

REPORT OF THE WSCUC VISITING TEAM

SEEKING ACCREDITATION VISIT 2

For Institutions Seeking Initial Accreditation

To Lincoln University

October 1 – 4, 2019

Team Roster

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The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. 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. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be 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 Visit

Description of Institution

Lincoln University (LU) is celebrating its centennial on November 16, 2019. It was founded in 1919 by Dr. Benjamin Franklin Lickey and his wife Susan and was initially a law study program. It was established in San Francisco to serve returning World War I veterans and other part-time students with evening courses. By 1927 LU was offering both day and evening college courses in law, commerce, foreign trade, business administration, and special courses and coaching in bar examination preparation, advertising, journalism, and public speaking.

LU became a non-profit tax-exempt institution in 1950. In 1961, under the leadership of E. Barbara Jorss and Dean Jerome Sack, a second campus was opened in San Jose. During the 1970's, Lincoln University began producing a ten-part cable television series featuring panel discussions by local attorneys and judges, which addressed legal issues of concern to the San Francisco and San Jose communities. By 1987, Lincoln University's entire law school program was concentrated in San Jose. In 1993, the San Jose campus formally separated from Lincoln University changing its name to Lincoln Law School of San Jose. The remaining school moved to Oakland from San Francisco in December 1999.

The LU campus in Oakland is a physical facility consisting of three buildings; the four-story main classroom and administrative building owned by LU, a leased one-story office space housing the diagnostic imaging labs and faculty, and a two-story leased facility for the LU library. All three buildings are in close proximity and located in downtown Oakland near public transportation.

According to the audited financials for fiscal year 2018, the balance sheet lists total assets of \$5,678,972 and current liabilities of \$408,563, no long-term liabilities and net assets of

\$5,270,409. For the 2018 fiscal year the total revenues were \$ 6,080,490, total expenses \$6,010,506, and an increase in net assets of \$69,984. The cashflow for the 2018 fiscal year was in the beginning of the year \$ 3,796,841, and at the end of the year \$ 1,416,782. The significant change in cash is in part the result of paying off the mortgage.

The *Institutional Research Report 2018* states, “In the year 2018, Lincoln University enrolled over 600 students, representing 50 different countries.’ The report provides the following student profile for fall 2018 semester (n = 778):

- 94% fulltime and 6% part time
- Gender profile: males comprised 56% and females 44% of the student population
- Average age was 28.9 years
- Ethnic profile: African and African-American 42%; Asian 38%; Caucasian 15%; Hispanic/Latino 3%, and other 2%. With the majority of students coming from six countries: Nigeria (40%), India (10%), Nepal (8%), Thailand (5%), Vietnam (5%), and USA (15%).
- The U.S. national average retention college rate is 79%. These statistics show that the LU’s current retention rate of above 80% is exemplary and that the strategies being used by the University are effective. LU’s goal is to maintain above-average retention rates and improve the rates by 1% per year. (IR Report 2018, page 10)
- The graduation rates for Spring 2017 were: BA Business Administration 76.9%; MBA 91.6%; MS International Business 100%; and MS Finance Management 100%. (IR Report 2018, page 11-12)

According to the university there are 19 full-time faculty and 16 part-time faculty members. Full-time faculty gender diversity is reported as 16 males and 3 females, and with the part-time faculty there are 10 males and 6 females. Of the 9 females who teach full-time or part-time, 7 teach in diagnostic imaging and none teach in the larger business programs (IR Report 2018, page 26). This indicates there is a gender diversity imbalance in the business programs. In addition, there are approximately 50 staff employees.

The university offers six degrees: Bachelor of Arts (BA) in Business Administration, Bachelor of Science (BS) in Diagnostic Imaging, Master of Business Administration (MBA),

Master of Science (MS) in International Business, Master of Science (MS) in Finance Management, and Doctor of Business Administration (DBA). LU does not have any off-campus sites or offer any distance education programs.

LU serves a unique international mission “to provide traditional educational programs in diverse fields of study, delivered by experienced educators, and leading to outstanding employment opportunities for American and international students. Graduate and undergraduate programs utilize practical experience of the instructors and are geared to give its students tools for successful professional careers.” It was noted by the review team that many of the faculty are foreign born and relate well to the students’ experience.

Lincoln University was accredited by the Accrediting Council for Independent Colleges and Schools (ACICS) in 1990. In 2012, the Bureau for Private Post-secondary Education (BPPE) granted LU exempt status which was held through December 31, 2016 when it was removed due to decertification of ACICS. ACICS was recognized again in 2018. Currently ACICS and BPPE approve the 6 existing LU degree programs. As a result of ACICS decertification, LU decided to pursue regional accreditation through WSCUC and was granted Eligibility in April 2017. The WSCUC SAV 1 team visited LU in spring 2018, and as a result of this visit, LU became a Candidate for Accreditation by WSCUC in June 2018. There have been no other WSCUC accreditation applications including new program Substantive Change reviews. In 2019 the International Accreditation Council for Business Education (IACBE), a programmatic national accreditor, accredited LU’s graduate business programs.

Description of the Team’s Review Process

The WSCUC site visit team conducted the pre-visit teleconference on Tuesday, August 20, 2019 to review the team’s consolidated worksheet based on the institutional report and evidence provided by Lincoln University. The team identified individuals to interview on the

site visit and additional documents needed prior to the visit or on-site in the team's workroom. In addition, the team members confirmed writing assignments and key issues arising in the consolidated worksheet based on the information provided by Lincoln University.

The assistant chair worked with Lincoln University's ALO in preparation for the site visit and the development of the schedule. Prior to the visit, LU provided the additional information requested in a timely manner and prepared the team room with the additional documents requested. The WSCUC team members reviewed the institutional report submission and attachments, along with all relevant correspondence, reports, and documents, in preparation for the site visit scheduled for Tuesday, October 1 through Friday, October 4, 2019, in Oakland, California at Lincoln University. The initial planning meeting of the team was scheduled for Tuesday, October 1, 2019.

The reviewers prepared for the SAV 2 visit according to a standard visit protocol. The reviewers did extensive preparation in advance of the site visit, including analysis of the evidence made available electronically. The visit was hosted by Lincoln University and was well organized and presented a full assessment of the progress made by the university in addressing the issues identified in the SAV 1 visit. Lincoln university leadership, administration, staff, students and faculty grasp the importance of the WSCUC Standards, and successfully addressed the issues of the WSCUC reviewers with an in-depth and transparent analysis, particularly those issues related to Standards 2, 3 and 4. The WSCUC reviewers concluded that the discussions were wide ranging, transparent, and thorough. (CFRs 1.5, 1.6, and 1.7)

B. The Institution's Seeking Accreditation Visit Report: Quality and Rigor of the Review and Report

LU's institutional report is well-written and organized. The institution should be commended for taking seriously the SAV 1 report and the recommendations as outlined in the Commission Action Letter (CAL). While the LU steering committee was responsible for writing much of the institutional report, the committee members sought wide institutional involvement to collect evidence and artifacts for the visit. It is clear that the institution as a whole is working on each of the standards and is making progress towards improvement based on previous recommendations.

