

# REPORT OF THE WASC SPECIAL VISIT TEAM

To Cogswell Polytechnical College

March 20 – 23, 2012

## Team Roster

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The team evaluated the institution under the WASC Standards of Accreditation and prepared this report containing its collective for consideration and action by the institution and by the Accrediting Commission for Senior Colleges and Universities. 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 WASC website.

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## **SECTION I. OVERVIEW AND CONTEXT**

### **A. Description of the Institution and Visit**

The Cogswell Polytechnical College (hereafter referred to as Cogswell or the College) was founded in San Francisco in 1887 as a co-educational vocational high school. Cogswell became a two-year college in 1930 and a four-year institution in 1971. The College moved to Silicon Valley in 1985 and has been located in Sunnyvale, California since 1994. Cogswell offers Bachelor of Arts and Bachelor of Science degrees in digital arts and animation, Digital Audio Technology, Game Development and Design, Software Engineering, Computer Engineering, Digital Arts Engineering, and Fire Science. On September 30, 2010 the Western Association of Schools and Colleges (WASC) approved Cogswell to award Bachelor of Arts and Master of Arts degrees in Entrepreneurship and Innovation with an Optional Specialization in Digital Media, both in online and residential formats.

The WASC Commission (hereafter referred to as the Commission) approved Cogswell's independence from the Foundation for Educational Achievement in June 2008. The College was scheduled for a Special Visit in spring 2010 to evaluate the following issues: a change in governance related to the structural change, financial sustainability, strategic planning, and assessment of student learning and program review. The spring 2010 Special Visit was rescheduled to fall 2010 to accommodate Cogswell's proposal for a change of ownership. WASC approved the November 2010 acquisition of Cogswell by Palm Ventures, LLC.

The Commission received the College's fall 2010 Special Visit Report, removed a formal Notice of Concern, requested a progress report by May 1, 2011 to provide final documentation related to the change of ownership, and scheduled a Special Visit for spring 2012 (Commission Action Letter – Cogswell Polytechnical College, February 28, 2011)

The spring 2012 Special Visit on March 20 – 23, 2012 focused on Cogswell’s ability to address issues related to their change of ownership and governance (CFR 1.3, 3.8 – 3.11), financial sustainability and management (CFR 1.3, 3.5, 3.10), strategic planning (CFR 3.1 – 3.3, 4.1 – 4.3), and assessment of student learning and program review (CFR 2.6, 2.7, 4.4; see Appendix A for details).

The chair of the spring 2012 Special Visit Team (hereafter referred to as the Team) reviewed Cogswell’s distance education program. Appendix B reflects a report on this review.

There were no special follow-up visits related to substantive change conducted in connection with the spring 2012 Special Visit.

A compliance audit was not conducted.

## **B. Quality of the Special Visit Report and Supporting Evidence**

According to Cogswell’s spring 2012 Special Visit Report a small team led by the College’s Chancellor worked together to prepare the report. The College’s interim Chief Financial Officer (CFO) and partners from Palm Ventures assisted the team on the institution’s financial sustainability and management issues. The College’s standing Assessment Committee consisting of members of the faculty and led by one of the College’s Program Directors, who also serves as the College’s Accreditation Liaison Officer (ALO), and the Academic Dean addressed student learning assessment and program review issues. Strategic planning issues were addressed by the Chancellor and the College’s standing Strategic Planning Committee which includes key academic and administrative department members. Finally, the section on changes in ownership and governance was drafted by the Chair of the College’s Board of Trustees (hereafter referred to as the Board). “The substance of the report” was reviewed by the faculty senate, senior staff, representatives from Palm Ventures, the ALO, and the Board of Trustees Chair.

It is clear that faculty, senior staff, and some Board of Trustees were involved in drafting the Report and preparing for the Special Visit. But, it is unclear what Cogswell means by “the substance of the Report” and, as such, whether the actual report was reviewed by various College constituencies. It is also unclear whether staff who report to senior administrators, independent Board of Trustees members, or students were involved in the process.

The Team thought Cogswell’s Report was well written, commenting on each of the identified issues and reflecting earnest efforts. However, the report lacked supporting documentation and other forms of evidence for the Team to use to judge the College’s use of evidence, its analysis, and the alignment of its conclusions with such evidence. The Team asked for a long list of documentation and information on February 18, 2012 to be able to make these sorts of judgments before the visit, which the ALO provided through the creation of a Wiki by the team’s requested deadline. Unfortunately, the Wiki provided was difficult to navigate and still lacked some requested evidence. This pattern continued throughout the visit, i.e. while Cogswell was responsive to team requests, some of the information provided was incomplete and/or was repeatedly revised while on site. The team found this persistent pattern troubling, and the incomplete or changing evidence made it very difficult for the team to make the required evaluations.

