

REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Thomas Aquinas College
September 26-28, 2017

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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 its Accreditation History

Thomas Aquinas College (TAC) was founded in 1971 as a robustly Catholic institution of higher learning. The mission of TAC is to instruct and develop undergraduate students both morally and intellectually through a Catholic liberal education. TAC was established as an alternative to other faith-based colleges in the Catholic tradition by applying the principles of a “liberal education” to all of its courses of study and, indeed, to all of its co-curricular programs. This aligns with the founders’ belief that all of life is to be understood as cohesive and meaningful and therefore all of TAC’s education would reflect this missional cohesiveness. The result is that TAC is deeply Catholic in its values in order to prepare students for an enriched life of moral and intellectual flourishing, nurturing students in a community that finds its meaning in the grasping of big ideas through great works of philosophy, science, literature and theology. This sets TAC apart from other colleges and universities in the landscape of American higher education and even sets it apart from the majority of those self-identified in one form or another as “Catholic.”

Though the idea of TAC began in the late 1960s, TAC’s educational theory and practice have been understood within the religious academy dating back centuries. The result is a single, lock-step curriculum that is common to all students and focuses on developing students morally and intellectually rather than in specialized areas of study. TAC offers a single degree, a Bachelors of Arts in Liberal Studies. As of 2017, 33 full-time teaching tutors and 5 part-time teaching tutors support 389 undergraduate students (51 percent male and 49 percent female).

TAC was originally granted Candidacy by the WASC Senior College and University Commission (WSCUC) in 1976, and TAC was granted Initial Accreditation in 1980. TAC submitted an Interim Report in 1983. In 1987, accreditation was again affirmed for another three

years. A comprehensive review occurred in 1992, which resulted in an eight-year reaffirmation of accreditation. In 2001, TAC underwent a joint visit from WSCUC and the American Academy for Liberal Education (AALE) which resulted in accreditation from both agencies. Accreditation was again affirmed in 2011 by WSCUC. Since 2011 the college has completed two Interim Reports—one in 2012 and one in 2015—to address specific issues raised by the WSCUC Commission. In May 2015 the college received a favorable report with several recommendations focused on program review and strategic planning.

In preparing for this visit, TAC attended to both program review and strategic planning, and it continued the planning and assessment work it undertook in response to previous WSCUC recommendations. The college's institutional report (IR) provided a comprehensive look at the college and its practices and presented its responses to these recommendations.

Additionally, in the current priorities and plans section (IR, page 5), TAC included a discussion of its strategy for expansion, which was delineated in detail (IR, page 71). Briefly, the college has experienced enrollment interest from more prospective students than it can currently accommodate, and as a result it has explored the option of establishing a second campus to offer more students its unique education. A former preparatory school in Northfield, Massachusetts was identified, and TAC was granted this property by the National Christian Foundation (NFC). Representatives of the college's Board of Governors (board), administration, tutors, staff and student body have visited the campus on several occasions and found it well suited to the purposes of the college. TAC developed a plan for beginning operations on the Northfield campus as early as fall 2018. As work towards the second campus has continued, TAC has been forthcoming with WSCUC to describe the opportunity for expansion and to provide financial details regarding this plan.

B. Description of Team's Review Process

The team reviewed the institutional report and the supporting documents during the Offsite Review, and developed a number of lines of inquiry for the Accreditation Visit. The team was interested in understanding:

- How the institution balances its commitment to the college's Catholic character and mission with its obligation to be responsive to legislative mandates and federal expectations.
- The extent to which the college values diversity of thought in the curriculum and the co-curriculum and how the college is encouraging students to engage with diverse ways of thinking, given the college's clearly stated Catholic worldview.
- How the college demonstrates to external stakeholders the relationship between students' education at the college and a flourishing and full life.
- What is happening outside the classroom to support the development of the whole student
- How tutors are recruited, developed, retained, compensated and promoted.
- The involvement of the governing board in the strategic plan and to what extent the board is using assessment data in its decision-making responsibilities.
- The effect a second campus in Northfield, Massachusetts might have on the Santa Paula campus
- How the college will assure the viability of ongoing significant dependence on philanthropic support.

During the team conference call in August 2017, team members divided the responsibilities for the writing and the inquiry that would be conducted, enabling the members to

explore questions, pursue lines of inquiry and draft preliminary documents to guide the visit. The team discussed the preliminary schedule which included an overview of TAC's plans for the Northfield campus. The team agreed that during the Accreditation Visit it would remain together for most meetings, although separate meetings requiring follow-up or a more focused conversation would be scheduled as needed.

By virtue of its small size, the college was able to engage almost every teaching and administrative tutor in the various activities that contributed to the Accreditation Visit. The team had ample time to meet with a broad cross-section of community members that included senior administrators, deans, tutors, teaching and administrative tutors and students. Meetings with key units included senior staff, Northfield team, admissions and financial aid, legal counsel, business office, teaching and administrative tutors, the library, student affairs, student prefects and alumni. The team also met with members of the board. More focused sessions included exploring the implications of the Massachusetts campus on the Santa Paula campus, the use of assessment data to guide student learning and program review, tutors and staff development, student life and the use of evidence to guide decision-making at all levels of the college, including the board. The team chair presented ten commendations and six recommendations to the president prior to presenting those statements to an assembled group of TAC community members at the exit meeting.

C. Institutions Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence

TAC's institutional report (IR) was clearly written and organized around the nine Components delineated by WSCUC. While the report provided the foundation for the

Accreditation Visit, the onsite interviews and discussion provided the necessary information to answer questions and shape the team's findings.

The team found in the supporting documents well-developed and thorough evidence to support claims made in the report. TAC addressed the issues and concerns raised by the Commission through an institutional culture that grasped and demonstrated the importance of reaffirmation. The team found that TAC's description of the report development process was accurate and that the process included broad participation from campus stakeholders under the leadership of the president, dean and Accreditation Liaison Officer (ALO). These administrators devoted their time, expertise and experience to assure the process was thorough and reflective. The president assumed this role as the college's chief executive officer, the dean as the leader of the academic program and the ALO as the one responsible for mapping the college's own procedures and policies to the accreditation process.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to Previous Commission Actions

In its May 2015 letter, The Commission recommended TAC focus on the following areas for its comprehensive review:

1. Developing course learning outcomes (CLOs) and a curriculum map.
2. Continuing work in the assessment of student learning.
3. Continuing the work of “translating” student learning into the evidence typically expected by external constituents.
4. Articulating how the strategic plan and implementation efforts have advanced the college’s vision for the future.

The team found that TAC has continued to develop its culture of assessment. The dean appointed a subcommittee to develop CLOs for each course (IR, Appendix B1). A curriculum map was developed to illustrate the extent to which courses contributed to the achievement of institutional objectives (IR, page 25). TAC also articulated standards of performance for the skills and competencies expected in a course which then made up a student’s course grade (IR, Appendix B1). TAC continued to develop an assessment rubric for the senior capstone experience which includes a thesis project and a final written examination for the senior theology tutorial (IR, page 43). Finally, with respect to assessment the team also noted that TAC continues to have discussions about how to translate student learning at the college into the kinds of evidence expected by those less familiar with the college.

The team also noted that the strategic plan has been updated (IR, Appendix C) and serves as a living planning document for the college.

B. Component 2: Compliance with the Standards and Federal Requirements

The compliance review has two sections. In the first section, TAC documented its compliance with federal requirements. More complete treatment can be found in the appendices for this report.

The team found that TAC's Inventory of Educational Effectiveness Indicators (IEEI), which was submitted along with the institutional report, provides a comprehensive picture of TAC's quality assurance in both academic and non-academic areas. It aligns with the narrative in the institutional report and clearly articulates strengths and areas for improvement. The team would note that since TAC has only one degree program, the institutional and program level learning outcomes, their publication and their assessment and interpretation are one in the same.

The second section of the compliance review is a self-review organized around the 39 Criteria for Review (CFR) distributed across WSCUC's four Standards of Accreditation. The team found that TAC engaged in the process in such a way as to foster institutional self-reflection. The compliance review process identified five areas that warrant further attention: 1) assessment of student learning, 2) coordination of data gathering, 3) public nature of evidence of student learning, 4) the finalization of plans to accept from NCF the gift of a second campus, and 5) the need to resist threats to the college's religious liberty.

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

WSCUC requires that institutions define their purpose clearly and provide evidence that their educational objectives are aligned with their purpose. As it relates to TAC, the team was interested in the college's clearly stated set of guiding values and whether these values were demonstrably reflected in student learning and alumni outcomes

Furthermore, the team wanted evidence that this purpose at TAC is lived-out in its objectives in such a way that clearly contributes to the betterment of society. Finally, in all of its work the team wanted to see that the college operates with integrity, with transparency and with autonomy.