LU has done a solid job responding to the issues raised in the CAL. The institution has made significant improvements in 15 months, and the documents suggest that more improvements are forthcoming. The institution takes seriously WSCUC's mission and standards. It has made investments in its faculty and staff to take advantage of the numerous development opportunities provided by WSCUC. Finally, the document makes clear that LU is a student-centered institution and prides itself on its service to its international students.

C. Response to Issues Raised in Past Commission Letters

The July 18, 2018 Commission Action Letter to Lincoln University articulated 10 discrete recommendations spanning seventeen CFRs. The SAV 2 visiting team found the university in substantial compliance in sixteen of the CFRs, with the only exception CFR 3.8 which was determined to be in minimal compliance.

1. Review general education policies and engage in an external review of the program at the earliest opportunity (CFR 2.2a);
2. Review and systemize its policy for providing financial support for faculty research, and scholarly and creative activity (CFRs 2.8, 2.9);
3. Develop a formalized framework of assessment for student services, building on current surveys distributed after student events, and develop a schedule for program review of academic support programs. (CFRs 2.11, 2.12, 2.13);
4. Implement a formal recruitment and hiring process to ensure that faculty and administrative staff hiring processes adhere to newly adopted policies. (CFR 3.1 and 3.2);

5. Develop a coordinated enrollment management function that informs realistic resource planning scenarios in response to external impacts and seek diversified revenue sources. (CFR 3.4);
6. Continue to clarify roles and responsibilities and decision-making structures, as many full-time faculty play significant administrative roles and leadership as a whole is overextended. (CFR1.7 and 3.8);
7. Continue development of the Board of Trustees and further institutionalize its committee structures. (CFR 3.9);
8. Supported by administration, expand faculty engagement in order to provide effective academic leadership. (CFR 3.10);
9. Increase support to the Office of Institutional Research to support using additional measures to gauge student satisfaction and campus climate, such as the National Survey for Student Engagement (NSSE). Moreover, deepen the quality assurance work of the Office of Institutional Research by shifting from a compliance orientation to attention to quality through additional disaggregation of data and analysis of issues related to the student experience and student success. (CFR 2.10, 4.1, 4.2);
10. Further develop and institutionalize the assessment and quality assurance processes and expand faculty involvement in assessment and program review. (CFR 4.1, 4.3).

In addition to the above, the CAL explained that CFRs: 2.4, 2.7, 4.4 and 4.7 also required additional progress. Overall, the institution has responded positively to each of these recommendations with tangible evidence both in its institutional report as well as during the team visit. In particular, it has made significant strides in the areas of general education, outcomes assessment and program review, and faculty engagement. Each of these items will be discussed more specifically in relation to each CFR.

SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS

For the SAV 2 phase of accreditation, LU responded to recommendations addressing several CFRs within Standards 2, 3, and 4.

Standard 2: Achieving Educational Objectives through Core Functions

Almost from the time it received its SAV 1 report and CAL, Lincoln University began making significant and impressive improvements to address the core functions of general education, assessment, and program review, both in the curricular and co-curricular areas. The

evidence provided for Standard 2 reflects an institution-wide commitment to student learning and research and creative activity.

ISSUE 1 – CFR 2.2a

Undergraduate degree requirements, including general education and core competencies

SAV 1 Team Recommendation:

- *Faculty approach and understand general education differently and inconsistently. Therefore, there is inconsistency in application of the approaches of general education that continues through the upper-division level and is fully realized at the capstone level within a major. Lincoln should work to ensure a consistent definition of general education that aligns with WSCUC core competencies. The faculty should have a consistent understanding of what the GE definition is and apply assessment approaches as appropriate.*

To address CFR 2.2a, LU has built a more sophisticated assessment infrastructure, including mapping Program Learning Outcomes (PLOs) to Institutional Learning Outcomes (ILOs), and ensuring alignment of outcomes in course syllabi. The institution underwent a program review of its general education curriculum in June 2018, and began working on recommendations from that external review in fall 2018. As part of that process, LU hired an external consultant to conduct a thorough review of the general education program and provide faculty feedback and guidance.

The university has scheduled a follow-up, “mid-cycle” review of general education in 2020 in order to evaluate the recent implementations. Some of the developments include the construction and institutionalization of GE rubrics, a more complete infusion of the WSCUC core competencies into the GE curriculum, and the integration of GE into the multi-year assessment and program review cycle. The rubrics, handbooks, and GE philosophy and policy statements are well developed and indicate a sustainable commitment to GE and the integration of the core competencies into the curriculum and assessment of student learning.

Further, the general education faculty have articulated an impressive vision of general education that focuses on intellectual curiosity, the integration of prior knowledge with new knowledge, and the application of theories and philosophies learned in GE classes to everyday lived experience. In keeping with best practices for general education, the GE faculty recognize that the core competencies introduced at the GE level will be honed throughout the students' programs of learning and will form part of their disciplinary skills upon graduation.

ISSUE 2 – CFR 2.4

Faculty's collective responsibility for setting SLOs and standards, assessing student learning, demonstrating achievement of standards

SAV 1 Team Recommendation:

- *It appears that individual faculty and faculty as a unit, concentration, or program do not have full responsibility for setting SLOs and choosing appropriate program level assessment methods. LU should ensure greater faculty involvement of assessment at the program level.*

Since the SAV 1, LU has ensured more faculty involvement in the development of Student Learning Outcomes (SLOs), specifically noting in the Faculty Handbook and the statement on Academic Freedom that ownership of the development of SLOs belongs to faculty. Since SLOs are now aligned to Program Learning Outcomes (PLOs) and Institutional Learning Outcomes (ILOs), faculty are more involved with the assessment of student learning at the program and institutional levels. Currently the university is conducting a search for a faculty director of the general education program and shared with the visiting team some of the options under consideration.

