

REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Palo Alto University

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

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SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Accreditation History

Palo Alto University (PAU), formerly known as Pacific Graduate School of Psychology, is a specialized institution providing doctoral, Master's, and undergraduate degree completion programs. PAU initially offered only graduate degree programs. Accreditation was first sought in 1978, but almost ten years passed before it was actually received (in 1986). PAU was issued a warning by WASC in 1989, with that sanction removed in 1996. Since then, there have been several special visits to ensure that the institution maintains adequate faculty numbers, fiscal viability, and quality in distance learning.

A major change occurred in 2006, when PAU received approval to offer baccalaureate degrees in cooperation with the Foothill – De Anza Community College District. More recently (2014), PAU responded to Commission requests for additional information regarding strategic planning, institutional research, program review, undergraduate programs, and financial stability. This information was received favorably by WSCUC. The current reaccreditation visit was originally scheduled to take place in 2017 but was postponed one year because of the loss of two team members, and to allow PAU to rework its institutional report and make progress on its strategic planning (under a new president).

PAU offers a variety of degrees, all focused on psychology. Undergraduates can choose from a BS in Business Psychology or a BS in Psychology and Social Action. These are upper-division degree completion programs housed on the campus of De Anza Community College. The programs are offered in a several formats: traditional classroom, online, or hybrid. All classes in the bachelor degree programs are taught by PAU faculty.

Undergraduate classes had been offered as well at Foothill Community College and San Mateo Community College. However, classes are no longer offered at Foothill Community College, and beginning in fall 2018 all classes at San Mateo Community College will be moved to De Anza Community

College. These changes are due in part to fewer students enrolling in the undergraduate completion programs, and to the convenience of offering all classes at one location.

In addition to the undergraduate programs, there are two master's programs. The MS Psychology program is online, with a one-week residency requirement. It is designed to prepare students for entry into doctoral level clinical programs and related employment, such as community college teaching and business and nonprofit fields. The MA Counseling program prepares students for licensing as a Marriage, Family and Child Therapist (MFT) and/or as a Licensed Professional Clinical Counselor (LPCC). The MA is offered in two hybrid models: low residency (87% online) and high residency (13% online).

PAU also offers two doctoral programs. The PhD in Clinical Psychology is based on the "practitioner-scientist" model that provides education in the science and practice of clinical work. The PsyD degree program adheres to the "practitioner-scholar" model and is offered in collaboration with the Stanford University School of Medicine, Department of Psychiatry and Behavioral Sciences.

PAU has had only three presidents throughout its roughly 40-year history. The most recent change in the presidency occurred in 2016, when President Allen Calvin was replaced by President Maureen O'Connor. Institutional changes relating to this transition in leadership began several years before President Calvin retired, and were still in process when the team visited in 2018.

B. Description of Team's Review Process

PAU initially submitted its institutional report in 2016, in anticipation of an accreditation visit (AV) in 2017. The team expressed some concerns about the quality of the institutional report, and problems relating to the team's membership arose, resulting in postponement of the AV until spring 2018. This enabled PAU to revise the institutional report, with a resubmission made in 2017. The summary below describes the review process following receipt of the final institutional report in 2017.

The team gathered information in a variety of ways, including: a phone call with President O'Connor and selected administrators, faculty, and staff; a telephone conversation with PAU's auditor Susan Malone (a partner at Hood & Strong, LLP); a two-day off-site meeting where the team discussed the materials received from PAU, including the institutional report and supporting materials; a review of additional documents requested in conjunction with the lines of inquiry, followed by a team conference call; and a five-day campus visit by the team chair and assistant chair, who were joined by the remaining two team members during the final three days. All team members visited the campus in Los Altos and the main (Allen Calvin) campus in Palo Alto. The team chair and assistant chair also visited the Gronowski Clinic (housed in the Los Altos campus), PAU facilities at De Anza Community College, and the campus facilities located in the Stanford University School of Medicine, Department of Psychiatry and Behavioral Sciences. Materials examined as part of the review included the following:

- Institutional report
- Updated organizational chart
- 2014 Interim Report Action Letter
- Faculty constitution
- Bylaws
- Institutional goals and degree program goals
- PhD, PsyD, and MA program learning outcome (PLO) maps
- WSCUC and CACREP crosswalk
- CACREP accreditation self-study document and response letter
- WSCUC and APA crosswalk
- APA accreditation self-study document and response letter
- PCAF practicum competency assessment form
- 2017 undergraduate report to EEC

- PsyD mini-dissertation grading rubric
- Faculty senate workgroup evaluation of teaching effectiveness
- Sample class schedules and course syllabi for all PAU degree programs
- 2016 EEC report to the provost PAU graduation and retention
- 2017 PAU inventory of educational effectiveness indicators (IEEI)
- 2017 PAU review under WSCUC standards and compliance with federal requirements worksheet (consensus)
- 2017-18 catalog
- Summary of faculty headcount by program and hiring status
- Enrollment trends by degree program
- Board of Trustees calendar of meetings, committee memberships, and minutes
- FY2018 budget and examples of budget vs actual reports
- Independent auditors' report and financial statements, A-133 and Form 990 for fiscal years 2009-2017
- Institutional policies
- List of significant programs
- Disaster recovery plan
- Summary of student complaints and disposition
- Emails sent to the confidential email account
- 2016 EEC report: Recommendations for improving online learning
- Faculty and student handbooks
- Previous sub-change approval action letters for PAU's online programs
- Sample courses in PAU's learning management system

- PAU faculty learning and instructional development resource center and other training materials
- PAU website

Interviews were conducted with the following groups and individuals during the AV:

- Director of Student Activities
- Student Council representatives
- Gronowski Clinic and clinic research leadership
- Students and faculty from the BS in Business Psychology program
- Students and faculty from the BS in Psychology and Social Action program
- Students and faculty from the MA program
- Students and faculty from the MS program
- Students and faculty from the PhD program
- Students and faculty from the PsyD program
- Undergraduate program leadership
- MA and MS leadership
- PsyD and PhD leadership and PsyD practicum director
- President and President's Cabinet
- Faculty Senate
- Staff Council
- CFO and Controller
- Faculty Learning and Instructional Development Committee
- Finance Team
- Board of Trustees Executive Committee
- Student Services Director and staff

- Institutional Research Director and staff
- Enrollment Management VP and staff
- Human Resources and Accessibility Director and staff
- Chief Information Officer and information technology staff

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

The team was pleased to note a marked improvement in quality between the original report that was submitted in 2016, and the final report that was submitted in 2017 following the one-year postponement of the AV. Compared to the 2016 report, the 2017 report reflects more authentic engagement with the self-study process and is more tightly tied to the CFRs. The report demonstrates expertise in documenting PAU's activities and achievements and is supplemented with additional supporting evidence presented on the PAU website. The report also accurately reflects the condition of the institution, focusing not just on the institution's notable strengths, but acknowledging areas for improvement as well.

PAU facilitated the review by providing the team with direct access to their external auditor, and by responding promptly to multiple requests for additional information. The team was especially appreciative of PAU's efforts to hyperlink and index documents, ensuring that the team could easily locate requested information. The team also noted newly updated links on the PAU website providing easier access to institutional policies.

