized in the effort to foster an inclusive campus climate through opportunities for training, particularly for those who had student-facing roles such as those in the Division of Student Affairs. Future outcomes assessment and evaluation work will provide insights into the impact of these programs and their effectiveness in changing perceptions of organizational trust and culture by all campus stakeholders. Professional development opportunities for faculty and staff particularly around flourishing and inclusion would not only serve to

reiterate the institutional commitment to these values but also strengthen the educational community by enhancing the services and resources that contribute to student success and well-being.

B. Theme: Liberal Arts in the 21st Century

Pomona College identified “Liberal Arts in the 21st Century” as its second theme for exploration in their institutional report. The institution noted in its thematic pathway proposal that they had observed a migration by students away from arts and humanities fields and majors in recent years and into science, technology, engineering, and mathematics (STEM). The institution surmised that those enrollment shifts were driven by student interest in professional careers in STEM fields after graduation. As a matter of philosophy, Pomona College sought to better understand “how to respond to student demand in science and mathematics while maintaining commitment to other disciplines, and how to encourage student exploration of the arts/humanities.” (Institutional Report, page 38)

The offices of academic affairs, admissions, and institutional research collaborated on a study to better understand student admissions choices, decision-making processes, and the impact of those student choices on college resources. The institution provided convincing evidence of the results of its research. The team summarized the findings as follows: 1. Students completing majors in math and science had far outpaced completions in other majors (Institutional Report, page 39); 2. This phenomenon was not driven by foreign students and remained consistent for students across all races and ethnicities. 3. “Pomona College students matriculated with a higher level of interest in science and mathematics fields than their coed college counterparts” (Institutional Report, page 40); 4. Retention and recruitment of students in arts and humanities disciplines had been on a downward trend that began in 2006. The trend was the opposite in math and science disciplines while social sciences held steady over this same period; 5. Course enrollments had shifted over those periods toward math, science, and psychology, which had created significant new demands for full-time faculty in those fields. As a result of the study, the college stated, “The institution must consider all dimensions of this shift,

from admissions to the messages that our curriculum sends to students to the role of faculty advisors... The interests and curricular pathways of Pomona students are increasingly out of line with the liberal arts ideal.” (Institutional Report, page 45)

Pomona College identified three subordinate themes for investigation as part of its plans to respond to the liberal arts enrollment trends noted above: liberal arts advising, disciplinary connections, and Global Pomona.

Liberal Arts Advising

Liberal arts advising at Pomona College underwent a significant transformation in 2017 when pre-major advising was shifted out of the office of student affairs and into the office of the vice president for academic affairs and dean of the college. Currently, pre-major advising was overseen by a director of academic administration until a student declared a major, then the role was shifted to the major where advising happens within the degree program. Those changes in advising were the result of data and evidence collected from student and faculty surveys and focus groups. A task force at the time was charged with articulating a vision for pre-major advising, to define the roles within advising, and to provide professional development for faculty advisors. In transitioning the office to academic affairs, the institution stated that, “The goals were to a) improve the quality and efficacy of pre-major advising for both students and faculty; b) align academic advising with the goal of student success; and c) promote student exploration of the liberal arts.” (Institutional Report, page 47)

Pomona College launched a number of new initiatives and made several refinements to existing practices to achieve its goals in liberal arts advising. The team was particularly intrigued and impressed with the thoroughness of the approach. Advising at Pomona College appeared to be systemically integrated across the institution in a variety of formats. Unique efforts at the college included the revisions made to the “Letter to Your Advisor” assignment that students write after their first semester. The prompt was changed from one in which students wrote about which classes in their major excited

them the most, to one in which they wrote about an experience where they relied on their intellectual curiosity and tenacity. An advising workshop was designed during orientation for freshmen and faculty where curriculum exploration was promoted. A special session named “It’s Not About the Major” was introduced and a summer email series was launched to showcase liberal arts ideology. Faculty attended professional development workshops around the subject of liberal arts advising, and a class dean model was launched to promote academic community and engagement among students.

In fall 2020, Pomona College conducted its first assessment into the effectiveness of its new and redesigned approaches to liberal arts advising. A survey was administered to first-year students. The institution reported that, “While curricular planning, course selection, and GE requirements figured prominently, 65% indicated that advising also helped them think creatively, consider new academic interests, challenge themselves academically, or pursue academic passions.” (page 50) Pomona College acknowledged that liberal arts advising was a work in progress with more changes to come. The team commends Pomona College on its thoughtful, systemic, innovative, and creative approaches to liberal arts advising and encourages the institution to continue assessing and building upon what appears to be a very promising new model.

