

**REPORT OF THE WSCUC TEAM
SEEKING ACCREDITATION VISIT 1**

Minerva Institute

April 13-16, 2021

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The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be made available to the public by publication on the WSCUC website.

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SEEKING ACCREDITATION VISIT 1 TEAM REPORT

SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Visit

Minerva Institute (“Minerva^{*}”) is a private, not-for-profit institution, established in 2013 as part of an agreement Minerva Project^{*} made with Keck Graduate Institute (KGI), a WSCUC-accredited institution. The agreement established the Minerva Schools at KGI as one of KGI’s three schools as a branch campus in San Francisco, and in 2014 WSCUC approved the substantive change that in effect permitted Minerva Institute to be “incubated” within KGI. (WSCUC’s incubation policy had not yet gone into effect.) Minerva’s mission is: “Nurturing critical wisdom for the sake of the world.” In addition, Minerva has seven guiding principles: being unconventional, human, confident, thoughtful, selective, authentic, and driven.

Minerva currently offers five bachelor’s degrees including a BA in arts and humanities, a BS in business, a BS in computational sciences, a BS in natural sciences, a BS in social sciences, and an MS in decision analysis. Each of the bachelor’s degrees include six concentrations. As of fall 2020, Minerva enrolls 636 students, taught by 60 faculty members, and since 2014 has graduated two classes. As part of KGI’s accreditation and substantive change reviews, Minerva was part of WSCUC site visits three times during its seven-year history.

As a first step in seeking its own accreditation, separate from KGI, Minerva applied for Eligibility with WSCUC in January 2020, was found eligible in May 2020, and submitted its Letter of Intent and Application later that month. No new degrees have been added since the institution was granted Eligibility. The institution does not consider itself a distance education institution despite the fact that learning takes place online outside traditional, physical

^{*}Throughout this report, Minerva Institute is referred to as “Minerva,” whereas Minerva Project is referred to as “Minerva Project,” to distinguish them from each other.

classrooms. The rationale for not calling the learning modality distance education is because of several differences from the latter: the learning takes place in synchronous classes held in real time online using a proprietary system called the Forum; undergraduate students are required to be in residence; they are required to carry out credit-bearing work on location in each city; the work is done under the supervision of faculty and staff.

Students live in housing provided by Minerva while they study online using the Forum system. Students spend their first full year in San Francisco, then move in subsequent years to six cities around the world, Seoul, Hyderabad, Berlin, Buenos Aires, London, and Taipei. Given the limitations the review team experienced as a result of the pandemic, the team did not visit any of these locations. Instead, staff and faculty who support students studying in these locations were interviewed online.

B. The Institution's Seeking Accreditation Visit 1 Report: Alignment with the Letter of Intent and Quality and Rigor of the Review and Report

- *Alignment with the Letter of Intent*

Minerva's *Letter of Intent to Apply for Accreditation* consisted of six sections: 1) addressing areas of previous concern; 2) preparing for SAV1; 3) identifying outcomes of the review process; 4) describing changes in leadership, ownership or governance; 5) providing financial statements; and 6) and reviewing stipulations limited to existing degree programs. The team found the SAV1 report to be consistent with the *Letter of Intent to Apply for Accreditation* in that its sections align with the information included in the SAV1 report. Specific outcomes that Minerva shared that it intended to achieve through the review process included continuous evaluation through "program review, annual evaluation and planning, and annual assessment reporting" and to make improvements through this continuous evaluation process. The team's

assessment of Minerva's achievements in these areas are discussed under CFRs 2.7, 2.11, 3.3, 4.5. and 4.6.

- ***Quality and Rigor of the Review and Report***

Minerva Institute's SAV1 report was well organized, and clearly written and presented. It accurately portrayed the condition of the institution overall, although it notably lacked detail as to how the impact of the pandemic affected its current condition, especially given the multiple cities where its students live and study. The evidence submitted for each Standard and accompanying Criteria for Review (CFR) was appropriate, extensive, and largely conclusive. The self-review provided the team with an understanding of the institution's effectiveness, systems of quality improvement, and evidence of student learning.

The team found that institutional involvement in the accreditation process and review was evident not only in the self-study report, but also through the interview process of the review. During review meetings, the team learned that the Steering Committee, which comprised administrators and one faculty member, provided opportunities for engagement in the self-study and report from all groups at Minerva except students. Faculty were included in discussion of issues and recommendations through meetings and surveys. In the context of meetings in the review itself, the team found the governing board, administrators, faculty, staff, students, and alumni all shared a sincere commitment to, and great enthusiasm for, the mission and goals of the institution.

The self-study report showed evidence of the institution's self-reflection as it considered compliance with the Standards with identified areas of strength and need for improvement. The areas identified for improvement, while cursorily discussed, did not include a great deal of content regarding plans for improvement, possibly because of the page limitations of the

institutional report. However, during the review meetings, the team learned about improvement plans and efforts intended to produce changes. For example, in the Synthesis/Reflection section of the self-study report following the review under Standard 2, Minerva noted its faculty's concerns regarding teaching, research, and creative activity. This was not discussed as an area for deeper reflection on the extent to which Minerva relies on the research support provided to its faculty who are affiliated with other institutions to enable their currency in their fields. Instead, these concerns were framed as a form of misunderstanding of the unique faculty role at Minerva as primarily teaching and to a lesser extent, engagement with the scholarship of teaching and learning. However, in the review meetings the faculty expressed an appreciation for flexibility in being able to reduce teaching loads at Minerva to permit discipline-based research at other universities.