Faculty express familiarity with and feel ownership of the process of assessing student learning including general education, and have made appropriate curricular changes in their departments and programs as a result of different assessments. As one notable example, the institution conducted an assessment of written communication and determined that students

needed more support, not only with written communication, but oral communication as well. At the same time, student services received feedback from students requesting more support for writing resumes and cover letters. After consultation between the two areas and Institutional Research (IR), the provost's office authorized the creating of the Writing and Speaking Center, housed in the library.

ISSUE 3 – CFR 2.7

Program review includes SLOs, retention/graduation data, external evidence and evaluators.

SAV 1 Team Recommendation:

- *The program review process as articulated in the program review handbook is systematic and detailed, though more ownership by stakeholders involved in each program is necessary for writing self-studies and a policy for establishing a follow up during the successive cycle should be developed. The Diagnostic Imaging program might serve as a model for other programs.*

LU has continued its commitment to periodic program review since its SAV 1. In 2018, the GE program underwent an external review, and co-curricular programs are on the schedule for a program review in the spring of 2020 and 2021. The institution has enhanced its program-review documents, which were already fairly well-developed, and its program review process, which was already active prior to the SAV 1 visit. The *Handbook on Program Review* is clear and detailed, outlining a multi-year framework for continuous review, and all policies and procedures regarding program review are now readily available on the faculty portal on the LU website. The faculty portal is particularly notable, ensuring that all information in the printed handbook of policies is available to all faculty and staff stakeholders.

The Program Review Committee has been formalized with a committee of comprised of the program chairs to ensure that all members understand processes and necessary communications. This change also ensures that each department holds more ownership in the process of writing self-studies and participating in the external review process.

ISSUE 4 – CFR 2.8

Scholarship, creative activity, and curricular and instructional innovation for both students and faculty valued and supported.

SAV 1 Team Recommendation:

- *Scholarship, creative activity, and curricular and instructional innovation for both students and faculty valued and supported: The institution's process, policy, and procedure for retention and promotion of faculty are unclear. The institution distributes a document entitled "Individual Faculty Development Plan" by which it tracks membership in professional organizations, publications, and presentations, but there is not a clear connection between the articulation of these activities, institutional financial support of them, and the mission of the institution itself. The Institutional Report provided a table of faculty research and scholarly activities. However, the listing was not organized along timelines, so it was difficult to determine the yearly level of scholarship activities. Going forward the Provost's Office should maintain records of faculty scholarship and creative activities disaggregated by year and by type of activity, so the level of activity is more transparent.*

The institution has made significant progress in addressing SAV 1 concerns for CFR 2.8.

In the *LU Policy on Faculty Scholarly and Professional Development* and in the *LU Policy and Procedure for Conducting Research*, recognition of scholarship related to teaching, learning, assessment, research, and co-curricular learning is clearly outlined, and the process to define scholarship is commended. The promotion process is clearly addressed in its policy. The faculty expressed knowledge and involvement in the development of the policies and procedures documents.

Further, faculty acknowledged progress has been made in supporting scholarship and creative work in terms of both financial resources and release time. The tracking of scholarly activity is conducted by the Office of Institutional Research and was provided to the visiting team which addressed concerns raised during the SAV 1. The President's faculty grant initiative is more evidence of LU's commitment to financially support scholarship. The policy is well defined with a fair application process that is available to both full-time and part-time faculty.

Additionally, there is also evidence that the students' scholarly activity is promoted and financially supported. Some of the recent grants include collaborative research between faculty and students. The library continues to be a primary support network for faculty and students' research and creative activities. For example, it formally houses the new Writing and Speaking Center which provides resources to support scholarly activities. The library also provides student workshops which advance the students' achievement of key competencies.

In addition, the library has developed a consolidated warehouse for library resources, significantly enhancing the research capabilities for faculty, staff, and students. This consolidated warehouse builds on the already existing resource sharing agreement LU has with other regional libraries. Finally, the new Multidisciplinary Research Center (MRC) appears to have the potential to be a significant resource for faculty, staff, and students in their research endeavors as it provides them the opportunity to partner with professionals from the business world to link academic issues to real-world situations.

ISSUE 5 – CFR 2.9

The institution recognizes and promotes appropriate linkages among scholarship, teaching, assessment, student learning, and service.

SAV I Team Recommendation:

- *Though many faculty publish and remain active in their respective fields, scholarship and creative activity are not emphasized at the university and there is little financial support for professional development of this sort; limited stipends are provided by the president's office on an ad hoc basis for travel for presenting at conferences. Recognition for faculty scholarship should be emphasized through institutional support and expected through faculty evaluation.*

In addition to the policies and procedures surrounding research, scholarship, and creative activity, LU has a well-developed faculty scholarship and support structure to address CFR 2.9. There is evidence of both promotion and financial support for professional development. For example, faculty are financially supported when they travel for conferences and invited

professional presentations. In particular, the recently instituted President's Faculty Grant Awards provide additional support for professional development and speaks to the recognition and value placed on faculty scholarship.

Both full-time and part-time faculty are eligible to receive \$600 per annum to participate in conferences or other types of professional meetings. In spring 2019, the grant program was extended, with another \$25,000 per annum offered for faculty research and creative activities. Thus far, four faculty members received an average of \$2,075 to pursue their professional activities. It should be noted that most of the faculty previously taught at regional universities with a strong research emphasis. Some of the faculty continue their long-term research agenda. The recently enacted self-assessment and peer-evaluation tools are evidence of where linkages are made between scholarly activity and faculty evaluation. In addition, student-evaluations are used a complementary tool for verification and feedback.

In addition to engaging students in research, conference presentations, and publication, the faculty are proponents of authentic assessment and frequently introduce real-world exercises and activities in the classroom. Faculty in the business program have a capstone that includes student involvement in national competition for GLO-BUS, a worldwide business strategy simulation. Teams from LU have ranked in the top 100 of this simulation for the past two years.

ISSUE 6 – CFR 2.10

Institution identifies and supports needs of students; tracks aggregated and disaggregated student achievement, satisfaction and campus climate; demonstrates students' timely progress

SAV 1 Team Recommendation:

- *The institution provides data, but has not yet developed a framework for providing consistent, public, longitudinal data tracking student success. In particular, student satisfaction or campus climate data is extremely limited.*

The institution has done tremendous work in this area, developing a framework for tracking student progress and success measures. With the addition of a valuable IR Research

Analyst position, data is coming in and going out in a systematic robust manner. As data is viewed by instructors, chairs and administrators, there is an accompanying analysis from IR. This has been valuable as the institution shared evidence of data-driven decisions with the visiting team.

