

# REPORT OF THE WSCUC TEAM

## For Reaffirmation Of Accreditation

West Coast University

October 24 - 27, 2016

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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 Reaccreditation Process**

West Coast University (WCU) is a private, for-profit institution of higher education offering bachelor's, master's, and doctorate degrees in healthcare-related fields. Academic programs are offered at seven campus locations in California, Texas, and Florida and through a distance education modality. The mission of the institution affirms support of students' professional success through market-responsive programs.

WCU was founded in 1909 in Los Angeles, California as an ophthalmology school. In 1997, the institution was reorganized under the leadership of David Pyle, Board Chairman, and in 2004 adopted a singular focus of educating health care professionals, after which several focused degree programs in health care programs were implemented. Table 1 provides an overview of campus and online degree program enrollment as of September 2016.

**Table 1: Campus and Online Programs Enrollment**

Program	Year implemented	Dallas, TX	Los Angeles, CA	Miami, FL	Ontario, CA	Orange County, CA	Los Angeles Center for Graduate Studies, CA	Online	Total
Nursing, BS	2007	504	1301	436	1021	1206			<b>4468</b>
Dental Hygiene, BS	2009					189			<b>189</b>
Nursing, MS (inc. RN to MSN)	2010					118		105	<b>223</b>
Health Administration, Master's	2010							78	<b>78</b>
Nursing, BS - RN to BSN or LVN to BSN)	2011	40	249	44	184	243		226	<b>986</b>
Occupational Therapy, MS	2013						108		<b>108</b>
Physical Therapy, Doctorate	2014						115		<b>115</b>
Pharmacy, Doctorate	2014						152		<b>152</b>
<b>Total</b>		<b>554</b>	<b>1550</b>	<b>480</b>	<b>1205</b>	<b>1756</b>	<b>375</b>	<b>409</b>	<b>6319</b>

WCU was granted initial accreditation by the WASC Senior College and University Commission (WSCUC) in 2011 for a period of five years. As a condition of initial accreditation,

WSCUC required an interim report in 2014, which was formally accepted by the Interim Report Committee via an action letter dated January 2015.

Also, the institution has sought substantive change committee approval for institutional actions since the granting of initial accreditation in 2011. These actions included:

- New degrees in Physical Therapy (2013), Occupational Therapy (2013 and 2015), Health Services Administration (2013), Pharmacy (2013), Registered Dietetics (2013), Physician Assistant (2015), and Public Health (2016).
- Campus modifications including the opening of a branch campus in Florida (2013) and a conversion of the Los Angeles campus from a standalone campus to a branch campus (2014).
- Change in duration of the Master's of Science in Nursing (2012).

As the university has evolved from 2011 to the present, enrollments have also grown from 3,272 students in November 2011 to 6,319 in September 2016.

In addition to maintaining accreditation through WSCUC, WCU also maintains programmatic accreditation for academic programs through the Commission on Dental Accreditation (CODA) of the American Dental Association, Commission on Collegiate Nursing Education, and the Accreditation Council for Occupational Therapy, as well as approval from applicable state agencies.

### ***B. Description of Team's Review Process***

The review process was conducted in two phases: 1) an off-site visiting team meeting in April 2016 and 2) a site visit in October 2016. Documents reviewed before the off-site review included the institutional self-study and supporting appendices, website, catalog, course syllabi, faculty handbook, Commission action letters, 2011 visiting team report, and 2014 interim report. Additional information, evidence, and data were requested at multiple times beginning in March 2016 through the conclusion of the site visit.

During the off-site review, the team identified 20 lines of inquiry for the site visit, which focused on faculty governance and workload, staffing plans, board of trustees, program review, curriculum, online and hybrid instruction, strategic planning, financial planning, and shared services.

The site visit schedule took into consideration the multi-campus locations, the organizational structure of the institution, and the online degree programs. Team members visited two off-campus locations - Dallas, Texas and the Los Angeles Center for Graduate Studies (see appendix B), and the main campus in Orange County, California. In addition to engaging multiple stakeholders during the offsite campus visits, interviews were conducted with online administrative staff, faculty, and students. Cumulatively, the team spoke with an estimated 110 students, 74 faculty, 50 administrators, and the full (seven-person) board of trustees.

The team also completed a review of the online programs in Health Administration, Public Health, and Nursing, which is detailed in appendix C.

For those unable to participate in a meeting or interview, a confidential email account was made available to all students and employees, and the account was monitored by the assistant chair during the visit. A total of six individuals provided comments or suggestions via the confidential email account.

There were no special follow-up requirements related to substantive change approvals.

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

WCU's institutional report provided the team with ample information and evidence necessary to conduct a thorough review. The institutional report clearly and accurately addressed most of the required components and previous Commission recommendations, and the claims made in the report were supported by 151 reference materials and attachments.

Institution-wide involvement in the preparation and drafting of the report was coordinated by WCU's Steering Committee (Committee). The Committee was formed in 2010,

and it has been comprised of 15 members who met regularly to review and analyze WSCUC standards and accreditation requirements. The Committee includes academic leaders, campus administrators, and functional area leaders from both the central office and outlying campuses. Discrete sections of the institutional report were assigned to Committee members, and individual members were paired with review teams from their specific campuses or functional areas. Though full-time faculty members were not included as official members of the Committee, they were involved in the drafting and review processes.

The institution's approach to drafting the report appeared to have both pros and cons. On the one hand, the process was highly inclusive. On the other hand, the sections were slightly disjointed. However, both the documentation presented and interviews conducted during the site visit evidenced broad-based, reflective and efficient institutional engagement in producing the self-study report. The visiting team appreciated the transparency and openness demonstrated throughout the site visit, particularly the prompt responses to multiple requests for additional documents. (CFR 1.8)

Meeting minutes from the Committee meetings demonstrated thoughtful review of the WSCUC Standards and effective use of evidence. For example, minutes from October 29, 2015, Committee meeting noted a thoughtful discussion of CFR 2.2a. The meeting participants had a healthy discussion about the expectations for baccalaureate degrees and the general education curriculum redesign.

The institution demonstrated improvements in the quality assurances processes since undergoing self-review in 2010, including a streamlined program review process and inclusive systems for faculty and administrative participation in decision-making through Academic and Administrative Councils.

## **SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS**

### ***Component 1: Response to previous Commission actions***

The Commission action letter dated November 21, 2011, granting initial accreditation to WCU, identified five areas of focus. The interim report (2014), reaccreditation report (2016), and site visit (2016) identified progress to date. Following is a summary of the recommendations.

#### **1. Further development and implementation of the program review process, including the use of research data in this process.**

WCU implemented a revised program review process in 2012 in which one or two program learning outcomes undergo annual assessment in a “Learning Outcomes Review” meeting involving faculty from all campus locations. Participants also review program data, including attrition rates, graduation rates, placement rates, and licensure pass rates.

After all program learning outcomes are assessed, the program completes a comprehensive program review in the 3<sup>rd</sup> to 5<sup>th</sup> year of the cycle, in alignment with programmatic accreditation reviews. Comprehensive program review broadens participation from faculty to include a broad range of stakeholders, including students, administrators, and community partners.

This revised program review process, characterized by the inclusion of research data, systematic SLO data, and input from both internal and external stakeholders evidences the institutional response to the recommendation. Detailed descriptions of WCU’s program review processes can be found in components two, three, four, six, and seven. (CFRs 1.2, 2.6, 2.7, 2.10, 4.1, 4.2, 4.3, 4.4, 4.5)

#### **2. Progress on the assessment of student learning at the course, program, and institutional levels, as well as for the general education curriculum.**

West Coast University has evolved assessment systems since the last site visit in 2011.

Student learning outcomes have been developed at the course, program, and institutional levels. Faculty have reviewed and revised the learning outcomes at the graduate level to ensure they reflect the increased rigor expected in master's and doctoral degree programs. In addition, curriculum mapping has occurred to ensure alignment between course, program or department, and institutional learning outcomes.

Engagement in the assessment process by faculty, assessment committees, curriculum committees, and the Steering Committee has resulted in an assessment infrastructure able to measure student learning at the course, program, and institutional levels. Direct assessment of learning outcomes occurs through embedded signature assignments, which can take the form of test questions or projects accompanied by assessment rubrics. The Inventory of Educational Effectiveness Indicators reflects a program review cycle has been completed for all programs, including general education. Institutional learning outcomes were assessed as part of programmatic learning outcome reviews in 2015. General education has completed two cycles of program review, once in 2012 and again in 2015. General education outcomes are assessed through course-level signature assignments and the general education capstone course. (CFRs 1.2, 2.2a, 2.3, 2.4, 2.6, 2.7, 2.9, 3.3, 4.4)

### **3. Progress on the participation of faculty in shared academic governance.**

The multi-year focus of the (WSCUC) Steering Committee have lead to evolved structures for faculty engagement in shared academic governance:

*Learning communities* comprised of all faculty teaching a specific course across all campuses and the online modality meet telephonically each quarter to discuss curriculum and recommend improvements. Suggested curriculum changes are forwarded to the curriculum committees for review, deliberation, and possible implementation.

An *Academic Council* comprised of administrators, deans, and program chairs, and one faculty member per campus meets regularly to review recommended changes to curriculum or academic policy. During the site visit, faculty and staff noted that any employee could submit a proposed change or significant curriculum revision to the Academic Council for review. Once approved, proposals are routed to an Administrative Council for additional deliberation and then forwarded to the President for final approval. (CFRs 2.4, 3.1, 3.10, 4.6)

**4. Evaluation of the workload of full-time faculty in terms of expectations for teaching load, service, scholarship, and assessment and review activities.**

Modifications to WCU's faculty workload model were in place at the time of the 2014 interim report; the most current faculty handbook released January 1, 2016, identifies three faculty workload models currently applied to full-time faculty at West Coast University:

- *Nursing undergraduate programs*: Instructional points (or fractions of points) are assigned to each course based on class size, preparation time, course credits, and contact hours; each faculty member is assigned a teaching load averaging 1.0 instructional points per quarter.
- *Undergraduate programs (excludes nursing)*: 25 hours of teaching per week, with the remainder of the time spent on preparation, grading, meetings, service, scholarship, office hours, etc.
- *Graduate programs*: Up to 12 contact hours are assigned per semester; assumes an increased workload of service and scholarly activities than that expected of faculty at the undergraduate level.

(CFRs 2.8, 3.1, 3.2, 3.3)

**5. Prepare to address the modified and the additional reporting requirements of the revised WASC accreditation process.**

The WCU Steering Committee (described in Section I.C) engages in a continuous review of WSCUC Criteria for Review and accreditation processes. In fact, committee minutes reflect that WCU served as a pilot institution for WSCUC's mid-cycle reporting process. WCU's selection as a pilot institution, combined with an institution history of meeting accreditation reporting requirements since 2011, evidences WCU's preparation to address the modified and additional WSCUC reporting requirements. (CFR 1.8)

***Component 2: Compliance with the Standards and federal requirements; Inventory of Educational Effectiveness Indicators***

**STANDARD 1**

***Institutional Purposes***

West Coast University (WCU) clearly defines its purposes and has designed educational objectives that are aligned with its mission to:

“...embrace a student-centric learning partnership that leads to professional success. We deliver transformation education within a culture of integrity and personal accountability. We design market-response programs through collaboration between faculty and industry professional. We continuously pursue more effective and innovative ways through which students develop the competences and confidence required in a complex and changing world.”