C. Response to Issues Raised in the Eligibility Review Committee Letter

In general, Minerva's SAV1 report demonstrated that the institution had made sufficient progress in responding to or addressing the issues raised by the Eligibility Review Committee (ERC). The following are the recommendations of the ERC, and how the institution responded in its SAV1 report and during the review.

Eligibility Criterion 7. Governance & Administration. *Clarification of the entities involved in Minerva and the relationship between Minerva Institute dba Minerva University and Minerva Project, including licensing of intellectual property by Institute and control over the curriculum by Institute and its faculty.* (CFRs 1.5, 3.9, 3.10, and 4.4)

WSCUC standards require the thorough independence of the Minerva board to safeguard its academic mission. A primary focus of the team was the apparent tension between Minerva's operational independence and Minerva Project's role as Minerva's founder, primary startup funding source, developer, and owner of the Forum, the key learning platform. It is a familiar

concern whenever a for-profit entity is aligned with a non-profit that is undergoing accreditation – does the for-profit control or have undue influence (“undue” according to accreditation standards) over the non-profit? (CFR 1.5)

Minerva’s bid for initial accreditation requires more scrutiny than would one by an established for-profit/non-profit institution in which the relationship is mature and can be measured over time. In this case, the for-profit Minerva Project has put millions of dollars at risk to develop a platform (Forum) that can be distributed to other clients and thus prospectively monetized. The non-profit provides the example of what the learning platform can do and is essential to the for-profit’s business strategy. Thus, the concern: with such pressures is Minerva independent?

The financial relationship between Minerva Project and Minerva provided the team with insight into this question. Unlike other for-profit/non-profit/OPM relationships, Minerva Project is contributing substantial sums to Minerva’s capacity to function independently. During Minerva School’s “launch phase” (2012-19), Minerva Project provided annual “Launch Grants” from 2016-17 through 2018-19 totaling \$38.8 million (Minerva Seeking Accreditation Report, p. 66). These grants and other support totaling an estimated \$100 million (Memo from the president dated April 6, 2021 “Additional Analysis of Minerva Institute-Minerva Project Relationship,” p. 2) prevented Minerva Schools from incurring deficits during the startup period. Minerva Project provided Minerva Schools (and subsequently Minerva) with the Forum at cost and will not charge Minerva for Forum licensing until it reaches enrollment of approximately 700 students. Minerva Project is providing to Minerva their office space in San Francisco at no cost. Finally, Minerva Project has committed \$56.8 million in stock to Minerva, and individuals associated with the Minerva Project have committed an additional \$10.2 million in stock (Minerva Seeking Accreditation Report, p. 67), both contingent on Minerva obtaining initial

accreditation. The intent of these gifts is to establish an endowment for Minerva sufficient to ensure prospectively its independent, balanced annual operations.

The Minerva Project founder explained, when meeting with the team, that Minerva is independent to the degree that if, subsequent to the expiration of the ten-year Master Services Agreement which was signed in February, 2021, Minerva chose no longer to use Forum, Minerva Project would have no say in that decision. He noted that the agreement's term is ten years, not fifty, which is "a leap of faith" by Minerva Project that the relationship will continue beneficially for both parties in part because of Minerva's independence. As a public critic of other models of higher education, Minerva Project could not survive as a commercial entity if it engaged in coercion of Minerva.

The team met with Minerva's board. All but one of the ten members participated. A majority of six trustees are fully independent as defined by WSCUC; four trustees have varying degrees of involvement with Minerva Project, including financial relationships (Exhibit 3.33). Minerva's trustees were engaged, informed and well prepared. The team explored the issue of independence with them. The board was persuasive that they protect Minerva's mission and independence in all of their actions. (CFR 3.9) As an example, they noted their careful oversight of the recently signed Intellectual Property License Agreement and the Master Services Agreement (Exhibit 1.12) to ensure that even if key people responsible for the founding of Minerva are no longer involved the agreements will safeguard their intentions, including Minerva's independence. One trustee described the contractual relationship as "complementary and independent."

In further response to the team's inquiries, the president prepared a memorandum outlining the relationship between Minerva Project and Minerva under WSCUC standards and policies (memo dated April 6, not included among exhibits). She documented that Minerva

Project and Minerva “do not have interlocking boards; Minerva Project does not have designated seats on [Minerva’s] board; the two entities are not related entities...” In this context the team also reviewed Exhibit 1.13, Minerva’s “Analysis of [the agreements] under WSCUC Standards and Policies,” and “MI Response to Review re Governance and MI-MP Relationship.” As a result of its inquiries and review of documentation, the team finds that Minerva has demonstrated that it functions autonomously from Minerva Project and in accordance with WSCUC policy and guidelines.

Although Minerva Project provides virtually all of the academic program’s content delivery through Forum and retains ownership of the Intellectual Property rights to Forum courses (Exhibit 1.12, Section 3.1 (a), p. 5), Minerva faculty, prior to the independence of Minerva and while Minerva Schools were being incubated at KGI, developed all of the course content and had independent authority to do so.