### **C. Description of the Team Review Process**

WASC provided in person and web-based trainings to orient team members to Special Visit roles, responsibilities, protocols and processes. WASC also provided an online file sharing website for the team to use to access and store materials and documentation in preparation for the visit. Each member of the team received a CD by U.S. mail from Cogswell by the expected deadline that was supposed to include their Special Visit Report, though none of the team members were able to see and, therefore, access the Report that way. The ALO immediately

responded to the problem by sending the report as an email attachment to the team Chair and Assistant Chair, who shared it with the rest of the team. Each team member read the report closely and used a worksheet provided by WASC to record his/her initial albeit tentative feedback. The team Assistant Chair collated the worksheets and posted the collation on the file sharing website for team members to access and use during a team conference call. During the call, the team discussed the College's report, the foci of the visit, and team strategies for the gathering and analysis of evidence. The call also functioned as further team training with our WASC Staff Liaison to orient the team to the review process, timeline, and logistics. Together, the team analyzed how well the institution was positioned for the visit, whether there were any compliance issues that should be targeted during the visit, and how to assign the work to be done during the visit and, then, to draft the visit report.

Once on site, the team met with the ALO each morning to cover team room and technology details and resources and other visit logistics. The team toured Cogswell facilities and properties early the first morning of their visit. The team spent two days meeting with various constituencies including students, the Chancellor, Palm Ventures principals, independent Board of Trustees members, the Board of Trustees Chair, the Finance Committee Chair, members of academic leadership, senior staff including the interim CFO and Chief Marketing Officer (CMO), the Director of Student Life, Executive Directors of Recruitment and of Entrepreneurship, and committees on Assessment, Budget, Compliance, General Education, and Student Services. One team member met with auditors by teleconference. The team met each evening to review the visit schedule, refine lines of inquiry, plan visit methods, and discuss findings from the day's meetings. Team members spent the remainder of each evening drafting sections of the visit report on their own. The team met with the Chancellor, the ALO, an

investor member of the Board of Trustees, and other faculty and staff from the College the last morning of their visit to share the team's findings and recommendations.

## **SECTION II. EVALUATION OF ISSUES UNDER THE STANDARDS**

### **A. Change of Ownership and Governance**

Cogswell Polytechnical College is a revenue-dependent institution that faced closure in 2010 due to revenue shortfalls. Late that year, Palm Ventures acquired the College. One and one-half years following the acquisition, the College is in the early stages of a major turn-around effort. This effort is challenging because of the conversion of a non-profit college to a for-profit college. This ownership change involves major shifts in culture, staff, and governance that will take time to execute. The turn-around will be successful if there is an appropriate balance between the academic and business cultures wherever the dynamic tensions between these cultures are confronted and if these tensions are managed in ways that produce positive, creative, and successful outcomes.

Cogswell is to be commended for good work accomplished since the acquisition. There is consensus across the organization that the top priority is to generate sufficient revenues to cover costs. The current estimate is that this will occur in fall 2012. In fact during the past ten months of relative turmoil, enrollment providing needed tuition revenue has increased. At the same time, the new owners used cash flow loans to help stabilize the College's financial situation. And, the new owners made a substantial investment in computing equipment. Once revenue neutral, Palm Ventures will continue its work to bring the College to a revenue positive position.

During a meeting with the team, the investors presented a compelling vision for the College. Faculty reported a basic understanding of the vision. However, the team suggests the investors and Board take steps to even more clearly articulate this uplifting vision that serves to unify and

inspire faculty and staff and allow the faculty, staff, and institutional leadership to make the vision a reality. The team believes the College meets the expectations of CFR 1.6, 1.9, and 3.9.

The College is to be commended for clearly articulating a cross-functional team structure that specifies the charge, makeup, meeting schedule and record-keeping for each of six college wide teams. This type of clarity is important for the College as it progresses through the turn-around. The engagement of these teams in the fiscal year 2012 budget development has resulted in unprecedented transparency and will undergird work now underway to develop a strategic plan.

Challenging progress, nearly sixty percent of the positions listed on the College's organizational chart saw changes in personnel in the past ten months (approximately ten administrative staff positions). This included three of four senior staff (Chancellor, Chief Financial Officer, and Chief Marketing Officer), the student recruitment leader, the student services leader, and others. At the time of this Special Visit, many of the senior leaders of the College had less than six months on the job and the Board of Trustees was new.

The team investigated potential governance issues resulting from the change of ownership, using three lines of inquiry: (1) whether the Board is sufficiently independent of the College and its parent company (CFR 1.6, 3.9); (2) whether the Board grants sufficient authority to the College leadership (CFR 1.3, 1.6, 3.8, 3.9); and (3) whether the faculty are appropriately engaged in the governance of the College (CFR 3.8, 3.11).

An impressive Board was constituted by December 2011 and had their first face-to-face meeting in late February 2012. Review of Board of Trustee minutes reveals that the Board has addressed important issues such as Board policies and election of a Chair and a Secretary, recruitment of independent members, and development of committee assignments. And, the Board has effectively addressed the recommendation of the May 2011 team to "continue to

develop its membership and culture of leadership and governance consistent with its policies and higher education standards” (CFR 1.3, 3.8, 3.9).