Documentation of PAU's practice, policies, and operations is extensive, in part because several of PAU's graduate programs are accredited by professional organizations: The PsyD and PhD programs are accredited by the American Psychological Association (APA), while the MA Counseling program is accredited by the Council for Accreditation of Counseling & Related Educational Programs (CACREP). Both of these accrediting bodies advocate for evidence-based practices, so it is not surprising that PAU

embraces a culture of evidence-based practices. An exception is in the area of student learning outcomes assessment, which lags behind current WSCUC standards as is detailed below in the section relating to Standard 2: Achieving Educational Objectives Through Core Functions. For example, Appendix 4 of the Institutional Reports shows a matrix of desired outcomes but does not explain how they are assessed. Similarly, Appendix 10—Faculty Senate Workgroup Evaluation of Teaching Effectiveness and PAU Inventory of Teaching Effectiveness discusses student survey questions in which the students respond to questions about the overall effectiveness of the teaching. Unfortunately, student perceptions of their own learning often do not correlate well with more objective measures of learning. Student perceptions of teaching effectiveness cannot be substitutes for actual measures of learning. Without the assessment of student learning outcomes, PAU cannot answer questions such as how many and which students can write effectively, work through difficult problems, or determine the difference between good and poor research designs, to list just a few examples

It was not entirely clear to the team whether recent institutional changes resulted from the self-study, from the transition in PAU’s leadership, or from other factors. However, the team found President O’Connor to be both fully informed about, and committed to, the WSCUC review process. Furthermore, when the team met privately with President O’Connor prior to the exit meeting (which was attended by her cabinet), she acknowledged that the issues highlighted by the team were largely coincident with the concerns she had noted regarding PAU, and that she had already begun addressing several of those issues. Further details regarding PAU’s receptivity and likely response to the team’s feedback are described below, in the discussion of Component 8.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

As noted above, PAU has a long history with accreditation, from its first failure in 1978, to its initial accreditation in 1986, through various substantive change actions and reaffirmations. The most

recent Commission action required a mid-cycle review in 2014 to address concerns with strategic planning, institutional research, program review, undergraduate programs, and financial stability. A particular concern was the Educational Effectiveness Review that had been submitted earlier. At its May 2014 meeting, the Commission noted substantial progress in all of these areas and commended PAU for its progress.

Strategic planning continues to be a priority at PAU, with President O'Connor initiating a strategic planning process shortly after her arrival at PAU. This has been a rigorous and collaborative process that heralds positive changes on many fronts. Progress has been notable, with the Faculty Senate recently supporting the new strategic plan.

PAU also demonstrates an increased commitment to institutional research. This is evidenced by such markers as the hiring of a direct report to the president in the area of Institutional Effectiveness, Analysis, and Planning, and development of a highly informative dashboard. The team also found that faculty and administration are engaged in conversations at multiple levels regarding observed fluctuations in enrollments, retention, and completion, and appropriate institutional responses.

These strengths were offset somewhat by the failure of the institutional report to highlight, on pages 15-16, changes that PAU made in response to mid-cycle concerns regarding undergraduate programs. Several improvements have been made to the undergraduate programs since the mid-cycle review, but the descriptions of these improvements are scattered throughout the report; no comprehensive summary was provided to indicate how the institution responded to specific Commission concerns. Despite this shortcoming in documentation, the team noted during the AV that undergraduate programs are receiving considerable scrutiny. PAU appears to be engaged in thorough consideration of the fit of the undergraduate programs within the institution. There is also appropriate recognition of the resources and policies needed to ensure the success of undergraduate students. This has resulted in a number of changes, including a decision to offer all on-ground courses exclusively at De

Anza College, rather than at several different community colleges. This development is likely to further increase the already strong sense of community among PAU's undergraduates.

Conversations are also taking place regarding the reasons underlying poor retention and significant enrollment declines in some undergraduate programs. These may be due in part to enrollment dropoffs at community colleges that can perhaps be offset by broadening the appeal of the undergraduate programs to non-traditional students. The team urges PAU to continue examining options, such as a part-time program, that would better accommodate students who must balance the demands of personal and employment commitments with the academic rigors of a full-time, cohort program.

It is clear that undergraduate enrollments will need to increase if the undergraduate degree programs are to become self-funded. However, the overall financial stability of PAU is commendable. PAU has built its reserves and recently placed \$1 million in an endowment, with another \$1 million moved into a short-term reserve account. The institution's US Department of Education Composite Score has been in the "Financially Responsible" zone for several years and is approaching the maximum possible value. PAU has made great strides in automating their financial systems and now functions in a "paperless" mode. The institution continues to face challenges resulting from the extremely high real estate costs that characterize the Silicon Valley, but long-term leases are in place to help ensure the stability of operating expenses. This stability is especially important, given the technological advances planned for the clinical facilities at the Los Altos campus.

The institution has made less progress in reviewing academic programs, despite the mid-cycle recommendation that "PAU continue to pursue ways to use program review results to identify program-level interventions. (CFRs 2.11–2.13, 4.4, 4.5)." The program review process in the current institutional report is opaque. PAU lacks policies that mandate conducting systematic reviews on a regular basis. Also nascent is assessment of student learning outcomes, which is an integral component of program

review. Graduate program faculty appear unaware of the need to engage in program review, and graduate program administrators may feel (incorrectly) that the processes they implement for professional accreditation are aligned with the WSCUC standards for program review and assessment of student learning outcomes. By contrast, undergraduate program administrators recognize the need to implement assessment protocols, and plan to educate faculty by sending them to assessment conferences. However, for all of PAU's degree programs, the team is concerned by the absence of clear progress regarding program review, and the lack of systems for obtaining and reviewing direct measures of student learning. These issues are discussed in more detail below in the section pertaining to Standard 2.

It was noted above that PAU recently brought a new president on board. This is a significant event in any institution – more so at PAU, which had previously changed presidents only once. However, President O'Connor is highly regarded by the other administrators at PAU, by the faculty and staff, and by PAU's students. She actively seeks input from stakeholders and is genuinely receptive to this feedback. These hallmarks suggest that the stewardship of PAU has not been jeopardized by the change in leadership.

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

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

The team's finding, which is subject to Commission review, is that PAU has provided sufficient evidence to determine compliance with Standard 1. PAU is a specialized institution; it only grants degrees in psychology, so it can tightly focus on its mission of "improving lives through education and research anchored in psychology, clinical training, and practice in a diversity of cultures and service to communities around the world." This mission is found on the PAU website and in its printed and online materials. Degree programs and services are in accord with the institution's mission, as is required for

Standard 1. Similarly, free speech and due process guidelines are easily found in the catalog and web materials. Graduation rates, time to graduation, and other markers of student success are also publicly available, as are clear statements of cost.

PAU's commitment to diversity and its centrality to PAU's mission was emphasized throughout the institutional report and is highlighted on PAU's website. The team verified during the AV that this commitment is genuine. Other agencies have noted as well that PAU excels in its commitment to diversity, recognizing the institution with awards. The team lauds PAU for its broad definition of diversity, which extends far beyond consideration of race and ethnicity. The team also lauds PAU for offering specialized counseling programs for diverse sexual orientations and for the LatinX community. It is noteworthy as well that one motivation for the creation of PAU's baccalaureate programs was to increase the number of psychology graduates from historically underrepresented groups.

Policies for addressing student grievances at PAU are clear. As part of the review process, the team examined a summary of grievance outcomes, which appeared to be reasonable in number. Resolution of the grievances appeared appropriate, to the extent this could be determined by the team from the information provided in the summary.

Assurance of educational objectives requires a sound financial foundation. The team found PAU's business practices to be exemplary. The institution was forthcoming with documentation and provided direct access to their external auditor, leading the team to conclude that PAU undertook the review process with "seriousness and candor."

Final determination of compliance with Standard 1 rests with the Commission.

Standard 2: Achieving Educational Objectives Through Core Functions

The team's finding, which is subject to Commission review, is that PAU has provided sufficient evidence to determine compliance with Standard 2. PAU's institutional report and supporting materials, together with information gathered at meetings during the AV, provide clear evidence that the

institution has thoughtfully considered how it supports teaching and learning to achieve its educational objectives. PAU's graduate programs conform to the standards of specialty accreditors and leading professional organizations; these standards inform undergraduate programs as well (CFR 2.1). Information for the prospective student regarding entry-level requirements and admissions, levels of student achievement, program outcomes, costs, course offerings, and transfer credit details are readily available on the PAU website (CFRs 2.2, 2.12, 2.14). Syllabi include course outcomes, while institutional learning outcomes (ILOs) and PLOs are accessible from the course catalog, student handbooks, and website as appropriate (CFRs 2.3, 2.4). The institution has staff and resources adequate for delivery of the curriculum, and to administer and oversee practica and internships, including a dedicated clinical training director for online students in the MA Counseling program. Community-based activities are woven into the curriculum and help students advance their learning and development (CFRs 2.3, 2.5, 2.9).