WSCUC’s “Agreements with Unaccredited Entities Policy” states that “Arrangements with unaccredited entities that provide 50% or more of academic services for at least one academic program will not be approved except under exceptional circumstances and in cases for which Title IV funds are not at issue.” This policy is interpreted by the team to mean that such approval by WSCUC is subject to two conditions: (i) exceptional circumstances, and (ii) no Title IV funds are at issue. Minerva does not participate in Title IV programs, so the second condition is met. As to the first condition, the team’s view is that the unique and innovative design of Minerva’s business model constitutes such an exceptional circumstance.

The team also reviewed Minerva in the context of the WSCUC “Related Entities Policy.” The scope of this policy does not include contractual relationships in which the accredited entity contracts for services so it would appear that this does not apply to the Minerva/Minerva Project relationship. However, the Minerva/Minerva Project relationship is unique, and the team wanted

to confirm that there are no significant matters involving the related entity that might affect accreditation requirements. After a thorough review of all the documents provided by Minerva and interviews with stakeholders during the remote visit, the team concluded that the Minerva board does not share decision-making responsibility with a related entity (Minerva Project) and functions as an independent and autonomous entity.

The Intellectual Property (“IP”) License Agreement (Exhibit 1.12) Section 3.1 (d) states that the ownership rights of “improvements and modifications” to existing courses owned by Minerva Project that are funded by the Project but initiated by faculty of Minerva will be retained by Minerva Project, and that new course content and/or modifications of existing courses that are funded by Minerva will become jointly owned content (Exhibit 1:12, Section 3.1 (e)). Throughout the agreement Minerva is granted “control over academic content and delivery.” The team discussed with Minerva faculty and leadership the IP provisions of the license agreement. In all cases, Minerva reported a clear delineation of roles and responsibilities that provide Minerva with control of all academic course content, curriculum and teaching decisions. (CFR 3.10)

Eligibility Criterion 8. Financial Resources and Accountability. *Plans and financial arrangements for access to Minerva Project Forum and upgrades.* (CFR 3.4)

During the meeting with the Minerva Project leadership, the team learned about the process for funding continuing improvements in Forum. Beginning in 2012 with Benchmark Capital’s first \$25 million investment in Minerva shares, Minerva Project has raised an estimated \$128 million to date. Their most recent round of financing, in 2019, resulted in raising \$57 million of capital. The recent transaction, incidentally, provides the Commission with validation of Minerva Project’s reported share price. Prospectively, the founder explained, the Forum will be financed through licensing agreements with universities and high schools around the world.

The Minerva Project CFO said that there are a number of “pilots” underway, including a full high school program in Forum developing in multiple countries, university pilots in Spain, Vietnam and the United Arab Emirates, and executive education pilots with three corporations and three universities including UC Berkeley and the University of Michigan.

The business plan for sustaining the Forum is for Minerva to gain accreditation and become independent, thus demonstrating the merit of the educational philosophy and the effectiveness of the Forum in an elite, innovative institution, which in turn facilitates the expansion of licensing Forum and Minerva Project’s related revenue growth. Minerva Project provided the team with their five-year operating projections showing that, on this plan, the for-profit Project breaks even in FY23 and produces substantial profits in FY26. To accomplish this result, Minerva Project will have to increase top line revenue many times the F21 amount in five years. While the current “pilots” encourage Minerva Project’s leadership to believe this growth is achievable, with some pilot partners contemplating seven-figure commitments, the team encourages Minerva to monitor Minerva Project’s progress toward financial stability - especially over the coming few years, to insure the continued viability of the Forum platform.

The chief product officer at Minerva Project informed the team that Forum is an evolving platform, with constant improvement, additions and upgrades since it was first introduced to Minerva students in March, 2014. The team’s interviews with Minerva faculty and leadership confirmed that Forum is evolving with substantive input from Minerva and timely production by Minerva Project.

Eligibility Criterion 13. Faculty. *The faculty role in admission of students to MDA regarding applicants’ preparedness and fit. (CFRs 2.2b, 2.9)*

In response to the ERC panel’s recommendation (letter from 5/18/20) that Minerva describe the ways in which faculty teaching in the graduate program will be involved in student

admissions to gauge preparedness and fit, Minerva responded that “Admissions are handled by the Dean and Associate Dean who are both Minerva Institute faculty members who developed and have taught or currently teach in the MDA program and have a deep understanding of the program and the characteristics needed for students to be successful in the program.

Consideration will be given to adding additional faculty members to the admission process (Letter of Intent, 6/6/20).” Consideration was apparently given, and the team learned that “the Admissions Committee for the graduate program was expanded this year and now includes the provost/CAO, dean of faculty, MDA program director and another faculty member teaching in the program. All four administrators hold faculty status, have taught in the program, and have a deep understanding of the program and the characteristics and preparation needed for students to be successful in the program (SAV1, p. 4).” The team concluded that Minerva satisfactorily addressed this issue.

Eligibility Criterion 15: Admissions. *How Minerva addresses diversity, equity and inclusion in the context of its mission and US roots, including the approach to disaggregation of data and WSCUC’s Policy on Equity and Inclusion.* (CFR 1.4)

Minerva’s SAV1 report addresses this criterion squarely and thoroughly, documenting its approach through a series of exhibits. Exhibit 1.05 gathers diversity-related policies and procedures covering institutional commitment to diversity and inclusion, principles of community against discrimination and for the contributions of diversity and inclusion to the richness of the educational experience, equal employment opportunity and pay parity, and support for transgender and gender non-conforming employees. Exhibit 1.06 presents detailed diversity data on the student population which highlights its highly international character (86% from outside of the US), and highly diversified by national origin across the globe.