The Amended and Restated Limited Liability Company Agreement of Cogswell College (hereinafter referred to as the LLC Agreement) dated November 18, 2010 calls for a majority of the Board to be independent of the College. The College’s fall 2010 Special Visit Report asserts that the Board has “substantial independence” from the investor. There are nine members of the Board with three members “representing the investor.” Though remaining in compliance with the LLC Agreement, it is possible that the Commission might conclude that the Board of Trustees Chair, who is compensated at a substantial annual rate, does not qualify as an independent member of the Board, because of that compensation. The team believes that this level of compensation is appropriate for the short term while the College goes through the early stages of the ownership transition. The Chair’s involvement in the College exceeds what is normally expected, but his active role fills a leadership void caused by both the ownership transition and other significant personnel changes noted in this report. If progress with the transition means the Chair’s day-to-day involvement decreases, the investors expect the amount paid to the Chair may be reduced.

The team identified an issue with the Academic Affairs Committee that was resolved during the visit. The LLC Agreement, Article 4.1 states that “at all times, at least two-thirds (2/3rds) of a Committee’s members shall be Public Trustees.” Article 4.4 specifically deals with the Academic Affairs Committee and repeats that the committee must be “comprised of at least three members, two-thirds (2/3rds) of whom must be Public Trustees.” However, the Academic Affairs Committee had a simple majority of three public members to two investor members.

When this was reported to the Board, one of the investor members resigned his position on the committee allowing the College to be in compliance with the LLC Agreement (CFR 3.9).

The team found the second line of inquiry, delegation of authority, more difficult to evaluate. Board minutes reveal that extensive engagement in the operation of the College extends beyond the Chair and involves other Board members. Again, this engagement currently fills gaps in the College's leadership. In light of the recent turnover in a majority of senior administrative positions and a significant number of other staff positions, the team strongly suggests that Cogswell complete and stabilize its leadership structure and secure the necessary talent as quickly as possible to assure its ability to pursue its institutional purposes (CFR 1.3). Resolving the College's leadership issues will allow Board members to become less involved in day-to-day issues.

The Chancellor is in the appropriate position to best assure successful academic and business leadership. The team urges the Chancellor to act with urgency to address these leadership issues. For example, the College needs a full-time, permanent CFO (CFR 3.1, 3.10). When this is accomplished, the Board should have confidence in the College's leadership and, therefore, assume more appropriate Board roles (CFR 1.6, 3.1, 3.10).

The team was troubled by the Board's involvement in recent CFO and CMO searches. The LLC Agreement, Article 3.1 (v) gives the Trustees the authority to select and evaluate the President and Chief Executive Officer (CEO) of the Company (i.e., Cogswell College). However, Article 3.1 (vi) calls for the Trustees to "delegate to the President and Chief Executive Officer full responsibility and authority for the daily management of the Company." That at least implies that the Trustees do not hold hiring authority for other positions, e.g. CFO or CMO

(CFR 3.9). It should be noted that the Trustees changed the title of the Chief Executive Officer from President to Chancellor in 2011.

For the spring 2012 Special Visit, Cogswell was asked to provide “clarification of the role of faculty on the Academic Affairs Committee and of faculty governance processes” (CFR 3.8, 3.11). Faculty governance includes participation in searches for institutional leadership. However, it is difficult to invite participation when a search is done quickly. For example, the Board began a search for a new Chancellor in May 2011 and made an offer to the new person in June 2011. In addition, faculty were not included in the interviewing process of candidates for Chancellor, Chief Financial Officer, and Chief Marketing Officer. While the Board has authority to hire the College’s CEO, i.e. the Chancellor, it is important for the College to fulfill this responsibility by engaging the College community and, particularly, the faculty (CFR 3.11).

While Cogswell’s Special Visit Report makes claims about faculty involvement in governance (e.g. faculty are involved in the strategic planning process), the report lacks supporting evidence or documentation. As a result, the team asked Cogswell for faculty governance policies and procedures, constitution and bylaws, and committee participation in February, 2012 (CFR 3.11). Cogswell provided a Wiki link to the Faculty Handbook, noting that the newly revised handbook had not yet been formally approved by the Board of Trustees. The team learned during the visit that the Board of Trustees has sent the revised handbook out for legal review regarding intellectual property policy matters and will revisit the handbook at the May 2012 Board meeting.

The revised Faculty Handbook seems relatively comprehensive, defining ranks and types of faculty, hiring procedures, and guidelines for evaluation and promotion. The Faculty Handbook specifies that all fulltime faculty members are automatically members of the Faculty Senate. But

the handbook does not include faculty governance rules and processes for electing the leadership of the Faculty Senate and its standing committees.