For example, the Office of Student Services received feedback that students desired more support in the area of career planning and resources. LU added a full-time position, the Director of Career Services, and in just two months, they have offered “workshops” to assist students with cover letters, resumes, and job placement. To close the loop on this new resource, Career Services launched a survey to gather feedback on its services and is awaiting the results. Additionally, IR was instrumental in providing aggregated historical data in the process. The institution shows evidence of excellent graduation and retention rates. The annual Institutional Research report is extraordinarily detailed, providing analysis of teaching and learning, as well as retention, persistence, and graduation rates.

In addition to the local surveys of student satisfaction, LU has adopted the National Survey of Student Engagement (NSSE) and will administer the survey for the first time in spring 2020. The Office of Accreditation Compliance, and Quality Assurance (ACQA) is looking forward to benchmarking local results with national results and developing longitudinal information regarding student satisfaction at the institution.

ISSUE 7 – CFR 2.11

Co-curricular programs aligned with academic goals and regularly assessed

SAV I Team Recommendation:

- *Data collection and analysis reflecting trends and gaps in student success are in the nascent stages. LU should develop a comprehensive program review process for co-curricular programs that support student success.*

The institution demonstrated to the visiting team a nascent but strong relationship between the assessment work of the faculty and the coordination with the co-curricular staff in order to create an exceptional educational experience for students. Since the majority of LU students are international, the co-curricular activities and services are uniquely tailored to meet their needs. The new Director of Student Services introduced a successful art program for students and found it serves as therapy for those students who have experienced trauma in their home country.

The institution's co-curricular programs have long been connected to its larger mission, but beyond end-of-activity surveys, there was not much assessment of co-curricular programs, particularly in relation to ILOs. The co-curricular committee has discussed the incorporation of more direct means of assessment of outcomes, but since the activities do not produce student artifacts, the committee has continued its reliance on local surveys. This difficulty in adopting direct assessment of the co-curricular programming is not atypical for institutions, though, and since the program is scheduled for a spring 2020 program review, it is expected that the institution will receive valuable advice on how to implement successful assessments.

Another strength of the co-curricular activity format is that the institution focuses beyond the cognitive domain of learning and uses the activities to assess both the affective and psychomotor domains. Student services is in the early stages of building an assessment infrastructure to regularly and consistently conduct assessment which will lead to longitudinal data and national benchmarking. The post-activity surveys currently used by student services are consistently administered. Data is collected and sent to the Institutional Research Coordinator. After conducting an in-depth review, a summary of the data with an analysis is returned to Student Services for the staff's review. e

This partnership has been an improvement as the IR office aggregates and disaggregates the survey responses, then meets with the relevant office to analyze the data. Exit interview data is also consistently gathered and has been particularly informative, and focus groups have provided valuable data. The addition of a research analyst in IR has significantly increased the office's capacity to analyze the data and communicate with departments and offices.

The visiting team determined that Lincoln University demonstrated compliance with Standard 2 sufficient for **initial accreditation** with the understanding that the Commission makes the final determination regarding compliance.

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

WSCUC Standard 3's emphasis on fiscal and organizational structure as connected to institutional decision-making and short- and long-range planning form the foundation for this section of team's discussion of Lincoln University's SAV 2.

ISSUE 8 – CFR 3.1

Sufficient, qualified, and diverse faculty and staff to support programs and operations

SAV 1 Team Recommendation:

- *The institution prides itself on cultural diversity, and the cultural and gender balance of students and staff is strong. However, the faculty is not as gender-balanced, though recent hires show movement in this direction. LU should continue to work toward a diverse balance of faculty and staff to serve the student population.*

LU is in a very expensive region of the country with significant competition for qualified faculty and staff. There has been progress in the area of retention of faculty with individualized development plans for retention. This is especially helpful since many of the faculty are of retirement age and some previously retired from regional universities. The hiring plan and the resulting retention rate of faculty is commendable. In the faculty plan there is a hiring strategy that is aligned with the culture of the institution. Potential colleagues are often recruited one-on-

one, though according to the “Faculty Selection, Appointment, and Promotion Policies” in the *Policies and Procedures Manual* the institution also uses various online agencies and peer-reviewed journals for recruitment.

Gender diversity amongst faculty, though, is still an area that needs improvement (83% male / 17% female). Faculty readily point to the Diagnostic Imaging Program as a department that is predominantly women, but the business program remains heavily skewed towards men. Indeed, two of the three most recent hires the visiting team spoke with were men. While increasing gender diversity is an administrative priority, and women are on the short-list for currently advertised positions, the leadership at LU concedes that the competition in the Bay Area for qualified, diverse faculty is intense, and their financial resources would be strained to try to match salaries in a bid to hire someone. When gender balance was raised in meetings with the faculty and the faculty association, attending members recognized the issue and the university goal for gender diversity but seemed unconcerned about the numbers. This continues to be an area LU needs to focus attention in bringing balance to the faculty gender diversity.

ISSUE 9 – CFR 3.2

Faculty and staff policies, practices and evaluation well developed and applied

SAV 1 Team Recommendation:

- *LU should implement a formal recruitment and hiring process to ensure that the faculty and administrative staff hiring processes adhere to their newly adopted policies.*

LU has a very well-designed faculty hiring and evaluation process, and all indications are that it is being fully implemented. The *Policies and Procedures Manual for Selection, Appointment, and Promotion* is a good well-defined framework for hiring. Faculty are evaluated in part on student evaluations of teaching, a peer review, and also on their individualized Faculty Development Plan that is developed in partnership with the administration. Further, the *Faculty Personnel Policies Manual* clearly outlines the requirements for promotion. The administration

is supportive of its part-time faculty, and when a full-time position opens, preference is given to qualified part-time faculty.

In addition to faculty hiring and evaluation, the evaluation of non-faculty administrative appointments (staff) is also clearly outlined. The organization structure provides a good overview of non-faculty appointments, and how each office interacts with others. Staff can transfer between departments or apply for a promotion, and the policy outlining position changes is clear and transparent. There appears to be broad-based input on recruitment and hiring, from the provost to administrative managers and their staff. For example, in meetings with administrative senior staff and individual departments, the team learned that the student services office worked together with the provost and the dean of students when hiring for new positions for career development. Both faculty and staff feel that the administration supports their hiring goals, and even when some offices faced position cuts as a result of budget cuts, the members of those offices believed that the process was fair and equitable.