Exhibit 1.08 is a report on anti-racism to the Minerva community remarkable for its thoughtfulness and introspection. Relevant to Criterion 15, the exhibit's review of Minerva's outreach and admissions is unflinching in its recognition that its international diversity and small US share of the student population notwithstanding, it should do better in attracting more applications from US African Americans and increasing their yield. It also outlines steps in the short- and medium-run designed to achieve those goals.

Additionally, Exhibit 1.09 systematically analyzes how Minerva effectively addresses all the elements of WSCUC's Equity and Inclusion Policy, namely: institutional commitment; access/inclusion; support/success; campus climate; and educational objectives. It also addresses individually each of the good practices for valuing diversity and inclusion that are itemized in WSCUC's policy.

Eligibility Criterion 16. Information and Learning Resources. *Update on information resources needed to meet academic and scholarly needs, including costs, after Minerva leaves the Claremont Colleges.* (CFR 3.5)

The review team recommends that Minerva "insure continued access to sufficient library resources after the end of the affiliation with Keck Graduate Institute" (See Recommendations under Section V below). The team understands that efforts to secure equivalent access to online library resources, as well as staffing for reference librarian services are underway and should be successfully concluded. Additionally, it was noted that, "Minerva Schools have access to the Claremont resources as part of Keck Graduate Institute and will no longer have access when Minerva Schools separate from KGI. The agreement is renewed each spring and the KGI president has approved renewal for FY21 and FY22" (SAV1, p.74). This renewal gives Minerva's new librarian and the Library Committee time to adjust and review its library needs while continuing to have access to those of KGI if needed during the transition period, and until

Minerva has secured alternate arrangements, such as the one being currently explored with the Statewide California Electronic Library Consortium (SCELC) .

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

Based on the information received prior to the virtual visit and significant interactions during the visit meetings, the team found that Minerva is in compliance with the four WSCUC Standards at a level sufficient for Initial Accreditation, subject to Commission review. Prior to the virtual visit, the team had areas of focus for the review that largely centered on governance and financial stability. During and after the visit, the team was unanimous in its view that Minerva had substantially answered inquiries regarding these areas of focus regarding compliance with the Standards.

Standard 1

Institutional Purposes (CFRs 1.1, 1.2)

Minerva is an institution with an extraordinarily well-defined mission that intentionally distinguishes itself from mainstream institutions of higher education. It is global by design; it believes that high potential is uniformly distributed across nationalities, race, and gender; it is committed to adopting learning practices based on science rather than tradition; and it has constructed a curriculum designed from the ground up to achieve the holistic learning outcomes it seeks for its students. Its unique, innovative institutional design has as its overarching objective to serve the public good, which it understands to entail preparing students to address the world’s problems (CFR1.1).

Minerva’s educational objectives are well-developed and articulated. As an intentionally designed organization since its inception, its educational objectives have driven the construction

of the curriculum. Unlike many institutions, there is no aspect of the curriculum that is a legacy of an era without explicit learning objectives.

Minerva's distinctive formulation of Habits of Mind and Foundational Concepts (HCs) is the foundation for a curriculum structure that cross-cuts the traditional disciplines and focuses explicitly on the capacities it seeks to instill in its graduates. This is a sophisticated implementation of general educational outcomes of the baccalaureate degree.

Minerva tracks student retention, persistence, and graduation rates; carefully monitors achievement levels of learning outcomes based on detailed and comprehensive rubrics; and keeps track of success levels in post-graduation positions or further education, with excellent results reported (CFR 1.2)

Integrity and Transparency (CFRs 1.3, 1.4, 1.5, 1.6, 1.7, 1.8)

Minerva has adopted the Academic Freedom Statement of the American Association of University Professors (AAUP, 1940) and has published its policy in the Faculty Handbook (see Exhibit 3.09), the Undergraduate Student Handbook (see Exhibit 2.32), and the Graduate Student Handbook (see Exhibit 2.33). A grievance process exists for faculty and one for students. No complaints have been filed since the inception of the institution. In a review meeting faculty described how they advise students seeking to resolve informal issues that do not rise to the level of a formal complaint.

Minerva considers its ability to protect academic freedom in its choice of cities where its students will live over the course of their undergraduate program. (CFR 1.3)

Minerva is a global institution with a student population less than 15% US-based; Minerva is striving to develop diversity policies and practices appropriate to its purpose and character.

The team commends the combination of multiple global urban locations, the ability to draw faculty from around the world through its virtual learning platform, and the highly international

student body that are intentionally leveraged in the design of the curriculum, leading to an enriched educational experience and to globally and multiculturally literate graduates. One example is the creation of the required Integrated Learning Course and recent modifications to the course to include specific readings on being Black in America in support of Intercultural Competency as one of five integrated learning outcomes. (CFR 1.4)

Even so, the institutional self-study acknowledges that more than a third of respondents to the self-review under the Standards conducted in July indicated that this CFR 1.4 (diversity policies, programs and practices) needed attention.