Analysis of student success data such as licensing exams, placements, and other success indicators is conducted effectively and disaggregated by demographic information as appropriate. Relevant data are posted to PAU's public website (CFRs 2.7, 2.10). However, there is very little direct assessment of student learning outcomes (CFRs 2.2a, 2.2b, 2.6). At the undergraduate level, PAU is unable to document evidence that students exhibit competencies in written and oral communication, quantitative reasoning, information literacy, and critical thinking. Indicators of graduate student learning are similarly lacking and overly dependent upon external indicators, such as pass rates on qualifying exams required for licensure and reviews from field supervisors. These metrics cannot be directly linked to specific graduate-level program or institutional learning objectives.

Similarly, PAU lacks policies for conducting systematic program review (CFR 2.7). PAU practices most of the institutional activities necessary to support program review, such as examining disaggregated student success data and considering whether curricular adjustments are needed to

match community needs. However, these activities are not conducted at regular intervals with the specific aim of ensuring that each program actively engages in evidence-based reflection. PAU has identified issues relating in particular to the uncertain mission of the MS Psychology program, and relatively high attrition in the BS Business Psychology program. Faculty and administrators are aware of these issues and discussing possible remedies, but regular program review could uncover other issues that also require attention.

The university robustly supports faculty development, including research support and professional engagement. Most impressive are a required faculty orientation, access to one on one training and consultation, an annual faculty retreat, and an annual evidence-based teaching conference. Policies for faculty related to research, evaluation, promotion, and tenure are available on the teaching support site and faculty handbooks; policies for student research are available in student handbooks (CFRs 2.8, 2.9).

A variety of co-curricular programs are available to both undergraduate and graduate students, including students in online programs. Opportunities are varied and align to the PAU's values of "high quality clinical training and research that advance knowledge and practice." These include faculty-led undergraduate research projects, continuing education events, and clinical training at medical centers and community mental health programs throughout the Bay Area (CFR 2.11). PAU provides academic and other support services to students, including those who study online.

Adequacy of academic services is evaluated and additional support put in place when a need arises. Notable examples are increased efforts by the institution to better support entering students with academic "boot camps" and expanded academic advising services for MA Counseling students. Other student services are underdeveloped, but the team notes that the newly hired Director of Student Services intends to establish a career services office, as well as writing and tutoring services. The team

supports these efforts and as the addition of other services that are determined by PAU to meet the needs students in all programs (CFRs 2.12, 2.13).

PAU serves large numbers of transfer students through its undergraduate programs. Articulation agreements and other information relevant to transfer students is published on PAU's website and ensures that the transfer process is structured to minimize loss of credits (CFR 2.14).

Final determination of compliance with Standard 2 rests with the Commission.

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

The team's finding, which is subject to Commission review, is that PAU has provided sufficient evidence to determine compliance with Standard 3. Since the previous reaffirmation of accreditation, PAU formed two new organizational structures that greatly enhance the institution's ability to ensure quality and sustainability. The additions of a faculty senate and a staff council now provide formal mechanisms for faculty and staff to voice their concerns and explore possible solutions with administration (CFR 3.10). As a result, PAU enjoys broader participation of stakeholders in shared governance. However, still missing is the voice of students. Student representatives are in place for each of PAU's degree programs, but they are not formally engaged in the governance process. Adding student members to both the faculty senate and the board of trustees could remediate this.

PAU's current faculty numbers, and their qualifications, are well matched to the needs of the institution and the students (CFR 3.1). The institution's use of adjunct faculty is increasing. This is partly driven by the nature of PAU's graduate degrees, for which practitioners and other working professionals can provide unique perspectives to facilitate student success. The team notes as well that resources are in place to help ensure proper onboarding and adequate professional development (CFR 3.2). An evidence-based teaching conference was offered in 2017, and is expected to become an annual event (CFR 3.3).

PAU has dedicated important resources to support the success of its online offerings, including the establishment of a Learning and Instructional Design Resource Center (CFR 3.3). The institution enjoys a productive partnership with Canvas, and the entire institution makes extensive use of Zoom, which enables the development of a sense of community even among remote participants. If the institution moves increasingly to online functioning – which may be forced by impending space and financial pressures – PAU will need to ensure that its technology and curriculum adapt accordingly (CFR 3.5).

The team was pleased to note the progress made by PAU in addressing its financial stability (CFR 3.4). The institution's US Department of Education Composite Score has been in the "Financially sound" range for the past several years. PAU maintains a healthy reserve and implements sound financial practices.

During the AV, the team was surprised to learn of the degree to which PAU's various degree programs operate in isolation of each other (CFR 3.7). Most faculty teach and supervise students in only one program, even though identical courses are offered across several programs. Given this operational characteristic, it is not surprising that some faculty members harbor feelings of perceived inequity. Similarly, students sometimes bemoaned the lack of opportunity to meet and interact with participants in other degree programs. The ability of students to develop peer mentor/mentee relationships has suffered accordingly. President O'Connor is aware of these issues and aims to work towards a structure in which faculty and students regard themselves as colleagues in an integrated academic institution, with common goals.

During the AV, the team met with several members of the board of trustees. They are fully supportive of President O'Connor's administration and are well positioned to assist the institution moving forward (CFR 3.9).

Final determination of compliance with Standard 3 rests with the Commission.

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

The team's finding, which is subject to Commission review, is that PAU has provided sufficient evidence to determine compliance with Standard 4. The institution's organizational chart was recently modified so that the institutional research director reports directly to the president. The change serves as tangible evidence of PAU's commitment to evidence-based decision making, but this commitment predates the modification to the organizational chart (CFRs 4.1, 4.2). PAU has devoted considerable time and effort to tracking student performance, disaggregating it in ways that are consistent with the institution's commitment to diversity, and taking steps to address whatever shortcomings may be found. President O'Connor is committed to continuing and expanding this practice, and upper level administrators are also in concordance with this objective (CFR 4.3).

Against this backdrop of evidence-based decision making, it is surprising that PAU makes limited efforts to assess student learning outcomes and make adjustments accordingly (CFRs 4.4, 4.5). As noted above in the discussion of Standard 2, there are multiple indirect indicators that PAU is serving its students well. However, in the absence of learning outcomes data, the institution cannot identify specific deficiencies that students may have. Analysis of outcomes data can also help identify situations when resources can be saved by, for example, eliminating costly pedagogical methods if less expensive methods are shown to be equally impactful.

The president and several members of the faculty and administration are aware of the need to engage in authentic outcomes assessment, so the team is hopeful for improvement on this front. President O'Connor is also aware of other areas where institutional change should be explored and has implemented a new strategic planning process to identify these areas and initiate campus-wide discussions accordingly. Early progress on this is encouraging (CFR 4.7).

Final determination of compliance with Standard 4 rests with the Commission.

Inventory of Educational Effectiveness Indicators

PAU's Inventory of Education Effectiveness Indicators (IEEI) listed all six of its degree programs with all of the required elements. Institutional and program learning outcomes (stated as learning goals) have been developed for each program and are widely available to students in the course catalog and respective program handbooks. For the doctoral and master's programs, key outcomes are published even more widely, such as directly on the public portion of the PAU website, and in APA and CACREP annual reports. The indicators themselves generally appear to be appropriate to each program and sufficient to document student progress and program outcomes in multiple contexts and by multiple stakeholders. However, as the team learned during the accreditation visit, PAU has not made significant progress in regularly and systematically assessing learning outcomes, and does not regularly perform program review (CFRs 2.7, 3.7, 4.1). The MS Psychology degree seems to have the least developed program evaluation process and more could be said generally about how data derived from assessment will be used for improvement of programs.

Component 3: Degree Programs: Meaning, quality and integrity of the degrees

All of the degree programs offered by PAU have clear learning goals (CFR 2.3). Programs that provide professional training have PLOs that align with learning goals appropriate for, or required by, their corresponding professional accreditors: CACREP for the Master's degree in Counseling, and APA for the PhD and PsyD (CFR 2.4). Furthermore, students and faculty in each degree program have a clear understanding of the "meaning" of the programs in which they are enrolled; they can articulate expected outcomes and career opportunities provided by their programs and explain their interest in those programs using language that is consistent with the corresponding PLOs (CFR 2.2). Students who met with the team during the AV were universal in their high regard for their respective programs.

Pass rates for licensing examinations and outstanding "match rates" for clinical internships demonstrate that PAU's graduate programs are clearly educating outstanding mental health

professionals. Students in all programs are provided with excellent opportunities to integrate their academic studies with professional practice; even the undergraduate programs include capstone experiences that provide students with service learning opportunities, internships, or other experiences that allow them to apply the material they have learned in their classes (CFR 2.5).