The Faculty Senate home page on the Wiki site did not include any governing documents, constitution, or bylaws. It does include comprehensive meeting minutes, however. The minutes reveal a consistent pattern of meetings and demonstrate substantial engagement by the Faculty Senate in exercising appropriate academic leadership. During the Special Visit, the team was assured that the Faculty Senate operated under an existing Constitution, which was provided to the team on the second day of the visit, but not in time for sufficient review prior to writing this report.

The team was concerned that Cogswell did not provide key evidence of faculty governance in their Special Visit Report or afterwards upon request. The Wiki site was extremely problematic. While well-intended to serve as a clearing house for assessment and Faculty Senate documents, the Wiki site was poorly maintained with old or irrelevant documents, at the same time constantly changing with updates and new materials, extremely frustrating to navigate, and included numerous empty links that did not lead to the requested documents (CFR 1.9).

Because it was not included in the Special Visit Report, the Team had to request the Policy Manual adopted by Board of Trustees as of February 23, 2012. The team reviewed the manual for evidence of the role of faculty on the Academic Affairs Committee. The manual does not provide for faculty participation or representation in any fashion—voting or ex officio—on the Academic Affairs Committee. The team learned during the visit, however, that the Board Chair and an investor member of the Board have interacted with faculty on several issues on an ongoing basis, and that the Academic Dean and his Program Directors were, on one occasion, asked to make presentations to the Academic Affairs Committee. The team concludes that

Cogswell has not provided for faculty participation on the Academic Affairs Committee in any formal fashion (CFR 4.1). The team recommends that clear policies and processes be developed for faculty governance, including participation on the Board's Academic Affairs Committee and engagement in interviews for college leadership positions (CFR 3.8, 3.11).

## **B. Financial Sustainability and Management**

The financial position of Cogswell Polytechnical College changed dramatically on November 28, 2010 following the execution of an asset purchase agreement and the simultaneous creation of Cogswell College, LLC, a wholly-owned subsidiary of Cogswell Education, LLC. Cogswell Education LLC, in turn, is a wholly-owned subsidiary of Cogswell Capital, LLC. Bradley C. Palmer is the Manager of Cogswell Capital, LLC. This section not only describes and analyzes this change, but reflects Cogswell's overall response to the country's economic downturn that was occurring at the same time.

Cogswell College, LLC was formed on November 28, 2010 to acquire substantially all of the unrestricted assets and assume certain liabilities of Cogswell Polytechnical College. The formation of Cogswell College, LLC (hereafter referred to as Cogswell) resulted in a new entity with a stronger financial position. The stronger financial position as of December 31, 2010 can be attributed primarily to the injection of cash related to the acquisition; the appraisal and resultant revaluation of land, buildings and equipment; the availability of a bank-provided \$5,000,000 revolving credit facility; and the use of the revolving credit facility to pay off the \$3,000,000 mortgage debt of Cogswell Polytechnical College. Cogswell's financial position was further strengthened on October 28, 2011 with the execution of a settlement and release agreement with The Savannah College of Art and Design, Inc. The Savannah College of Art and Design, Inc. had made claims against the assets of Cogswell Polytechnical College based on a series of promissory notes dating back to August 4, 2009.

Cogswell is to be commended for the transition of ownership that occurred in November 2010. The financial resources of Palm Ventures should help Cogswell sustain and advance; especially as it continues to address its serious near-term operating and financial challenges.

Although Cogswell's financial position was stronger than its predecessor entity, the most recent audited financial statements show a combined loss of \$458,578 from operating and non-operating activities and covered only the period from November 18, 2010 through December 31, 2010. Unaudited financial statements for the year ending December 31, 2011 show a combined loss of \$3,460,746 from operating and non-operating activities.

The operating plan for the year ending December 31, 2012 also projects a combined loss from operating and non-operating activities. The operating plan does, however, indicate that projected fall 2012 enrollment growth will be sufficient to cover fall operating expenses and achieve a break-even position for the 2012 fall semester. Unfortunately, the breakeven position in fall 2012 still results in a combined loss of \$1,949,500 from operating and non-operating activities for the entire year based on operating projections for the 2012 spring and summer semesters.

A pattern of losses from operating and non-operating activities by Cogswell Polytechnical College was the source of concerns noted by past WASC teams and the Commission. The continuation of this pattern of losses by Cogswell College, LLC is therefore of great concern and brings into question its ability to ensure its own long-term viability (CFR 3.5).

Longer-term operating budget and financial projections beyond the year ending December 31, 2012 were not available for review by the team until the last full day of the visit. It was clear to the team, however, based on interviews with key administrative staff members and members of the Board of Trustees that the College is primarily focused on the operating plan for the year

ending December 31, 2012 in order to help assure that a break-even position was achieved during the fall semester. The team also found, as detailed later in this report, that a longer-term strategic plan was being developed and thus not available for review. The team could, therefore, not determine if the longer-term operating budget and financial projections recently developed by the College were aligned with longer-term strategic plans (CFR 4.2) and if they provided additional evidence of long-term viability (CFR 3.5).