The institution has a well-defined and a clear sense of its values and commitment to higher education, particularly within the healthcare sector. The faculty, staff, and administration appear to operate with integrity and transparency, which was demonstrated by timely and thoughtful responses to the Visiting Team's request for information and individual and group meetings with students, faculty, staff, and the board of trustees. (CFR 1.1)

The team witnessed evidence of the university meeting its educational objectives and stated purposes throughout review and site visit processes. For example, the Steering Committee

is comprised of stakeholders from across the institution. This body meets on a regularly scheduled basis to share information about and discuss the institution's performance, particularly in the areas of student persistence, graduation, licensure exam passage, clinical placements and loan repayments. Publication of student achievement data is made available on the institution's website. (CFR 1.2) [See also CFRs 2.4, 2.6, 2.10 and 4.2 and Marketing and Recruitment Review]

The institution publicly states its commitment to academic freedom for faculty, staff, and students, and acts accordingly. Campus and online faculty, staff, and students were interviewed, and they consistently affirmed that the university honors and promotes freedom, specifically through teaching and scholarship, to express their views in a thoughtful and respectful manner openly. (CFR 1.3) [See also CFRs 3.2 and 3.10]

WCU consistently demonstrated throughout the accreditation reaffirmation process a commitment to the principles noted in the WSCUC Diversity Policy. This commitment was reflected in the institution's focus on increasing diversity within the healthcare professions through its investments in student marketing, student supports, faculty recruitment, state-of-the-art equipment, and facilities, as well as policies and practices that produce effective outcomes for underrepresented groups in higher education and the workforce. (CFR 1.4) [See also CFRs 2.2a and 3.1]

### ***Integrity and Transparency***

WCU appears to operate with integrity and transparency. For example, WCU was very open about their relationship with American Career Colleges (ACC) under a shared services arrangement. Before the site visit, a review of the Master Services Agreement and the organization chart suggested that there is a complicated and unconventional arrangement among the president of WCU, the CEO of ACC (who is also the owner of WCU, ACC and Shared Services), and the president of "Shared Services." It is hard to say how this arrangement

influences the authority of the WCU's president, and as a result the team was unable to confirm that the institution operates with appropriate autonomy. However, the university appears to operate in a highly efficient and effective manner that is demonstrated by very impressive student outcomes. (CFR 1.5) [See also CFRs 3.6, 3.7, 3.8, 3.9 and 3.10]

WCU appears to candidly represent its academic vision, programs, services, and costs to students and the larger public. The institution's academic programs can be completed promptly. The institution engages students fairly and equitably guided by policies and processes addressing student conduct, grievances, disability, and financial matters, including financial aid and refunds.

WCU maintains accurate records of students' complaints for at least the last six years. There was no evidence, including the feedback provided during the student interviews, confidential email account, and a cursory internet search, that there were grievances leveled against the university worth noting. (CFR 1.6) [See also CFR 2.12, Appendix A.3 - Student Complaints Review Form]

WCU has demonstrated a history of financial growth and stability, unqualified independent financial audits, and resources to ensure long-term financial substantiality. The resource planning and development process, including its long-term strategic planning, has been conducted in a realistic, inclusive, collaborative manner, resulting in effective budget management, capital spending, and enrollment management, and a focus on achieving institutional outcomes. (CFR 1.7, 3.4, 4.6)

The institution is committed to open and frank communication with the WSCUC, and it adheres to a consistent and thorough multi-year accreditation review process. It appears committed to abiding by the Commission's policies and procedures, including all substantive change policies. (CFR 1.8)

## **STANDARD 2**

### ***Teaching and Learning***

The visiting team confirmed that West Coast University's (WCU) programs are sufficient for the degrees offered. All but one of WCU's academic programs are programmatically accredited and require licensure exams for employment in the related professions. The institution appears to have adequate faculty with the requisite experience necessary for the type of courses and degree programs offered. These comprehensive discipline-based reviews help ensure that CFR criteria are met, academic rigor is pervasive, and undergraduate/graduate differentiation is clear. (CFRs 2.1, 2.2, 2.2a, 2.2b)

At the time of the visit for initial accreditation in 2011, WCU employed 72 full-time faculty; this number increased to 236 by Spring 2016 supporting seven departments: Nursing (141 faculty), Dental Hygiene (15), General Education (44), Health Administration (5), Physical Therapy (9), Occupational Therapy (9), and Pharmacy (19). (CFR 2.1)

The team found sufficient evidence that suggests that WCU has paid very close attention to the Standard 2 criteria over the past five years (or since its last major WSCUC review). With the exception of the newer programs which need more time to mature, WCU has taken action to address the issues cited in previous reviews. (CFRs 2.3, 2.4)

### ***Scholarship and Creative Activity***

In response to a WSCUC Commission Action Letter dated November 21, 2011, WCU has developed an improved faculty workload model to address parity in teaching responsibilities among its Nursing faculty and to support non-teaching activities, including scholarship. The nursing faculty workload model addresses theory versus clinical versus skills-based teaching and teaching mode (face-to-face or online). The faculty workload model in other undergraduate programs were not as well developed compared to the nursing program, and a no clear explanation was provided to explain the difference between the models. Faculty outside of the nursing program teach 25 instructional hours per week. Given the instructional workload, it is not clear whether faculty have sufficient time to engage in scholarly activity.

WCU provides opportunities for faculty professional development. WCU's related "Excelsis" faculty development program for full-time (primarily Nursing) faculty, where participation is based on length of service, relieves faculty of teaching duties for one term, similar to a sabbatical. Faculty uses this re-assigned time to reflect on their teaching effectiveness, to develop plans for improvement, and to refresh their perspective on student learning. In addition, faculty members are encouraged and are provided the support necessary to attend and present at conferences, e.g., WSCUC's ARC. (CFRs 2.8, 2.9)

### ***Student Learning and Success***

WCU has made a noticeable improvement in the implementation of its program review process. The process is now more straightforward and includes better-defined research data together with input from student affairs. The assessment of student learning at all levels and in the General Education program is now supported by curriculum maps, better assessment methodologies and a clearer distinction between undergraduate and graduate-level Student Learning Outcomes. In addition, all campuses participate in annual assessments of campus climate through the Noel-Levitz Student Satisfaction Inventory surveys, and the institution uses this data to inform action plans to support student success. (CFR 2.10)

## **STANDARD 3**

### **Faculty and Staff**

WCU employees, faculty, and staff are sufficient in number, professional qualifications, and diversity to achieve the institution's education mission, establish and oversee academic policies, and ensure the integrity, quality, and continuity of its academic and co-curricular programs. Faculty and staff recruitment, hiring, orientation, development, incentives and

evaluation practices are in overall alignment with the institution's mission and educational objectives. The institution has in place programs and systems to support faculty and staff development directed at improving teaching, learning, and assessment of learning outcomes.

(CFR 3.1, 3.2, 3.3) The University has acknowledged a need for enhanced onboarding, orientation, and training for new faculty and has developed an improvement plan. (CFR 3.2)

### **Fiscal, Physical and Information Resources**

The University has continued to experience significant growth in student enrollments and revenue. Between 2013 and 2015, student enrollments grew from 4,378 students to 5,174 students, a growth of 18 percent. Student enrollments increased by 58 percent during the period of 2011 to 2015. Over the past three years (2013-2015), total annual revenue increased from \$159 million to \$187 million and grew to approximately \$206 million in 2016. During 2013 and 2015, WCU invested a total of \$26 million in facilities, technology, and equipment. During this same period, the institution significantly increased its annual internally-funded student scholarship budget (award amount) from \$335K in 2013 to \$2.3 million in 2015. From 2013 through 2016, the average annual net income for the institution was approximately \$45 million. (CFR 3.4)

During 2012 to 2015, total assets of the institution increased from \$94 million to \$118 million, a growth of 26 percent. As indicated, the institution has continued to generate significant returns through the growth in student enrollments which translates to additional revenue. New program offerings and campus locations have contributed to the growth. In recent years, WCU has expanded its graduate programs (Doctor of Physical Therapy, Doctor of Pharmacy, Master of Science in Occupational Therapy, and Master of Science in Nursing) as well as adding undergraduate programs (Registered Nurse to Bachelor of Science in Nursing and Bachelor of Science in Health Services Administration). It has also established stand-alone

distance learning degree programs (Registered Nurse to Master of Science in Nursing, and Master of Science in Nursing).

Although the institution has been diversifying its degree offerings, the undergraduate nursing program (BSN) represents around 77 percent of WCU's total net revenue. In 2012, the University opened new campuses in Dallas and Miami as well as the Center for Graduate Studies in Los Angeles. (CFR 3.4)

The University has had unqualified independent financial audits. The federal student aid compliance audits indicate that WCU complied, in all material respects, with specified requirements applicable to the Student Financial Assistance (SFA) programs. (CFR 3.4)

Institutions participating in Title IV programs are required by the U.S. Department of Education (USDE) to demonstrate financial responsibility. USDE determines an institution's financial responsibility through calculation of a composite score based upon certain financial ratios. Institutions receiving a composite score of 1.5 or greater are considered fully financially responsible. The annual composite score for WCU were as follows: 2012 - 1.5, 2013 - 1.5, 2014 - 1.9, and 2015 - 2.3. (CFR 3.4)

The USDE's 90/10 rule restricts the proportion of cash receipts for tuition and fees from eligible programs to not be more than 90 percent from Title IV programs. The failure of an institution to meet the 90 percent limitation could result in the loss of an institution's ability to participate in the Title IV programs. For the years 2012, 2013, 2014 and 2015, WCU was in compliance with the 90/10 rule. The institution's 90/10 revenue test percentage for 2015 was 47.7 percent. (CFR 3.4)

The USDE established a Gainful Employment Rule which was effective as of July 2015. The rule applies to all programs at for-profit institutions. The rule assesses continued eligibility of gainful employment programs by performance against specific defined debt-to-earning measures. Gainful employment programs that fail in two out of three consecutive years or are in the zone for four consecutive years will be ineligible. WCU recently received from the USDE

the draft gainful employment debt-to-earnings rates for the gainful employment programs at the institution for 2015. The release is neither final nor public. The preliminary gainful employment information provided for WCU indicated that the institution would receive “pass” ratings for all of its programs. (CFR 3.4)

The team was impressed with the overall quality of WCU’s campus facilities, including classrooms, laboratories and clinics and technology resources, and found them to be consistent with the institution’s mission and objectives and in alignment with student learning outcomes. However, one issue that was raised consistently by students, faculty, and staff during campus visits was the need for more space to study, meet, and collaborate. (CFR 3.5)

### **Organizational Structures and Decision-Making Process**

As part of the team visit, a copy of the Memorandum of Understanding (MOU) between WCU and the Shared Services entity was requested. Shared Services is a division of American Career College, Inc., a non-WSCUC accredited entity. Although there is some confusion amongst the senior leadership at the institution regarding the history of the documentation of the Shared Services Agreement, the team concluded that a formal MOU between WCU and Shared Services did not exist until a few weeks prior to the team’s arrival. The MOU was executed by WCU and Shared Services in mid-August 2016.