Viewed in this context, PAU's MS Psychology degree is an outlier. The MA and MS programs both train students in research skills and client assessment. This is appropriate for the MA Counseling program, which students complete to satisfy the coursework required for licensure as a counselor. However, the career goals of students in the MS Psychology program may not involve counseling or clinical work. The program is marketed partly as an intermediate step in the transition from undergraduate to clinical doctoral work, but few MS Psychology students actually follow this path; instead, the MS is their terminal degree. Thus, the "meaning" of the MS Psychology degree is enigmatic (CFR 2.2b). There is limited information regarding the career outcomes for MS Psychology students, leading the team to question whether the mission of the program and the outcomes it ostensibly provides are aligned with student needs and expectations (CFR 2.3).

The team was pleased to see PAU introduce what is expected to be an annual Evidence Based Teaching Conference. PAU also provides other supports to facilitate the development of faculty as teaching professionals. However, PAU is not positioned to demonstrate the impact of these activities on student learning in any of its degree programs; methods for ensuring the quality and integrity of PAU degrees are underdeveloped. PAU is highly respondent to the assessment requirements imposed by its professional accreditors. Accordingly, PAU tracks such indicators as reports filed by field supervisors, passing rates on licensure exams, and post-doctoral placements. In many instances, PAU's statistics exceed national averages. The institution is justifiably proud of these indicators, but they provide little or no feedback on mastery of PLOs or other performance indicators of interest to WSCUC (CFR 2.6). Passing or failing an exam administered by the state provides no indication of whether PAU's students

have met institutional goals for student learning and suggests no remedies to implement when performance falls short of aspirational levels. A systematic method for assessing student learning outcomes is needed but has not been implemented for any of PAU's degree programs. For many courses, the sole evidence of teaching "effectiveness" consists of indirect measures, such as student evaluations. The undergraduate program previously used the Major Field Test in Psychology to assess student competencies, but this instrument is not aligned with the baccalaureate learning goals and has been abandoned. Some undergraduate artifacts have been assessed using appropriate VALUE rubrics, but these efforts have been inconsistent; assessment of core competencies is rudimentary at best (CFR 2.6). PAU students have frequent opportunities to engage in community-based projects and other high-impact practices. However, in the absence of data demonstrating that faculty have successfully adapted their pedagogies to meet the needs of PAU's diverse student population, the team is unable to conclude with confidence that students in any degree program are meeting the institution's "high standards of performance" (CFR 2.5).

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

PAU's undergraduate programs have well articulated PLOs, and curriculum maps that clarify the points within the curriculum that are intended to help students achieve competency in these PLOs. However, there is no systematic method for assessing progress in PLO attainment or mastery of undergraduate core competencies. PAU's graduate programs are somewhat more advanced in this respect, with specific PLOs and desired competencies. Five core training goals were identified for the PhD program, which were associated with nine objectives and 10 competencies. Proximal and distal outcomes were identified for each of these, along with metrics that can be used to ensure that students attain minimum levels of achievement for

each competency. However, despite a more thoroughly developed assessment infrastructure, the graduate programs rely primarily on exam passing rates as measures of student learning.

The limited data that are available regarding student learning demonstrate the need for PAU to engage more authentically with assessment. On several undergraduate ILOs, 0% of students are reported to have attained the “capstone” level of performance (Appendix 8). “Capstone” signifies a skill level appropriate for graduate education and is expected to be attained by 25% of undergraduates. The 0% attainment data suggest that PAU does not produce students who are ready to enter its own graduate programs.

The team reminds PAU that it must assess student learning outcomes (CFRs 2.4, 2.6, 4.3, 4.4). Course and program learning objectives have been articulated for all degree programs, but these are not assessed, which of course precludes examining outcomes data to improve instructional quality. PAU is well positioned to assess student learning: The degree programs include capstone experiences or signature assignments that provide excellent opportunities for outcomes assessment. However, despite PAU’s commitment to data-based decision making, the requisite data are not collated, examined, or discussed at the program level, let alone the institutional level.

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

The heart of PAU is its commitment to student success. The institution defines student success in terms of both academic program completion and positive outcomes after completion. Evidence of PAU’s strength in facilitating student success is shown by the favorable evaluations from specialized accrediting bodies (APA and CACREP), the pass rates of graduate students on licensing examinations, high retention and graduation rates in most of its programs, and exciting, community-based practicum placements at all levels of education. These success indicators are reflected upon in the institutional report and were also noted by the team during the AV (CFR 2.10).

Undergraduate programs

PAU's undergraduate programs are 2-year degree completion programs, designed in part to address the minority achievement gap. On average, students completed the program in 1.9 years and 77% completed the program on time. While PAU was unable to locate benchmark data for 2-year bachelor's degree completion programs, their on-time graduation rate exceeds that for students who complete 2-year programs and transfer to 4-year colleges. However, the Psychology and Social Action has an attrition rate of 24%, which is high and in contrast to the 18% attrition rate for PAU's Business Psychology program. (The team learned after the visit that these differences are not statistically significant.) Undergraduate program administrators are aware of this discrepancy, have speculated about its origins, and are considering appropriate remedies.

PAU posts data to the Graduation Rate Dashboard and provides some analysis of dashboard data in its institutional report. While discussion of the Dashboard was not required of PAU, the institution is nonetheless making good use of the data, especially for comparison purposes. PAU notes that its 62% adjusted graduation rate (8-year total) has been trending upward for the last three years and is consistent with its 77% completion rate. Similarly, PAU's 80% unit redemption rate (8-year total) is also trending positively (CFR 2.10).

PAU routinely examines disaggregated data to look for disparities that may exist between white and ethnic minority students in undergraduate programs, although this task is challenging because 43% of undergraduate students decline to report their race or ethnicity (CFR 2.10). Even so, PAU has made a good effort to compare trends in unredeemed units between the two groups, finding no differences that are statistically significant.

Another example of PAU's efforts to study and promote student success is found in the *EEC Report to the Provost: Analysis of Student Retention and Graduation* (2016). The results presented in this report note improved attrition rates, especially among minority students. This improvement

coincides with increased efforts by the institution to better support entering students with academic “boot camps” and additional advising services (CFR 2.12). Even with these successes, the institution acknowledges the need for further study (and better data) in order to improve understanding of differences in the success of its diverse undergraduate student body (CFR 2.7).

MA Counseling program

The team was pleased with the success of the MA program. The program provides students with a solid educational experience that leads to exciting placements throughout the United States and the rest of the world. Graduates complete the MA Counseling program in an average of 2.6 years (the program is 9 or 11 quarters, depending on modality), with 60% of students completing on time. First-year retention is 81% overall. The average annual rate of attrition is 8%, compared with a national average of 4.8%. Faculty have noted the attrition rate and are making efforts to address it. One approach is to continue building academic advising services, which dovetails with PAU’s overall plan to expand student services (CFRs 2.10, 2.12-2.14). Additional success indicators for the MA Counseling program include above average 2016 pass rates for the California Law and Ethics Examination for Registered Master’s-level Providers: The MFT pass rate was 81% (compared to the California average of 73%), while the LPCC pass rate was 75% pass rate (compared to the California average of 71%).

MS Psychology program

The institutional report did not analyze graduation and retention rates in the MS Psychology program, which is marketed in part as a preparatory program for students wishing to enroll in the PhD program. However, the PAU website shows an average completion time of 1.88 years and a 56% overall graduation rate. The team learned during the AV that a typical enrollment cohort is 25 students. About 17 complete the program, and 5-7 students per year move on to the PhD program. Distal outcomes from the *2015-16 Alumni Outcomes* report indicate that 38% of graduates from 2015-16 were confirmed

to be employed, and an additional 37% of the graduating cohort went on to join PAU's PhD program in Clinical Psychology (a combined total of 75%).