The team strongly recommends that Cogswell develop as quickly as possible a longer-term operating budget and financial projections that are aligned with longer-term strategic plans (CFR 4.2) and reflect an ability to cover operating costs from enrollment and other operating revenue sources to assure its long-term viability (CFR 3.5).

The continued backing of Cogswell by Palm Ventures will be important to the College's long-term viability. Interviews with Bradley Palmer and other investor members of the Board of Trustees indicate a continuing financial commitment to Cogswell and an enthusiasm about its future and long-term viability. Interviews with independent members of the Board of Trustees also verified the commitment of Bradley Palmer and his partners as well as a track record of commitment to other institutions of higher education in which they had invested.

A telephone interview with the independent auditors for Cogswell addressed the auditor's assessment of the College as a "going concern." The auditors had concluded in their last assessment of Cogswell that it was a going concern based on the financial assets of Bradley Palmer and his partners in Cogswell Capital, LLC and their track record of supporting the viability of other colleges and universities in which they had invested.

A telephone interview with the independent auditors also revealed that the auditors' reports, findings and required communications were not shared directly with the Board of Trustees

and/or its Audit Committee. A review of the structure of the Board of Trustees as detailed in the LLC Agreement indicates that the Board of Trustees has an Audit Committee, but not a Finance Committee.

In light of the serious financial and oversight challenges faced by Cogswell, the team recommends that the Board of Trustees create a standing Finance Committee that is separate and apart from the existing Audit Committee to allow the Audit Committee to focus on appropriate oversight functions such as the direct receipt of all correspondence and reports from external independent auditors (CFR 3.9).

Cogswell created a position for a full-time Chief Financial Officer and currently has someone filling that role in an interim capacity (CFR 3.10). Interviews with key administrators and members of the Board of Trustees indicate that the interim CFO has been instrumental in the development and implementation of appropriate internal controls and reporting systems (CFR 1.3) focused on budgeting and compliance processes that were developed through a collaborative process. The appropriateness of internal controls and reporting systems was verified by the management letter of the independent auditors dated June 30, 2011. Interviews with senior staff and members of the Board of Trustees also verified the appropriateness of internal controls and reporting systems.

Cogswell is to be commended for the development and implementation of improved systems through collaborative processes for internal controls and reporting systems including compliance monitoring, budget formulation and budget monitoring (CFR 1.8).

Cogswell has an updated organizational chart that shows lines of accountability across senior staff and academic leadership.

After meeting with both students and faculty during the visit, the team concluded that Cogswell's website, recruitment positioning, claims and promises are reliable and consistent with the actual student experience while attending the institution (CFR 1.7).

### **C. Strategic Planning**

The WASC Visiting Team Report, dated May 4, 2011, included the following team recommendation: build on near- and short-term strategic plans to engage in long-term strategic planning. In November 2010, that WASC visiting team also called for the development of a strategic plan. For this visit, the strategic plan was one of four major areas of emphasis. Despite repeated WASC requests over the years for a strategic plan, the spring 2012 Special Visit Team was informed that there was no plan in the traditional form. Instead, there is broad understanding that the College's singular focus is on returning to a positive revenue situation

A reasonable and comprehensive strategic planning process was defined and shared with this team and the May 2011 visiting team. During 2011 the College made an effort to follow their process and develop a strategic plan. But, this work was derailed by the pressing nature of operating deficits and significant staffing changes. A majority of the new leadership arrived in November 2011 and immediately faced the need to develop the 2012 budget and operating plan which was completed in December 2011 and approved by the Board in February 2012.

Cogswell has a nascent strategic planning process, but no meaningful plan in place. The institution does not have experience in the development and discipline of using a strategic plan and the team learned during the visit that the College has never had a strategic plan (CFR 4.1, 4.2, 4.3).

At the same time, there was a serious attempt to utilize the process in 2011 and the team learned that work is underway to develop a plan during 2012. The team met with the Strategic Planning Committee that reported 100% certainty that a strategic plan will be in place by the

summer 2012. Cross-functional teams that helped develop the 2012 annual budget are involved in the strategic planning effort.

There is evidence of Trustee recognition of the need for long-term plans. At the April 2011 Board meeting the Board Chair asked for a four-five year plan. The May 2011 Visiting Team Report said that “the Board sees long-term planning as a priority.” Faculty and staff expressed an understanding of the need to develop and use a strategic plan, even though they have limited experience with doing this type of work. The institution appears ready to finish the work they have begun to develop such a plan.

While the College is not meeting the expectations of CFR 4.1, 4.2, and 4.3, the team believes that it is focused on the single most important priority, achieving sufficient revenues to become financially viable. The team made it clear during the visit that it is imperative that the College understand the expectation that a strategic plan be developed and utilized. However, the team has sufficient confidence that new leadership and other key members of the College community will complete the plan within the next six months. The team recommends that Cogswell use its recently developed strategic planning process to develop a longer-term strategic plan (CFR 4.1) that is based on a vision for the institution.