Six faculty-staff-student committees, formed in the wake of the killing of George Floyd in the summer of 2020, have conducted systematic reviews of The Minerva Team; Outreach and Admissions; Curriculum; Student Life; Student Culture; and Partnerships and set forth specific recommendations for changes to instantiate an anti-racist agenda consistent with Minerva's philosophy (Exhibit 1.08). In response to those recommendations, Minerva and the Minerva Project jointly issued a "Report on Anti-Racism" describing short-, medium- and long-term plans to address the recommendations (Exhibits 1.07 and 1.08). The Report persuasively demonstrates the institution's commitment to increasing diversity in *society through its policies, its educational and co-curricular programs, its hiring and admissions criteria, and its administrative and organizational practices*. (CFR 1.4)

This is commendable work, but the team remains concerned about an issue raised in the Eligibility Review Committee Approval of Eligibility Action Letter. In its action letter, the Eligibility Review Committee asked, "how Minerva addresses diversity, equity and inclusion in the context of its mission and US roots, including the approach to disaggregation of data." In its response, Minerva declares that the racial and ethnic categories of the Integrated Postsecondary Education Data System (IPEDS) are inapplicable to its majority non-US based student body. As

an alternative, Minerva presents an extensive breakdown of both undergraduate and graduate students by country of origin. The team is concerned that this approach falls short of the intent of CFR 1.4. While the team acknowledges the extraordinary global diversity of the Minerva student body, it notes the increasing recognition that race-like and caste-like social categories exist across the globe. In the team's view, Minerva has an extraordinary opportunity to define an approach to diversity that transcends the US experience and suggests that Minerva define categories and identify appropriate metrics so as to reflect fully the multiple forms of diversity represented in its student body. See CFR 2.10 below for more information about Minerva's pilot to group students by global region in an approach to define new categories.

Following rigorous interrogation of agreements, written policies, the board, senior leadership of Minerva Schools, and senior leaders of the Minerva Project, the team has concluded that Minerva has education as its primary purpose and operates as an academic institution with appropriate autonomy. (CFR 1.5)

Minerva has a unique origin story. Founded by the Minerva Project, its original core curriculum and the Forum platform that supports delivery of this curriculum were created by a group of founding faculty who were at the time employees of the Minerva Project. When Minerva was spun off from the Minerva Project, it became affiliated with the KGI, one of the Claremont Colleges. (CFRs 1.5, 3.9)

Once Minerva obtains independent accreditation, its relationship with KGI will end with the possible exception of an extension of a library agreement. All faculty will be employees of what will then be called Minerva University. (CFR 1.5)

The Minerva Project has no direct voice in decisions about the Minerva curriculum or its governance. Minerva's ongoing relationship with Minerva Project will involve the following:

- (a) Minerva has special, reduced cost access to Forum (a product of the Minerva Project);
- (b)

Minerva faculty, from time to time, might receive compensation from the Minerva Project for the development of new courses for use on Forum; and (c) Minerva owns stock in the Minerva Project. There is currently legacy overlap in the board membership, but there are no designated seats on the Minerva board for Minerva Project board members. (CFR 1.5)

Minerva is transparent about its academic goals and programs. Information about degree requirements as well as data about student enrollment and retention, degree completion, degree learning outcomes, and post-degree activities for both undergraduate and graduate students are published on the Minerva website. Policies with respect to diversity, accommodations for students with disabilities, student conduct, and grievances are available in the undergraduate and graduate student handbooks. Grading policies are included in course syllabi. (CFR 1.6)

The tuition and fee schedule and policies regarding refunds are also accessible on the Minerva website. Information about financial aid policy is also on the website but the team believes that this information could be improved. The team recommends that Minerva work to ensure greater transparency about all-in costs to students net of financial aid (as well as impact of work on ability to participate in internships). In meetings with staff and students, concerns were expressed that the criteria for financial aid were unclear to students, that students with high financial need were unable to reap the full benefits of the experiential components of a Minerva education and that unexpected changes in the commitment to loan maximum amounts were made after students were in mid-program. Minerva should provide clear and accessible information about the full cost of its programs, as well as an advisory that participating in unpaid internships might necessitate forgoing paid work to defray expenses. (CFR 1.6)

Minerva's finances have been independently audited by qualified auditors. The team was provided with 2020 audited financials. Minerva has adopted appropriate policies and procedures and sound business practices as indicated by unqualified opinions from its auditors. The

Employee Handbook, the Faculty Handbook, and the Student Handbook outline processes for complaints and grievances. (CFR 1.7) The team commends Minerva for an extraordinarily well written, organized, and clear self-study report. The report directly, concisely, and fully addressed the Standards and provided germane supporting documentation. Responses to the team's requests for additional information were swift and fulsome. (CFR 1.8)

Conclusion. The team's finding, which is subject to Commission review, is that Minerva has provided sufficient evidence to demonstrate compliance with Standard 1 at the level of Initial Accreditation.