Disciplinary Connections

Since its founding over 130 years ago, Pomona College has evolved as a premier institution firmly rooted in the liberal arts tradition. At the same time, the shift across the landscape of higher education from the pursuit of liberal arts education was also occurring at Pomona College. Thus, the reaffirmation of accreditation review through the TPR process provided the campus an opportunity to “critically evaluate, refine, and reflect on its approach to liberal arts education.” (Institutional Report, page 37) Among the components of the college’s review was a focus on disciplinary connections.

The underlying premise behind “disciplinary connections” was ensuring their graduates acquire the competencies necessary to succeed in the future, by requiring students to engage and work across

disciplinary boundaries for creative problem-solving and solutions. The college had worked to promote and be intentional in fostering such collaborations.

Pomona College identified several ways such cross-disciplinary work was occurring: Envirolab Asia, the Rick and Susan Sontag Center for Collaborative Creativity (the Hive), the Pacific Basin Institute and the Humanities Studio. The Envirolab Asia and the Sontag Center (the Hive) were part of the Claremont College consortium that included cross-disciplinary research, experiential learning, design-based-thinking and team-based projects.

The Humanities Studio was established in 2018 to promote interdisciplinary study of the humanities among students and faculty, while also seeking connections between humanities, social sciences and natural sciences. Similarly, the Pacific Basin Institute was an interdisciplinary center devoted to studying the interdependent issues affecting the nations that touch the Pacific Ocean.

Further support aimed at fostering disciplinary connections was the Presidential Challenge grants established in 2018. This funding allowed faculty across academic boundaries to conduct research, train students, or work collaboratively on a variety of initiatives (e.g., a local community oral history archive).

Those programs emphasized the importance of, and opportunity for, multi-disciplinary problem solving and integrative learning. However, the breadth of engagement of Pomona students and faculty in those programs and whether the desired outcomes were attained was unclear.

The 2015 review of General Education (GE) led the campus to reexamine its aims and offerings and served as a catalyst for exploring disciplinary connections. Among the consistent themes of the survey results were the desire for students to achieve greater breadth of knowledge at an earlier stage of their academic career. The review revealed that 30% of students completed their GE requirements in their senior year. A concern was that the disciplinary connections, that are oftentimes associated with GE, would not have the same impact later in a student's academic journey.

Among the GE revisions was the addition of “Interdisciplinary Thought” to the Institutional Learning Outcomes (ILOs). Another revision was offering “Critical Inquiry Seminars” for first-year students (finalized in 2019). Those seminars, along with other faculty development initiatives, were also aimed at providing equity and inclusive-minded best practices for cross-disciplinary instruction, writing, and speaking pedagogies.

The college’s reconceptualization of GE was shaped by the goal to engage students with the values of a liberal arts framework that emphasized integrative learning. The team acknowledged that the college had identified the need for ongoing assessment to ascertain whether the desired outcomes were achieved within and across the student demographics. Such assessment could be important in illuminating whether disciplinary connections, including curricular and co-curricular experiences, along with disaggregated student participation in high-impact programs, supported the GE objectives, ILO and the aims of student success.

The team found that the college’s incorporation of inclusive pedagogy in faculty learning communities was a promising practice. While the predominate model for disciplinary connections appeared to be focused on course-level student learning, there were also indications that institutional strategies were emerging that may further advance cross-disciplinary engagement.

Global Pomona

Building on the selected theme of the liberal arts, Pomona College’s 2020 Strategic Vision affirmed that, “the world is ever more interconnected in confronting vast problems and pursuing the search for solutions” and that our liberal arts education equips students to “lead the way in an ever-changing world.” Specifically, the college asserted that, “Pomona’s curriculum and extracurricular offerings aim to develop global literacy and intercultural agility as part of students’ overall intellectual character.” (Institutional Report, page 60) (CFR 1.1)

Global programming and offerings at Pomona were meant to both bring global perspectives to campus and to enable Pomona students to learn about and study in other countries outside of North America. Noting that global studies was often an arena for grappling with histories of colonialism, imperialism and other forms of inequity and exclusion, Pomona sought to foster collaboration between campus-based initiatives at increasing diversity, equity and inclusion and their Global Pomona initiatives. As a foundation, Pomona requires its students to demonstrate proficiency in a language other than English.