ISSUE 10 – CFR 3.4

Financial stability, clean audits, sufficient resources; realistic plans for any deficits; integrated budgeting; enrollment management; diversified revenue sources

SAV I Team Recommendation:

- *Given the current dependence of the university on international student revenue and the volatility that exists in this area, the university should seek diversified revenue sources.*

In recent years, LU has faced three significant challenges. The first two issues were beyond the control of the university and the third was the result of inadequate financial oversight: 1) ACICS, the university's accreditors, lost their credentials, 2) US immigration policy toward international student visas greatly curtailed students visas which in 2018 comprised 85 % of LU enrollment, and 3) and U.S. Department of Education required LU to go on Heightened Cash Monitoring (HCM2) due to irregularities in the disbursement of student

Title IV financial aid. Overall, the visiting team found that LU is an institution that weathered these difficult times and bounced back with significant improvements in several key areas of operation particularly related to the WSCUC Standards under consideration.

Lincoln University is a tuition-dependent institution with approximately 90% of its total revenue generated from tuition and fees, with international students representing approximately 85 % of the student body in academic year 2017-2018 (Institutional Research Report 2018). In addition, challenges involving ACICS accreditation have caused confusion and also negatively impacted enrollment. These declines in enrollment and enrollment-related revenue, therefore, have significant impact on the university's long-term financial sustainability. In its efforts to increase diversification and identification of non-tuition-based funding, the university is encouraged to continue to engage in meaningful and realistic strategic planning and accelerated implementation to include:

- *Establishment of a donor development office* to lead the university's fundraising efforts. This will launch a renewed commitment to connect and reconnect with alumni, individuals, foundations, and corporations to generate the support and resources needed to achieve the university's goals.
- *Development of the admissions and enrollment management functions* that prioritize the university's strategy to meet domestic enrollment goals. Leveraging technology resources, the enrollment management plan should include best practices in industry standards, recruiting and tracking applicants.

The university has had clean external audits for the years ending July 31, 2016 through 2018, and in FY 2017-2018 paid off the mortgage on the building in which the university is located. To provide the board and the university with confidence in the financial information and internal controls, the board should review the current auditor's performance and expertise in

higher education. This may include preparation for a comprehensive request for proposal (RFP) that will allow the university to obtain the information needed to decide about the qualifications of the firms and the value they can bring to the university.

Although the university experienced an increase in net assets for the years ended July 31, 2016 through 2018, the university provided internally prepared and unaudited financial results for the year ended July 31, 2019 with unrestricted net assets of \$4.7 million, or loss in total net assets of \$300,000. On the revenue side, tuition and fee revenues decreased \$900,000 or 16%, as compared to the year ended July 31, 2018. On the expense side, total expenses of \$5.3 million for the year ended July 31, 2019 decreased \$700,000 or 12%, as compared to the prior year. The university's balance sheet continues to be solid with cash and cash equivalents of \$1.1 million, with no long-term liabilities. The three-year operating budget projections through FY 2021-2022 project net operating cash surpluses. Achieving these long-term plans will provide more complete evidence that the university can maintain its financial discipline and deliver positive and predictable financial results. Any multi-year financial plans should be inclusive of physical plant and spending plans, cash flow projections, and deferred maintenance of existing capital assets.

As part of the visiting team's review, meetings were held with executive, administrative and faculty leadership, Lincoln University's COO and CFO, and select Board of Trustee members. These interviews indicate that the university continues to pursue strategies to balance its unrestricted operating budget. The team noted that the university has a mid-year budget review process to collaboratively identify offsetting savings in a timely manner. The university's careful and continuous monitoring will be important to ensure that plans are on track and to allow for rapid response to changes or unmet targets.

The university should ensure that its budget and financial management processes and strategies are continuously strengthened to maintain long term financial sustainability. Since unexpected events can happen within all areas of the university's operations, it is best practice to build adequate contingency funds into budget plans and forecasts. To further stabilize its financial situation, the university should continue to refine a process for dissemination of budget and financial information to the campus community.

ISSUE 11 – CFR 3.7

Clear, consistent decision-making structures and processes; priority to sustain institutional capacity and educational effectiveness

SAV I Team Recommendation:

- Lines of authority and decision-making seem unclear among existing staff across functions of academic support, financial planning and management, academic planning, and assessment. LU should work to clarify scope of authority and responsibility across all its staff and administrative positions, highlighting the expertise of its personnel, so that functions related to human resources, facilities, and financial administration are clearly understood.

LU has taken seriously the WSCUC requirement to professionalize and clarify the lines of authority and decision-making, however there are still areas in various stages of development. The greatest progress has been made in the area of academic administration and curricular approval processes. The university has developed new policies for faculty assessment, program review, curricular changes, faculty hiring, and promotion. The co-curricular programs have also developed well-articulated processes for assessing student satisfaction and have an embedded continuous improvement culture.

A benefit of the smaller university is the informality of communication with administrative staff and faculty who are often filling the responsibilities of multiple roles. However, a challenge for smaller institutions is in maintaining clear lines of authority and retaining repositories for official records as well as records of decisions. In addition, without

formal deliberative processes, decisions are sometimes made informally rather than based on a period of due diligence and analysis of underlying data and best practices.

There are still areas throughout the university that could benefit from formalized policies and procedures, but the university has made great progress and responsible faculty and staff acknowledged where deficiencies exist. This is particularly evident where individuals are filling multiple roles. For example, the provost oversees the academic administration of the university but also assists the president in donor development, serves on the board finance committee, and teaches courses, in addition to providing functions that are typically fulfilled by the CFO and business office.

Another area where more clarity is needed is in the human resources and oversight role. There are no human resource professionals on the staff or an office where these functions are centralized. Currently, the personnel functions are shared among the president's office, the CFO, and the COO. The CFO controls salary and benefits, the president's office writes and maintains contracts, and the COO oversees Title IX, is responsible for human resource policies and hiring for the co-curricular, admissions and enrollment, marketing, registrar, and information technology offices.

There are also issues regarding reliability and accuracy of administrative data as a result of technology that is not a fully integrated structure. For example, the university does not have a learning management system (LMS), enterprise resource planning (ERP) system, donor management system, and integrated financial systems. Currently, in some administrative areas personnel maintain their own office records in excel spreadsheets and word documents. These records are siloed and unable to interface with other administrative functions. In order to grow the university, the institution will need to build a technology infrastructure that will serve as an integrated system. When administrative staff were questioned, they stated that currently there

are many mistakes because records are transferred by hand from one system to another and these errors could be nearly eliminated with appropriate higher education technology.

The WSCUC standards emphasize clear, transparent, and data driven decision-making that often require a shift in culture in the smaller university. During this period of transition to WSCUC regional accreditation the review process has highlighted to the LU community their need to formalize and professionalize policies, procedures, committee deliberations, and institutional decision-making. While LU has made significant progress in this area, there is a continued diligence needed until the more formalized processes, particularly in the areas of financial and administrative functions, are fully embedded in the institutional culture.