Standard 2

Teaching and Learning (CFRs 2.1, 2.2, 2.3, 2.4 2.5, 2.6, 2.7)

Minerva offers well-designed programs for five undergraduate degrees and one graduate degree which reflect current best practices. The programs' content is strongly linked to the institutional educational objectives. Each degree program follows traditional credit hours and time-to-degree-completion expectations. The faculty are exceptionally well qualified. (CFR 2.1)

Minerva embodies an uncommon design and approach in higher education today; Minerva is truly a learning organization, informed by data and evidence, continually looking for ways to improve its outcomes, with faculty, staff, and students that do their work not in isolation but collaborating toward holistic objectives. The Cornerstone foundational curriculum which makes up the entire first year of the undergraduate program, is the same for the five degrees. The review team was somewhat concerned before meetings with faculty and students that this comprehensive specification of program outcomes and use of pre-designed courses could constrain teaching and squeeze out serendipitous learning; however, the faculty reported that the extraordinary level of collaboration (both required and voluntary) actually enhanced their own teaching and the quality of the course content, after developing familiarity with the learning

model. Several faculty members also offered that working with colleagues was a benefit that they had not experienced before in academia (suggesting that teaching had been a lonely endeavor).

The requirements for all degree programs are clearly and thoroughly documented and specified. In team discussions with undergraduate students and alumni, the two groups expressed appreciation for internships and project-based learning. Some shared a desire for more and deeper courses in their majors and for more flexibility in the curriculum. Moreover, an external review by faculty from other universities (R1s, liberal arts colleges) “had suggestions for the breadth and depth of the course listings” (SAV1, p.38). As a result, the team recommends that Minerva continue to monitor the appropriate balance between breadth and depth of the curriculum, noting that there is an inherent albeit healthy tension between the time dedicated to holistic, overarching skills and abilities aimed at in the Cornerstone curriculum and the subject matter proficiency that may be needed by Minerva graduates. Achieving balance between these two objectives would benefit from continuing attention. (CFR 2.2a)

The natural science program has a potential shortcoming of note that was mentioned to the team by both faculty and alumni. It concerns the decision not to include physical laboratory courses as part of the Minerva curriculum; and faculty and students wondered how to teach/learn the natural sciences without working directly with physical materials in a laboratory. The team notes that this choice has obvious advantages in efficiency, but it represents an important missing element, particularly for the sciences major. The team recommends that Minerva assess the educational impact of the absence of physical laboratory courses, particularly in the sciences. The concern is to ensure that Minerva graduates are not disadvantaged by lacking hands on experience in a laboratory setting.

The Master's of Decision Analysis (MDA) program is holistic and practical. It is organized around desired competencies and it employs small seminars and a multidisciplinary, problem-solving approach to content. The faculty are well-qualified and enthusiastic. It was shared in a meeting that the Faculty Advisory Committee (FAC), Minerva's faculty governing body, was considering adding a representative dedicated to the MDA once the program grew somewhat in enrollment. (CFR 2.2b)

The review team agreed that student learning outcomes (SLOs) are an area of particular strength for Minerva; SLOs are well-articulated, well-documented and all linked to institution-wide educational objectives. Assessment of SLOs is embedded in the learning platform, Forum. The concern of possible rigidity in learning experience (from SLOs being so specific and comprehensive) is allayed by the good practice of having faculty who teach the same courses share observations and align modifications to these courses. (CFR 2.3)

Founding faculty of Minerva set the SLOs and standards for the original curriculum. Faculty with whom the team met referred to this several times, adding that owing to continuous feedback and collaboration, it is possible to update content. The team did not learn of any changes to the original SLOs. If new courses are developed, the faculty members developing them set the SLOs and define levels of performance which are then embedded in the teaching platform for assessment. (CFR 2.4)

The Collegiate Learning Assessment (CLA+) measures are designed to test for critical thinking, analytic reasoning, problem solving, and written communication skills, and Minerva administers the CLA+ to students in their first year of study, and again, at the end of their final year. The team notes that the CLA+ provides external validation of learning outcomes and of students' self-reported perceptions of learning. (CFR 2.4)

Additionally, in the two agreements governing the Minerva Project/Minerva Institute relationship, faculty have control over assessment. During the team's meeting with faculty, they described how they train and work with new faculty to ensure students' learning is assessed. (CFR 2.4)

Minerva's model is built from the ground up, based on active learning and flipping the classroom. This design leverages the strength of the course-delivery system. Faculty teach from lesson plans that are carefully designed with structured activities that require students to engage actively while applying specific learning outcomes. In a Forum demonstration, the team was able to see the data available to instructors while teaching (participation frequency, for example) to aid in boosting student participation and attention. (CFR 2.5) Faculty can also do all grading "blind" in Forum and learn whose work they assessed only after grading in order to reduce potential bias. Students told the team about being "kept on their toes" by activities and "cold-calling" in Forum classrooms.

Minerva provides internal and external evidence of attainment of learning outcomes. (CFR 2.6) The annual assessments of student learning are produced each fall. Additionally, indirect indicators of attainment, such as student success post-graduation, are also tracked. Comparisons to competitor institutions are tracked by the CLA+ score changes from first to last years at Minerva. Results for the graduating classes (both undergraduate and graduate) showed successful levels of attainment of learning outcomes.

Program review at Minerva fully meets CFR 2.7. Minerva has been conducting program reviews from its start – before formal review would have been required. Minerva faculty adapted the Keck review forms and format for self-study and for external review to the educational model at Minerva. Minerva has conducted program reviews of two of its degree programs and its general education program, including external reviews. Recommendations offered by the

external reviewers have been incorporated into an Action Plan for concrete changes to the curriculum. Minerva has a format and regular schedule for program review in place that will ensure all degree programs are reviewed in a timely fashion.