#### **D. Assessment of Student Learning and Program Review**

The WASC Commission’s letter dated February 28, 2011 directed Cogswell to demonstrate, “progress on assessment processes including analysis of program data for college-wide improvement, and results that demonstrate educational effectiveness,” and “an explanation of how external reviewers and comparative data will be used in program review and assessment of educational effectiveness” (CFR 2.6, 2.7, 4.4). Cogswell’s spring 2012 Special Visit Report highlights a number of key activities and initiatives in assessment and program review that have taken place since the May 2011 team visit. No appendices or evidence of these activities were

provided with the report, however. The spring 2012 Special Visit Team subsequently requested the following items prior to February 24, 2012:

- Comprehensive plans, policies, procedures and timelines for annual assessment activities, reporting and program review; connection to institutional planning, budgeting and decision-making
- All program review documents for program reviews currently underway; list of external review teams and CVs; site visit schedules
- All program review documents for Engineering PR completed in 2010, and evidence of how results have impacted institutional planning, budgeting and decision-making

Cogswell provided a Wiki link to an assessment website which included a four-page Program Review Plan adapted from Fresno State University. The plan defines the content of a self-study report and outlines the scope of a program review. A description of the usage of external reviewers, however, is limited to a very small section of the Program Review Plan, allowing each College program to define for itself how it utilizes reviewers. The team concluded that the external reviewer material does not constitute thoughtful deliberation and planning regarding the role of external reviewers or employment of comparative data from external sources in program review processes (CFR 2.7, 4.4).

A schedule for program review is mentioned in Cogswell's Data Exhibit 6 – Educational Effectiveness Indicators. This document states that program reviews of General Education, Digital Arts and Animation, and Digital Audio Technology will all be completed by May 2012. At the time of the visit, the team had not received evidence of self-studies for any of the programs even after making specific requests for such evidence.

Only one program, Digital Arts and Animation, had mentioned the use of external reviewers. None of the reviewers, according to the Assessment Wiki, had been contacted to date. Given that the academic term is halfway over, and no self-studies have been provided, the team concluded that it is highly unlikely that any substantive, comprehensive program reviews using external reviewers will realistically take place by the stated date of May 2012. The team advises the College that for a program review to be substantial and comprehensive, and include external reviewers, much time, writing, and planning is required. Program reviews typically take place over an entire academic year, or more, at many institutions.

A program review for the Engineering program was completed in 2010, and a comprehensive self-study was prepared for that review and provided to this team. While there appear to be findings of the program review, no written evidence was presented that indicates external reviewers were used or consulted in reaching those findings.

A program review for the new Entrepreneurship and Innovation program has not been scheduled.

The Educational Effectiveness Inventory shows that a program review of Degrees at a Distance for Fire Prevention was conducted in 2008. No documentation of this review was provided to the team prior to the visit and no materials related to the review could be found on the Assessment Wiki. A thumb drive said to contain the program review and assessment documents for Fire Prevention was finally provided to the team on the second day of the visit, but not in time for sufficient review prior to writing this report. The team reasserts its frustration about the timely preparation of requested documents necessary for this visit (CFR 1.9).

The evidence on the Assessment Wiki regarding progress made in learning outcomes assessment of Cogswell's degree programs and its General Education program appears to be

quite inconsistent. While all programs appear to have identified learning outcomes, not all conduct substantive or comprehensive assessment of those outcomes (CFR 2.3, 2.4, 2.6, 4.6, 4.7, 4.8).

The General Education, Digital Audio Technology, and Digital Arts and Animation programs conduct thorough and comprehensive assessments using valid assessment processes that result in findings which are targeted to improve student learning. On the other hand, Degrees at a Distance/Fire Science, Engineering, and Entrepreneurship and Innovation programs did not provide evidence of effective assessment practices in time for sufficient review prior to writing this report.

The following list highlights the levels of assessment preparation and functionality for each of Cogswell's programs:

Entrepreneurship and Innovation. This new program at Cogswell has only recently begun to define assessment processes. Learning outcome statements and a curriculum map have been created, but rubrics, a multi-year plan for assessing the outcomes, and annual reporting are not in place. Assessment materials were uploaded to the Assessment Wiki on the first day of the visit, but not in time for sufficient review prior to writing this report.

Engineering. Only a single assessment report could be found for Engineering and its three tracks, and this report was filed in January 2012. A good portion of the 13 page report is dedicated to defining the practice of assessment and quoting sections on educational effectiveness from a previous WASC visit report. Some references are made to closing the loop from the program review that was conducted for Engineering in 2010; however, it was not clear how decisions were linked to data or evidence of student learning. As with the assessment report, all three Engineering tracks, or programs, appear to be conflated into a single program

review. Rubrics for evaluation of student work could not be found (CFR 2.4). The team was advised upon its arrival that the Engineering Program Director had resigned earlier in the week and that the position had not yet been replaced.