On institutional purpose, it is clear that TAC is singularly focused in its mission; its mission is concise and well-stated, and its educational objectives are defined and consistent with the college's purpose (CFRs 1.1, 1.2). As stated in its institutional report,

The mission of Thomas Aquinas College was determined before it opened and it has not changed. The college exists to provide a Catholic liberal education to undergraduate students. To understand this mission, it must be understood that "liberal education" is seen as a course of studies desirable for the enrichment of life as a whole, as opposed to instruction in a particular branch of knowledge. Liberal education aims at the acquisition of the fundamental arts and sciences upon which genuine intellectual accomplishment is based. In the judgment of the college, those who are liberally educated have made these arts and sciences their own, so that they can apply them to their intellectual and moral lives. The single aim, then, is to produce free men and women who grasp firmly the principles basic to learning itself.

The mission of TAC is understood by the board, tutors, staff and students. This is commendable. Furthermore, TAC's educational objectives are aligned with its mission and truthfully and clearly represent to the general public its purpose and objectives. These educational outcomes are clear in all materials describing the college, and are widely recognized throughout the college and evidenced in the curriculum (CFRs 1.1, 1.2).

TAC is able to fulfill its educational mission within a framework of academic freedom. As a faith-based and religiously devout college, TAC regards “academic freedom” as an affirmation that tutors at the college are free to share their convictions and responsible conclusions in their teaching and writing. TAC accomplishes its mission to provide Catholic liberal education to undergraduate students by pursuing truth in light of the Catholic faith and by helping students imitate the freedom of spirit achieved by their tutors. This is understood in the Catholic tradition as “faith seeking understanding.” That is, enlightened by faith, TAC tutors and students discover the deeper meaning of all things and especially of their own existence.

Centered on its religious convictions, the institution has demonstrated that it is primarily educational in mission with an overarching purpose as an academic institution with appropriate autonomy and without inappropriate interference from outside bodies. TAC operates with integrity in a truthful representation of its educational purpose and objectives, its curricular sequencing and its timeliness to completion. TAC demonstrates integrity and transparency in its operations as demonstrated by its policies, procedures and sound business practices.

Furthermore, qualified independent auditors regularly qualify its finances. The institution has demonstrated open communication with WSCUC and has taken its review with seriousness and openness to improvement in how it fulfills its unique mission as a Catholic college (CFRs 1.5, 1.6, 1.7, 1.8).

The stated outcomes that should characterize every TAC graduate include four moral virtues and four intellectual virtues. The moral virtues are: love of the intellectual life spawned from wonder about the world, confidence that one can come to know truth about it, humility to recognize the sort of help one needs along the way to wisdom and a love for the common good. The intellectual virtues include an understanding of the distinction of the academic disciplines,

an understanding of the order among the academic disciplines, a grasp of the order seen in the world and the ability to discuss these matters fruitfully and amicably with others. Where more evidence is needed is on assessing how well these outcomes are realized in the life of TAC students and in the life of TAC alumni. Three years after graduation TAC alumni are surveyed (about family, education and career) and every other year a census is taken measuring a) alumni scope of careers, b) alumni who went to grad school, c) alumni who are teachers and d) alumni in religious orders. To assess how well a TAC education prepared students for a flourishing and full life seems to be lacking in evidence except perhaps anecdotal, and even that is not substantive (CFR 1.2).

Given that the college is committed to graduating students who draw on their wisdom, moral strength, ethical thinking and intellectual acumen to serve the common good as great learners and independent thinkers, measurable confirmation is needed that this is indeed the case. It would be in the best interest of the college to be able to balance this internal understanding of objectives with external validation of outcomes. As such, the alumni survey and questionnaire are *helpful* validators but not *substantial* validators. More exploration is needed for TAC to demonstrate and articulate to external stakeholders the relationship between students' education at TAC and their capacity to enjoy a flourishing and full life as alumni, a life that embodies these four moral and four intellectual virtues (CFR 1.2).

Consistent with its purposes and character TAC needs to demonstrate an appropriate response to the increasing diversity in society. The team did not find substantial evidence that, in a context with a fixed curriculum, nearly 60 percent of tutors as TAC graduates and an abiding commitments to a conservative Catholic theology, students are being prepared to engage with a plurality of political, religious, cultural and philosophical views/ideas. For example, the team

did not surface evidence that students are getting outside of themselves by learning empathy for those whose ideas are very different than their own. This may very well be happening, but evidence of this needs to be more quantifiably demonstrated (CFRs 1.4, 1.6).

Additionally the team noticed the lack of representation of women as tutors and administrators compared to the student body demographics. This observation is not intended to be noted as a representational critique (the need for more women to fill a quota), rather it is intended as a missional comment (the need for more women who can mentor and engage with the students, half of whom are women). With women making up approximately half of the student body and given the college's commitment to contribute to the academic and professional success of all its students, the influence of more women tutors and women administrators as mentors and role models would benefit TAC's mission fulfillment (CFRs 1.4, 3.2, 4.7). This comment was also reflected among students who were hopeful that the college would be open to wider searches that may indeed open the college to more tutors who are women, and of course are highly qualified to tutor in this unique educational mission.

TAC has published or has readily available policies on student grievances and complaints, refunds, etc. It does not have a history of adverse findings against it with respect to violation of these policies. Records of student complaints are maintained for a six-year period. The institution clearly defines credit hours and accurately identifies the type and meaning of the credit awarded in its transcripts. The institution's policy on grading and student evaluation is clearly stated and provides opportunity for appeal as needed (CFRs 1.6, 1.7).

Where more work is needed in the coming cycle of evaluation is in TAC's regularly generating, evaluating and making public data about student learning and achievement learning.

Though measures of retention and graduation are available and commendable, more evidence is needed validating student learning outcomes.

The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with this WSCUC Standard.

Standard 2: Achieving Educational Objectives through Core Functions

Teaching and Learning. The TAC curriculum for the Bachelor of Arts in Liberal Studies includes courses sequenced and designed to inculcate the institution's moral and intellectual virtues. TAC students must complete 146 credit hours to complete the degree. Students generally take 18 or more credit hours each semester and over four years complete a breadth of courses in mathematics (28 hours), philosophy (24 hours), language (12 hours), theology (24 hours), natural sciences (28 hours), music (4 hours) and seminar work (24 hours). Additionally, students complete a senior thesis or capstone project (2 hours) (CFR 2.1).

TAC has a curriculum map which illustrates the progression of this education, indicating the specific courses that contribute to the development of each moral and intellectual virtue in a minimal, moderate or significant way.

The syllabus for each course clearly delineates the learning objectives and the integrated nature of the curriculum allowing for the introduction and then reinforcement and application of fundamental concepts and academic competencies across students' four-year experience (CFRs 2.4, 2.6).

Given the nature of its curriculum, TAC has only small classes in which tutors direct discussion rather than lecture students. Students are expected to read and study texts beforehand and arrive to class prepared not only to enter the discussion but also to contribute toward an atmosphere of community. Tutors guide students towards the goal of being practitioners within

disciplines rather than historians of them. Students are encouraged to listen to one another with the goal of being able to distinguish what is agreed upon and what remains an open question, and then they discern why a certain position is being advanced. Tutors work intentionally to make the texts accessible and engaging, guide students in forming habits of mind, help them integrate what they learn in the various disciplines and instill a passion for engagement with truth. The classroom is seen as a common enterprise where all who enter are linked in a common pursuit of the truth and a passion to share it with one another (CFR 2.5).

The quality of the degree is reflected in the curriculum, pedagogy and ongoing development of students through academic and co-curricular involvement. Residential experiences and social activities augment academic lessons to enhance the sense of community and shared purpose. (CFR 2.6).

TAC has devoted considerable attention to program review and has made progress with respect to developing a systematic, college-wide assessment program. The college's institutional objectives are woven into each course at TAC. The extent to which students are meeting those objectives is constantly being evaluated by tutors (CFR 2.7). The college has clearly increased its ability to document and standardize its assessment practices, though it remains a challenge to provide evidence of student learning in ways that translate beyond graduation. The college uses modes of assessment which it finds useful and meaningful, but due to the qualitative and informal nature of its assessment efforts the college still struggles to translate and communicate the success of its students to those outside its culture (CFRs 2.6, 2.7).