Doctoral programs

Graduation and retention rates for PhD and PsyD students are generally very favorable, and PAU makes good use of comparison data available from the APA in gauging the success of doctoral students. The average time-to-completion for PAU doctoral students is 6 years for PhD graduates and 5.3 years for PsyD graduates since 2010-11; these rates are comparable to national averages of 6.3 and 5.2 years, respectively. The rate of attrition in doctoral programs at PAU (1% to 2%) is slightly lower than the national average for APA-accredited programs (2.7% to 3.8%). In the PhD program, efforts have been made over the last 5 years to improve early identification and intervention for students who may be having difficulties. Understanding the characteristics of students who are more likely to withdraw (e.g., older students or those with lower first-term GPAs) positions the institution to better identify these students and attempt appropriate interventions (CFR 2.13).

Additional success indicators for doctoral programs include the high percentage of doctoral students obtaining APA-accredited internships (100% of PsyD students in 2016-17, compared with 91% nationally; 97% of PhD students compared to 92% nationally). These placement rates are especially notable considering that a large proportion of students obtained top choice placements. Other indicators, such as licensure rates and first-examination pass rates for the Examination for Professional Practice in Psychology, are also strong (CFRs 2.7, 2.10).

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

PAU continues to ignore the requirement to conduct program reviews on a regular basis (CFRs 2.2, 2.7, 4.1). During the AV, the team asked faculty from each program to describe their involvement in the program review process. None had any experience in this process, and most seemed to have no

understanding of the team's line of questioning. This lack of involvement in program review undoubtedly stems from PAU's failure to implement relevant policies, despite a recommendation by a panel of the Interim Report Committee to "pursue ways to use program review results to identify program-level interventions."

The panel's recommendation was made specifically for PAU's undergraduate degree programs, but it applies equally well to PAU's graduate programs. There is no review of PAU's MS Psychology program; only the MA Counseling program is reviewed by a professional accrediting body. However, even the MA Counseling program is reviewed only in accordance to CACREP's requirements, which differ in significant ways from the WSCUC requirements for program review. Similarly, program review for the doctoral programs is conducted only in accordance to the APA requirements, ignoring elements that are unique to WSCUC.

Ignoring program review entirely, or delegating it to professional accreditors, can significantly impact institutional decision making. WSCUC mandates that impacts on educational quality be considered when modifying a program (CFR 4.1). PAU's current operations may lead the institution instead to focus solely on the demands imposed by CACREP or APA accreditation, or by California state regulations regarding the coursework required of MFTs, LPCCs, or Psychologists.

These observations do not imply that PAU ignores the requirement to engage in data-based decision making, planning, and improvement; these activities take place at multiple levels within the institution. However, without a policy that describes when and how these activities should occur, decision making can be chaotic and reactive, rather than systematic and intentional.

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

PAU furnished a narrative of its financial situation in the institutional report, as well as supplemental documents that included audited financial statements for years ending July 31, 2015 and

2016, the 2016 Form 990, and a strategic plan for 2015-17. The FY2017-18 budget was referenced but not provided. The institutional report also made reference to, but did not include, a financial planning model (described in the narrative as utilizing Tableau, software used for data visualization, and Adaptive Insights, software used for financial planning and forecasting).

The provided documentation shows that PAU has been realizing net surpluses for several years, with stable or improving metrics. Annual audits are performed by an outside certified public accounting firm. As of July 31, 2016, PAU had a debt to equity ratio of 0.8. Its assets included \$5.7 million in cash and cash equivalents, \$1.4 million in long-term investments, and \$8.2 million in net property and equipment. Current liabilities stood at \$11.8 million, with no long-term debt. Unrestricted net assets were \$12.5 million.

In the fiscal year ended July 31, 2015, the University had operating revenues of \$28.6 million, and a net increase in assets from operations of \$0.4 million to \$13.6 million. In fiscal year 2016, the University had operating revenues of \$30.8 million, a net increase in assets from operations of \$0.7 million to \$14.2 million (CFR 3.4). The Board approved the FY2017-18 budget on May 3, 2017. This budget projected operating revenue of \$31.3 million, and a change in net assets from operating activities of \$0.7 million.

The United States Department of Education utilizes a Financial Responsibility Composite Score (DOE Composite) to gauge the financial responsibility of institutions. This measure is derived by combining three ratios reported in an institution's audited financial statements: the primary reserve ratio, an equity ratio, and a net income ratio. These ratios are used because they serve as fundamental indicators of an institution's financial health. PAU's DOE Composite has steadily increased from 1.81 in 2012-13 to 2.81 in fiscal year 2016-17 (unaudited results). Clearly, PAU is in a strong financial position.

PAU is also well positioned to navigate the changing landscape for higher education. The institution's strategic plan for 2015-17 established three general goals: Impact psychology related

education and training on a regional, national, and international level; combine traditional instructional methods with web based delivery of didactic material to provide state of the art training to students locally and globally; and enhance PAU's position as a leader in multi-cultural psychology based training.

A new strategic plan was initiated in November 2016, after President O'Connor replaced President Calvin. Presidential transitions are often accompanied by disruptions in planning, but the strategic plan that is taking shape under President O'Connor's guidance is evolutionary rather than revolutionary. It, too, has three objectives, which share many characteristics with those defined under President Calvin's leadership: Create a unified university to optimize the educational, research, and clinical experiences for PAU students and faculty; strive toward excellence in research, education, and clinical training for students; and raise the profile of PAU in higher education. These strategic objectives (and the detailed goals) have been preliminarily presented to and discussed by the Board of Trustees (CFR 3.9).

PAU's upper level administration is key to implementing this plan. The team was impressed by PAU's leadership and congratulates the institution on hiring President O'Connor. Her background of expertise in higher education, and her joint degrees in law and psychology, are a perfect mix for the daunting job of president and augur success for PAU in the years ahead. PAU's new organizational chart, which shows more direct involvement in institutional research, demonstrates a commitment to evidence-based decision-making and should facilitate PAU's ongoing development as an institution of higher education.

Component 8: Reflection and plans for improvement

PAU has undergone many changes since beginning the review process in 2016. It is difficult to know which or how many resulted from the self-examination that is required in preparing an institutional report. Some of these changes were initiated under past-president Allen Calvin, but most seem to be part of President O'Connor's plans for PAU. As noted earlier, many of the issues identified

by the team as needing action are being addressed in PAU's strategic plan, including initiatives to build an institutional identity instead of multiple, separate program identities, expand student services, and upgrade technology.

In their institutional report, PAU listed several plans for improvement that resulted from the self-study and other processes initiated by President O'Connor. That list will not be repeated here, but the team notes that every item in the list shows thoughtful consideration. The changes are comprehensive, spanning all university functions including student affairs, finance, external affairs, and educational effectiveness.

PAU is currently moving ahead with a new strategic plan. It was discussed at the Board meeting that took place during the AV. The team understands the plan is a "work in progress" that appears to be based on a continuous process of reflecting on ways to improve PAU.

SECTION III – OTHER TOPICS (such as Substantive Change)

The team did not identify other issues requiring consideration.

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

The team commends PAU on the progress it has attained in addressing previous issues concerning financial sustainability. Revenue has doubled since 2009, and the institution has demonstrated sound stewardship by consistently reporting positive net contributions. The Department of Education's Composite Score has remained in the "Financially Responsible" zone for several years. Now that student enrollment has plateaued (except in the undergraduate programs), the team reminds PAU to remain financially attentive to ensure it continues to operate within its fiscal boundaries.

The team commends PAU for establishing a faculty senate. This body gives faculty a formal mechanism for expressing their concerns. As the senate matures and plays a more integral role in governance, the team expects it will also help unify PAU across its various programs and remediate perceived inequities. These two issues are discussed in more detail below. The team suggests that PAU

consider adding a student representative to the faculty senate, and a faculty member to the Board of Trustees, to further increase the role of all stakeholders in shared governance.

Similarly, the team commends PAU for fostering the development of an active staff council. This body has and should continue to provide staff at PAU with a method for voicing and addressing the concerns of employees, who are essential to the institution's success.

The team commends PAU's commitment to diversity, broadly defined. This commitment is evident throughout the institution and is exemplified by such practices as establishing a LatinX clinic and founding the Center for LGBTQ Evidence-Based Applied Research. The diversity of PAU's faculty, staff, and student body demonstrates that PAU values and honors diversity.