ISSUE 12 - 3.8

Full-time CEO and full-time CFO; sufficient qualified administrators.

SAV 1 Team Recommendation:

- The CFO position was recently created and the controller was promoted into the position and continues to manage the accounting functions of the university. However, the provost, who also serves as full-time faculty and has a business and finance background, has assumed the core strategic aspects of the CFO role and communicates financial information to the board. The institution should create and hire for a formal CFO position.

As was noted in the SAV 1 report, the executive leadership each wear multiple hats that include both administrative functions and teaching. The wide range of authority and responsibility is very common for a smaller institution. However, as the university grows enrollment, a reevaluation of priorities will be necessary. The university needs to create a hiring plan based on growth metrics as well as a succession planning strategy for key leadership roles.

The SAV 1 report noted that the provost was performing many of “the core strategic aspects of the CFO role and communicates financial information to the board.” The SAV 2 visiting team verified that all indications are the provost is still performing these core CFO functions. Prior to the SAV 1 visit, LU promoted longtime LU Controller to the CFO role in

order to come into compliance with CFR 3.8. When the provost was questioned about this, he indicated that LU leadership has been working on the professional development of the CFO.

Much of the financial operations at the university are archaic and need to be brought up to current standards. This inadequacy of the business staff and operations to support the university was the only concerning deficiency observed by the visiting team. For example, there are no integrated financial systems which would allow administrators to access real time operating and budget information. When the team asked for financial information it often had to be revised, was not available, or the staff was unfamiliar with typical reports used in higher education.

As the university finds its stronger financial footing, it is important that the CFO and business staff transition to a more active engagement with the university's constituencies, including the board of trustees. This includes the CFO's advisor and manager responsibilities in providing fiscal and operating stability to the university. Additionally, the CFO responsibilities should include roles as leader and change facilitator. The CFO should work closely with board committees, including the Financial Audit Committee and Finance Budget and Planning Committee, addressing such issues as budget and strategic planning, and technology investments. Further, the CFO should actively provide knowledge, strategy, and leadership to the selection, implementation, and support of the university's technology needs.

Another area that needs development is admissions and enrollment management. Currently, the university has one enrollment professional and relies on recently hired alumni to interface with the applicants. The university has a well-developed process for using international recruiters in sixty countries where they draw students. However, the political climate in the United States around immigration and student visas has resulted in a sharp decline in applicants. The university has shifted its focus to recruiting domestic students to grow enrollment and offset

the decline in international applications. This is a significant shift in the admissions and enrollment management operations that will require a very different approach to recruitment and managing applications. While the admissions staff recognizes the challenges, it appears that it does not have the capacity to support enrollment management and admissions for the domestic market.

ISSUE 13 - 3.9

Independent governing board with appropriate oversight, including hiring and evaluating CEO

SAV 1 Team Recommendation:

- LU should continue its movement towards greater gender balance in recruiting additional board members. To help address areas for growth, including the implementation of the university's strategic plan, university advancement and appropriate roles of the board subcommittees, the board should continue its self-review and training and further develop its oversight over compliance with policies and effectiveness of ongoing operations

LU has made progress in diversifying the demographic profile of the board as well as expanding the skills and expertise of the members. In many cases the board is following best practices in terms of oversight. For example, the board conducts an evaluation of its own operational effectiveness, it has held board development retreats to study best practices, it has an effective committee structure that is engaged in oversight roles and has performed annual evaluations of the president based on clear expectations.

There are additional areas where the board needs to focus its attention. The board is required to work with the president to address concerns raised during the SAV 2 visit regarding the auditor, business staff, technology planning, and donor development function. These issues were addressed by the visiting team and discussed extensively with the board. The team found the board to be very receptive and engaged in the resolution of any concerns the team identified during the visit.

In the area of fiduciary oversight of the financial health of the university, the board did not have a deep understanding of the issues leading up to US Department of Education placing LU on Heightened Cash Monitoring 2 (HCM2) status. When asked, the board members acknowledged that they did not question the audit firm's inability to uncover the irregularities in the disbursement of financial aid. When this issue was brought to the attention of the board, the members were unanimously and positively responsive to the visiting team's expressed concern and committed to work with the president in correcting the deficiencies.

The visiting team determined that Lincoln University demonstrated compliance with Standard 3 sufficient for **initial accreditation** with the understanding that the Commission makes the final determination regarding compliance.

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

The heart of WSCUC Standard 4 is self-reflection, whether through establishing and maintaining quality assurance practices such as the use of qualitative and quantitative data to make informed decisions related to planning, to determine educational effectiveness, or to gauge and ensure student satisfaction. Lincoln University's stakeholders not only articulate a commitment to quality assurance processes, but have embedded that commitment in day-to-day operations.

ISSUE 14 – CFR 4.1

Quality-assurance processes in place to collect, analyze, and interpret data; track results over time; use comparative data; and make improvements

SAV I Team Recommendation:

- *The practice of assessing and tracking the PLOs and ILOs has not been uniformly adopted. As the institution continues to implement this process, it will be important to determine the extent to which it provides meaningful information on student learning to*

the faculty. Moreover, it will be important in the next review to demonstrate how the assessment data lead to changes that impact student learning.

As noted in its SAV 1 report, the university had begun a systematic approach to quality assurance in the curricular and co-curricular programs. Under the leadership of the Office of Institutional Research (IR), the university began taking part in the development of an ongoing commitment to evidence-based educational excellence. By 2018, IR had established a mature assessment system, which annually seeks evidence of student learning by cycling through one or two outcomes each year, including re-assessing agreed-upon changes that the university's assessment team made based on results from the previous assessment cycle.

The university has been methodically building on the assessment results developing its expertise and innovation. The university has embedded a culture of continuous improvement throughout the student's entire educational experience by bringing together the assessment findings of the curricular and co-curricular programs to create solutions. By way of example, the university's 2018 assessment noted that students had difficulty creating professional reports and in making oral presentations. It should be noted that for the majority of the students English is not their first language. To close the loop on these findings and improve student success, the university provided funds for the library to create a Writing and Speaking Center. Further, the dean of students received funding to develop a training program for students to provide them the tools and knowledge to make effective oral presentations. The institution should be commended for making specific, measurable changes as a result of its core competency assessments.