Pomona programming for global education was broad and diverse. The college offered 60 different approved programs for study in 34 countries and supported majors in six modern languages plus self-instruction in two additional languages. Area studies were focused on seven regions of the world, plus the general program in International Relations which was highly subscribed. Pomona has greatly expanded its enrollment of international students, including the offering of need-based scholarships for low income international students. (CFR 1.4)

The college was in the midst of ongoing reviews and reorganizations to better align the campus-based support for international students that will enable and invite them to be more fully integrated into the campus life and dialogue of important social issues. More professional staff focused on support, increased multi-lingual writing assistance and specific support for F-1 visa and Curricular Practical Training (CPT)/Optional Practical Training (OPT) were important improvements in this area.

A current area of ongoing attention was the change in the International Place program that had been supported by the Claremont College consortium. As that program ends and each campus takes up its own support instead, Pomona will need to fully address how these services and amenities can be replaced and enhanced for Pomona students. A focus of the campus effort was also to enable international students to participate, as they feel called to do so, in campus discussions of diversity, equity and inclusion.

Efforts in the study abroad area focused on increasing study abroad offerings. Currently, about half of all Pomona students chose or were able to study abroad before graduating. Participation rates for underrepresented minorities were similar to other students, in part because Pomona extended campus financial aid to an off-campus experience. In addition to the traditional semester-long programs, Pomona was also exploring how to expand short-term programs including summer internship experiences abroad. Building on the models of the Summer Undergraduate Research Program (SURP) and the Pomona College Internship Program (PCIP) the college has started offering funded internships for students in an international context. A related focus of this work has been to identify more opportunities outside of Western Europe. Several new endowments and programs were proving helpful in this initiative. A new area for exploration would be offering more study abroad programs hosted and taught by Pomona faculty, or from the Claremont College consortium or hired locally to run a specific program in their own country. (CFR 2.8)

The organizational locus of this work was the Oldenborg Center for Modern Languages and International Relations. Both a facility and a collection of programmatic support, that long-standing institution within Pomona was the focus of significant renewal. Plans were underway for an entirely new facility and the organizational changes discussed earlier have brought a sharper focus to areas where staffing and student engagement could be productively enhanced. Building on the 2007 Strategic Plan, plans were moving ahead for the design and construction of a new Oldenborg facility. Simultaneously, assessment efforts had identified areas for increased focus for campus programming, student support and global study offerings. All of this was indeed related to the fundamental goal of enhancing the liberal arts and enabling Pomona students to engage the world. Pomona seemed aware of and focused on this important self-evaluation and ongoing reimagining of the Global Pomona theme as demonstrated by participation in the American Council on Education (ACE) Internationalization Lab. Focusing this work in a new organizational structure with appropriate and sustainable linkages to other

parts of the campus organization will be an important area for focus and a likely indicator of intermediate term success. (CFRs 2.8, 2.11, 2.13, 4.7)

Component 9: Reflection and plans for improvement

The Pomona College self-study provided the institution an opportunity for reflection on and analysis of the initiatives and activities that were critical to their foundational underpinnings as a premier liberal arts institution. They boldly embraced the challenges facing many colleges through their examination of the factors they believed underlie a national trend of a shift away from the liberal arts. Moreover, they focused on meeting the needs of a changing student demographic in higher education.

Evolving from their analysis was an overarching initiative referred to as “Liberal Arts Advising” which was aimed at greater intentionality of broadening students’ understanding of and exposure to the liberal arts. Simultaneously, the college worked to advance diversity, equity and inclusion. Those two areas provided the framework for their Thematic Pathway for Reaffirmation report (TPR).

Pomona College’s focus on diversity evolved over the years. “Lighting the Path to 2025: A Vision for Diversity,” released in 2015, provided a strategic roadmap for changing the “landscape” of the college. The college examined their student recruitment practices and instituted effective practices for increasing faculty diversity. Further, new promotion and tenure review guidelines demonstrated a thoughtful and structural approach to a long-term commitment to DEI.

More recently, beyond the successful work of diversifying the student body, the college crafted a 2020 Strategic Vision that emphasized students succeeding as well as “flourishing.” It was acknowledged that there were persistent differences in the ways students from diverse backgrounds experienced the college, which were forming the basis for a greater emphasis on inclusion, promoting trust, and a sense of belonging. While the institution had made strides in creating an inclusive campus, concrete and shared definitions for diversity, equity, inclusion, and “flourishing” should be developed in order to assess, and evidence progress in these areas.