The Shared Services organization provides a wide range of administrative functions and services to WCU. These services include facilities and real estate services; finance, accounting and budgeting support; financial aid services; human resources; information technology; marketing and student recruitment; procurement; and government relations, as well as compliance-related services (audit and compliance, education regulatory assistance, legal services, payroll and taxes, employee benefits). The annual budget for shared services in support of WCU totals approximately \$27 million. In addition to WCU, the Shared Services

organization provides administrative services to other related entities, primarily American Career Colleges.

In reviewing the MOU, the team found that the document contained general statements on the “manner of performance” and “reporting,” but no specific procedures for periodically evaluating the efficacy and quality of the services and the outcomes of the contractual relationship, such as key performance indicators and other such measurements. The agreement also does not specifically address the period of the performance (length of contract); conditions of renewal and termination; institutional and student data stewardship, protection and ownership; and specific marketing guidelines, including the use of the institution’s branding. (CFR 3.6, 3.7)

The team interviewed the CFO, who also serves as President of Shared Services, Inc., whether Shared Services organization, as a division of a separate but related corporate entity, was subject to USDE regulations related to “Third-Party Servicer.” The USDE defines a Third-Party Servicer as any entity that contracts with or performs work on behalf of an institution to administer any aspect of an institution’s responsibilities under Title IV, HEA programs. This includes, but not limited to, the processing of student financial aid applications on behalf of an eligible institution and the awarding, certifying, originating and/or disbursing of Title IV funds. Although under the same ownership as WCU, Shared Services is a separately incorporated, non-WSCUC accredited entity which is providing financial aid services to WCU. The CFO indicated that WCU’s legal counsel had reviewed the matter and determined that the Shared Services was not classified as a Third-Party Servicer. (CFR’s 1.5, 3.6, 3.7)

WCU has a committed and high collaborative staff and management team that is well suited for the needs and future growth of the institution. The University has an experienced and capable chief executive officer (CEO) who joined the institution as president in August 2014. When asked to explain how often the Board evaluates the performance of the president, they noted that the evaluation takes place annually. One member stated that they recently completed

a performance review. However, the board cited privacy concerns as the reason why they could not share a copy of the recent performance review. However, they volunteered to provide a copy of the rubric they used to assess the president's performance. Unfortunately, the evidence they shared was a copy of the "WCU Executive Dashboard." (CFR 3.8)

Though WCU has a chief financial officer (CFO), it is questionable whether the CFO's primary obligations are to the University. The institution was very open about sharing its organizational structure, the roles of the senior administration and the shared services arrangement.

Based on a careful review of the organizational chart, Memorandum of Understanding (MOU) for Shared Services, position descriptions, and interviews with the CEO, COO, CFO and members of the board of trustees (BOT), it was clear that the CFO holds multiple titles and appears to have different (and perhaps potentially competing) reporting relationships within the broader corporate structure. WCU is one of three or four entities under the corporate structure. In addition to the the CFO's role at WCU, she also serves as President of Shared Services, Inc., as well as the CFO of American Career Colleges (ACC), which is a non-WSCUC accredited entity. Shared Services provides support to both WCU and ACC. As a result, the CFO's role requires having multiple reporting relationships with the WCU President, Audit Committee of the BOT, the Executive Committee of the BOT, and interim president of ACC, who is the owner of WCU, ACC, and Shared Services, Inc. These overlapping roles and responsibilities made it very difficult for the visiting team to determine whether the CFO reports directly to the president and is full-time employed at WCU. (CFRs 1.7, 3.8)

The board of trustees is an independent governing board that is engaged, informed and committed. It exercises appropriate oversight over policies, operations, and institutional integrity. The BOT and senior administrators effectively gather and analyze data, and they use the "Executive Dashboard" to track and monitor institutional performance in the areas of enrollment, student satisfaction, graduation and default rates. The BOT recently expanded the number of

board members from five to seven, and they indicated a desire to further expand board membership. As a result of reviewing WCU's bylaws and policies, and engaging in conversation with board members, the team recommends that BOT expand the bylaws, policies, and practices to more formally reflect its on-going commitment to assessing the performance of the president, enhancing board development, and implementing other actions necessary in order to achieve long-term institutional sustainability. (CFR 1.5, 1.7, 3.6, 3.9)

Faculty representation on the Academic Council, the university's primary academic governance body, has been expanded. The Academic Council is responsible for reviewing university-wide academic policies and procedures. At the program level, faculty composes the membership of the Learning Communities, Assessment Committees, and Curriculum Committees. WCU's faculty members are actively engaged and exercise effective leadership to ensure both academic quality and fulfillment of the institution's mission. (CFR 3.10)

## **STANDARD 4**

### ***Quality Assurance Processes***

The university uses multiple methods to identify and collect data that measures the quality and integrity of academic programs. The review process occurs throughout the academic year, culminating with a formal program review of student learning outcomes in the spring of each year. The institution conducts a more comprehensive review, when necessary, to coincide with program assessments performed by other professional accrediting agencies. It is noted that the review process includes input from many stakeholders within and outside of the University from all levels, including faculty, students, alumni, clinicians, employers, and administrators. This process appears to be consistent across programs and campuses. Evidence for quality

assurance and institutional learning improvement is provided in more detail in components six and seven. (CFRs 1.1, 1.3, 2.2-2.6, 2.7, 2.10, 4.1, 4.3, 4.5, 4.6)

In addition to academic program review, four non-academic departments undergo review every two to three years. However, analysis, interpretation, and use of data collected for these departments are not clearly defined. The library is developing a program review that will align with their professional association (the Association of College & Research Libraries). Although solid program review procedures are in place, evidence of institutional reflection and planning is more difficult to discern. (CFRs 2.2-2.6, 2.7, 2.10, 4.1, 4.3)

The institution is in the process of developing a database that will track the results of program reviews and will be available internally to program administrators and faculty. Reports of student learning outcomes and achievements are available internally as well as to professional program accreditors. (CFRs 1.2, 2.10, 4.2)

### ***Institutional Learning and Improvement***

An instructional design team is available to assist program faculty in developing courses for on-ground and online teaching. This ensures that curricula and courses, and hence student learning, are consistent across campuses. A process is in place that allows faculty to recommend modification of course content or resources to accommodate changes in student learning needs as they occur. The institution at all levels constantly monitors the health care system to determine the need for curricular changes or the addition of new programs. (CFRs 2.2-2.6, 4.4, 4.7)

### **Federal Requirements**

The team found the institution to be in compliance with federal requirements for the credit hour, program length, marketing, recruitment, student complaints, and transfer policy

review; appendix A provides formal reports in each of these areas. Though some evidence was provided in the self-study report, it was difficult to determine how the institution periodically reviews the credit hour and internal management of student complaints. However, based on personal interviews conducted during the site visit, the institution demonstrated that it was in compliance in these two area. It would have been helpful if the institution had done a better job of documenting and completing the federal compliance worksheets.

It should be noted that clinical/practicum syllabi from Master of Science in Occupational Therapy (MSOT) program contained insufficient information to assess if the courses meet for the prescribed number of hours as required by the credit hour assignment. The institution is encouraged to review and refine syllabi format in the MSOT program to clarify the hours of instruction, class type (using categories referenced in the institution's credit hour policy), and credit hour assignments.

### **Inventory of Educational Effectiveness Indicators**

The Inventory of Educational Effectiveness Indicators submitted with the self-study accurately reflected the evidence as well as statements made by individuals during the site visit. Each program at WCU has defined learning outcomes made public in multiple locations (e.g., catalog, website, syllabi) which are measured by faculty using direct assessment strategies. Review of learning outcomes occurs annually with comprehensive program review scheduled after all program learning outcomes have been assessed and at the time of program's professional accreditation.

### **Summary of Component 2**

The team's findings, which are subject to Commission review, is that West Coast University has provided sufficient evidence to demonstrate compliance with the Standards and federal requirements. Final determination of compliance with the Standards rests with the

Commission. The team identified areas where further attention and development are needed, as noted in the recommendations section of this report.

***Component 3: Degree Programs: Meaning, Quality, and Integrity of the Degrees***

The University's mission is to graduate individuals who can "make substantive contributions to the health and well-being of others." The institution offers a variety of degree programs that are aligned with health care professions and WCU's mission. The oldest programs include undergraduate and graduate nursing, dental hygiene, and health care management; newer programs comprise occupational therapy, physical therapy, and pharmacy. These programs fit the institution's values, objectives, and learning outcomes and align with the WCU mission. (CFRs 1.1, 1.2, 2.1, 2.2)

WCU's "Profile of a Graduate" document describes the characteristics that represent the "qualities, attitudes and values that students should possess by the time they have completed their studies." Most of these characteristics are reflected in many of the program learning outcomes (PLOs) and demonstrate the meaning and quality of the degree program. The profile provides the foundation for distinctive student learning experiences within each degree program. All programs provide multiple learning opportunities such as Interprofessional Education, clinical experiences in multiple settings, and the nursing program's simulation center. (CFRs 1.1, 1.2, 2.1, 2.2)

Two programs are offered at the baccalaureate level (nursing and dental hygiene) with the remaining programs at the graduate level. WCU graduate programs addressed the initial 2011 Commission concerns by revising course objectives to reflect a higher expected proficiency level than those obtainable at the undergraduate level. The baccalaureate degree capstone course appears to be highly developed, and the expected level of performance is appropriate for undergraduate students. This course provides a solid foundation for future graduate education. (CFRs 1.1, 1.2, 2.1, 2.2)

Processes are in place to manage curricula. All faculty are expected to participate in this process via their program's Curriculum Committee. The purpose of these committees is to ensure the quality of the academic program and to be responsive to all stakeholders. For programs across campuses, faculty form learning communities to manage/review related curricula. The process is faculty driven and is overseen by the dean, chair or designee. In addition, each program has a Program Advisory Committee (PAC) comprised of practitioners and employers of graduates. These PACs, along with program accreditors, help define the quality of degrees. Overall, input on defining the quality of a program comes from a variety of sources; i.e., employers, accreditors, graduates. Programs track the progress of their previous year's action plans throughout the year as well as during the spring Learning Outcomes Review (LOR) meetings. (CFRs 2.6, 2.7, 4.1, 4.3, 4.4, 4.6)