ISSUE 15 – CFR 4.2

Sufficient institutional research (IR) capacity; data disseminated and incorporated in planning and decision-making; IR effectiveness assessed

SAV I Team Recommendation:

- *A more robust analysis of the data sets could provide the institution with meaningful data that identify areas for improvement and decision points for issues related to student success. In particular, more comprehensive, nationally normed satisfaction surveys for students and employers should provide fruitful information /data for further analysis and a source for comparative analysis. Moreover, further disaggregation of student and faculty data will likely lead to research questions that could improve the institution's understanding of the challenges to student success. A data report is disseminated annually to internal stakeholders. At this point, the IR Office is well positioned to shift from a compliance orientation to continuous self-improvement, converting data to actionable information to better understand the student population and student experience.*

The team reviewed the written materials and reports provided by the university and met with key academic leaders and staff during the site visit. The materials provided to the visiting team included actionable protocol and procedures for the university's curricular and co-curricular assessment efforts, in addition to the detailed and comprehensive *Institutional Research Report 2018*. The Office of Institutional Research is taking a key role in LU's ongoing commitment to evidence-based educational excellence, which involves projects focused on planning and carrying out a continuous assessment cycle.

The university budgeted and hired a full-time analyst to assist the Director of Accreditation Compliance and Quality Assurance (ACQA) and the IR Coordinator in developing assessment rubrics, data collection efforts, and data analysis. The assistant provost facilitates communications between IR and faculty, linking qualitative and quantitative assessment. The institution should be commended for the resources it has committed to IR integrating the production and presentation of data into the analysis of trends in support of institutional decision-making and planning.

ISSUE 16 – CFR 4.3

Commitment to improvement based on data and evidence; systematic assessment of teaching, learning, campus environment; utilization of results

SAV 1 Team Recommendation:

- *The process of assessing and analyzing data based upon PLOs mapped to CLOs and ILOs is at a developmental stage. LU should continue institutionalizing the use of data in assessment of teaching and learning and incorporating an engaged faculty.*

LU has made significant progress in demonstrating its commitment to a culture of continuous improvement. Its assessment infrastructure, in a developmental stage during SAV 1, has been refined and more sustainably implemented. With the hiring of a research analyst to assist the Institutional Research Coordinator, the institution is better placed to analyze the volume of data from program-level assessment that occurs each semester. Additionally, the institution developed an assessment plan and schedule that is structured, coherent, and designed to “close the loop.” LU should be commended for the institutionalization of quality assessment procedures to complement extant policy.

The Faculty Development Plan (FDP) and Faculty Evaluation Template are used by IR to systematically track faculty effectiveness, both in the classroom and in their research fields. The President’s Faculty Grant Awards program was developed in part as a result of the data generated by IR showing that faculty had difficulty participating in professional activities and thereby satisfying components of their FDP. The FDP and faculty evaluations were also used by the administration to develop in-service training courses. For example, the theme for spring 2019 was the flipped classroom. These in-service workshops focused on best practices for constructing a flipped classroom and for generating assessment.

As discussed earlier in this team report, the institution has constructed a well-developed and sustainable assessment infrastructure. The faculty partner with the offices of IR and Accreditation Compliance and Quality Assurance and with the assistant provost’s office to merge quantitative and qualitative assessment practices for both the curriculum and co-

curriculum. An example resulting from the analysis made by IR of formal assessments—both direct and indirect—the institution earmarked funds to develop the Writing and Speaking Center to work with students’ oral and written communication skills. Additionally, the center is offering workshops on critical thinking. Similarly, a partnership between IR and student services staff resulted in the adoption of an in-house early warning system using predictive analytics in order to engage in targeted intervention strategies with struggling students mid-semester.

Though the first implementation of NSSE will be spring 2020, the institution has longitudinal information on student satisfaction, using end-of-term and exit surveys. These reports are all included in the impressive annual report generated by IR. This annual report includes both aggregated and disaggregated data for students, faculty, and staff at LU. The institution is commended for these developments in using data for improvement.

ISSUE 17 – CFR 4.4

Ongoing inquiry into teaching and learning to improve curricula, pedagogy, and assessment

SAV 1 Team Recommendation:

- *The areas requiring the most attention at LU are the continued institutionalization of outcomes assessment and program review processes, faculty involvement in leadership and faculty governance, and faculty engagement in assessment and teaching and learning.*

Since SAV 1, LU has introduced Faculty Learning Communities (FLC). The FLCs promise to be excellent areas for assessment to be more fully integrated into the culture and mission of the institution. In interviews with the faculty they expressed excitement about participating in the FLCs and how this will ultimately benefit students. The FLCs are especially important since part of LU’s mission is the embracing of the teacher-scholar / teacher-administrator model.

Teaching and learning are the center of the mission of the institution and a key element for hiring new faculty. Consequently, the changes implemented since 2018 show that faculty are increasingly part of the larger dialogue about student achievement. Additionally, the institution developed an online faculty portal on its website where faculty can access policies, procedures, manuals, and minutes of various committees such as the assessment committee, the program-review committee, or the co-curricular assessment committee.

ISSUE 18 – CFR 4.7

Anticipating and responding to a changing higher educational environment

SAV I Team Recommendation:

- *A large portion of the faculty is part-time (42%). In addition, six of the part-time faculty have both administrative and teaching responsibilities. These characteristics present challenges for constituting faculty governance committees and for generally maintaining faculty with a commitment to develop the shared governance necessary to support the academic infrastructure of the institution. In addition, many if not most of the faculty, are very senior and in the final phase of their academic careers. While this profile has the advantage of providing Lincoln with remarkably experienced educators, it also suggests the need for a solid succession plan that will ensure the future stability of the university.*

LU is remarkably self-aware of its unique mission as well as the ways in which the current political climate has negatively impacted its commitment to international students and global education. Nevertheless, it continues its global outreach and, as part of its 100-year celebration, has reinforced partnerships with the city of Oakland and established partnerships with the mayor of Emeryville. These partnerships highlight not only the financial connections with surrounding communities, but also the civic connections between Lincoln students, faculty, and staff with the towns and cities of the Bay Area.

Further, administration officials continue to travel abroad highlighting the institution's offerings, and Admissions and Records staff work closely with international students to ensure that appropriate and updated US visa policy is readily available for students. Staff are using new

social media technologies to remain in contact with students while in their countries of origin to provide a support network to ensure safe arrival on campus. The institution is doing an admirable job ensuring student success by responding in real-time to higher education issues outside its control.