The team found a broadened emphasis on the global education of students (e.g., Global Pomona) and other curricular initiatives that were focused on promoting inclusive cross-disciplinary pedagogies. Such work was undertaken to yield greater faculty engagement through learning communities, along with new scholarly pursuits.

While the college demonstrated a commitment to creating an educational effectiveness infrastructure that was grounded by a culture of assessment, it appeared to have less engagement at the department and program levels. There were large time gaps between academic program reviews, which could be used, for not only assessing student learning outcomes, but also the experiences in the majors and identifying enhancements for meeting the evolving needs of students. In general, there was a lack of clarity regarding the interrelationship between the institutional learning outcomes, and the general education learning goals, and/or academic program learning outcomes.

Further, there was little differentiation or association between the “high impact” initiatives and programs and the effect on student demographic sub-groups. It remained unclear whether, or to what extent, student learning outcomes and feedback had been systematically captured and incorporated in the refinement or planned expansion of the many initiatives at the institution.

While the college crafted a 2020 Strategic Vision document that was approved in May 2020, the team found no evidence of a timeline, outcomes, and key success measures. The full strategic planning committee finished its work with the adoption of the plan and will not be reconvened in its previous configuration. However, various subgroups met consistently during the pandemic. The team recommends the college develop clear outcomes, timeline, and performance indicators moving forward to ensure the success of their strategic vision.

Pomona College’s deep commitment to the value of a liberal arts education, as well as their concomitant focus on diversity, equity and inclusion were highly commendable. This review posed a

“self-reflective” opportunity for the college to establish its desired outcomes, confirm and chart its future direction, while determining the interconnectedness of its work.

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

The team commended Pomona College for the following:

1. A commitment to its identity and mission as a liberal arts institution that serves a diverse student body
2. A strong financial position that generously supports carrying out the mission to educate students of exceptional promise regardless of their financial circumstances
3. A thoughtful, systemic, innovative, and creative approach to liberal arts advising that reflects a developmental and student-centric approach
4. Strong retention and graduation rates
5. The multiple approaches Pomona uses to attract, recruit and maintain a diverse student body with focus on reducing financial stressors
6. The progress made in diversifying the faculty
7. The new criteria for reappointment, promotion, and tenure in advancing inclusive pedagogy
8. The decisive focus on and investments in the Global Pomona initiative and the plan for further enhancements guided by participation in the ACE Internationalization Lab

The team recommends that Pomona:

1. **Diversity, Equity, Inclusion (CFRs 1.4, 2.10, 4.1, 4.3, 4.6, 4.7)**
 - Establish concrete and operational definitions of diversity, equity, inclusion, and “flourishing” that the college would use to measure outcomes and evidence of progress
 - Develop a coordinated and sustainable approach to implementing the institution’s vision and values of diversity, equity, and inclusion
 - Actively confront and address the trust issues identified in the campus climate survey to foster a greater sense of community
2. **Strategic Planning (CFRs 4.3, 4.6, 4.7)**

Establish clear outcomes, metrics, timeline, and key performance indicators to evaluate the success of the strategic plan

3. Assessment and Program Review (CFRs 2.3, 2.4, 2.5, 2.6, 2.7, 4.3, 4.4)

Consistent with best practices, engage the faculty in regular assessment of academic program learning outcomes as central to evaluating the effectiveness of teaching and learning for each degree offered by the institution; ensure regular program reviews to inform curricular changes and resource decision making

4. Collaborative and Integrated Campus (CFR 3.7)

Leverage the cross-divisional knowledge and expertise on campus through improved role clarification, communication, and coordination to enhance program effectiveness and further ensure student success

5. Credit Hour Policy

Review and revise (as needed) its credit hour policy to reflect effective and timely evaluation of the reliability and accuracy of credit hour assignments across courses and programs