Scholarship and Creative Activity (CFRs 2.8, 2.9)

For its students, Minerva has clearly defined expectations for research, scholarship and creative activity. Every undergraduate student must complete a capstone project -- a culmination of the training in research skills and independent work integrated into every stage of the curriculum. Every Master's in Decision Analysis (MDA) graduate must complete a thesis project. In addition, Minerva encourages undergraduate students to seek research internships either during the school year or during summer breaks. Minerva has sought and obtained external grants to support undergraduate student research activities.

Minerva does not define specific expectations for research, scholarship and creative activity for faculty. Research, scholarship and creative activity do not factor into decisions regarding faculty contract renewal and promotion. As defined in the Faculty Handbook, decisions regarding contract renewal and promotion are based on (1) the quality of teaching and (2) contributions to academic excellence and service. Curricular and instructional innovations and scholarship and creative activity that engages students and informs and improves teaching count as contributions to academic excellence and service. (CFR 2.8)

Minerva's support for faculty engagement in research, scholarship and creative activity is minimalist. Support includes a modest stipend for faculty development, no sabbatical leave but a possibility of a reduction in course load with a corresponding reduction in pay, and student research assistance funded by the institution's work-study program. (CFR 2.8)

Although Minerva's recognition and reward structures do not actively encourage research and scholarship unrelated to the scholarship of teaching and learning, FY 19-20 Faculty

Scholarly Activities (Exhibit 2.39) reflect both disciplinary research as well as engagement in the science of teaching and learning, e.g., a book on the interactive classroom, blogs and conference presentations related to online-learning, and an NSF grant on education and assessment. The level of scholarly activity reflected in this document is admirable given the limited institutional support for research and scholarship. (CFR 2.8)

The strong representation of part-time faculty among the faculty listed on the Faculty Scholarly Activities document suggests that Minerva may be benefiting from the support for research and scholarship provided by other institutions where the part-time faculty teach or have an affiliation. In response to a team inquiry as to how faculty stay current in their fields if not engaged in research and scholarship, full-time faculty cited their interactions with part-time faculty who are active researchers. Minerva's approach upends the more prevalent pattern of part-time faculty with a primary focus on instruction who enable full-time faculty to devote time to research and scholarship. Faculty also reported in review meetings that they appreciated the flexibility to increase or reduce their teaching loads to accommodate changes in discipline-based research at another institution. (CFR 2.8)

Goal 4 of Minerva's strategic plan, "Provide higher education thought leadership through research, presentations and publications," directly links teaching, assessment, student learning, scholarship and service. The goal envisions Minerva deans, administrators, and faculty utilizing Minerva's data on student learning outcomes to design, execute and publish educational research. Minerva also plans to showcase its pedagogical approach, and approach to student life and experiential learning at regional, national and international meetings. (CFR 2.9)

In addition, in its institutional report, Minerva acknowledges that support for faculty participation in research could enable faculty to keep current in their fields and provide opportunities to involve students to participate in hands-on research. Nevertheless, the report

also states that Minerva has no intention of changing its current model of limited support for faculty research and scholarship.

The team believes that in the near future Minerva will need to grapple with this tension between its low-cost, teaching-centered institutional model and its commitment to provide students with rigorous training in research and to support faculty in becoming thought leaders in the scholarship of teaching and learning. The team acknowledges that Minerva's emphasis on teaching and curricular and instructional innovation over research, scholarship and creative activity is *prima facie* consistent with the institution's purposes and character, but suggests that achieving the goal of thought leadership may require an increased allocation of resources to support faculty scholarship. (CFR 2.9)

Student Learning and Success (CFRs 2.10, 2.11, 2.12, 2.13, 2.14)

Minerva monitors its students' progress to degree completion as well as achievement of learning outcomes through detailed tracking systems. Two undergraduate classes have graduated from Minerva in 2019 and 2020. The four-year completion rate for the 2019 graduating class was 76% and 80% at five years. For the 2020 graduating class the four-year completion rate was 71% with an expected 81% completion rate in five years. With low numbers of students representing approximately 60 countries, it is difficult to disaggregate completion data. Minerva will begin to pilot a new method in 2021 to cluster countries by region to analyze completion data.. Examples of changes made to improve undergraduate retention and completion are adding peer-tutoring in reading and writing as well as in coding. (CFR 2.10)

In 2016, the first year the MDA was offered, it was a one-year, full time program and all ten in that cohort graduated. In 2017, the program was revised to a two-year part-time program in part because of issues students faced balancing full-time work with their degree programs. The second cohort that began in 2017 resulted in three graduations, one withdrawal, two leaves of

absence with the intent to return, and two on thesis extensions. In its institutional report Minerva describes expected improvements to retention and completion rates in the MDA following clearer communications with prospective students about workload expectations. (CFR 2.10)

Minerva provided evidence of student success upon program completion with 91% of the class of 2019 and 79% of the class of 2020 entered graduate school or were employed in degree-relevant positions within six months of graduation. Many examples of student employment in well known organizations upon graduation were also provided, along with 69% of MDA graduates reporting career advancement since graduation. (CFR 2.10)

One issue that emerged during discussions with students and faculty was the frequency of curricular change and experimentation in innovative teaching methods. The scholarship of teaching and learning is a primary focus of Minerva and because of this it is expected that the institution would engage in and measure curricular change in the interest of improvement. With so many changes however, as frequently as weekly, there is a risk that monitoring long term trends will prove difficult when comparing the learning outcomes results of student cohorts. The team recommends that the use of Minerva's leading-edge and complex assessment system be leveraged to ensure this risk is reduced.