Scholarship and Creative Activity. Consistent with its mission, TAC maintains that research and publication are not criteria in the selection or retention of tutors, although it should be noted that the college does host an annual academic conference focused on the work of

Aristotle and Aquinas and publishes *The Aquinas Review*, an annual journal with articles by tutors and other scholars (IR, page 64). Tutors primarily focus their attention on teaching and on becoming proficient in the entire program of study. Tutors are encouraged to develop their understanding of fields outside of their own discipline. In order to facilitate this, TAC has established a five-week summer program in which tutors engage one another in formal courses of study. This allows tutors to learn from those already accomplished in the various fields of study and ultimately allows tutors to teach courses across the entire program, leading to greater integrity and internal consistency of the academic program (CFR 2.8).

Evaluation of tutors rests with the president, dean and elected members of the Instruction Committee (IC). The IC monitors the development and progress of tutors who have not yet received permanent appointment. Due to the small nature of the college, tutor development occurs almost seamlessly through both formal channels and informal mentoring. Evaluations are based on understanding and commitment to the mission of the college and the expectation of success teaching students in and out of the classroom. Reappointments are based on a tutor's ability to inspire students to study and to learn as well as their success in guiding students to situate the issues they encounter within a discipline and the entire program. Reappointments can occur at various intervals during the first few years depending on age and previous teaching experience (CFRs 2.9, 3.2, 3.3).

Student Learning and Success. The college has been working steadfastly to address issues to inform student learning and success around its use of assessment data. Tutors work closely with students, which provides an opportunity for two-way conversations about student achievement. The Don Rags (semiannual, formal and documented meetings between individual students and all tutor members' teaching their courses) provide a documented occasion for tutors

to meet with individual students, hear from one another about student learning and think together with the students on next steps. Surveys of tutors who work with those students provide insight into whether the institutional objectives are being met among seniors. Senior and alumni surveys provide limited evidence that program objectives are being met.

In co-curricular areas the administration, tutors, students and chaplains work together in a federated network of support. Members of this community are provided training and are well-qualified for their roles. In the case of student prefects, they too are ably supported in their leadership roles (CFRs 1.2, 2.10, 2.13).

Tutors are engaged in the development of each individual student and are involved inside and outside the classroom. Each first-year student is assigned an academic advisor who teaches that student in at least one class. The first-year advisor generally helps the student with matters such as class preparation, class participation and time management (CFR 2.12). The nature and order of the curriculum—comprised of the traditional liberal arts, theology and philosophy—is described clearly in the college's *Bulletin of Information* and is available online. Because all students follow the same sequence of courses, academic advising is focused on the students' growth and development. Tutors provide a structured and deliberate presentation of students' strengths, weaknesses and opportunities for growth during the Don Rags process.

Formal dinners occur on a regular basis at tutors' homes and serve to strengthen the bond between students and underscore the relationship between students and tutors. Students indicate invitations to tutors' homes for social events are common, and these are also considered an active part of their co-curricular life (CFRs 2.11, 2.12).

There remains a need to document how TAC measures and communicates the impact of the academic and co-curriculum with those outside of the institution, including the public. The

capacity for data development and analysis would strengthen the culture of evidence, which given the nontraditional nature of the program, is important (CFRs 2.7, 4.1).

The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with this WSCUC Standard.

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

Tutors and Staff. Because of TAC's small size, its limited resources and its commitment to keep student costs low, members of the president's management team and other key administrators are expected to assume multiple responsibilities with little redundancy and only limited backup. Based on its review of curriculum vitae and interviews with the president and his team, the team can say that members of the senior administrative team and other key staff are well qualified and extraordinarily committed to the institution's academic program (CFRs 1.3, 3.1, 3.6, 3.8).

In addition, as part of the plan to integrate each component of the curriculum tutors are expected not only to be well-qualified to teach in their fields of study but also to be prepared to teach in areas with which they are less familiar. To provide newer tutors an opportunity to understand better areas with which they are less familiar, most tutors (as members of the TAC Curriculum Committee) participate in a five-week summer development program to ensure they are more familiar with each discipline in the program and are able to relate effectively one area to another. The team believes administration, tutors and staff are extraordinarily dedicated and committed to the institution and its special mission (CFRs 3.1, 3.3, 3.6).

TAC views the recruitment, hiring and training of qualified tutors among its principal responsibilities and challenges (Institutional Report (IR), page 62). The extraordinary level of

dedication *to* and appreciation *for* TAC's special program required of the tutors makes challenging the process of their recruitment. Because those who have gone through the program as students have that understanding and appreciation of TAC's unique mission, a significant percentage of tutors are TAC graduates, and a limited numbers are non-alumni. Whether this condition provides sufficient diversity among the tutors remains an issue that needs more consideration. (CFR 3.2)

Overall, the student-tutor ratio is less than 11:1. Based on its review of descriptions in the institutional report and of related materials, the team finds that tutors are of sufficient numbers and with appropriate professional qualifications and experience to accomplish the institution's unique educational mission and goals (CFRs 3.1, 3.2, 3.8).

Members of the staff who maintain key operational functions are also committed to the institution's special mission and to its students as well as supportive of TAC's leadership. Those in key positions of responsibility are competent and dedicated to maintaining the college's distinctiveness. (CFRs 3.1, 3.2).

Performance evaluation systems are in place for tutors who have not yet been granted permanent appointment. In their evaluation process, tutors "interact with tutors in a variety of ways, including informal conversations, Don Rags, formal class visits and Curriculum Committee discussions" (IR page 62). The amount of formalized and uniform documentation is unclear.

Tutors do not have the traditional professorial rank common at other colleges and universities. Rather, they are referred to as "tutors" to reflect their role as facilitator of the students' understanding and appreciation of the curriculum. An important outcome of a series of successful tutors' evaluations and renewals is the decision to grant "permanent appointment".

This decision rests with the president with the advice from a committee of permanently appointed tutors (CFR 3.2).

Fiscal, Physical and Information Service. As developed more fully in Component 7 below, the institution's financial resources have been prudently managed (CFR 3.4) TAC has a long series of unqualified financial audits indicating a consistency, transparency and commitment to the wise stewardship of its financial resources. With a small enrollment, relatively low tuition rate and modest endowment, the institution has depended on a generous donor base to maintain quality. Over the past five years, annual fund gifts, grants and bequests have represented approximately 25 percent of its operating revenues (see, Actual vs. Budget Summary Reports, FY 13 through FY 17). This level of donor support is extraordinary, but such heavy reliance on this source—particularly estate gifts—makes the institution more vulnerable to variations in donor support (CFR 3.1).

In addition, TAC has had success in improved student recruitment, student retention and graduation rates (See Appendix A.5). This solid enrollment management effort has enabled the institution to continue its high quality program as well as support its well-maintained physical plant. TAC has plans for relatively modest expansions and improvements to its Santa Paula campus physical plant, while understandably focusing more now on the substantial facility requirements of the Northfield campus. Overall, the physical plant in Santa Paula has an adequate array of spaces for the college's various curricular, co-curricular and extracurricular functions (CFR 3.5).

TAC has had a solid record of financial management over its 45-year history. TAC, however, has experienced deficit budgets in three of the past five years. The institution has a board-designated reserve fund to handle such situations. Although the net assets of the institution

at the end of FY2016 were approximately \$300,000 less than at the end of FY2015, they were over \$10 million more than the end of FY2013. While there are concerns on campus and with the team, that TAC's plans for the establishment of a new campus may adversely affect TAC's financial status, its record of prudent management gives confidence that such effects will be handled with fiscal responsibility (CFR 3.4).

TAC and the team have noted some concern that most unrestricted estate gifts have recently been used to meet operating budget requirements when they would be better directed to the endowment (Standard 3.4 comment, WSCUC Standards Worksheet) (CFR 3.4). TAC and the team also noted concern that the second campus will "challenge the college's historic financial stability" (Standard 3.4 comment, WSCUC Standards Worksheet). TAC has presented a comprehensive five-year strategic plan describing additional improvements on the Santa Paula campus while undertaking the considerable additional challenge of raising funds to meet legal and operational obligations associated with the establishment, preparation and implementation of the Northfield campus (IR, pages 159-206). These considerations are more fully discussed in Sections 7 and 8 below (CFR 3.4).

Because it is not a research institution and does not require research and publication by its teaching tutors, TAC has made the decision to maintain the library and other information resources at a level less robust than might be otherwise expected (IR, page 35). While this decision may be consistent with the institution's academic objectives and program, TAC should continually broaden student and tutor access to such resources as technology to make its availability greater and its costs less (CFR 3.5).

Organizational Structures and Decision-Making Process. Based on its review of TAC's organizational chart, relevant curriculum vitae, and interviews with the president, dean, and

senior staff, the team determined that the organizational structure of TAC and its management team (Institutional Report, Appendix A.5) is effective and consistent with appropriate responsibility and accountability (CFR 3.5). The decision processes are clear and support effective decision-making (CFR 3.7). The Chief Executive Officer (CEO) and Chief Financial Officer (CFO) are experienced, well-qualified and committed to TAC's success (CFRs 3.6, 3.8).