**APPENDICES
FEDERAL COMPLIANCE FORMS**

1. Credit Hour and Program Length Review

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
<p>Policy on credit hour</p> <p><u>Credit Requirements</u> (Pomona College Course Catalog)</p>	<p>Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, where is the policy located? Website: https://catalog.pomona.edu/content.php?catoid=37&navoid=7477&hl=%22credit%22&returnto=search</p> <p>Comments: (excerpted from website and institutional statement)</p> <p>The following institutional statements show the challenges in understanding the institution’s policy on credit hours: At Pomona College, thirty-two courses are required for graduation, as well as a cumulative grade point average of 6.00 (C) and a 6.00 grade point average in major requirements. Grade points are based on a 12.0 grading system. Pomona College does not award academic credit based on a contact hour or credit hour formula. One course credit represents the holistic sum of time, effort, intellectual growth, and academic performance within and outside of classroom-based learning. Pomona College does not view learning as being defined by, or limited to, instructional time alone. A one-unit course at Pomona College is considered the equivalent of 4 semester hours or 6 quarter hours. Each course typically meets for 150 minutes per week, in addition to other course-related activities which may include, but not be limited to, laboratories, film screenings and discussions. The number of actual hours spent in class or in related activity, such as a laboratory, may vary with the subject matter and the level of the course. Generally, students are expected to spend a minimum of two to three hours in out-of-class learning/studying for every hour spent in class, though this may vary due to the subject matter and preparation for the course.</p> <p>From website: A semester course (referred to simply as “a course,” since Pomona does not use semester hours) generally consists of three 50-minute, two 75-minute, or one 150-minute session weekly for the semester and also generally including a minimum of 8-10 out-of-class hours per week.</p> <p>Courses meeting more than 150 minutes per week (such as laboratory courses) may in some cases require commensurately less out-of-classroom work than others.</p> <p>There are instances where a course might involve fewer formal class meetings than the norm but require commensurately more than 8-10 hours of out-of-class work.</p>
<p>Process(es)/ periodic review of credit hour</p> <p>See <u>Pomona College Course Credit System</u></p>	<p>Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>If so, does the institution adhere to this procedure? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> Unable to discern</p> <p>Comments: According to Pomona College, program review was the primary mechanism through which the quality and integrity of the academic enterprise was verified. However, according to Pomona College’s Program Self-Study Process, credit hour review was not a required element of the process. In addition, the Curriculum Committee examined the rigor of courses at the time of approval, but did not appear to have periodic audits or consistent policies in the application of credit hour assignments.</p>

<p><u>Course listings</u> (2020-21 Course Catalog)</p> <p><u>Pomona College Course Schedule</u></p>	<p>Does this schedule show that on-ground courses meet for the prescribed number of hours? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> Unable to discern</p> <p>Comments: The team’s review of the Pomona College Course Schedule showed the unique variation described by the college in applying non-traditional seat time-based formulas to their courses. Some courses appeared to meet twice weekly for an equivalent of 3 hours, or once weekly for 3 hours, of traditional meeting time which equated to a traditional three-hour course in a 15-week semester system. It was unclear to the team how a class that met for three hours in contact each week with the professor counted for an equivalent of 4 semester hours.</p> <p>It was noted that other courses meet for 4 hours weekly, and a wide variety of other formats also existed. Pomona College claimed that the courses meeting for only 3 hours weekly were the equivalent of 4 semester hours. Without the verification of all syllabi and evaluation by external reviewers skilled in the disciplines, the team was unable to verify how a course that met for 3 hours was the equivalent of a 4-semester hour course offered in a traditional format. Course schedule doesn’t consistently provide description of additional “out of class” hours expected.</p>
<p>Sample syllabi or equivalent for online and hybrid courses Please review at least 1 - 2 from each degree level.</p> <p>N/A</p>	<p>How many syllabi were reviewed? N/A</p> <p>What kind of courses (online or hybrid or both)?</p> <p>What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral</p> <p>What discipline(s)?</p> <p>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: Not applicable. The institution does not offer online or hybrid courses. This needs to be verified during the visit.</p>
<p>Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) Please review at least 1 - 2 from each degree level.</p> <p>N/A</p>	<p>How many syllabi were reviewed?</p> <p>What kinds of courses?</p> <p>What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral</p> <p>What discipline(s)?</p> <p>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: It was unclear why the institution had listed this section as Not Applicable when a review of the course offerings showed lab courses in Biology and other sciences, for example. Did they not offer internships? Independent study courses?</p>
<p>Sample program information (catalog, website, or other program materials)</p> <p>See <u>Pomona College Course Catalog</u></p>	<p>How many programs were reviewed? 3</p> <p>What kinds of programs were reviewed? Science, Arts, Humanities</p> <p>What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral</p> <p>What discipline(s)? Physics, Music, History</p> <p>Does this material show that the programs offered at the institution are of a generally acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>

	<p>Comments: Pomona College requires 32 courses for bachelor’s degrees at an equivalent of 4 semester hours (which could not be verified by the team) per course. The equivalency calculation equated to 128 credit hours for a bachelor’s degree, which was well in line with higher education standards and practices. Unfortunately, the team was unable to verify that the courses listed in the major requirements, without credit hours, were equivalent to 4 semester hours because those courses typically only met for 3 hours each week. Unable to verify “out of classroom” time.</p>
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Review Completed by: Joe Slowensky; Date: April 16, 2021
Additional Edits – Soraya Coley June 9, 2021

2. Marketing and Recruitment Review Form

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices.