The primary outcome used to measure the meaning, quality, and integrity (MQI) of the degree is the national or state board examinations which lead to licensure. The institution has worked diligently to improve nursing students' board scores through the program review and revision processes. For example, student learning outcomes were improved by means of the Excelsis training program which enhances faculty teaching skills and provides a New Faculty Assessment Primer. MQI rubrics developed by faculty reflect a sincere and self-reflective approach to defining and assessing the meaning, quality and integrity of institutional degrees. An area identified by the institution as needing improvement involves increasing the involvement of the alumni and employers to gain more insight regarding the MQI. (CFRs 2.7, 4.1, 4.4, 4.6)

Program review is a multilevel, multistep process that involves administrators, faculty and students. In addition, outside stakeholders participate. The process includes setting internal benchmarks as an indication of student performance. However, no external benchmarks are identified except for licensure pass rates. The Director of Educational Effectiveness and staff in Institutional Research assist faculty in analyzing assessment data. They prepare university-wide

and individual program reports to interpret data such as retention/attrition, graduation rates, and licensure exam pass rates. (CFRs 2.6, 2.7, 4.1, 4.3, 4.4, 4.6)

Overall, MQI is expressed in terms of faculty, curricula, learning experiences, and outcomes (particularly exam pass rate). Two sources are involved in the program review process, the Curriculum Committee, and the Program Advisory Committee. Specific examples of input from these sources (faculty, practitioners, employers) are not provided in this section. (CFRs 2.7 4.1)

***Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation***

Improved program review and multiple new methods of evaluation and follow-up have significantly improved WCU's assessment of student learning and the achievement of core competencies over the past five years. This is evident from the institution's focused attention on student Institutional Learning Outcomes (ILOs), Program Learning Outcomes (PLOs) and Course Learning Outcomes (CLOs), and is the result of dedicated work by WCU's Steering Committee, its program outcomes assessment and curriculum committees, and its growing culture of faculty engagement in improving student outcomes based on data assessment. (CFR 2.7, 4.1)

WCU's ILOs are divided into four competency-specific ILOs and three healthcare/professional specific ILOs. This balance is appropriate given the nature of the academic programs that lead to employment as healthcare professionals. These ILOs, together with PLOs and CLOs, are included in all syllabi and are addressed in all assessment processes at the institution. (CFR 2.3, 2.4)

Student progress and improved learning associated with general education PLOs for undergraduates together with the associated CLOs is ensured by general education Program Outcomes Assessment Committees (POACs). Each POAC, consisting of pertinent general

education faculty, develops signature assignments and course rubrics for the courses they evaluate. The assignments and rubrics are reviewed, interpreted and (based on achievement gaps) are repeatedly improved, thereby providing a continuous cycle of improvement in courses and student learning. Also, a general education capstone course was added to “formulate students’ integrated learning experiences” through a culminating oral and written research-based project. (CFR 2.2a, 2.6)

Key PLOs of focus in WCU’s large nursing program include “apply nursing process and critical thinking when providing holistic, patient-centered nursing care to diverse populations” (PLO 4) and “developing an effective communication style to interact with patients” (PLO 7). Key PLOs of focus in WCU’s dental hygiene program include “exhibit critical thinking skills through evidence-based decision making” (PLO 2) and “demonstrate effective communication skills with diverse populations” (PLO 3). These PLOs were developed by the faculty in the respective programs. A senior year exit exam to assess skills (given in the last term) for dental hygiene students helps provide objective success data for learning outcomes. (CFR 2.4)

Faculty members regularly identify possibilities for curriculum change through the use of course feedback forms that enable any faculty member, particularly those teaching a specific course, to improve the content and delivery of that course. At one time student critical thinking and effective communication skills were judged unsatisfactory by the faculty, and appropriately the faculty developed a plan to support additional learning in these areas. For example, the baccalaureate nursing curriculum was reinforced with additional opportunities for student learning and remediation (e.g., the ATI “Titanium package” of services, apparently acquired at an extra cost to students). Tutor.com provides additional writing and math support for students. Also, information literacy and critical thinking skills are strengthened at every campus by librarians (holding Master of Library and Information Science degrees) who support student library orientations and student research for project and other coursework. (CFR 2.13, 4.5)

WCU’s graduate “market-responsive” programs also undergo a continuous cycle of

improvement highlighted by an annual Learning Outcomes Review (LOR) process that is supported by an “Outcomes Reporting Template.” The “5-column model” used in this template tool organizes the questions that should be asked about student learning in a format that helps faculty ask the right questions about their specific courses. Program faculty and other stakeholders participate in the program-based LORs where student learning outcomes are examined and improvement plans are identified. (CFR 2.2b, 2.6)

Graduate programs enforce a high level of learning by requiring students to write about sophisticated topics or work with clinical issues. For example, the Master of Science in Nursing (MSN) program, which emphasizes healthcare delivery systems, requires that students write papers that analyze and make judgments about current healthcare issues. Students in the Family Nurse Practitioner (FNP) diagnose a patient problem and then formulate a plan of care for that patient. Some of these activities culminate in student poster sessions or research projects. The team suggests such endeavors be made a requirement for all graduate students. (CFR 2.2b, 2.3, 2.5, 2.8)

(Note that evidence reflecting that the competencies and key learning outcomes are being met is described in greater detail in Component 3 Meaning, Quality, and Integrity of the Degree.)

Faculty and staff at WCU have worked collaboratively to define learning outcomes and standards of performance. Faculty get an “assessment primer” document that details the expectations the university has for students and helps faculty understand everything about learning at WCU from the development of a syllabus and exams to clinical write-ups and rubrics. This primer encourages faculty to use the structure of curriculum and assessment committees to improve the courses they teach. (CFR 2.3, 2.4, 2.8, 4.3)

#### ***Component 5: Student Success: Student learning, retention, and graduation***

WCU states that “student success is central to the institution’s mission” and provides clear evidence to support this claim. Student success is well-defined in its documents and

throughout the student lifecycle from onboarding and orientation through graduation rates, board exam passage rates, and student placement of licensed graduates. (CFR 2.10)

Faculty members play a leading role in student success at WCU. As emphasized in the faculty handbook, they are expected to “contribute to the transformation of the student with respect to the acquisition of the necessary knowledge, skills, behaviors, attitudes, and competencies required by their professions.” Faculty members are expected to respond to any student inquiries within 24 hours and to recognize and encourage academically at-risk students to seek help. The faculty-populated Assessment Council, Curriculum Committees, and POACs are critical to evaluating and improving academic programs to ensure that student learning is paramount. Moreover, the facilitation of student success is a key part of the faculty recruitment and promotion evaluation processes. (CFR 2.8, 2.9)

The institutional report referenced several recent initiatives to increase student success that were based on faculty observations or data supported evidence. Three of those initiatives are worth noting here. First, after realizing the widely varying levels of preparation among entering students, WCU added a first-year seminar to the general education program. The seminar supports new students by familiarizing them with the values and expectations promoted by the university, as well as the support services that are offered. The prime goals of the seminar are to enhance students’ understanding of the university resources, to build a sense of community, and to instill optimism in students to encourage them to succeed in their academic and clinical performances. (CFR 2.2a. 2.5, 2.11, 2.12, 2.13)

Second, WCU made changes to the curriculum in its dental hygiene program in 2014 following an analysis of case-based section scores in a standardized national exam taken by seniors. More case studies were added to every course in the curriculum, and by the next year, the student scores in the exam section rose from below to significantly higher than the national average. (CFR 2.5, 2.6)

The third initiative to increase student success – perhaps the most significant given the

size of the nursing program – was a multi-year effort to help students raise their National Council Licensure Examination (NCLEX) scores. In 2011 WCU student scores on the NCLEX were about 10 percent below the California state average and varied across campuses. Through a range of developments – including a partnership with Assessment Technologies Incorporated (ATI), changes to the nursing curriculum, and GPA admission requirements – WCU raised its NCLEX scores to roughly the state average. The partnership with ATI included a post-graduation preparation for NCLEX activity that had a major impact. This lengthy improvement effort included a student performance dashboard and in-depth reviews of data evidence. (CFR 2.6, 2.10)

There is some evidence that WCU is trending towards similar student successes in their Master's and Doctoral degree programs, but additional attention should be paid to these programs as they mature and graduate (more) students.

Key outcome metrics support WCU's claim of student success centricity. These include first-to-second year student persistence rates of at least 86 percent for the past five years and graduation rates of 71.5 percent for 2010-11 cohorts (150 percent of normal time). Board passage is required for licensure and placement of graduates in all but one WCU program and passage in their two largest programs are well above average. For example, WCU's NCLEX passage rate is above state averages, while its passage rates for dental hygiene students is a remarkable 98 percent (some students took these board exams more than once). The six-month placement rate for WCU graduates during the 2014-15 reporting year was 65.7 percent, and the cumulative rate was 83.3 percent. WCU's loan default rate, which reflects its graduates' ability to repay student loans, has dropped to under 1 percent. The off-campus locations reviews in Dallas, Texas, and the Los Angeles Center for Graduate Studies showed achievement of student learning outcomes were comparable across campuses. (CFR 2.6, 2.10)

The most recent administration of the Noel-Levitz Student Satisfaction Inventory in 2016 shows that 79 percent of students enrolled in on ground programs are satisfied overall with their

experience at WCU. However, personal interviews with students and faculty revealed that there might be a need for more student success counselors. (CFR 2.6)

***Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence***

WCU has made great strides to improve the program review process and assessment of student learning at the course, program, and institutional levels as well as the General Education (GE) curricula. Comprehensive evidence of the 2015 program review process, including assessment of SLOs, data collection, analysis and results leading to action plans, is provided for GE, nursing, dental hygiene, and health administration programs. Newer programs (occupational therapy, physical therapy, pharmacy) have plans which show how the review will be conducted, including the Assessment Primer and training offered to new faculty hires. (CFR 2.3, 4.1)

The institution provided considerable documentation. For example, the review process may include a strength, weaknesses, opportunities and threats/challenges (SWOT/C) analysis, outcomes data, action plans, 5-Column Model, assessment rubrics, internal benchmarking, and institutional research predictive data. Changes to a course or program curriculum may occur as a result of areas in need of improvement that are identified in the action plan. Progress from the previous year's action plans are tracked throughout the year and reviewed during the spring LOR.

Highlights of the methods used to determine and implement changes include:

- GE program sets internal benchmarks for student proficiency in courses and uses rubrics to assess student performance. Data is collected for signature assignments of specific courses that address the PLOs under review. Following the review, faculty make recommendations to improve student learning by making appropriate changes to the courses, assessment methods, curricula. In addition, faculty complete the WASC Rubric for Evaluating the General Education Assessment Process.