Based on a thorough review of the bylaws and material about board members provided by the college, the team concluded that TAC has an independent governing board with clearly defined and appropriate authority to meet its legal and fiduciary responsibilities including oversight of the institution's operations including the hiring and evaluation of the CEO. In addition, members of the Board of Governors represent a sufficiently diverse set of skills and backgrounds to provide effective oversight over the president and the institution's operations. Except for two current members who were among seven founding board members specifically named in the bylaws in 1971 as having "indefinite" terms and the president, who is appointed for a six-year term, members of the Board of Governors hold three-year terms with no limit on the number of terms they may serve (Bylaws, Article 3) (CFR 3.9).

TAC's founders believed it was so important that the president understand the institution's unique educational program and its unique demands on its tutors, the institution's bylaws require the president to be named from the ranks of current, Roman Catholic permanently appointed tutors, after advice from the Tutors Review Committee (Bylaws, Article IV, sec. 2). Whether this limiting condition provides an undue impediment to the board's exercise of this important responsibility may be an issue. This may be particularly true with the increasing pressures on higher education (and other sectors of the non-profit community) for greater accountability, including a rapidly changing legal and regulatory environment (CFRs 3.8, 3.9).

In addition to the president, members of the Board of Governors from within the college include the dean, the vice president for finance and administration and the vice president of development. There is also provision for teaching tutors to be represented on the board. With the increasing attention and expectations on executive oversight and control by governing boards, there is concern that placing so many of the management team on the board may result in a conflict of interest, confusing the well-functioning partnership among the board, the executive team and the tutors (CFR 3.9).

The governing board's missional fidelity to the college is commendable. As TAC continues to use assessment data in its decision-making, it is recommended that engagement with results of the assessment of teaching and learning be a serious undertaking of the board to inform its decision-making. It is further recommended that in light of the campus expansion, the board fiduciary role and the increasing governance challenges of nonprofit organizations, the board chair in consultation with the president consider board education sessions--using external counsel--based on best practices for higher education governing boards (CFRs 4.3, 4.5-4.7).

A review of the tutors' handbook confirms that the tutors, although different in many ways from typical institutions, exercise effective academic leadership consistent with the institution's purposes (CFR 3.10). The absence of academic departments organized around each "major" discipline and the expectation for all tutors to "tutor" in fields outside their primary area of study create an unusual but effective structure. The institution's leadership views the tasks of recruiting, hiring and developing tutors who understand and are committed to its special model to be of vital importance. Over time, this has resulted in approximately two-thirds of the tutors' being alumni of the institution (CFR 3.10).

The team's finding, which is subject to the Commission's review, is that the institution has demonstrated sufficient evidence of compliance with the Standard.

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

Thomas Aquinas College uses a variety of means to assess student learning in its single degree program. Direct measures of student learning include Don Rags (semiannual formal and documented meetings between individual students and all tutors teaching their courses), embedded questions in capstone course exams and the evaluated defense of senior theses or capstone projects. Indirect measures include student satisfaction reports (oral and written), alumni satisfaction surveys, alumni outcomes census reports and employer feedback (CFR 4.1). The Curriculum Committee (CC) comprises all 38 teaching tutors, including the president and dean and it is the primary body through which evidence of student learning is evaluated (CFR 2.4). Each summer the CC spends five weeks to review and revise the curriculum and consider assessment results as one factor guiding improvements to the program (CFRs 2.4, 4.1, 4.3, 4.4). Ad-hoc subcommittees are formed periodically to investigate more specific aspects of student learning in the curriculum such as writing or quantitative skills. Recommendations from the CC and its subcommittees are submitted to the dean and Instruction Committee (IC) based upon interpretation of evidence. The IC includes the president and dean as well as six elected members of the tutors with permanent appointments. That group evaluates the recommendations of the CC and authorizes action. Once implemented, the action is re-evaluated for impact and effectiveness by the CC, generally between two and three years (CFRs 4.1, 4.3, 4.4).

Although every summer the college conducts rigorous and prolonged inquiry with its full tutors into teaching and learning to improve curricula, pedagogy and assessment (CFRs 4.4, 4.5),

it is less clear whether the assessment of institutional effectiveness is shared with multiple constituents, including students and the board. Reflecting with stakeholders such as these may provide additional clarity and direction in strategic planning and the prioritization of key initiatives (CFR 4.6). The systematic collection and dissemination of data across offices and among external TAC stakeholders is structurally limited by the lack of a dedicated capacity for institutional research (CFR 4.2). Additional institutional research capacity, e.g. dedicating a staff position for institutional research, would allow the college more nimbly to anticipate and respond to current and future institutional challenges and opportunities in our changing higher education landscape (CFR 4.7). The ability to collect and readily report data ranging from enrollment trends to assessment outcomes to alumni placement will enhance the college's articulation of its impact and the important role TAC plays in graduating well-educated citizens.

The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with the Standard.

While the team has found that TAC has demonstrated sufficient evidence of compliance with all four Standards, final determination of compliance with the Standards rests with the Commission.

C. Component 3: Degree Programs: Meaning, Quality and Integrity of Degrees

A Thomas Aquinas College degree is deeply rooted in the Catholic tradition and signifies the completion of a single, integrated four-year curriculum that relies nearly exclusively on the biblical text and on great texts of western civilization. In small intimate courses, highly qualified tutors engage students in a breadth of fundamental academic disciplines including philosophy, mathematics, natural sciences, language, politics, theology, music and literature. The program of

study is coherent and sequenced intentionally to build from fundamental skills and principle knowledge to more complex concepts and higher-level thinking. Indeed, the order of the curriculum is thought to reflect the Catholic understanding of the order between the natural world and the supernatural. The tutors endeavor to instill four moral and four intellectual virtues deemed necessary to the ongoing pursuit of wisdom and a fruitful, meaningful life (CFR 1.1). Students develop a love of the intellectual life, confidence in their ability to pursue knowledge of truth, humility in seeking wisdom from others including the great thinkers of the past and a love for the common good (CFR 1.2). Discussion based courses demand a high level of preparation and empower students to take primary ownership of their education. Through guided discourse, the students cultivate habits of intellectual inquiry and develop an understanding of the distinction of disciplines, while recognizing the order and unity of those disciplines. They likewise come to grasp the order seen in the world as a whole and learn to communicate effectively in the continual pursuit of wisdom (CFR 1.2).

The academic program is demanding. Students are selected for admission to the college only if they exhibit a deep-seated commitment to rigorous study and Catholic character. All students follow the same sequence of courses and must meet the standards of achievement spelled out in the *Bulletin of Information* in each course to advance to the next (CFRs 2.2, 2.3). The tutors are responsible for establishing and assessing those standards and do so in consultation with the college's Curriculum Committee, Instruction Committee and in collegial working groups of tutors who are teaching in the same discipline at a given time (CFR 2.4). The quality of the degree is reflected in the curriculum, pedagogy and ongoing development of students through academic and co-curricular involvement. Residential experiences and social activities augment academic lessons to enhance the sense of community and shared purpose.

TAC holds that the conferral of a Bachelor of Arts degree in Liberal Arts denotes the satisfactory completion of each element of the program and signifies the graduate's competence as an intellectual, moral person who is prepared to engage in virtuous, life-long learning (CFR 2.6); the college would benefit from evidence that its graduates are, in fact, leading lives of virtue and ongoing learning.

The TAC teaching and administrative tutors are committed to ensuring the integrity of a TAC degree. Each summer over a five-week period the tutors consider the effectiveness of the academic program and discuss potential changes. These conversations are informed, in part, by assessment results and often result in refinements to pedagogical practices or the curriculum (CFRs 2.7, 4.3). The tutors are receptive to the appraisal of colleagues and are wholly invested in the educational experiences of students.

D. Component 4: Educational Quality: Student Learning, Core Competencies and Standards of Performance at Graduation

As mentioned previously, TAC has a curriculum map which illustrates the progression of this education, indicating the specific courses that contribute to the development the eight virtues in a minimal, moderate or significant way. In addition to verifying that the curriculum supports the institution's mission and learning objectives, the integrated nature of the curriculum allows for the introduction and reinforcement of fundamental concepts and academic competencies across the students' entire experience. Each course requires critical thinking skills, calling upon students to apply clear, reasoned, reflective and evidence-based thinking as they consider the complexities of a text. Students likewise develop written and oral communication skills in every class, as each requires the synthesis and articulation of analytic thought. Tutors model modes of

debate and discourse, and they are active participants in classroom discussions encouraging students to grapple with multiple perspectives and to communicate their positions with clarity and focus. A writing preceptorial is available for students who, through a diagnostic essay assessment, are determined to need additional support in various elements of writing (CFRs 2.10, 2.13).