The Gronowski Clinic provides PAU's community with low cost treatment, and its students with excellent training. It is fully aligned with PAU's mission and the team commends the institution for creating and maintaining this facility. The plans for digitizing data from the Gronowski Clinic offer exciting opportunities, both for research purposes (such as examining impacts of various interventions) and for institutional learning (such as identifying how instructional practices impact long-term outcomes like exam pass rates and APA placements).

The team commends PAU for the attention paid to faculty development. Most impressive are a required faculty orientation, access to one on one training and consultation, an annual faculty retreat, and an evidence-based teaching conference first offered in 2017 and expected to become an annual event. It is clear that PAU values the strategic importance of online learning to its future, and deeply understands how effectively online learning serves its students.

The team commends PAU for its dedication to students. At the heart of PAU is its commitment to student success. The institution produces a notable number of highly qualified PsyD and PhD students, who are successfully placed in top internships. PAU's graduate students have outstanding pass rates on licensing examinations, and students in all degree programs participate in high quality

practicum placements and other exciting, community-based activities. Students at PAU clearly benefit from the institution's support of the teaching side of the teaching-learning continuum.

Also commendable in this regard is PAU's implementation of its distance learning options. The institution is clearly committed to providing the infrastructure necessary to support online learning. The partnership with Canvas, and the ubiquitous use of Zoom, testify to this.

Against this backdrop of success, the team is concerned with PAU's failure to assess student learning outcomes. The team recommends that PAU focus on this as it moves forward, and notes that teaching, which as noted above is a strength at PAU, does not always produce the desired learning outcomes. Broad issues to address for the undergraduate program include the assessment of core undergraduate competencies at or near graduation, and specific issues such as justifying the selection of 5% and 25% as aspirational levels for the number of undergraduates expected to attain benchmark and capstone performance levels, respectively. For the graduate programs, the team notes that licensing exam pass rates, internship placements, and attrition rates provide an incomplete picture of student learning; these markers do not communicate what students know and can do. Without systematic assessment, PAU cannot describe which or how many students can write or speak well, whether there are deficiencies in any topical area (such as statistics), how well students can think when they are faced with conflicting information, or other important learning outcomes. The assessment of student learning outcomes is required by all accrediting agencies at all levels of postsecondary education, as well as the U.S. Department of Education. The team urges leaders in all PAU programs to become actively engaged in the assessment of student learning (CFRs 2.3, 2.6, 4.3, 4.4).

Academic program review should make extensive use of assessment data. However, when the team attempted to discuss program review with faculty, few understood the team's line of questioning or its relevance to the institution. Periodic, systematic review is essential to maintaining the currency and quality of academic programs, but there is no evidence that this takes place at PAU. The team

recommends that PAU adopt and implement policies that mandate periodic reviews of all of its degree programs. The team is especially concerned about the lack of PAU's progress on this requirement since it received a similar recommendation (focused at that time only on the undergraduate program) in the most recent mid-cycle review (CFRs 2.7, 4.1).

PAU is strongly focused on academic programs but has not provided the same emphasis to its co-curricular offerings and student services. The team recommends that PAU review the needs of its students in this area and take steps to address those needs. This may include centralizing the existing student services and offering an array of new services, including career planning, national honors societies for all programs, and clubs that are open to students in all programs. An office for writing and learning would probably attract students with disabilities, students who need tutoring, and other students who would benefit from academic assistance. During the AV, the team learned that students desire a single campus, space for meetings, and places where they can stay between classes. These and other issues identified by students can perhaps not all be met, but they should at least be discussed, and potential solutions considered. The library is planning to remove older books and create student spaces and a media center, which may help to address some space issues (CFRs 2.11, 2.13).

A final recommendation is to build bridges across the various degree programs at PAU. The team was surprised to learn during the AV that little communication exists between faculty and students in the various degree programs. As a result, PAU operates more as a collection of independent academic units than as an integrated academic institution. Students are essentially confined to silos defined by their degree objectives, limiting opportunities for the development of peer mentor/mentee relationships within PAU. Faculty are similarly handicapped in learning from and about their counterparts in other programs. The team also noted that there were some perceived inequities between programs, which may at least partially dissipate as faculty begin to recognize that they are all colleagues working towards a common goal (CFRs 3.7, 3.10, 4.6, 4.7).

APPENDICES

A. Federal Compliance Forms

1. Credit Hour and Program Length Review

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, where is the policy located? Webpage and student handbook
	Comments:
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for online and hybrid courses Please review at least 1 - 2 from each degree level.	How many syllabi were reviewed? 12
	What kind of courses (online or hybrid or both)? Both
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? Psychology
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) Please review at least 1 - 2 from each degree level.	How many syllabi were reviewed? 5
	What kinds of courses? Psychology
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? Psychology
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Workload expectations are described in practicum and counseling site agreement forms for graduate programs, and in the Undergraduate Student Handbook for undergraduate programs

Sample program information (catalog, website, or other program materials)	How many programs were reviewed? 5
	What kinds of programs were reviewed? All programs offered by Palo Alto University
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? Psychology
	Does this material show that the programs offered at the institution are of a generally acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

Review Completed By: Bruce Johnson and Harold Stanislaw
Date: April 30, 2018

2. Marketing and Recruitment Review

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

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	Does the institution follow federal regulations on recruiting students? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Comments: Relevant policies are described at www.paloalto.edu/about/consumer-information
Degree completion and cost	Does the institution provide information about the typical length of time to degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Comments: Information is provided online in the respective program description pages of the Palo Alto University website
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Information about potential careers for which graduates are qualified, as well as alumni jobs data, are available on the Palo Alto University website

*§602.16(a)(1)(vii)

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing

student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed By: Douglas Grier
Date: March 8, 2018

3. Student Complaints Review

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

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy or procedure easily accessible? Is so, where? Policies are described online, in the catalog, and in the student handbooks for each program
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, please describe briefly: Procedure details clear, explicit standards and guidelines for all university faculty, staff, and students
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Records	Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? Student Evaluation Committees
	Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: Outcomes are tallied
	Comments: The total number of incidents is small, precluding formal analyses. Early intervention procedures and frequent formal and informal reviews of students appear to be effective in preventing most issues from requiring adjudication.

*§602-16(1)(1)(ix)

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

Review Completed By: Diane Halpern and Harold Stanislaw
 Date: April 30, 2018

4. Transfer Credit Review

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

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

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

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

See also WASC Senior College and University Commission's Transfer of Credit Policy.
 Review Completed By: Harold Stanislaw
 Date: March 8, 2018

B. Off-Campus Locations Review

Institution: Palo Alto University
 Type of Visit: Reaffirmation of Accreditation
 Name of reviewer/s: Diane Halpern and Harold Stanislaw
 Date/s of review: March 6, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed¹. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address

De Anza Community College
 21250 Stevens Creek Blvd, Cupertino, CA

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

On-ground courses for the BS Psychology and Social Action courses are offered at the Cupertino site, as well as Foothill College (in San Mateo). However, classes currently taught at Foothill College will be moved to the Cupertino site beginning in Fall 2018.

The BS Psychology and Social Action program currently enrolls 89 students. The program is supported by one full-time professor and a large number of adjunct faculty who teach part-time.

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

The team toured the De Anza facility, and met with undergraduates, with instructors in the baccalaureate programs, and with the undergraduate Director and Manager.

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?	N/A	

¹ See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.