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	Does the institution follow federal regulations on recruiting students? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Admissions staff seemed to be treated equally with other professional staff. There was no evidence of incentive payments for recruitment. (How to formally verify this?)
Degree completion and cost	Does the institution provide information about the typical length of time to degree? X YES NO
	Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: I could not find information about time to degree or even graduation rates on the Admissions segment of the Pomona website. Information about cost of attendance and likely financial aid was readily available and well formatted.
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: The Outcomes pages of the website had information about employers and typical careers. The essay on the Outcomes surveys conducted and planned provided much context, though this additional information did not appear to be available to the general public.

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third-party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed by: Fred Rogers
Date: May 14, 2021

3. Student Complaints Review

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
<p>Policy on student complaints:</p> <p>Complaints arising under the umbrella of discrimination and harassment are handled via the College's Discrimination and Harassment Investigation and Response Procedures, while sexual misconduct complaints are handled through the Sexual Misconduct, Sexual Harassment, Gender Discrimination Policy and Title IX Procedures.</p> <p>These links are available publicly via the Pomona College website.</p>	<p>Does the institution have a policy or formal procedure for student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, is the policy or procedure easily accessible? Is so, where?</p> <p>Yes, the policy and procedures were easily accessible on the 2020-21 Pomona College Catalog website.</p> <p>Comments:</p> <p>The policy and procedures provided definitions and resources. The procedures by which a member of the College community who was or believed themselves to be a victim of these activities were clearly described and key contacts were identified.</p>
<p>Process(es)/ procedure:</p> <p>See materials, above.</p>	<p>Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly:</p> <p>With respect to complaints related to harassment and discrimination, individuals may report such conduct to the Harassment and Discrimination Grievance Coordinator or Grievance Intake Officers who would then consult with the Title IX Coordinator. The procedure for addressing student complaints related to sexual misconduct, harassment, or discrimination consisted of four categories: 1) reporting; 2) intake and initial review; 3) investigation; and 4) hearings and sanctions.</p> <p>If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:</p>
<p>Records:</p> <p>All complaints that originate from Pomona College are stored online in Maxient and</p>	<p>Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, where?</p> <p>Yes, in Maxient, a reporting and record-keeping software for tracking student conduct and managing behavior records.</p>

<p>kept for a minimum of 10 years. The Judicial Council hearing records are redacted to ensure student privacy and placed in an online case history file which is password-protected and maintained for at least five years.</p>	
	<p>Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly:</p> <p>A process and policy were in place for maintaining confidential online case history files with a timeline for storage.</p>
	<p>Comments:</p>

Review Completed by: Helen L. Chen
Date: May 14, 2021

4. Transfer Credit Review

Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution’s transfer credit policy and practices.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? X YES <input type="checkbox"/> NO
	Is the policy publicly available? X YES <input type="checkbox"/> NO If so, where?
	Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? X YES <input type="checkbox"/> NO
	<p>Comments: Pomona College made available on their website the policies, deadlines, procedures for prospective transfer students who had attended community colleges, public and international universities, private colleges as well as those who had military experience. Additionally, the College provided guidance on the types of recommended courses that they should take in order to be prepared to matriculate in the major. A guide for the interview process that occurs when transfer students are admitted was also made available.</p> <p>Transfer students were a small proportion of the overall student body. In 2019, there were 20 transfer applicants, seven coming from community colleges. It was unclear the overall demographic make-up of this population and whether the expected graduation rate of transfers differed from those who entered as first-time freshmen. Also, there was an acknowledgement that depending upon the courses taken and the units completed, they may have needed to be classified as sophomores rather than juniors. Alternatively, they may have needed to take more courses each semester than those who began as First Time Freshmen, which limited their chance to participate in other curricular activities, e.g., study abroad. Though a small segment of the student population, it was recommended that clarity regarding matriculation challenges of transfers be addressed to provide greater options for more fully engaging in the Pomona College experience.</p>

Review Completed by: Soraya Coley
Date: May 14, 2021