Quantitative reasoning skills are developed principally through a series of difficult mathematics courses, focused less on the application of algorithms and more on the conceptual understanding of mathematical theory, including the original work of scholars such as Euclid, Descartes, Newton and Maxwell. To be admitted to the college students must have successfully completed an intermediate level algebra course. Students are also required to pass an “algebra enabling exam” before the start of their junior year to ensure they are prepared for the advanced elements of the junior and senior year math curricula. Students who fail the assessment may opt into an algebra preceptorial to strengthen their skills (CFRs 2.10, 2.13). They are not permitted to enroll in a junior mathematics course until they have surpassed a required standard (CFR 2.6).

The aforementioned core competencies are evaluated using a range of direct assessments including Don Rags, the algebra enabling exam, writing diagnostic essay, embedded questions in capstone course exams and thesis rubrics and the evaluated oral defense of senior theses or capstone projects. Students who fail to meet the expectations of the tutors are not permitted to progress to the next course (CFRs 2.4, 2.6, 4.3). Students thus take seriously their obligation to prepare well for classes and assessments, especially the Don Rags. Periodic program review systematizes reflection on the academic program in light of student achievement data (CFR 2.7).

The fifth core competency (information literacy) is de-emphasized at TAC at least until the senior year. Distinct from other models of education that require students to identify, research

and evaluate information from a variety of sources, the TAC model encourages students to engage directly with primary texts and avoid influences of other authors' perspectives. When writing the senior thesis, however, students often include research elements and are able to access many volumes from the college's library. Senior theses are assessed using institutional rubrics, but information literacy is not prominent among the measured items. TAC may see improved quality among senior theses if there are concerted efforts to train students in the use of the library. This may enable advanced-level students to more ably fulfill WSCUC's expectations that students be able to recognize when information is needed and have the ability to locate, access, evaluate and use that needed information ethically and legally (CFR 2.2a).

E. Component 5: Student Success: Student Learning, Retention and Graduation

TAC is clearly committed to the success of the students it admits. There exists an ethos of individual and personal attention to students. The college conducts regular meetings between students and tutors that allow tutors to gain a clear picture of student needs at an individual level and provide students with a picture of their learning from all of their tutors. Because students are encouraged to provide feedback regarding their learning in this process, this process not only helps students self-reflect on their learning and prepare to take the next intellectual steps, it also helps tutors to understand and implement curricular changes or improvements at the course and class year levels (CFRs 4.1,4.3,4.4).

Before discussing retention and degree completion, several important caveats should be acknowledged. First, TAC has relatively strict conditions for remaining enrolled. If a student accrues too many absences in a given course, fails to maintain a 2.0 GPA, or is found in violation of rules of residence, he or she may be dismissed from the program. Because TAC does not

accept transfer students (if students wish to transfer to TAC, they must start over as a first year at TAC), the loss of students is not “made up” with transfer students. TAC, however, has a relatively generous policy regarding returning to the college such that if students can demonstrate that they understand their infraction and are ready to engage with the program as it is delivered, TAC will allow them to re-enroll. Second, TAC has a very small undergraduate population (389 students) and so sample size is an important consideration. The loss of a few students can cause great fluctuation in both retention and graduation rates.

TAC has maintained retention rates disaggregated by class year and gender since its founding (IR, appendix A5, page 105). TAC tracks retention by class year to be able to project enrollments for tutor hiring and track by gender to project housing requirements. It is important here to note that the college method of calculating retention rates for its own enrollment projection takes into account students who have previously left the college and returned into a different class. This explains the 102 percent retention rate of freshman to sophomore male retention as shown in Table A-4 on page 99 of the institutional report. In the fall of that year, all the males that matriculated were retained, and 3 males who had withdrawn the previous year re-enrolled into the freshman class. This is a nontraditional method of calculating retention rates but makes sense for the institution. Historical year-to-year retention rates show positive trends for all three class years (freshman to sophomore, sophomore to junior and junior to senior) and are in the high 90 percent range (IR, page 99) (CFRs 1.2, 2.10, 2.7).

Even given the high retention rates, TAC has been able to identify trends that help them understand student success. If students complete their junior year, they are likely to go on to graduate, and retention rates for women are consistently slightly higher than those of men.

Graduation rates are also quite high (IR, Appendix A5, page 101). TAC keeps average graduation rates over the same intervals. Over the past ten years, the college has a four-year graduation rate of 76 percent. Women graduate at a slightly higher rate than men (78 percent and 73 percent, respectively). As was the case with retention rates, graduation rates are steadily increasing over time, suggesting the college is admitting students who can succeed at the program and supporting them while they are enrolled at TAC (CFRs 2.10, 4.7).

TAC has completed WSCUC's Graduation Rate Dashboard since 2015 (IR, page 105) which estimates the institution's absolute graduation rate over time using six data points which accounts for all graduates, regardless of when students matriculate or how they enroll. While the WSCUC method of calculating graduation rates allows for comparison with other institutions, it is also a more inclusive metric than traditional measures that only use first-time, full-time students. TAC is unlikely to benefit from this more inclusive measure, as it only enrolls full-time students who graduate in four years. The eight-year average of absolute graduation rates is 69 percent.

The college has taken to heart the WSCUC recommendation to “translate student learning at Thomas Aquinas College into evidence typically expected by external constituencies.” Most notably, the dean and ALO have worked out a series of smaller assessment projects and ordered them into a schedule of assessment activities that is predictable and sustainable. These projects will serve to provide tutors with concrete information about the nature of learning in their classrooms. TAC has been able to accomplish this in a way that remains true to their culture and mission and retains the central role of the tutors in setting and maintaining academic standards of success (CFRs 2.4, 2.5, 2.10). Given the importance of this assessment work in identifying and supporting students, as well as facilitating an ongoing inquiry into teaching and learning to

improve the curriculum, it is critical that the institutional research function be robust enough to handle the demands created by such evidence-based assessment projects. It's not enough to plan and monitor assessment projects, institutional research has a role to play in the dissemination, discussion and in making sure that results are incorporated into decision-making at all levels of the college (CFR 4.2).

F. Component 6: Quality Assurance and Improvement: Program Review, Assessment, Use of Data and Evidence

Thomas Aquinas College takes seriously its obligation to ensure a high-quality academic program that is supported by talented tutors and administrators. Since 2014, the college has worked to demonstrate that quality assurance efforts are systematic and college-wide. Ongoing direct assessment measures gauge student learning within TAC's institutional objectives as well as the WSCUC core competencies. These learning objectives are clearly delineated in course syllabi and are assessed accordingly. Methods include Don Rags, the algebra enabling exam, a writing diagnostic essay, embedded questions in capstone course exams, thesis rubrics and the evaluated oral defense of senior theses or capstone projects.

TAC tutors participate in summer meetings of the Curriculum Committee, a five-week period in which tutors discuss the merits of the academic program, review assessment data and consider the totality of the TAC student experience (CFR 2.4). In recent years, the work of the Curriculum Committee has resulted in improvements to the curriculum and to processes that support student learning. Examples include revision to the senior thesis program which now requires that students submit drafts at an earlier date for feedback and an opportunity to refine their research and writing; revisions to the junior and senior mathematics manuals as well as

development of a four-year curriculum map with clear course objectives that align with course syllabi (CFRs 2.6, 4.1, 4.3).

Student and alumni satisfaction surveys supplement the direct assessment data and contribute rudimentary information to the college's overall understanding of students' educational experiences. The dean solicits feedback related to the curriculum, classroom environment and student life. This information is reviewed by the teaching and administrative tutors and when considered appropriate, revisions to practice are implemented (CFRs 2.10, 4.5).

The quality of the tutors is of critical importance at TAC. Tutors are expected to continually challenge their own understanding of the curriculum as active learners and facilitators of learning. The tutors benefit from professional development opportunities, especially during the summer, as they take mini-courses from one another, shadow experienced tutors in new areas of the curriculum and teach in the high school summer program. Tutors are committed to maximizing the impact of their pedagogical approach, and they participate regularly in occasions to learn from one another (CFR 4.4).