<p><i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</p>	<p>The De Anza location leases space from De Anza Community College and is used exclusively to deliver face-to-face instruction in the BS Psychology and Social Action program. The site is convenient, as it enables recruitment of students from courses taught by De Anza.</p>	
<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>The De Anza location is neither academically nor socially integrated with the main campus. There are occasional activities designed to improve this, but they are generally not successful. A Director of Student Activities was recently hired, which may help to at least partially remediate this situation.</p>	
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>Classes are relatively small, which facilitates student engagement. However, hybrid and online students seem less directly connected to the institution, and exhibit lower retention rates.</p>	
<p><i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>Student support services are few or non-existent at the site. Students can utilize the De Anza library, which is a public library; they need only request a library card. Other services are lacking at De Anza, but the main campus is located within a 15-minute drive, which may be an acceptable substitute for on-site services; many students use private transportation to reach the De Anza campus, so it could just as easily be used to reach the main campus. However, parking is a concern at the main campus, providing a potential barrier to treating the two sites as shared facilities.</p>	
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</p>	<p>The undergraduate program has only one full-time faculty member; all remaining faculty are adjuncts. It is not clear how deeply the adjuncts are involved in academic oversight.</p>	

<p><i>Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</i></p>	<p>Program review is not conducted on a regular basis. Comparisons to the main campus are not appropriate, because the program delivered at the De Anza campus is entirely distinct from (and offered at a different degree level) than the program at the main campus, and at the other off-campus locations.</p>	
<p><i>Retention and Graduation. What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</i></p>	<p>Retention rates are good for face-to-face instruction, and are probably assisted by early intervention when problems (such as absences) become apparent. Retention rates are considerably weaker for online students, who may struggle with the time demands of the program. For these students, adopting a part-time option (which is under discussion) could help.</p>	
<p><i>Student Learning. How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</i></p>	<p>Instructors provided multiple examples of course-level assessment, utilizing rubrics (including the VALUE rubrics). However, no attempt is made to compile the data across courses and use this for program-level assessment.</p>	
<p><i>Quality Assurance Processes: How are the institution's quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</i></p>	<p>Quality assurance processes are underdeveloped. This issue is discussed in more detail in the team's main report.</p>	

Institution: Palo Alto University
 Type of Visit: Reaffirmation of Accreditation
 Name of reviewer/s: Diane Halpern and Harold Stanislaw
 Date/s of review: March 5, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed². One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address

Gronowski Clinic and Los Altos campus
 5150 El Camino Real, Los Altos, CA

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

The Gronowski Clinic was established in 1988 and moved to the Los Altos campus facility in 2005. MA Counseling, PsyD, and PhD students utilize resources at the Gronowski Clinic to obtain clinical experience relevant to their degree programs.

The Los Altos campus is used to deliver portions of the MA Counseling program and portions of the two doctoral programs. Site-specific FTE statistics are not meaningful, because students in the relevant programs complete their coursework at several locations, and because Palo Alto University does not offer parallel programs in different locations.

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

The team toured the Gronowski Clinic and met with Student Council representatives for the BS program, the MA program, the PsyD program, and the PhD program. There were no representatives present from the MS program. The team also met with Clinic directors.

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<p><i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</p>	<p>N/A</p>	

² See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.

<p><i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</p>	<p>The Los Altos campus is a leased facility that shares space with other tenants. It houses classrooms and the Gronowski Clinic and serves as the primary instructional campus for PsyD students. The Clinic is integral to their clinical training; about half the PsyD students complete their second-year practicum hours at the Clinic. The Clinic also houses two specialty clinics that meet specific community needs and provide students with unique training opportunities.</p>	
<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>The Los Altos campus and the Gronowski Clinic are neither academically nor socially integrated with the main campus. There are occasional activities designed to improve this, but they are generally not successful. A Director of Student Activities was recently hired, which may help to at least partially remediate this situation.</p>	
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>Given the nature of the work performed by students at the Clinic, there is considerable faculty oversight of students. Student meetings with clients/patients are videotaped, and faculty supervisors provide students with frequent feedback. Students are permitted to perform intake interviews, which is unusual but seemingly protected through the implementation of risk management procedures.</p>	
<p><i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>Student support services are few or non-existent at the site, other than those directly required for clinical work. Other PAU sites are located within a 15-minute drive of the Los Altos campus, which may be an acceptable substitute for on-site services; private transportation is required to reach the Los Altos campus, so it could just as easily be used to reach the main campus. However, parking is a concern at both sites, providing a potential barrier to treating the two sites as shared facilities.</p>	
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4,</p>	<p>PAU faculty may be appointed to the Teacher/Scholar line, or the Tenure Track line. Most of the clinical staff are in the Teacher/Scholar line. Some faculty are "core," which is a term that has its roots in PAU's professional accreditation. (Both APA and CACREP define, and have requirements for, the percentage of "core" faculty.) The team, and the faculty themselves, were not entirely clear regarding the distinctions between the various appointments. However, Senate and the administration are currently</p>	

4.6)	attempting to resolve this.	
<p><i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</p>	<p>Program review is not conducted on a regular basis, but the program at Los Altos is reviewed periodically for accreditation by CACREP.</p>	
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</p>	<p>MA Counseling students and doctoral students complete some of their work at the Los Altos campus and the Gronowski Clinic, but the main campus (Palo Alto) is also used for curriculum delivery. The team’s findings regarding retention and graduation, student learning, and quality assurance processes are described in the main report. It is not appropriate to compare data or processes between sites, because students do not complete an entire program at one site, and because Palo Alto University does not offer parallel programs at different sites.</p>	
<p><i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>		
<p><i>Quality Assurance Processes:</i> How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>		

Institution: Palo Alto University
 Type of Visit: Reaffirmation of Accreditation
 Name of reviewer/s: Diane Halpern and Harold Stanislaw
 Date/s of review: March 6, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed³. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address

Stanford Psychiatry and Behavioral Services
 Stanford Medical School

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

The Stanford Medical School site is used to deliver portions of the PsyD program, which was established in 2002. Stanford Psychiatry and Behavioral Services provides space for the PsyD program in the Stanford Medical School. Site-specific FTE statistics are not meaningful, because students in the PsyD program complete their coursework at three locations, and because Palo Alto University does not offer the PsyD program in different locations.

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

The team met with PsyD students, with PsyD program directors, and with PsyD instructors.

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?	N/A	
<i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)	The Stanford Medical School site operates in a physical space donated by Stanford Psychiatry and Behavioral Services. The site enables students to interact closely with both PAU and Stanford faculty, and provides a high-quality instructional environment that has earned an outstanding reputation.	

³ See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.

<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>The Stanford site is neither academically nor socially integrated with the main campus. There are occasional activities designed to improve this, but they are generally not successful. A Director of Student Activities was recently hired, which may help to at least partially remediate this situation.</p>	
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>Classes at the Stanford site are small, and much of the instruction occurs in even smaller groups (e.g., when conducting dissertation research). There is also close supervision at the two main practicum sites: the Gronowski Clinic and the Palo Alto VA.</p>	
<p><i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>Student support services are few or non-existent at the site, and student lack access to facilities available to Stanford students (such as the gym). Other PAU sites are located within a 15-minute drive of the Stanford campus, which may be an acceptable substitute for on-site services; private transportation is required to reach the Stanford campus, so it could just as easily be used to reach the main campus. However, parking is a concern at both sites, providing a potential barrier to treating the two sites as shared facilities.</p>	
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</p>	<p>Faculty are paid fully either by PAU or by Stanford; there are no split appointments. Many faculty are full-time, but some are adjuncts. Faculty do not appear to be involved in curriculum development and assessment of student learning, but there are retreats several times each year, which serve as opportunities to discuss program issues.</p>	
<p><i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</p>	<p>Program review is not conducted on a regular basis, but the program at Stanford is reviewed periodically for accreditation by APA.</p>	

<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</p>	<p>PsyD students complete much of their work at the Stanford site, but other sites (the Palo Alto main campus, the Los Altos campus, and the Gronowski Clinic) are also used for curriculum delivery. The team’s findings regarding retention and graduation, student learning, and quality assurance processes are described in the main report. It is not appropriate to compare data or processes between sites, because students do not complete an entire program at one site, and because Palo Alto University does not offer parallel programs at different sites.</p>	
<p><i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>		
<p><i>Quality Assurance Processes:</i> How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>		

C. Distance Education Review

Institution: Palo Alto University
 Type of Visit: Reaffirmation
 Name of reviewer/s: Douglas Geier and Diane Halpern
 Date/s of review: March 6-8, 2018

Programs and courses reviewed (please list)

Programs

- MA Counseling - distance learning “low residency” (13% onsite) and hybrid (63% onsite)
- MS Psychology Ph.D. Prep (100% online)
- BS Psychology and Social Action
- BS Psychology Business Psychology

Courses Access to four current sample courses in the LMS was provided:

MA Counseling

- COUN 600, Counseling Theory
- MTHD 600, Research & Program Evaluation

Undergraduate Courses

- PSYC 325, Psychology of Leadership and Team Development
- PSYC 320, Social Psychology

In addition, sample syllabi from all online programs were reviewed.