Digital Arts and Animation. Only a single, annual assessment report for Digital Arts and Animation for 2010-2011 could be found on the Assessment Wiki. The assessment report is comprehensive and descriptive of an authentic and viable assessment process. The report appears to be the first one ever completed, however, and the program has yet to demonstrate progress in improving student learning. If current practices are continued, the maturation of assessment efforts for Digital Arts and Animation will produce fruit in coming years. Excellent rubrics have been designed for each learning outcome. A multi-year plan for assessing each outcome has been articulated. And learning outcomes have been mapped to the curriculum via a course alignment matrix. Assessment plans for Digital Arts and Animation show promise.

General Education. Annual reports for the General Education (GE) program can be found for each academic year dating back to 2006-2007. The assessment reports, rubrics, multi-year timeline, and processes are quite comprehensive. Data of student learning for each GE area is provided graphically, in table form, readily identifying where student work is “Exemplary, Satisfactory, or Below Expectations.” Honest and thorough analysis appears to have taken place, and changes appear to have been recommended and implemented for the purposes of improving student learning. Faculty meet regularly for the purposes of discussing assessment results and program improvement. The assessment work in regard to the General Education program can be described as commendable, mature and effective.

Digital Audio Technology. Digital Audio Technology shares the quality and maturity of the assessment culture that can be found within the General Education program. Annual reports can

be found for each academic year dating back to 2006-2007. The assessment reports, rubrics, multi-year timeline, and processes are commendable. Data of student learning for each learning outcome is provided. Honest and thorough analysis appears to have taken place, and changes have been recommended and implemented annually for the purposes of improving student learning.

Degrees at a Distance/Fire Science. Despite the Special Visit Team's request, assessment reports could not be found for Degrees at a Distance/Fire Science on the Assessment Wiki. A thumb drive said to contain the program review and assessment documents for Fire Science was finally provided to the Special Visit Team on the second day of the visit, but not in time for sufficient review prior to writing this report.

While it became clearer during conversations with the faculty and program directors that faculty are genuinely engaged in a culture of assessment at the program level, it appears that, in relying on a poorly maintained Assessment Wiki site, Cogswell leadership did not always accurately represent the faculty's efforts and accomplishments in learning outcomes assessment to WASC (CFR 1.9). The team recommends that program reviews, that include external reviewers, be conducted for all programs and that the findings of those reviews be used in the College's planning efforts (CFR 2.7, 4.4).

### **SECTION III. FINDINGS AND RECOMMENDATIONS**

The WASC Special Visit Team was honored to have been at Cogswell as it celebrated its 125<sup>th</sup> anniversary.

The team was impressed with a number of things during its visit, including the students who were truly wonderful, the faculty, staff, and leadership. The team acknowledges the Board and the relatively new investors, without whom Cogswell would not be here.

#### **A. Commendations**

1. The team commends Cogswell for seeking and securing an investor/owner in Palm Ventures that has the capacity to secure its long-term viability.
2. The team commends the development of the cross-functional departmental team structure designed to help coordinate the planning and implementation of important administrative functions and all that this effort has produced in transparency for the budgeting and operations processes.
3. The team commends Cogswell for developing a strategic planning process that allows for participation by various members of the campus community and is informed by financial modeling and other quantitative and qualitative data.
4. The team commends Cogswell on increased use of analytics, especially in the recruitment and retention activities.
5. The team commends Cogswell for the development and implementation of improved systems through collaborative processes for internal controls, compliance monitoring, budget formulation, and budget monitoring.

6. Finally, the team commends Cogswell for developing an impressive, comprehensive retention plan focused on providing a satisfying student experience and supporting student success in their academic and career placement efforts.

## **A. Recommendations**

### **Governance and Change of Ownership:**

1. The team recommends that the Chief Executive Officer of the College, i.e. the Chancellor, act with urgency to fill academic and business leadership positions in order to assure that Board members, who are currently going beyond what would normally be expected, can assume their appropriate board roles (CFR 1.6, 3.1, 3.8, 3.9, 3.10).
2. The team recommends that the Board of Trustees create a standing Finance Committee that is separate and apart from the existing Audit Committee to allow the Audit Committee to focus on appropriate oversight functions such as the direct receipt of all correspondence and reports from external independent auditors (CFR 3.9).
3. The team recommends that clear policies and processes be developed for faculty governance, including participation on the Board's Academic Affairs Committee and engagement in interviews for college leadership positions (CFR 3.8, 3.11).

### **Financial Sustainability:**

1. The team recommends that the College continue its intensive focus on achieving enrollments levels that produce positive revenue results (CFR 3.5).