Thomas Aquinas College has been responsive to the recommendation of WSCUC that it enrich information gleaned from ongoing internal review with periodic external program reviews that would provide objective insight related to the program's viability and sustainability, strengths and room for improvement. External program review also contributes to an institution's understanding of its place and value in the broader higher education environment (CFR 4.7). In 2014, the institution's first external program review was commissioned, with a particular emphasis on assessment practices. The reviewer praised TAC's efforts to self-assess the quality of its program but noted deficiencies in the college's articulation of assessment efforts and student achievement data to external stakeholders (CFR 2.7). Indeed, during the Accreditation

Visit, it became evident that the college would benefit greatly from additional resources in institutional research capacity to systematize the gathering, dissemination and incorporation of data in decision-making (CFR 4.2).

This may prove particularly important as TAC adds the Northfield campus. Ultimately intended to double TAC's current enrollment, the Northfield expansion may result in an excessive burden on existing administrative tutors to track student achievement data in meaningful and useful ways. Similarly, the ambitious academic, financial and development goals of TAC's five-year strategic plan will require monitoring and revision that should be informed by clear and consistent data (CFR 4.6). Enhanced institutional research capacities will help actuate the strategic vision of the college, as decision-makers can reflect more readily on information related to everything from enrollment and financial aid projections to data about whether students have adequate support structures in place to thrive. These sorts of quality assurance efforts for both campuses are critical.

G. Component 7: Sustainability: Financial Viability, Preparing for the Changing Higher Education Environment

A key aspect of the reaffirmation of accreditation review is the demonstration by the institution that its operations will remain financially sustainable over the next six to ten years. This is especially important when the institution is challenged by a small enrollment and modest endowment (CFR 3.4).

Since its founding, TAC has reason to be proud of what it has accomplished and become. Over this time, while building this small faith-based institution into a high quality, mission-focused institution, TAC has carefully managed its financial, physical and human resources to

become a nationally recognized, well-regarded institution of higher education. With an unswerving dedication to its special mission, TAC has earned a generous group of donors who have gladly underwritten the operations to enable the institution to keep its tuition low, its facilities well maintained and its educational program highly personalized for its small, and—because of Northfield—growing student body (CFRs 1.2, 3.4, 4.1).

By the end of fiscal year 2016 (the last fiscal year for which an audited financial statement is available), the institution had total assets of approximately \$85 million, liabilities of approximately \$10 million (including \$7 million of long term debt) and net assets of approximately \$75 million. This asset base includes a well-managed endowment of approximately \$20 million (CFR 3.4).

On the other hand, these same audited financial statements as well as the “budget vs. actual” reports provided by the institution reveal an institution that fully utilizes the resources it has available. With the challenges of the new campus, the team has some concern about maintaining the institution’s financial stability and strength it has enjoyed in the past. According to TAC’s most recent annual budget summaries, it posted budget deficits in three of the last five years (see, “Actual vs. Budget Summary Reports, FY 13, FY 14, FY 15, FY 16 and FY 17). The institution does not have an accumulated deficit (CFR 3.4).

During these same recent five years, TAC’s operating expenditures have increased 2.3 percent per year. Expenditures other than operations and maintenance increased only 1.6 percent per year during this time. These rates of annual expenditure increases over the most recent five years corresponds to the prudent 2 percent annual inflation assumption used in TAC’s financial plan for the next five years. The team is concerned that the unknown demands on the institution’s human and financial resources which are associated with the implementation of the

plan for the new campus—as well as the demands this places on the institution’s generous donor base—will place additional stress on overall operations and make difficult continued steady improvement (See, IR page 181) (CFR 3.4).

TAC has enjoyed remarkable support from donors to its annual fund with such gifts accounting for nearly 25 percent of total operating revenue during the past five years. The annual budget, however, appears to be developed by first estimating projected non-gift revenues and necessary expenses and then determining “total gifts required” to achieve a balanced budget. According to the actual budget reports, a large swing in the amount of gift income (30 percent increase from FY2014 to FY2015; 39 percent decline from FY 15 to FY 16; 35 percent increase from FY 16 to FY 17) has accounted for its annual fund being questionably sustainable. This variability and the prospect of increased dependency on the ability and willingness of donors to provide such support appears to be a vulnerability (CFRs 3.4, 3.7, 4.6).

Income from its oil holdings has shown marked reductions in the last five years contributing to the budget growth and stability. After setting its endowment spending at 4.5 percent of its three-year average endowment balance in 2009, the institution raised its endowment spending rate to 5 percent to provide more income for the annual budget, but that slows the growth of the endowment as well as a decline in income from oil holdings that contribute to its annual revenue. Given the near-term challenges of the annual budget in consideration of the branch campus, this appears to be a wise decision (CFRs 3.4, 3.7, 4.6).

Overall, the institution has managed its assets with care and prudence. Debt has been kept low, and available resources are allocated in ways to best advance its special mission, (CFRs 3.4, 4.6). There are several concerns, raised by the recent record of multiple deficit budgets, increases in endowment spending, dependence on and variability of donations to balance the budget and

the application of some unrestricted estate gifts to current fund purposes rather than the preferred inclusion in the endowment for future strength and growth. While the institution has had a long, well-earned record of financial stability, the record indicates greater financial fragility (CFRs 3.4, 3.7, 4.6).

Preparing for the Changing Higher Education Environment. Thomas Aquinas College has done a commendable job providing an educational program that is highly regarded by several college ranking organizations. It is particularly remarkable that it has received these recognitions with a program that serves fewer than 400 FTE students. The dedication and commitment by tutors, staff and administration to maintain the special nature and rigor of TAC's program is apparent (CFRs 4.1, 4.3).

The institution has worked hard to recruit and develop a very special cadre of tutors willing and able to work in this special program. Unlike most institutions of higher education where a tutor is assigned to teach in his or her field of expertise, Thomas Aquinas expects tutors to teach in a range of subjects outside their field of study. It does not organize its tutors into departments based on those fields of study. The institution has also endeavored to recruitment sufficient numbers of these dedicated tutors to provide adequate and personalized support for students (CFRs 3.1, 3.2).

While many institutions are investing in ways to improve tutors, staff and student use of technology to expand inquiry and access, Thomas Aquinas College has not emphasized library and other information resources. This, in part, is because of its policy not to include tutor research and publication from its criteria for tutor evaluation (CFRs 2.8, 3.5, 4.3).

Overall, the college has an adequate foundation of financial assets and an extraordinarily dedicated administration, tutors and staff who have earned positive recognition for the institution

for its highly focused and successful program (CFR 3.4). Even without the challenges of establishing a new campus in Massachusetts, the institution will face challenges of resources and continuity. With the challenges created by its five-year strategic plan for the creation of a new campus, the capacity of TAC will be tested (CFRs 3.4, 3.7, 3.9).

H. Component 8: Institution Specific Theme: Expansion: An Off-Campus Location in Massachusetts

For a number of years, the institution has considered expanding to offer its program to more students. Recognizing the value of its educational program and seeing the growth in the number of prospective students, the institution concluded that it should take advantage of a special opportunity to take possession of a significant portion of the former Mount Hermon School in Northfield, Massachusetts, to establish an off-campus location. In June 2017, the gift from the National Christian Foundation (NCF) of a significant portion of that campus to Thomas Aquinas College was completed (CFRs 3.5, 4.3, 4.6, 4.7).

In planning for this reaffirmation of accreditation review by WSCUC, TAC asked that its proposed establishment of an off-campus location in Northfield be included in the scope of that review as an “institution-specific theme” under optional Component 8. In its institutional report submitted to WSCUC in January 2017, the college provided an extensive multi-year academic, fiscal and development plan for the establishment and maturing of the Northfield campus (See, IR pages 159 – 206) (CFRs 3.1, 3.4, 4.3, 4.7).

Since submitting its institutional report the institution proceeded aggressively on this plan. To ensure all interested stakeholders are aware of developments with this initiative, TAC established and maintains a website providing up-to-date information (CFRs 1.5, 1.8, 4.5). The

college has also indicated that it would be working to acquire the necessary government and regulatory approvals to operate a second campus in a different state. Such approvals will include a separate substantive change review by WSCUC, the Board of Higher Education to operate the institution within Massachusetts and the US Department of Education (USED) to qualify for Title IV federal funding (CFRs 3.6, 4.6, 4.7).

Even though TAC is proceeding with implementation of this plan, this team will not comment on the wisdom of the initiative or the quality of the strategic plan for the new campus. Rather, the scope of this review—has been limited to the projected impact of the off-campus site proposal on the operations at the Santa Paula campus now and into the future.

Background. On November 12, 2016, the college’s Board of Governors approved the acceptance of the gift from the National Christian Foundation. The board directed that the administrative team negotiate final agreement “including a provision that if Thomas Aquinas College is unable to secure all necessary governmental permits to operate on the Northfield campus.” NCF would accept the transfer deed from TAC for the campus (minutes of November 12, 1026 Board meeting) (CFRs 3.7, 3.9).