Beyond this, the institution is also responding to the increased online and hybrid curricular development within higher education. Though the institution does not have an official CMS, many faculty use Canvas for their courses and faculty, administration, and the governing board all expressed a strong desire to adopt a CMS that fits the specific needs of the institution. Additionally, faculty remain up to date on latest technologies in relation to curricular developments and incorporate those changes into their courses and ultimately their course descriptions. The institution has ensured that the Diagnostic Imaging (DI) Program has state-of-the-art equipment to ensure DI students are employable upon graduation. The Business faculty, too, rely on authentic measures to provide students real-life experiences (such as the GLO-BUS teams discussed earlier in the report).

The faculty are aware they face challenges in both engaging the part-time faculty in the life and governance of the university as well as the aging of the full-time faculty. These issues were addressed by the visiting team with the faculty and academic leadership. Though a sizable percentage of the LU faculty are part-time instructors, the percentage is not atypical for the current trends in higher education. Importantly, part-time faculty are incorporated into the decision-making processes at LU and participate in the shared governance processes that exist, and are given preference when a full-time position opens as aging faculty retire or new positions are created. It was noted by the visiting team that the excellent academic reputation of LU and the opportunity to work with international students from a wide range of countries presents a situation where LU has been successful in recruiting superb faculty.

Finally, the institution has adopted a planning framework intricately connected to the variety of qualitative and quantitative data regarding student success. By using these data, the institution is better able to make informed resource allocation decisions. For example, as a result of direct and indirect assessments, analysis of budget, and forward planning in the ACQA office, the institution recently purchased licenses for use of SPSS Statistical Software to provide more powerful tools at the disposal of students and faculty.

The visiting team determined that Lincoln University demonstrated compliance with Standard 4 sufficient for **initial accreditation** with the understanding that the Commission makes the final determination regarding compliance.

SECTION III. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

The SAV 2 visiting team finds that Lincoln University has responded appropriately and thoroughly to each of the SAV 1 issues raised in the Commission Action Letter on July 20, 2018. The WSCUC SAV 2 team determined that Lincoln University demonstrated compliance with the WSCUC Standards sufficient for **initial accreditation** with the understanding that the Commission makes the final determination regarding compliance.

Findings

In the SAV 1 report, the WSCUC Team raised issues where LU was required to demonstrate more progress for substantial compliance with Standards 2, 3 and 4 and the supporting CFRs. The university has shown significant progress in meeting the CFRs and addressing all of the issues raised in the SAV 1 review.

Standard 2

All CFRs are compliant at a substantial level. The team finds that Lincoln University meets this Standard at a level sufficient for **initial accreditation**. Only the Commission is

authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

Standard 3

Minimal Compliance – 3.8

Initial Accreditation – 3.1, 3.2, 3.4, 3.7, 3.9

The team finds that Lincoln University meets this Standard at a level sufficient for **initial accreditation**. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

Standard 4

All CFRs are compliant at a substantial level. The team finds that Lincoln University meets this Standard at a level sufficient for **initial accreditation**. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

Commendations

1. Lincoln University is commended for reaching the milestone of its 100-year anniversary in 2019. In keeping with its vision as a unique institution, it is marking that celebration with continued and new partnerships with the surrounding community.
2. The institution has made significant improvements with educational effectiveness assessment of student learning, including general education. The concepts of assessment, self-reflection, and continuous improvement are well-embedded in the culture and infused through the curriculum and co-curriculum. Additionally, the institution has developed a collaborative and meaningful relationship between curricular and co-curricular assessment in closing-the-loop to make meaningful changes. An example of this relationship is the development of the Writing and Speaking Center.

3. The institution has constructed an impressive general education program. It articulates a bold vision for students to develop meaningful life skills and passion for lifelong learning while it maintains the spirit of the professional degrees it offers.
4. The faculty are dedicated to the field of teaching, yet remain committed to research, professional, and creative activity, embracing the teacher-scholar model. The institution has developed a formalized faculty development fund to support faculty activities.
5. The institution has significantly improved institutional research capacity through the hiring of a research analyst and the introduction of nationally benchmarked surveys. The ACQA office has integrated the production and presentation of data into the analysis of trends in support of institutional planning
6. The University is to be commended for faculty, staff, and curriculum that addresses the educational needs and challenges of a globally diverse student body.

Recommendations

1. Urgently professionalize the university's business office aligned with the best practices and standards of higher education. This would include improvements in technology, staffing, procedures and operations. With a focus on building a foundation for future growth in enrollment. (CFR 3.7, 3.8, 4.3)
2. Accelerate the operationalization of a donor development office to lead the university's diversification of revenue and financial stabilization efforts. (CFR 3.4, 3.7, 4.5 and 4.7)
3. Develop the admissions and enrollment management functions that prioritizes the university's strategy to meet domestic enrollment goals. The enrollment management plan should include best practices in industry standards and practices in recruiting and tracking applicants. (CFR 3.4)

4. Executive leadership and the board of trustees should immediately follow best practices for undertaking a review of the current auditor's performance and expertise in higher education. The review might include a request for proposal (RFP) from alternative audit firms. (CFR 3.4)
5. Move toward the creation of a centralized human resource staff position with clear lines of responsibility for hiring practices, salary and benefits packages, performance evaluations, and state and federal regulatory compliance. The university should create a staff hiring plan that shifts responsibility from faculty and administrative staff to human resource professionals. (CFR 3.1, 3.2)
6. Create an information technology plan and budget that addresses the technology needs for a student information system, learning management system, integrated financial systems, personnel management systems, course and catalog management systems, etc. (CFR 3.5)
7. Continue to make progress on gender diversity in faculty hiring practices. (CFR 3.1, 3.10)

APPENDICES

- Inventory of Educational Effectiveness Indicators
- Four Federal Compliance Forms

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
	Where is the policy located? <i>Website, Catalog</i>
	Comments:
Process(es)/ periodic review of credit hour	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
	Does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
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:
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? <i>N/A</i>
	What kind of courses (online or hybrid or both)?
	What degree level(s)?
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? <i>N/A</i>
	What kinds of courses?
	What degree level(s)?
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? <i>3</i>
	What kinds of programs were reviewed? <i>on-ground</i>
	What degree level(s)? <i>Gen Ed, BS, MBA</i>
	What discipline(s)? <i>Gen Ed, Diagnostic Imaging, MBA</i>
	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
	Comments:

Review Completed By: *Eunhwi Cho*
 Date: *10/4/19*

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:</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:</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:</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:

Shalme Singh

Date:

10 October 2019

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.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
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? If so, where? <i>web site</i>
	Comments:
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:
	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?
	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:	
Comments:	

*§602-16(1)(1)(ix)

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

Review Completed By:

Date:

[Signature]
10-9-19

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.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy publically available? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where?
	Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

*§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: *Eun-Hwi Cho* 
 Date: *10/4/19*