- Nursing sets internal benchmarks, analyzes gaps and suggests strategies for improvement as part of the program review process. In addition to collecting student assessments, the nursing program sets benchmarks for faculty in performance, course evaluations, presentations, publications, and leadership.
- Physical therapy exhibits a well-planned strategy to complete program reviews following the process outlined for WCU. The review presented includes aggregated data analysis of the first cohort by age, ethnicity, GPAs, and Health Sciences Reasoning Test as well as correlations between these variables and specific course grades. The correlations are used to determine factors that may impact student learning in a specific course. Course modifications may be made to accommodate student learning needs. (CFRs 2.7, 4.1, 4.3, 4.4)

The institution holds a two-day planning Institutional Effectiveness Review (IER) event each year to share findings of program and department reviews and recommendations, identify WCU's strengths and challenges and discuss the relationship of the IER to annual planning and budgeting processes. Participants include leaders from academic programs and functional departments. A list of institutional objectives was developed and prioritized during this meeting. For the past few years, a top priority has involved raising nursing students' NCLEX pass rates, completion, and placement. Results of program changes and enhancements show a marked improvement in these areas. (CFRs 2.7, 4.1, 4.4, 4.6)

Another area of concern identified in both program reviews and the IER involves faculty onboarding. To improve the skills of faculty the director of educational effectiveness, assistant provost of curriculum instruction and the director of instructional design (DID) provide training and assistance in the areas of course development, assessment, and curriculum design. A student learning assessment template as well as common course shell (syllabus) is available to faculty. The DID assists faculty in modifying course resources for either online or on ground teaching.

These activities have aided faculty in enhancing teaching methods that result in improved student learning. (CFRs 4.1)

The contribution of Institutional Research (IR) to program review is to collect and analyze data provided by the program. Following data analysis, IR generates reports to explain and interpret the results. Reports are shared internally with programs and administrators. Data results are also used for program's professional accreditation reports. IR's predictive modeling software is used to improve student learning outcomes; how this is achieved is unclear. The Director of Educational Effectiveness is in the process of setting up a database as a repository for all program reviews. Once established, faculty will directly enter all information on PLOs and student assessments and will be able to track the information over the years for trends in student learning outcomes as well as disaggregate results by campus location. (CFRs 4.2-4.7)

***Component 7: Sustainability: Financial viability, preparing for the changing higher education environment***

As noted in other sections of the report, WCU has experienced significant revenue growth in recent years demonstrating strong demand for its programs and services. It has maintained balance annual budgets and generated significant surpluses. The institution has also made investments in facilities and infrastructure, as well as increased internally-funded financial aid resources for its students. These are all important factors necessary to achieving financial sustainability and long-term stability (CFR 3.4).

WCU has demonstrated financial responsibility relative to the USDE Financial Responsibility Index and it has had annual composite scores of 1.5 or greater over the past four years, and its composite score in 2015 was 2.3. The university has maintained unqualified independent financial audits, and it is in compliance with the USDE 90/10 and Gainful Employment rules (CFR 3.4). It appears that budget and resources allocation at WCU are

appropriately aligned to support student success and learning effectiveness (CFR's 2.13, 3.4, 3.5).

Finally, WCU appears to be well positioned within higher education for the types of health-related professional education programs it delivers. The programs they offer are in high demand fields. The institution appears committed to effective long-range strategic planning and is very responsive to the needs of the various professions and employers it serves. The institution seems poised to respond to potential threats, namely the regulatory environment impacting for-profit education, and the opportunities that may be available in the years to come (CFR's 3.4, 4.7).

***Component 8: Optional essay on institutional specific themes***

Not applicable.

***Component 9: Reflection and Plans for Improvement***

The visiting team carefully reviewed the West Coast University (WCU) institutional report and supporting materials, as well as well visited campuses and interviewed a cross section of the primary internal stakeholders. There was sufficient evidence to support the fact that WCU is fully committed to honoring and meeting WSCUC Standards of quality.

WCU operates in a manner consistent with the way it presents itself to students and employers, and they are open and transparent with all important stakeholders. Except for the unique relationship between WCU, American Career Colleges, and Shared Services, Inc., there were no signs that external entities influence the university.

WCU's apparent strengths include its faculty's real-world health care and teaching experience; its state-of-the-art facilities and infrastructure; its strong connections to hospitals, health clinics, and other employers; and its emphasis on institutional, program and course learning outcomes. The team applauds the WSCUC Steering Committee for developing a

collaborative environment focused on a student-centric culture, and the faculty's dedication and a strong commitment to the accreditation review process.

### **SECTION III – OTHER TOPICS**

After the site visit, in addition to the commendations and recommendations highlighted in Section IV below, the visiting team identified specific areas to provide WCU feedback. Following is information for future consideration.

The institution should carefully review the MOU between WCU and the Shared Services entity and incorporate specific procedures for periodically evaluating the efficacy and quality of the services, as well as the key performance indicators used to track and measure services rendered. (CFR 1.5)

The Steering Committee was perceived as an institutional strength because it provides inter-campus support and consistently used the WSCUC 2013 Standards for Accreditation criteria to guide planning and preparation for the Accreditation Visit. Although Component 2 Compliance with Standards of the WCU Institutional Report is brief, during the interview with the full Steering Committee, it was clear that they worked collaboratively with faculty and staff across the university to ensure the Standards are being meet across the six (6) campuses. (CFR 1.8)

Significant progress has been made to WCU's assessment infrastructure since the Initial Accreditation in 2011. WCU faculty, staff, and administration have made it a priority to refine the assessment structure and processes to improve academic programs and ultimately student success. (CFR 2.6) However, some assessment practices could not be verified during the site visit. For example, the team could not find information related to an assessment of clinical performance. If this data does not exist, the institution is encouraged to collect it and show how it is used to inform decision making. (CFR 2.3) Additionally, extensive examples of the evaluation of the assessment process are provided for all programs except for the MS in Occupational

Therapy (MSOT) [4.22 Learning Outcome Reviews]. There was no plan presented for conducting an LOR for the MSOT. Instead, the institution provided data that was aligned to their professional accrediting agency. (CFR 2.7) WCU should continue on the path to building a strong culture of evidence for evaluation and improvement by considering expanding the POAC-type approach to assessment to all programs. (CFRs 3.3, 3.10) The institution is encouraged to expand internal and external professional support opportunities for faculty to engage in assessment activities. Though the current support is minimally sufficient, it could be increased. (CFR 3.3) Overall, the review process appears to be well-developed in most programs. Faculty indicated that they frequently considered the previous year's action plan and during LOR follow-up as needed. Further clarification on how data collected over time is used in decision-making, and how the program review results are linked to institution planning and budgeting would be very helpful.

WCU provided strong evidence of systems established to assess student learning outcomes. However, the institutional self-study did not adequately address how the data informs program review, and though learning outcome data appears to be readily available, the connection between student achievement data (graduation, course completion, and placement rates) and program review were missing. (CFR 2.7)

Overall the team found that WCU promotes, measures and takes action to improve student success. The team encourages the institution to continue these efforts in its undergraduate programs and expand them in its graduate programs. (CFR 2.13)

The institution does a good job of serving transfer students through the publication of a transfer equivalency system (CollegeSource), which contains courses from over 1,000 institutions accepted in fulfillment of WCU academic requirements. (Available at <http://westcoastuniversity.edu/student-affairs/registrar/transfer-credits.html> (CFR 2.14))

The institution is encouraged to review the latest *Dear Colleague Letter* from the USDE regarding Third-Party Servicers to ensure that it is compliant with the requirements and

responsibilities, mainly related to the administration of the institutions participating in student financial assistance programs. (CRF's 3.6, 3.7, and *WASC Agreements with Unaccredited Entities Policy*)

The visiting team struggled to identify the connections between data analysis, planning, and resource allocation. WCU should provide further clarification regarding the planning and resource allocation for new programs in light of current program needs, and its mission. (CFR 4.5, 4.6, 4.7) In addition, WCU is encouraged to better demonstrate how data is used for strategic planning and the establishment of priorities and program goals. (4.1, 4.2, 4.6, 4.7) Additionally, the role of the institutional research function was not well demonstrated. (CFR 4.2)

WCU is encouraged to enhance the use of data for institutional improvement. The institution should consider using external benchmarks to better understand their students' proficiency levels against comparable or aspirational institutions -- there did not appear to be external benchmarks for outcomes other than licensure exam pass rates. (CFR 4.1) Exam passage rates appear to be based on the total number of students passing the exam, and WCU should consider presenting data for percent of students passing by the number of attempts. (CFR 4.2) A formal evaluation of the Excelsis training program may be warranted to determine its effectiveness and relationship to improved SLOs. (CFR 4.3) The link to institution planning and budgeting is not clear. For example, how does the budgeting process correlate with feedback from program review? (CFR 3.4, 4.6)

## **SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS**

### **Commendations**

1. The team commends WCU for its exceptional student outcomes, specifically in the areas of graduation, licensure exam passage, career placements and loan default rates. (CFRs 1.2, 1.4, 2.3, 2.6, and 2.10)

2. The team commends WCU for developing and maintaining an environment that fosters creativity and collaboration among its faculty and staff to drive positive student success. (CFRs 2.4 and 4.4)
3. The team commends WCU for developing a culture of faculty control over curriculum, characterized by transparency, efficacy, and the inclusion of all faculty, regardless of campus location or teaching modality. (CFRs 2.4, 3.1, and 3.10)
4. The team commends the University for designing a comprehensive program review process that uses a wide variety of assessment data and for developing annual action plans to ensure the quality and integrity of its academic programs. (CFRs 2.1, 2.2, 2.7 and 4.1)
5. The team commends the WCU Self-Study Steering Committee for its multi-year focus on and adherence to the WSCUC accreditation process. (CFRs 1.8, 4.3 and 4.5)

## **Recommendations**

1. The team recommends that WCU provide adequate space to ensure that students and faculty have the appropriate study, meeting, and other places to convene and collaborate. (CFR 3.5)
2. The team recommends that the university revisit its senior administrative reporting structures to ensure compliance with WSCUC Standards, with specific attention to the role of the chief financial officer. (CFRs 3.6, 3.7 and 3.8)
3. The team recommends that WCU align the August 2016 Shared Services Agreement with the intent of the WSCUC policy and guidelines on “agreements with unaccredited entities.” (CFR 3.7)
4. The team recommends that the board of trustees expands WCU’s bylaws, policies, and practices to formally reflect its on-going commitment to assessing the performance of the

president, board development, and other steps to achieve long-term institutional sustainability. (CFRs 1.7, 3.9 and 4.7)