On December 30, 2016, Thomas Aquinas College entered into a “Preliminary Grant Agreement” with NCF laying out the preliminary terms of the transfer. Included in that agreement is the understanding that NCF would assist the college with fundraising required for the costs of making necessary improvements to the campus and its facilities, including to donate up to \$5 million to match funds raised by TAC over five years (CFRs 3.4, 3.9).

On March 8, 2017, the TAC president announced members of a five-person advance team, including a highly experienced tutor as “associate dean,” three other tutors and a member of the admission office to initiate the on-site organization of the Northfield campus (CFR 4.6).

On May 2, 2017, TAC accepted title of the property from NCF and held a signing ceremony on the Northfield campus by the presidents of TAC and NCF.

Two months later, TAC held a reception on the Northfield campus to celebrate the beginning of this initiative. Over 300 persons were in attendance including many TAC alumni, tutors, staff, administrators and board members.

Strategic Plan for the Off-Campus Site. TAC has since presented a thorough five-year strategic plan for the college organized in three parts: the Academic Plan, the Financial Plan and the Development Plan (IR, Appendix C). Each of these three components includes a “supplement” for the Northfield campus to be fully operational by 2022. The organization and presentation of the plan was comprehensive and helpful in understanding the planning goals for each campus and their likely linkage (CFRs 3.4, 4.6).

The establishment of a second campus, comparable in size *to* and 3,000 miles *from* the main campus, is bound to be complicated. Many diverse components must succeed to ensure overall success. Based on its review of the institution’s five-year plan, the following planning goals for the Santa Paula campus are most likely to be affected by the second campus initiative:

- Tutors: The institutional report notes it is “inevitable that sending qualified tutors to Northfield will, at least for a time have negative impact on the Santa Paula campus” (IR, page 73). Some experienced tutors have already been assigned from the Santa Paula campus to Northfield and more are expected over the next five years. These assignments will reduce the experience within the Santa Paula campus’ current tutors (CFRs 3.1, 3.4, 3.5).
- Recruitment: Currently, approximately one-third of the TAC students come from east of the Mississippi River (IR Appendix, page 172). There is concern that the creation of a

similar program in New England will adversely affect the quality and numbers of admitted students required to maintain TAC's current academic profile and financial success (CFRs 2.10, 3.1, 3.4, 3.5).

- Financial and physical resources: The consolidated budget for the two campuses presumes the extra cost in the first year (2017) to be approximately \$1.5 million with about one-half of that amount assigned to each campus and made up with by new gifts. In addition, the Grant Agreement for the Northfield campus gift requires the institution to raise new matching funds of \$5 million to match a comparable gift from NCF over five years. These funds—of which 80 percent are committed—are necessary to complete the significant facility improvements required on the Northfield campus (CFRs 2.10, 3.4, 3.5).
- Donor base: The institution recognizes the need to increase its donor base as part of its plan for renovating and opening the new campus. (IR, page 196) Whether current donors (especially those from the East) and the resources they have donated in the past for the Santa Paula campus would continue is an issue of concern (CFRs 3.4, 4.6).
- Annual funds support for Santa Paula campus. In its five-year plan, the institution has identified the need for annual fund gifts to continue to at least \$5.5 million per year for the Santa Paula campus (IR, page 200) For the Santa Paula campus to continue to be successful, the annual funds of this level is necessary above the other fund-raising needs for the start-up and operation of the new campus. Between \$15 and \$19 million is needed to complete the first stage (through 2022) of the Northfield campus' renovation and renewal (AR page 202). Raising this much money for the operation of the new campus is

likely to have an adverse impact on the Santa Paula development efforts (CFRs 2.10, 3.4, 4.6).

- Other issues: TAC has described how the governance model of the institution may evolve as the Northfield campus matures. Governance model changes to serve the needs of the new campus are likely to affect the relationship of the board, administration, tutors and staff at the Santa Paula campus (CFRs 3.6, 3.7, 3.9, 4.6).

Summary. If the institution were not pursuing the initiative to establish a second campus, the five-year TAC strategic plan presented in its institutional report would raise few concerns. Given the limited capacity of this small and modestly funded organization, however, the addition of the significant and essential goals to finance, staff, equip, renovate and operationalize a new campus in New England amplifies concerns regarding the continuation of the program TAC has maintained for many years. While the team has great confidence in the skill and effort the administrative team, the tutors, the staff and the board will bring to this effort, the college should continue to monitor closely and carefully the progress on the Northfield campus to be sure the new campus is successful and, more importantly, the main campus in Santa Paula maintains the quality of its academic program.

I. Component 9: Reflection and Plans for Improvement

The team is deeply grateful for the leadership and the community of Thomas Aquinas College for its hospitality, accessibility and abiding care taken to preserve and advance the mission of the college. Clearly, TAC's reason for being in the broader landscape of higher education and the narrower sector of faith-based colleges and university is to provide a Catholic

liberal education to undergraduate students, preparing them intellectually and morally for a life worth living. The uniqueness of this mission has been affirmed throughout the visit.

SECTION III- FINDINGS, COMMENDATIONS AND RECOMMENDATIONS FROM THE TEAM REVIEW

Commendations

The team concluded that the same commendations we stated after reviewing TAC documents during our Offsite Review in the spring have been reinforced. The team further concluded that other commendations came to light in the intervening months, as well as during our Accreditation Visit.

1. Thomas Aquinas College has devoted itself to an abiding strength of and fidelity to its mission statement and has retained that sense of missional distinction and a unique place in American higher education.
2. TAC has a strong level of tutor camaraderie and commitment to student engagement and coherence and unity of the curriculum, and TAC has invested in tutors in the decision-making processes at the educational, the administrative and the governing levels.
3. TAC has approached the reaffirmation of accreditation process with a spirit of inquiry and a genuine interest in improvement.
4. TAC has committed itself to substantial and thorough progress on the commission's previous recommendations, especially with respect to assessment and program review.
5. TAC has integrated student feedback through Don Rags and other sources as a significant component of assessment allowing the college to think carefully about ways to improve the academic program and close the assessment loop.
6. Through the generous investment of donors, TAC has built and developed a campus with attention to architectural consistency, garden aesthetics, a thoughtful campus plan and a commitment to stewardship of space.

7. TAC has established and strengthened the summer Curriculum Committee meetings--a unique feature of TAC evidenced by high tutor participation--as a beneficial program to the development of tutors and the strengthening of the educational processes.
8. TAC has demonstrated high retention and graduation rates that speak to the achievement of students and the level of care by tutors and administrators.
9. TAC has demonstrated significant fundraising capacity supporting operational costs, campus development and vision for expansion.
10. TAC has stewarded its resources wisely to keep tuition and room/board affordable, limit educational debt to \$18,000 and offer generous financial aid to students from all economic levels.

Recommendations

On the basis of the WSCUC Criteria for Review (CFR) and the intersection of the CFRs with the team's lines of inquiry shared with TAC after the WSCUC Offsite Review, the following are the team's recommendations which will be shared with the WSCUC Commission.

1. Given the growing need to demonstrate the effectiveness of TAC in fulfilling its mission and given the workload carried by those now tasked with gathering and assessing the data necessary to inform the tutors, administrators and governors, a clear need exists for more dedicated administrative personnel. This will be a benefit to the college's mission fulfillment on multiple levels. With appreciation for TAC's commitment to tutors--and as a result a leaner administration--it is nonetheless recommended that TAC consider securing personnel with the exclusive responsibility of institutional research (IR) to inform decision-making and planning (CFRs 1.2, 2.10, 4.1, 4.2, 4.3).

2. The four moral virtues and the four intellectual virtues that mark the character of an ideal TAC graduate need to be integrated into the student assessment process more intentionally and less conceptually. It is recommended that TAC regularly generates, evaluates and makes public data on student learning and achievement as it relates to these eight virtues (CFRs 1.2, 2.3, 2.4, 2.6, 2.7, 4.4-4.7).
3. Anecdotal evidence suggests that TAC prepares students for a flourishing and full life, but the anecdotal evidence is not conclusive enough to know how well or to know the extent to which it can be improved. It is recommended that TAC develop consistent and meaningful measurement tools to document post-degree outcome measures that enable the campus to engage in a richer and more comprehensive discussion of how well these moral and intellectual virtues are realized in the lives of TAC alumni and to make these data available publically (CFRs 2.6, 4.1, 4.2, 4.5-4.7).
4. With approximately half of the student body who are women and given the college's commitment to contribute to the academic and professional success of all its students, the influence of more women tutors and women administrators as mentors and role models would benefit TAC's mission fulfillment. It is recommended that TAC recruit more women tutors and advance more women administrators whose presence, perspectives and missional fit will contribute toward student "enrichment of life as a whole" (CFRs 1.4, 3.2, 4.7).
5. The governing board's missional fidelity to the college is commendable. As TAC continues to use assessment data in its decision-making, it is recommended that learnings of teaching and learning be a serious undertaking of the board to inform its decision-making. It is further recommended that in light of the campus expansion, the board's

fiduciary role and the increasing governance challenges of nonprofit organizations, the board chair in consultation with the president consider board education sessions--using external counsel--based on best practices for higher education governing boards (CFRs 4.3, 4.5-4.7).