Background Information

Courses are offered through the Canvas Learning Management System, which provides access to course materials and activities, including asynchronous student-student and instructor-student interaction. Zoom video conferencing software is used for live (synchronous) sessions on a pre-scheduled, weekly basis. Zoom sessions are a required part of all MA Counseling and on a course-by-course basis for undergraduate-level courses.

Program	Degree Level	Started	Fall 2014 Distance Ed FTE (by Degree Level)	Fall 2016 Distance Ed FTE (By Degree Level)	Change
MS Psychology (Ph.D. Prep)	Masters	2000	84	74	-12%
* MA Counseling	Masters	2011			
BS Psychology and Social Action	Bachelors	2011	78	81	+4%

BS Business Psychology	Bachelors	2011			
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* Note: MA Counseling offers two formats: distance learning (87% online) and residential hybrid (37% online). The BS programs also offer hybrid and residential programs, in addition to online.

Nature of the review (material examined and persons/committees interviewed)

Access to the four online courses listed above was provided for review within the learning management system (Canvas). The syllabus, content, activities, and level of interaction in each of the courses were reviewed. The following additional materials were also examined:

- PAU Faculty Learning and Instructional Development (L&ID) Resource Center – an online repository filled with training materials, information and tools for faculty. This includes training information on the LMS (Canvas) and other technical instruction on instructional tools, institutional information and pedagogical resources and other support materials.
- *Palo Alto University Educational Effectiveness Committee Report: Recommendations for Improving Online Learning* (April, 2016)
- *Current Practices in Online Counselor Education: A Preliminary Exploration* – a study of current literature and survey results of online counselor educators, authored by faculty from PAU
- *The Palo Alto University Counseling Program: Comparing Distance Education (Online) to Residential Student Outcomes* (January, 2017) – a review of practicum and capstone assessments between the two groups of students. Student perceptions and level of satisfaction in the two groups are also reviewed. Analysis and recommendations are provided.
- Course schedules
- Faculty handbooks and training materials
- Student Handbooks
- Technology Needs and Disaster relief plan documents
- WASC Sub-change Approval Action Letters (for PAU Online Programs)

Persons / Committees interviewed

- Director of Faculty Learning and Instructional Development
- Director of Academic Technology
- Instructional Designer / Media Specialist
- Faculty Learning & Instructional Development Committee
- Institutional Research
- Information Technology
- Faculty who teach online
- Online students
- Other PAU stakeholders

Observations and Findings

Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)	Observations and Findings	Follow-up Required (identify the issues)
<p><i>Fit with Mission.</i> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?</p>	<p>Online and hybrid programs that provide flexible enrollment options for students, and in particular, working adult learners.</p> <p>The greatest enrollment gain has come from a 10-fold expansion in the MA Counseling Program (since 2010-11), as well as an increase in undergraduate program enrollments. Furthermore, recent CACREP accreditation of the MA Counseling program is expected to significantly increase enrollments in coming years.</p> <p>The importance of online learning at PAU is reflected in its administrative structure. The Director of Academic Technology (which includes instructional design and media) reports to the Provost. In addition, the Director of Faculty Learning & Instructional Development (who reports to the Dean for Institutional Effectiveness, Analysis & Planning) is responsible for evaluating effectiveness on online education and making recommendations for improvement.</p> <p>New distance learning programs have not been launched since 2011. However, the possibility of offering distance education at the PhD level is currently being evaluated by the Faculty Senate Online Workgroup. This workgroup is tasked with researching requirements, educational effectiveness, best practices for online teaching, and impact on budget and resources. This process will result in a policy proposal for offering online at the doctoral level.</p>	<p>As online enrollments grow, continue to ensure adequate resources and capacity to support the development of quality online courses.</p>
<p><i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?</p>	<p>Online courses provide an opportunity for active learning, with many programs and courses offering (or requiring) synchronous class meetings on a weekly basis, providing an opportunity to directly interact with faculty and other students in a more robust way. Synchronous sessions, as well as more “traditional” forms of online interaction (e.g., discussion forums) help connect online students with the instructor, their classmates and with the PAU community in general.</p> <p>Online students are provided with an online orientation to ensure that they are prepared to participate in the online community. Co-curricular and internship opportunities are also available for undergraduate and graduate students in online programs. An internship is required as part of the BS Psychology and Social Action degree, and is optional for the BS</p>	

	<p>Business Psychology degree. In the MA Counseling program, practica are facilitated for online student.</p>	
<p><i>Quality of the DE Infrastructure.</i> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?</p>	<p>The online learning infrastructure is sound, and conducive to learning and interaction among faculty and students. Canvas, an industry-standard, cloud-based learning management system, is the platform for online coursework, resources and asynchronous discussion among faculty and students. Canvas' interoperability with other applications makes it easier for PAU to link it with other course tools and to extract and use data.</p> <p>A video conferencing platform, Zoom, is used as a tool for synchronous class meetings. The university has demonstrated a commitment to supporting both of these resources and the training necessary for effective teaching and learning. Google Apps, a video platform (Panopto), and other tools further support learning.</p>	
<p><i>Student Support Services:</i> What is the institution's capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</p>	<p>All matriculated students (including online students) are assigned a faculty advisor. In the MA Counseling program, practica are facilitated for online students in much the same way as residential students. There is a dedicated clinical training director for online students in this program. Internships are also available to undergraduate students.</p> <p>The library is open/staffed until 9pm M-F and also open weekends to accommodate working adults and online students. Research databases and inter-library loans are available online through the library.</p> <p>PAU has recently brought on a new Director of Student Services to evaluate current services and develop new services for all PAU students, as needed. He has expressed the necessity of making resources available to all students, including those who study online.</p>	<p>Consider the unique needs of online students as new services are rolled out to all PAU students.</p>
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty</p>	<p>PAU provides a variety of technical support and pedagogical resources, workshops, mentorship programs, and other opportunities for faculty who teach online. Most impressive is a required faculty orientation, access to one on one training and consultation, and annual faculty retreat, and an annual Evidence-based Teaching Conference (first year was in 2017). The Faculty Learning and Instructional Development (L&ID) Resource Center is a "one-stop shop" built in Canvas for institutional info and policies, HR, technical support info and training, pedagogical development, and student support methods.</p>	

<p>involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</p>	<p>Online courses are taught by full-time faculty as well as a significant portion of faculty on adjunct contracts.</p>	
<p><i>Curriculum and Delivery.</i> Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</p>	<p>Syllabi for on-ground and online courses in each program were reviewed and found comparable in outcomes and quality.</p> <p>PAU demonstrates strong awareness of pedagogy and tools required for effective online learning. In some cases, it is using assessment and survey data to verify efficacy of online learning and make suggestions for improvements where needed. Some examples include practicum evaluations and capstone assessments (both from 2017) that found no significant differences in performance between residential and distance learning students in the MA Counseling program.</p> <p>Courses are developed by faculty who teach the courses and often shared with other faculty members who teach the same course.</p>	
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions' online offerings? If any concerns exist, how are these being addressed?</p>	<p>More efforts could be made to better understand retention and graduation rates among students who take classes online. However, some evidence is emerging. In the undergraduate program, attrition rates are significantly higher for students who take the majority of their classes online. Better understanding the contributing factors (e.g., course quality, student engagement or readiness, student demographics, etc.) will help the institution to improve online student success rates.</p>	
<p><i>Student Learning.</i> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings?</p>	<p>Assessment in online courses is comparable to on-ground courses at PAU. However, some efforts are being made or planned to study any differences in outcomes between the two modalities. For example, institutional analysis of practica and capstone projects in the MA Counseling program show no significant differences between these two modalities.</p>	

<p><i>Contracts with Vendors.</i> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on <i>Contracts with Unaccredited Organizations?</i></p>	<p>There are no contracts with online program management providers or other vendors to assist with the development, delivery or instruction of courses or otherwise engage in revenue-sharing arrangements.</p> <p>Online courses are built on the industry-standard Canvas learning management system; synchronous distance learning is conducted on the Zoom web conferencing system.</p>	
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?</p>	<p>Program directors and other faculty members are responsible for ensuring the quality of online courses. It is a PAU policy that directors and program curriculum committees must regularly review credit hour assignments for each course within their curriculum. The Online Education (OEI) Course Design Rubric is used by some programs to evaluate quality at the course level.</p>	