**Strategic Planning:**

1. The team recommends that Cogswell use its recently developed strategic planning process to quickly develop a longer-term strategic plan (CFR 4.1) that is based on a vision for the institution.
2. The team recommends that Cogswell develop longer-term operating and financial plans that are aligned with strategic plans (CFR 4.2) and that allow the College to cover its operating and capital costs from enrollment and other revenue sources to assure its future viability (CFR 3.5).

**Assessment and Program Review:**

1. The team recommends that program reviews, that include external reviewers, be conducted for all programs in a timely fashion and that the findings of those reviews be used in the College's planning efforts (CFR 2.7, 4.4).

**APPENDIX A:**  
**COGSWELL SPRING 2012 SPECIAL VISIT**  
**POINTS OF EMPHASIS**

The spring 2012 Special Visit on March 20 – 23, 2012 focused on Cogswell’s ability to address issues related to:

Change of Ownership and Governance (CFR 1.3, 3.8 – 3.11), specifically:

- A Qualified Governing Board That is Exercising Appropriate Oversight and has Adopted Structures and Policies Needed for Effective Board Functioning
- Clear Processes for the Role of Faculty in Governance, Including Participation on Board and Faculty Committees
- Explanation of how Authority for Decision Making is Distributed Among the Board, Faculty, and Administration

Financial Sustainability and Management (CFR 1.3, 3.5, 3.10) specifically:

- Improved Financial Position as Reflected in Budget Projections, Financial Reports and Audited Financial Statements
- Appointment of a Qualified, Full-Time Chief Financial Officer
- Appropriate Internal Business Controls and Systems
- Updated Organizational Charts, Showing Lines of Accountability Across Senior Staff and Academic Leadership

Strategic Planning (CFR 3.1 – 3.3, 4.1 – 4.3) specifically:

- Institutional Strategic Plan that Covers Operations, Academic Programs, Enrollment, Marketing, Faculty Staffing, Technology, and Facilities, and Contains an Implementation Schedule and Metrics

Assessment of Student Learning and Program Review (CFR 2.6, 2.7, 4.4) specifically:

- Progress on Assessment Processes Including Analysis of Program Data for College-Wide Improvement, and Results that Demonstrate Educational Effectiveness
- Explanation of how External Reviewers and Comparative Data will be Used in Program Review and Assessment of Educational Effectiveness

## APPENDIX B

### DISTANCE EDUCATION SUMMARY

Institution: Cogswell Polytechnical College

Type of Visit: Special

Name of reviewer/s: Michael J. Offerman

Date/s of review: March 20-23, 2012

1. Programs and Courses Reviewed (please list)  
SSC 400 Global Political Economics

FS 359 Personnel Management in the Fire Service

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

Cogswell has a single program (Fire Science) that is delivered online. In addition, there is a single course developed but not yet delivered in Entrepreneurship.

Headcount enrollment in Fire Science is 69. The program was started in 1978 and offered online in 2005. Enrollments have been stable.

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

Program faculty leaders in Fire Science and Entrepreneurship programs were interviewed and materials and courses in Fire Science were reviewed.

### Observations and Findings

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<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? (CFRs 1.2, 3.1, 3.5, 3.8, 4.1)	Fire Science program has existed since 1978 and is self-supporting.	None
<i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution? (CFR 1.2, 2.10)	Students required to participate on-site at least once each term. Faculty advise.	None

<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? (CFRs 2.1, 2.5, 3.7)</p>	<p>Use Sakai Etudes. Review demonstrated easy navigation.</p>	<p>None</p>
<p><i>Student Support Services. CPR:</i> What is the institution's capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? <i>EER:</i> What do data show about the effectiveness of the services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>Faculty provide advising. National Fire Science supplements institutional library with digital content.</p>	<p>None</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 involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality? (CFRs 2.4, 3.1-3.4, 4.6)</p>	<p>Led by full-time faculty who directly orient and supervise adjuncts.</p>	<p>None</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? (CFRs 2.1-2.3, 4.6) (Submit credit hour report.)</p>	<p>Faculty from a seven institution consortium adapt National Fire Science Academy content and standards.</p>	<p>None</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? (CFRs 2.6, 2.10)</p>	<p>70% fall to fall retention with 50% completion rate. Comparable to on-site programs.</p>	<p>None</p>
<p><i>Student Learning. CPR:</i> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? <i>EER:</i> 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? (CFRs 2.6, 4.6, 4.7)</p>	<p>Process similar to on-ground programs with clear ILOs and program and course LOs.</p>	<p>None</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>Sakai</p>	<p>None</p>

<p><i>Quality Assurance Processes: CPR:</i> How are the institution's quality assurance processes designed or modified to cover distance education? <i>EER:</i> What evidence is provided that distance education programs and courses are educationally effective? (CFRs 4.4-4.8)</p>	<p>Bi-Annual external review by faculty from other consortium institutions and the National Fire Science Academy. Exceeds on-ground program review</p>	<p>None</p>
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