6. The team shares the concern expressed by administrative leadership and others that the bold plan to establish a new campus in Massachusetts will put a strain on the leadership, the tutors and the financial resources of the school. Great care must be taken to ensure that the technological and administrative infrastructure is sufficient for both campuses. It is recommended that a) organizational structures and decision-making processes be delineated and clarified across both campuses, b) TAC administrators interact more frequently and systematically around the goals of the five-year plan, which includes the Northfield campus and c) budgets allocating costs between each campus be established (CFRs 3.4, 3.7).

APPENDICES

Federal Compliance Forms

1. Credit Hour Review
2. Marketing and Recruitment Review
3. Student Complaints Review
4. Transfer Policy Review

FEDERAL COMPLIANCE FORMS

OVERVIEW

There are four forms that WSCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:

- 1 – Credit Hour and Program Length Review Form
- 2 – Marketing and Recruitment Review Form
- 3 – Student Complaints Form
- 4 – Transfer Credit Policy Form

During the Accreditation Visit, teams complete these four forms and add them as an appendix to the Team Report. Teams are not required to include a narrative about any of the matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Under federal regulations, WSCUC is required to demonstrate that it monitors the institution's credit hour policy and processes as well as the lengths of its programs.

Credit Hour - §602.24(f)

The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.

(1) The accrediting agency meets this requirement if-

(i) It reviews the institution's-

(A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and

(B) The application of the institution's policies and procedures to its programs and coursework; and

(ii) Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.

(2) In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

Credit hour is defined by the Department of Education as follows:

A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

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

Program Length - §602.16(a)(1)(viii)

Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor's degree, and 30 semester credit hours for a master's degree; there is greater variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.

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: Based on the review of the materials provided by the institution and confirmed during the Accreditation Review, TAC does not provide incentive compensation to employees or third party entities for success in securing student enrollments or awarding Title IV funds. Staff salaries are set according to experience and skill relative to equivalent positions in the general market. No bonuses or additional payment on a commission or incentive basis are made.</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 <input type="checkbox"/> https://thomasquinas.edu/sites/default/files/pdf/financial-aid/Satisfactory_Academic_Progress_Policy.pdf</p> <p>TAC publishes on its website and in its student handbook its policy on Satisfactory Academic Progress (SAP) which describes the typical length of time to degree and the factors that affect that progress. Because of the unique nature of the school’s it is expected that students maintain a completion rate of 100%, which is necessary to complete the program in the expected eight semesters.</p> <p>Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO https://thomasquinas.edu/admission/cost-attendance</p> <p>Comments: TAC publishes on its website a summary of the overall cost to degree. This presentation is uncomplicated and easy to understand because it charges students one basic Tuition and Room and Board fees with no variations for different rooms or meal plans. No additional institutional fees are charged.</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>On its website, TAC publishes “Meet Our Alumni,” which presents examples of what its alumni have done with the classical education degree they earned at the institution. In addition to describing the broad spectrum of fields and experiences pursued by its alumni, it identifies particular alumni and the particular position they occupy. https://thomasquinas.edu/meet-our-alumni</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 website provides a partial list of alumni holding leadership roles in a range of industries including religious life, education, law, business, public policy, military science/law enforcement, medicine, arts & architecture, media, and non-profit social work. There is no easily accessible information about the overall placement of the graduating class beyond noting that 11% enter religious professions and nearly 40% go on to graduate school. https://thomasquinas.edu/alumni/profiles-leadership. TAC has an “Office of Career Advisement” which is effectively a one person operation. Mark Kretschmer leads the effort to bring representatives, generally alumni, who work in a variety of industries to talk to students about career opportunities. Mark Kretschmer is also the college Registrar, and he manages the TAC Bookstore.</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.

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? X YES <input type="checkbox"/> NO
	If so, Is the policy or procedure easily accessible? Where? https://thomasaquinas.edu/page/regulatory-information
	Comments: Thomas Aquinas College has a Regulatory Information webpage that includes links to consumer information and compliance documents, in addition to policies related to health and safety and student achievement. Included in that list is a link to the Student Complaint Process. The Dean also provided the AV team with a summary sheet that outlined the process for a range of potential complaints.
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? X YES <input type="checkbox"/> NO
	If so, please describe briefly: Students who wish to complain about matters related to academics, discrimination, sexual assault, or student life more broadly are urged to contact the appropriate college official, generally the Assistant Dean, and generally in writing. Depending on the nature of the complaint, the Dean will likely meet with the affected party(ies) or will conduct a fact-finding investigation. He will then bring his investigative finding to a consultative meeting with the President and Dean to determine if a student is responsible for the alleged violation of policy and, if so, to respond with an appropriate educational or punitive remediation.
	If so, does the institution adhere to this procedure? X YES <input type="checkbox"/> NO
	Comments: According to college administrators and students, student complaints are addressed in a thoughtful and timely way. Students indicated that they are familiar with how to lodge complaints with the college, and referenced their commitment to ethical lives, and thus an obligation to curb actions inconsistent with TAC's behavioral expectations.
Records	Does the institution maintain records of student complaints? X YES <input type="checkbox"/> NO If so, where? Student complaints are kept in confidential files in the offices of the Assistant Dean, Dean, or President.
	Does the institution have an effective way of tracking and monitoring student complaints over time? X YES <input type="checkbox"/> NO If so, please describe briefly: There seems to be little in the way of systematized tracking of student complaints over time; however, there is continual conversation and sharing of information among administrators who receive complaints. The record of a student's complaint is filed and retained in his/her assessment file by the administrative team.
	Comments:

*§602-16(1)(1)(ix)

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

Review Completed By: Dianna M. Graves

Date: September 26, 2017

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? X YES <input type="checkbox"/> NO
	Where is the policy located? https://thomasaquinas.edu/a-liberating-education/degree
	Comments: This webpage has the full schedule of courses for the single program of study over four years.
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)? X YES <input type="checkbox"/> NO
	Does the institution adhere to this procedure? X YES <input type="checkbox"/> NO
	Comments: Each summer, the faculty spend five weeks reviewing each course in the curriculum to ensure it is of appropriate length, rigor, and level. Recommendations are escalated to the Instruction Committee (IC), which comprises the president, the dean, and six elected members of the permanent faculty. The IC authorizes recommended actions.
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? X YES <input type="checkbox"/> NO
	Comments: TAC students must complete 146 credit hours to complete the BA in Liberal Arts. Students generally take 18 or more credit hours each semester, and over four years complete a breadth of courses in mathematics (28 hours); philosophy (24 hours), language (12 hours), theology (24 hours), natural sciences (28 hours), music (4 hours), and seminar work (24 hours). Additionally, students complete a senior thesis or capstone project (4 hours). Academic semesters are 16 weeks long, plus one week of final exams. A review of syllabi suggest that the courses are rigorous, and warrant the credit assigned. A description of the credit hours and four year program is easily accessible online.
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 reviewed syllabi for the course of study in each of the four years.
	What kind of courses (online or hybrid or both)? In person only
	What degree level(s)? BA
	What discipline(s)? Liberal Arts
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? X YES <input type="checkbox"/> NO
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? There is a single degree program to be reviewed. TAC plans to conduct a full program review in the off-cycle of its WSCUC reaffirmation reports to ensure continual, comprehensive reviews of its program.
	What kinds of programs were reviewed?
	What degree level(s)? BA
	What discipline(s)? Liberal Arts
	Does this material show that the programs offered at the institution are of a generally acceptable length? X YES <input type="checkbox"/> NO
	Comments:

Review Completed By: Dianna M. Graves

Date: September 26, 2017

4 – TRANSFER CREDIT REVIEW FORM

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

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for reviewing and receiving transfer credit? X YES <input type="checkbox"/> NO
	If so, is the policy publicly available? X YES <input type="checkbox"/> NO
	If so, where? Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? X YES <input type="checkbox"/> NO
	Comments: The institution admits only those students who intend to enter as freshmen to take that entire, integrated program of education, and does not admit transfers or academic credits from other institutions.

*§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 WSCUC Senior College and University Commission’s Transfer of Credit Policy.