## APPENDICES

### *Appendix A. Federal Compliance Forms*

#### **1. CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM**

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where is the policy located? In the online University Catalog Comments:  Credit hour definition: <a href="http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Academic-Policies-and-Procedures/Academic-Program-Measurement/Credit-Hours">http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Academic-Policies-and-Procedures/Academic-Program-Measurement/Credit-Hours</a>  Online credit hour: <a href="http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Academic-Policies-and-Procedures/Academic-Program-Measurement/Definition-of-a-Credit-Hour-in-an-Online-Class">http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Academic-Policies-and-Procedures/Academic-Program-Measurement/Definition-of-a-Credit-Hour-in-an-Online-Class</a>
	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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: New/change course approval form is mechanism for credit hour review. Courses are reviewed systematically as part of annual program learning outcome (PLO) reviews.  Once credit hours are identified, Registrar's office monitors for compliance through the "Course Hours/Scheduled Hours" customized report.
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Schedule shows courses scheduled in alignment with credit hour policy.
<i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? 6
	What kind of courses (online or hybrid or both)? Online and hybrid (WCU refers to hybrid courses as "blended")
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input type="checkbox"/> Doctoral (Institution does not offer AA/AS programs; doctoral program courses not offered in an online or blended format.)
	What discipline(s)? General education, dental hygiene, nursing, and health administration
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Reviewed HUM 360, PATH 370, MHA 505, DHYG 360, DHYG 315, and NURS 535
	Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs,

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
<p>clinical, independent study, accelerated)  <i>Please review at least 1 - 2 from each degree level.</i></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 checked="" type="checkbox"/> YES* <input type="checkbox"/> NO            *Syllabi from Occupational Therapy program clinical/practicum courses contain insufficient information to verify if students are doing the equivalent amount of work to the prescribed credit hours. See comments below.</p> <p>Comments:</p> <ul style="list-style-type: none"> <li>• DHYG 425 Lab/Clinical *Credit hours verified</li> <li>• NURS 481L Practicum * Credit hours verified</li> <li>• OCC 552 / OCC 562 Field Work *Cannot verify credit hours. Syllabus references lab units, yet description and schedule appear to reference clinical/practicum hours. Inconsistency in terminology means that credit hour compliance cannot be confirmed. Recommend institution to review and refine OCC program syllabi to clarify credit hour formulas applied.</li> <li>• PT 539 Clinical * Credit hours verified</li> <li>• PHAR 752 Lab* Credit hours verified</li> </ul>
<p>Sample program information (catalog, website, or other program materials)</p>	<p>How many programs were reviewed? 7 programs</p> <p>What kinds of programs were reviewed? Allied Health (BSN, BSDH, MSN, MPH, MSOT, DPT, DP)</p> <p>What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral            (Institution does not offer AA/AS programs)</p> <p>What discipline(s)? Nursing, dental hygiene, public health, occupational therapy, physical therapy, pharmacy</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:            Bachelor of Science in Nursing – 120 semester credits            Bachelor of Science in Dental Hygiene – 128 semester credits            Master of Science in Nursing – 36 semester credits            Master of Public Health – 42 semester credits            Master of Science in Occupational Therapy – 96 semester credits            Doctorate of Physical Therapy – 133 semester credits            Doctor of Pharmacy – 144 semester credits</p>

Review Completed by: Megan D. Lawrence  
 Date: 10/25/2016

## **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	<p>Does the institution follow federal regulations on recruiting students?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
	<p>Comments:  Admissions advisors are compensated based upon years of experience, educational level, and knowledge of admissions processes. They are not compensated based on number of enrollments or any other indirect measure of enrollments.</p>
Degree completion and cost	<p>Does the institution provide information about the typical length of time to degree?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
	<p>Does the institution provide information about the overall cost of the degree?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
	<p>Comments:   The marketing materials reviewed during the site visit showed that both typical length of time to degree and overall cost of degrees were included.   Additionally, cost and length of time to degree published in multiple locations on the website:  <b>Federal Disclosures:</b> <a href="http://westcoastuniversity.edu/general/disclosures.html">http://westcoastuniversity.edu/general/disclosures.html</a>  <b>School Performance Factsheets (CA Campuses):</b>  <a href="http://westcoastuniversity.edu/uploads/Performance_Fact_Sheets_All_Campuses.pdf">http://westcoastuniversity.edu/uploads/Performance_Fact_Sheets_All_Campuses.pdf</a>  <b>University Catalog:</b>  <i>Length of Time to Degree (Example from BSN program):</i>  <a href="http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Undergraduate-Programs-of-Study/College-of-Nursing/Nursing-BSN-Bachelor-of-Science-Degree">http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Undergraduate-Programs-of-Study/College-of-Nursing/Nursing-BSN-Bachelor-of-Science-Degree</a>  <i>Overall Cost of Degree (Example from BSN program):</i>  <a href="http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Financial-Policies-and-Information/Tuition-and-Fees">http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Financial-Policies-and-Information/Tuition-and-Fees</a></p>
Careers and employment	<p>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</p>
	<p>Does the institution provide information about the employment of its graduates, as applicable?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
	<p>Comments:  The kinds of jobs for which graduates are qualified as well as information about the employment of graduates (in the form of placement rates) are available on the institution's website:  <b>Federal Disclosures:</b> <a href="http://westcoastuniversity.edu/general/disclosures.html">http://westcoastuniversity.edu/general/disclosures.html</a>  <b>School Performance Factsheets (CA Campuses):</b>  <a href="http://westcoastuniversity.edu/uploads/Performance_Fact_Sheets_All_Campuses.pdf">http://westcoastuniversity.edu/uploads/Performance_Fact_Sheets_All_Campuses.pdf</a>  In addition, marketing materials include job placement rates and O*Net Occupation Titles for programs.</p>

\*§602.16(a)(1)(vii)

\*\*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: Megan Lawrence

Date: 10/25/16

### **3. STUDENT COMPLAINTS REVIEW FORM**

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

<b>Material Reviewed</b>	<b>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</b>
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, is the policy or procedure easily accessible? Is so, where? Policy is published for students and the public in the online catalog. Comments:  Hyperlink for student compliant policy published in online University Catalog: <a href="http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Student-Services-and-Resources/Complaint-Grievances-Procedure">http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Student-Services-and-Resources/Complaint-Grievances-Procedure</a>  Compliant policy is also available through the website under compliance disclosures: <a href="http://westcoastuniversity.edu/uploads/pdf/WCU_Student%20Grievance%20Procedures_Final%20(5-5-2015).pdf">http://westcoastuniversity.edu/uploads/pdf/WCU_Student%20Grievance%20Procedures_Final%20(5-5-2015).pdf</a>
	Process(es)/ procedure
	Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: Internal procedure is not documented. Through interviews with multiple sources, it was determined that student complaints are escalated at the campus to the Campus Director of Student Affairs, who in turn collaborates with the university Director of Student and Alumni Affairs. The university director coordinates with administration and faculty, as appropriate, to resolve complaints and documents the outcomes. If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Comments:
Records	Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? Records are maintained by the University Director of Student and Alumni Affairs. Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: Master spreadsheet with student complaints demonstrates tracking and monitoring student complaints. Comments:

\*§602-16(1)(1)(ix)

See also WASC Senior College and University Commission's Complaints and Third Party Comment Policy.

Review Completed by: Megan Lawrence

Date: 10/27/16

#### **4. TRANSFER CREDIT POLICY REVIEW FORM**

Under federal regulations\*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices accordingly.

<b>Material Reviewed</b>	<b>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</b>
Transfer Credit Policy(s)	<p>Does the institution have a policy or formal procedure for receiving transfer credit? X YES <input type="checkbox"/> NO</p> <p>If so, is the policy publicly available? X YES <input type="checkbox"/> NO If so, where? In the online University Catalog: <a href="http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Academic-Policies-and-Procedures/Transfer-Credit-for-Previous-Education">http://westcoastuniversity.smartcatalogiq.com/Winter-2016/West-Coast-University-Catalog/Academic-Policies-and-Procedures/Transfer-Credit-for-Previous-Education</a></p> <p>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>
	<p>Comments:</p> <p>In addition to publishing the transfer credit policy on the website, the institution maintains a database, available to the public, with previously evaluated courses. <a href="https://tes.collegesource.com/view/tes_view01.asp?rid={AF5B7235-EC8F-4F03-BF67-A934BC2F9639}&amp;aid={365848D2-C2A5-47F5-82F3-6F23A5A280DA}">https://tes.collegesource.com/view/tes_view01.asp?rid={AF5B7235-EC8F-4F03-BF67-A934BC2F9639}&amp;aid={365848D2-C2A5-47F5-82F3-6F23A5A280DA}</a></p>

\*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

- (1) Are publicly disclosed in accordance with 668.43(a) (11); and
- (2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

See also WASC Senior College and University Commission's Transfer of Credit Policy.

Review Completed by: Megan Lawrence

Date: 10/25/16

## ***Appendix B: Off-Campus Locations Reviews***

### **1. Dallas, Texas**

#### **OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT**

Institution: West Coast University  
Type of Visit: Reaffirmation of Accreditation  
Name of reviewer/s: Megan Lawrence and Thomas Stewart  
Date/s of review: October 11, 2016

##### **1. Site Name and Address**

Dallas Campus  
8435 North Stemmons Freeway  
Dallas, TX 75247-3900

##### **2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a branch campus standalone location, or satellite location by WSCUC)**

- Number of programs offered: 1 (Bachelor of Science in Nursing)
- Degree levels: Bachelors
- Faculty, Fall 2015\*: 21 Full-time faculty, 35 part-time faculty
- Student Count, Fall 2015\*: 450
- WSCUC designation: Branch campus

\*As reported and published to IPDES:

<http://nces.ed.gov/collegenavigator/?q=West+Coast+University&s=all&id=477039>

Approval of the Dallas, TX branch campus location was included within the process of initial accreditation through WSCUC in 2011. The first students began their study at the campus in February 2012 and the first class was graduated in January 2014.

##### **3. Nature of the Review (material examined and persons/committees interviewed)**

###### **Interviews:**

- Faculty: 5 adjunct faculty, 11 full-time faculty. 60 minutes
- Students: 11 students, ranging in tenure at WCU from their first quarter to penultimate quarter. 45 minutes
- Leadership: Members of the executive leadership team, 50 minutes

###### **Materials examined:**

- [www.wascseior.org](http://www.wascseior.org)
- nces.ed.gov
- Self study team report
- WCU Dallas Organization Chart

Campus Tour (30 minutes)

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<p><i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</p>	<p>Off-campus location review not approved through the substantive change committee.</p>	
<p><i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</p>	<p>The Dallas campus supports the West Coast University mission by the delivery of “transformational education with a culture of integrity and personal accountability. We designate market-responsive programs through collaboration between faculty and industry professionals.” The Dallas campus offers one program, the Bachelor of Science in Nursing program, which has been long-established by the institution in fulfillment of the mission.</p> <p>The site was planned as a branch campus location. Staff includes functional leaders responsible for day-to-day operations, including faculty, deans, and functional leaders in the areas of academics, nursing, financial aid, admissions, career services, student affairs, business office, and registrar, who report up to the campus executive director. Indirect reporting relationships connect functional leadership to the administrative office. Additionally, the administrative office provides support for those elements outside day-to-day operations, such as curriculum development, institutional research, and assessment. Shared services provides infrastructure for such items as accounts payable/receivable, human resources, tax, legal, etc.</p>	
<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>The leadership team indicated that decisions about the day-to-day operations of the campus are managed at the campus, such as hours of operation, tutoring services, etc. High level policy development occurs at the administrative office, and the leadership team reported that such things are managed collaboratively.</p> <p>Faculty report engagement with faculty from other campuses during video faculty senate meetings or annual, in-person program review / SLO assessments. There also appears to be a robust committee structure in which institutional committees include members from the Dallas campus as well as other campus locations.</p> <p>Students enrolled at WCU Dallas do not report substantive interaction with students from the main campus; instead, they describe a campus culture in which they are presented with multiple opportunities for involvement in multiple activities comparable to the main campus location, such as the nursing honor society, PALS tutoring, etc.</p>	

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>Oversight of the off-campus site is managed by an executive director to whom campus leadership reports. This structure is duplicated at other campus locations, with minor variations as needed due to variations in academic program offerings. During the tour, the campus appeared well-maintained, with adequate office space allocated for administration. Faculty revealed during interviews that they felt supported by the on-site dean of nursing.</p> <p>The Noel-Levitz Student Satisfaction Inventory is administered at the campus, thereby allowing comparison of student satisfaction with advising, financial aid, facilities, etc. data across campus locations.</p> <p>The physical space provides state of the art patient simulation rooms, didactic classrooms, and laboratories. Faculty and leadership report that as enrollments have increased classroom space (especially the computer lab) has become impacted.</p> <p>Faculty are assigned shared office space in cubicles. Faculty report that the lack of privacy in cubicles can limit student candor during advising sessions.</p> <p>There do not appear to be spaces to study in the campus. The library has limited seating, and open study areas in the hallways consist of backless chairs without desks or tables. Student interviews revealed this to be source of dissatisfaction.</p>	<p>Explore facility planning.</p>
<p><i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>The site has the capacity to provide student support services. Faculty cubicles provide facilities for student advising, with admissions, library services, career services, financial aid advising, and student records available on site. Computers are available throughout the campus for computing needs. Access to counseling services is not provided to students.</p> <p>The leadership team identified sources of data used to assess student support services, including Noel Levitz SSI data, admissions surveys, financial aid surveys, and student outcome data.</p> <p>The most recent SSI data shows high levels of student satisfaction with student services, often exceeding satisfaction levels at the main campus in Orange County, CA.</p>	
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning?</p>	<p>WCU reported to IPEDS that in Fall 2015 courses were taught by 21 full-time, 35 adjunct faculty, and a commitment to hiring full-time faculty was described during the leadership team meeting.</p> <p>WCU Dallas faculty are involved in the academic oversight of the campus through institutional governance processes. At the conclusion of every</p>	

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
(CFRs 2.4, 3.1-3.4, 4.6)	<p>course, faculty complete a Faculty Feedback form which is then routed to “learning committees” in which all full-time and adjunct instructors of a specific course are members. The learning committee considers the feedback and implements, when appropriate, though the process may take 2 – 3 quarters. When the sixteen faculty were asked during the faculty meeting if they had seen changes they had recommended be implemented, nearly all heads nodded.</p> <p>Faculty participate in the assessment of student learning by the implementation of signature assignments in the curriculum. Assessment of these signature assignments occurs through the Blackboard learning management system, and the overall aggregate grade for the assessment is then shared with the faculty. Any faculty whose course grades represent “outliers” are then advised by their deans. When asked if they had access to the data showing how their assessment results varied in comparison to the institutional mean, faculty reported “no.” Assessment results do not appear to be broken down by rubric criteria and appear to be available only in the aggregate. As a result, campus faculty were unable to answer the question about levels of learning at their campus compared to other campuses.</p> <p>Follow up interviews at the main campus with the dean of educational effectiveness revealed that campus-level SLO data is not always available; however, a technology platform is in the process of implementation that would allow for data to be disaggregated by campus.</p> <p>Annually, faculty travel to L.A. to participate in SLO assessment. They appear to be afforded the same opportunities to participate in assessment as faculty from all other campuses.</p>	
<i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)	<p>The nursing program existed prior to the implementation of the Dallas campus, and as a result the curriculum was transplanted to the campus (with minor variations required by the Texas licensing board for nursing). Thereafter, however, faculty are involved in curriculum change approvals and modifications through the learning communities.</p> <p>At WCU, standardized curriculum is defined in the syllabus, textbook, signature assignments, and test questions; individual faculty have latitude to modify other curricular components such as power points and lectures.</p> <p>At the end of every course, faculty complete a faculty feedback form, which is then reviewed by “learning communities” comprised of all faculty – regardless of location – who teach the course. The majority of</p>	

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
	<p>faculty reported that they had witnessed curriculum change as a result of the faculty feedback forms.</p> <p>WCU's standardized curriculum model ensures that the curriculum implemented at the Dallas campus is equivalent to that used at other WCU campus locations. Evidence of this is the comparability of outcomes in the NCLEX pass rates; the most recent NCLEX pass rate data by campus shows that the Dallas campus achieved an 88.0% pass rate compared to the institutional average of 87.4%.</p>	
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</p>	<p>Data reported to IPEDS for first-time, full-time students who began their studies in 2014 and returned in 2015 reflect that WCU Dallas retention rates exceed those at the main campus location in Orange County:</p> <ul style="list-style-type: none"> <li>• WCU Dallas: 100%</li> <li>• WCU Orange County (Main): 71percent</li> </ul> <p>Since campus was not implemented until 2013, statistically significant graduation data was not available for inclusion in the self study. Campus management reports frequent review of monthly and year to date attrition.</p> <p>Based on preliminary IPEDS retention rates and interviews with campus faculty, staff, and students, there are no concerns at the present time regarding student outcomes.</p>	
<p><i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>	<p>Signature assignments are identical across all West Coast University campus locations. Faculty report that assessment data from signature assignments are inputted into Blackboard, and aggregate data is then reviewed during annual program review meetings. These assessments are then used to calculate a grade, and faculty were able to address how their grades compared to institutional mean.</p> <p>However, faculty were unable to address the levels of learning as measured by signature assignments at the Dallas campus compared to the institutional aggregate or main campus. Though grades could be compared, information about aggregate data for WCU Dallas compared to other WCU campuses had not reached the faculty. One member of the curriculum committee noted that the institution could do a better job providing information on SLO data back to all campus faculty once submitted.</p> <p>Another method of direct assessment of student learning is the NCLEX exam, and all faculty and staff interviewed confirmed that passage rates were comparable. The most recent NCLEX pass rate data by campus shows that the Dallas campus achieved an 88.0 percent pass rate compared to the institutional average of 87.4 percent.</p>	

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>	<p>WCU Dallas analyzes performance against other campus locations at West Coast University using various metrics:</p> <ul style="list-style-type: none"> <li>• Monthly attrition</li> <li>• Year to date attrition</li> <li>• Noel-Levitz Student Satisfaction Inventory (SSI) results</li> <li>• Course surveys</li> <li>• Financial Aid Surveys</li> <li>• Admissions point-of-service surveys and SLO assessments</li> </ul> <p>In addition, educational effectiveness can be partially measured through passage rates of the nursing board exams (NCLEX), which are comparable to other campuses.</p> <p>Evidence of formal quality assurance processes can be verified by action plans generated by each off-campus location in response to Noel-Levitz SSI data (appendix 4.28) and NCLEX pass rates (appendix 5.14). Student learning outcome data disaggregated by off-campus location is not consistently available at time of writing, so quality assurance processes in the area of student learning are in the initial stages.</p>	

## **2. Los Angeles Center for Graduate Studies**

### **OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX**

Institution: West Coast University  
Type of Visit: Reaffirmation of Accreditation  
Name of reviewer/s: Donna Redman-Bentley, Phillip Doolittle  
Date/s of review: October 24, 2016

#### **1. Site Name and Address**

Center for Graduate Studies (CGS)  
590 North Vermont Avenue  
Los Angeles, CA 90004

#### **2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a branch campus standalone location, or satellite location by WSCUC)**

- Number of programs offered: 3 (Occupational Therapy, Physical Therapy, Pharmacy)
- Degree levels: 1 Masters and 2 professional doctorates (MSOT, DPT, PharmD)
- Faculty, Fall 2016: 29 Full-time, 23 adjunct
- Student Count, Fall 2016: 375
- WSCUC designation: Branch campus

The Center for Graduate Studies in Los Angeles underwent a substantive change expedited review to convert the standalone location to a branch campus in November 2014. The first students began their studies at the campus in the Fall of 2013. The first three cohorts in Occupational Therapy have graduated; the first class of physical therapy students are expected to graduate in December of 2017; the first class of pharmacy students will graduate in 2018. WCU plans to implement a graduate physician assistant program in 2018 at this branch campus.

#### **3. Nature of the Review (material examined and persons/committees interviewed)**

##### **Interviews:**

- Faculty\*: 27 faculty with 2 months to 4 years at WCU, 60 minutes
- Students/alumni\*: 43 students, in first, second or third year, 3 alumni, 60 minutes
- Leadership: 11 members of the executive leadership team with 6 months to 9 years at WCU, 65 minutes

\* included nursing, occupational therapy, pharmacy, physical therapy

##### **Materials examined:**

- [www.wascseior.org](http://www.wascseior.org)
- Self-study team report
- WCU Center for Graduate Studies Organization Chart
- Additional documents on program review and professional accreditation

Campus Tour (30 minutes)

<b>Lines of Inquiry</b>	<b>Observations and Findings</b>	<b>Follow-up Required (identify the issues)</b>
<p><i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</p>	<p>Information regarding changing the designation of the CGS from standalone to branch campus was shared with the visiting team. The Substantive Change Action Report for Expedited Reviews (November 2014) recommended close monitoring of fiscal viability...to ensure capacity to fully support academic programs.</p>	
<p><i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</p>	<p>The CGS campus supports the West Coast University mission by the delivery of "...market-responsive programs through collaboration between faculty and industry professionals." The CGS campus offers three new, highly marketable, graduate programs; occupational therapy, physical therapy, and pharmacy.</p> <p>The site was originally a standalone campus and was changed to a branch campus in 2014. All programs were established after the previous WSCUC accreditation in 2011. Campus leadership comprises the functional leaders of financial aid, student affairs, library, registrar, and admissions. These individuals along with deans, faculty, instructional technology technician, proctor and administrative assistant are responsible for day-to-day operations and report directly to the campus executive director. Indirect reporting relationships connect functional leadership to the administrative office. Additionally, the administrative office provides support for those elements outside day-to-day operations, such as curriculum development, institutional research, and assessment. Shared services provides infrastructure for such items as accounts payable/receivable, human resources, tax, legal, etc.</p>	
<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>The leadership team report that they are in communication with individuals from other campuses, such as financial aid staff communicate regularly with similar functional staff on all campuses and often share information to solve problems. The leadership team has the opportunity to influence policy development.</p> <p>Faculty describe many examples of interaction with faculty from other campuses including the annual conference, training and education programs, committee participation, use of simulation laboratory at the North Hollywood campus, and guest lecturing in other programs.</p> <p>Students in the programs at CGS indicate they have many opportunities to work with each other as well as nursing and dental hygiene students on other campuses. The Interprofessional education program and use of simulation laboratory provide events for collaboration with students from other campuses.</p>	

<b>Lines of Inquiry</b>	<b>Observations and Findings</b>	<b>Follow-up Required (identify the issues)</b>
	Students from multiple programs are involved in community events such as the Special Olympics and volunteer work in the surrounding communities.	
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>Oversight of the off-campus site is managed by an executive director to whom campus leadership reports. This structure is duplicated at other campus locations, with minor variations as needed due to variations in academic program offerings.</p> <p>The physical space provides state of the art laboratories for pharmacy, physical therapy and occupational therapy. Each classroom is equipped with high level technology that allows linkage between rooms. Pharmacy has state of the art sterile and non-sterile compounding laboratories. The library provides medical journals relevant to each of the professions and continues to monitor the needs of students to add or delete journals when appropriate. Library space appears to be small for the total number of students on campus; hours were extended during week days and opened on Saturdays to accommodate students in need of a place to study. Students have access to computers and printers in several open areas.</p> <p>Students and faculty agree that space for individual meetings is insufficient. Students would like more space for group and individual studying. They would like more access to the campus through expanded hours 7 days/week.</p> <p>Overall, the campus is well maintained. The major issue is allocation of space for studying and private meetings with faculty.</p>	Explore facility planning; monitor growth of programs and the addition of programs at this location that may require more space.
<p><i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>The site has the capacity to provide student support services including faculty advising, tutoring, counseling, library and career services, and financial aid advising. Computers are available throughout the campus for computing needs. IT staff is available to provide support and students receive free Microsoft software.</p> <p>The Noel-Levitz Student Satisfaction Inventory is administered at the campus, thereby allowing comparison of student satisfaction with advising, financial aid, facilities, etc. data across campus locations.</p>	
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning?</p>	<p>As of Fall 2015, no data for this campus were reported to IPEDS. Information provided by the ALO indicates that in Fall 2016 courses were taught by 29 full-time and 23 adjunct faculty. All faculty must meet the qualifications of their professional accrediting body. They are licensed professionals or, in the case of pharmacy, hold doctoral degrees in various sciences.</p>	

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
(CFRs 2.4, 3.1-3.4, 4.6)	<p>All program faculty are involved in the academic oversight of the campus though institutional governance processes. Both full-time and adjunct are actively involved in course development and design and may seek assistance from the WCU Director of Instructional Design. Faculty utilize the peer review process, student feedback and fieldwork feedback to consider changes to courses. Program faculty are the decision making body regarding curricular changes.</p> <p>Faculty own the curriculum and student assessment process. Program faculty develop the PLOs and CLOs. Student assessment comprises multiple methods such as written examinations, objective structured clinical examinations/practical examinations, special projects, and fieldwork or clinical evaluations.</p>	
<p><i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</p>	<p>The occupational therapy, physical therapy and pharmacy are new programs to WCU and are delivered only at the CGS campus. Each program has its own specific curricula that must comply with professional accreditation standards.</p> <p>Program faculty follow WCU's standardized curriculum model in developing and evaluating the courses and curriculum. At the conclusion of every course, faculty complete a Faculty Feedback form which is shared with the program's curriculum committee. The curriculum committee considers the feedback during regular faculty meetings as well as when the course is reviewed at the annual Learning Outcomes Review meeting in the spring.</p> <p>The three programs are unique to WCU and do not share common curricula with other programs and campuses. However, results of outcomes based on PLOs related to ILOs could be compared. The Director of Educational Effectiveness is developing a dashboard to track PLOs and SLOs on a single database which will allow for comparison of program strengths and weaknesses.</p>	
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</p>	<p>Data provided by the campus executive director shows a breakdown of students by year/cohort for enrollment, gender, ethnicity, median age, graduation rates, placement rates and board outcome rates. All programs began in Fall 2013; as of Fall 2016, only the occupational therapy program has graduated three cohorts. Graduation rates of the first two cohorts was 100 percent and 92.9 percent (26/28) for the third cohort. The physical therapy and pharmacy programs will not graduate students until December 2017 and 2018 respectively. No data on retention and graduation are available at time of this report.</p>	

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<p><i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>	<p>Each program has a set of assessment tools used to measure student learning. Signature assignments are selected by the faculty similar to other WCU programs and campuses, but these assignments are relevant only to the specific program.</p> <p>At this time, the only similar type of results that could be compared are the licensure pass rate of occupational therapy students to nursing NCLEX pass rate. Occupational therapy students show a slightly higher pass rate (89-93 percent ) than nursing (87 percent ).</p>	
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>	<p>WCU GCS analyzes performance against other campus locations at West Coast University using various metrics:</p> <ul style="list-style-type: none"> <li>• Monthly attrition</li> <li>• Year to date attrition</li> <li>• Noel-Leviz Student Satisfaction Inventory (SSI) results</li> <li>• Course surveys</li> <li>• Financial Aid Surveys</li> <li>• Admissions point-of-service surveys and SLO assessments</li> </ul> <p>In addition, educational effectiveness can be partially measured through passage rates of the professional board exams (nursing NCLEX, occupational therapy ACOTE, pharmacy ACPE, and physical therapy CAPTE).</p> <p>Evidence of formal quality assurance processes can be identified in formal action plans generated by each off-campus location in response to Noel-Levitz SSI data (appendix 4.28) and NCLEX pass rates (appendix 5.14). Student learning outcome data disaggregated by off-campus location is not consistently available at time of writing, so quality assurance processes in the area of student learning are in the initial stages.</p>	

## **Appendix C: Distance Education Review**

### **Distance Education Review-Team Report Appendix**

Institution: West Coast University  
Type of Visit: Accreditation Visit  
Name of reviewer/s: Mike Maloney and Thomas Stewart  
Date/s of review: October 24 – November 7, 2016

#### **1. Programs and courses reviewed (please list)**

West Coast University provided the visiting team with access to nine fully online courses for review (see list below). Two of the courses were in general education, two in the MS in Health Care Administration program, three in the RN-BSN (also BS Nursing courses), and two in the MS Nursing program.

**Table C. WCU Online Courses Available for Review**

<b><u>Program</u></b>	<b><u>Term</u></b>	<b><u>Course</u></b>	<b><u>Course Title</u></b>
General Education (RN-BSN)	Summer II	PATH 370	Pathophysiology
General Education (online course offered to ground students)	Summer II	HUM 370	Cultural Pluralism
Master in Health Care Administration	Summer II	MHA505	Information Systems for Health Care Programs
Master in Health Care Administration	Summer II	MHA500	Legal and Ethical Issues in Health Care Management
RN-BSN	Spring II	NURS 350	Research in Nursing
RN-BSN and Bachelor of Science in Nursing (online course offered to ground students)	Spring II	NURS 350	Research in Nursing
RN-BSN and Bachelor of Science in Nursing (online course offered to ground students)	Summer I	NURS 440	Issues and Trends in Nursing
Master of Science in Nursing	Spring II	NURS 561	Health Promotion and Disease Prevention
Master of Science in Nursing	Summer I	NURS 535	Principles of Teaching and Learning

**2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)**

Online enrollments increased from roughly 36 students in 2011 to more than 600 during the 2016 site visit. The university appears to have talented and experienced faculty and administrators overseeing curriculum development, course design, student supports, and in other important areas necessary to build quality online programs and enhance student success.

The courses delivered through distance education are designed to meet the needs of WCU students. The online programs are designed to meet the demands of working students by allowing them to complete their courses partially or fully online. It appears that the quality of the online courses is comparable to those offered on ground. Many of the online students we interviewed noted that they could not attend a ground based program, and they appreciated the opportunity to pursue their education conveniently online at WCU.

The average online course has a 1 to 24 faculty to student ratio. The university recently made a switch from eCollege to the Blackboard learning management system (LMS). WCU's faculty and course designers build the online class, and they collaborate with Blackboard to ensure that courses are appropriately delivered. The Blackboard LMS tracks and collects data pertaining to course, program, and student learning outcomes, and faculty and administrators noted that this information is effectively used to refine courses and enhance the online student learning experience.

After logging into the Blackboard-based Learning Management System, the online student sees a typical LMS student homepage including a list of current courses, a news box, a Dean's Corner box and links to a student success advisor, the Library, Tutor.com and other resources. One click on a course listing takes the student to the home page for that course. Each of the 9 courses reviewed had the same organization and "look and feel," important for easy student navigation. Similar to the student homepage, the online student gets the typical LMS

course homepage with links to announcements, the course syllabus, the virtual (faculty) office, student grades, the discussion board and most importantly, the 8-9 weeks of course material.

Each course syllabus contains the University Mission, ILOs, program mission and philosophy, PLOs, university policies and procedures, grading procedures and other university- or program-level items. These items do not need to be copied in every syllabus and instead could be made available through separate links from the course homepage. This would reduce each lengthy 12-page (or longer) syllabus (which are surely printed by most students) and would focus the student on the CLOs, the course material and the course requirements for the particular course. Otherwise the syllabi contain the right amount of course outline material that the online student needs to be successful.

One click on a course material link (e.g., link to Week 1) for a course gives the online student access to the core material for that week that often starts with a short introduction video, followed by objectives, (PowerPoint-like) presentations, reading materials and assignments. The course content and assignments appear to be appropriate for the course and level (e.g., Master's) in all cases.

### **3. Nature of the review (material examined and persons/committees interviewed)**

#### Sources of information

- Large group discussion with 20 online students
- Small group discuss with eight online faculty
- Small group discussions with curriculum and instructional personnel
- Interviewed the director of online operations
- Reviewed online courses

#### Key questions

Across all meetings with online program stakeholders, we asked three basic questions:

- What do you like most about WCU?
- What recommendations would you make to improve the university?
- What would you like to share that we have not discussed?

#### **4. Observations and Findings**

The respondents provided a long list of feedback, and following is a summary of the salient comments that were consistently expressed.

- The respondents provided candid and thoughtful feedback based on their experiences as students, faculty and administrators. Generally speaking, WCU appears to be committed to growing online courses and programs in a reasonable manner.
- The university appears to be thoughtfully growing enrollment, with an eye toward maintaining quality and improving student success.
- There are qualified and experienced administrators and faculty in place to ensure a high quality academic experience for online students.
- Though the online students interviewed generally appreciate the online program, they noted several ways the university could improve the online experience. The visiting team shared the students' recommendations with the vice president for online operations.
- Overall the WCU LMS, while not particularly engaging, appears to be very functional technically for its purpose – to help online students learn with easy navigation and support from instructors. The course materials reviewed were well developed and appropriate for online students.