Minerva has developed an integrated learning framework that ties academic coursework to experiential learning in the residential cities outside of the classroom. Minerva's Integrated Learning Outcomes (ILOs), which focus on personal, professional and character development are: self-management and wellness, interpersonal engagement, intercultural competency, professional development, and civic responsibility. Students are expected to achieve these ILOs through a 0.5 credit Integrated Learning course in each semester of their four years of study, through residential life activities, through city-based planned experiential learning activities

offered by student life, and through individual and group coaching and mentoring. Achievement of the ILOs are measured just as all learning outcomes are measured at Minerva. (CFR 2.11)

The effectiveness of these four means of ensuring achievement of the ILOs is reviewed through formal annual assessment of goals and outcomes as well as through weekly interdepartmental and department level meetings among the multiple student life departments. The team learned in its meeting with student life staff that these teams work in a highly orchestrated and collaborative fashion, sharing information about the effectiveness of programming in multiple cities and forming plans for individual students despite the teams working from locations across the globe. (CFR 2.11)

Minerva prides itself on being highly selective with an acceptance rate below 2% and its focus on finding students around the world with intelligence and drive regardless of socio-economic status. Admissions requirements and qualifications provided on the Minerva web site align with details about the criteria and processes for admission that Minerva provided the team upon request. Admissions criteria include previous academic performance; extra-curricular accomplishment; minimum scores on tests of mathematics, reasoning, creativity, and reading comprehension; an average score on Minerva evaluations; a qualifying score based on an algorithm that includes the scores listed previously; written and oral English language proficiency; integrity in the application process; and results of a live interview. (CFR 2.12)

Minerva provided extensive documentation of its academic and student support services in compliance with CFR 2.13. These services include peer-tutoring, student advising and coaching, career services, financial aid planning, medical insurance and health care, visa assistance, health records and disability accommodations, residential life and experiential learning, counseling and psychological services, and an alumni association. A first-year coach is provided to students who offers one-on-one and group coaching to all students for support in

meeting professional development goals. The focus for coaching in the students' second year is on internships, career and academic exploration, goal setting and decision making. Third year students take a required capstone seminar and are assigned a Minerva faculty capstone advisor at the end of that year to guide students through their final year as they complete their capstone final project. See more information below under CFR 4.1 regarding the ways in which co-curricular program staff collaborate to provide extensive and well-coordinated services to students. (CFR 2.13)

Minerva provides clear and unequivocal information regarding transfer students and transfer credit. Eight semester credit hours are accepted as transfer credit as electives into undergraduate programs and these credits do not fulfill general education or major requirements. No transfer credit is accepted for the MDA. (CFR 21.4)

Conclusion. The team's finding, which is subject to Commission review, is that Minerva has provided sufficient evidence to demonstrate compliance with Standard 2 at the level of Initial Accreditation.

Standard 3

Faculty and Staff (CFRs 3.1, 3.2, 3.3)

Minerva's 60 faculty members are diverse, highly qualified, and numerous enough to support Minerva students and current programming. They come from 15 countries; they all hold doctorates from top-tier universities; together, they speak 20 languages in addition to English; and 40% of faculty are female. (CFR 3.1) While the faculty are well-qualified to do research, their main responsibility at Minerva is to teach and support students. In meeting with the faculty the team learned that the emphasis on student success was a main reason for joining Minerva. Several part-time faculty shared that they focused on teaching at Minerva while keeping an affiliation with other universities for their research efforts and they felt this gave them the best of

both teaching and research. Minerva faculty also expressed enthusiasm for the high degree of collaboration with colleagues in teaching and coaching students.

The 80 staff members are likewise quite diverse in country of origin; they report coming from 28 different countries and over half of them (56%) are non-US citizens. They speak 28 languages beyond English and live around the globe. Half of the staff self-identify as female.

Minerva currently serves 634 students and has a faculty-to-student ratio of 1:13. Classes typically have 19 students each and meet entirely online using Forum. Minerva plans to keep enrollment for undergraduates constant for now, the review team was told. Staff, as opposed to faculty, each have greater numbers of students to serve, whether in Counseling (1:150), Coaching and Talent Development (1:150), and Student Life (1:40). Some staff expressed concerns about understaffing in certain functions that support students directly or indirectly. While Minerva prides itself on its low-cost model, the review team recommends that it exercise care in balancing low cost and efficiency with staffing levels sufficient to provide adequate support to students. (CFR 3.1)

Faculty and staff handbooks document policies and practices. Likewise, faculty and staff evaluation procedures seem appropriate as described in the institutional report. (CFR 3.2) Faculty initially receive a one-year contract with Minerva and graduate to three-year contracts thereafter. There is no tenure nor sabbatical system. After concern was raised by the faculty, a one-year improve-or-leave contract was added for faculty whose performance was not found to warrant a three-year contract renewal. The sense conveyed in the review team's meeting with faculty was one of satisfaction with policies. (CFR 3.2)

The high level of collaboration at all levels and among all Minerva employees creates a cohesive approach to practices (teaching, among faculty) and goals (attributes of strong student candidates, among Outreach and Discovery teams). Teamwork appears efficient and satisfying to

team members. (CFR 3.2) People conducting the same tasks in very different parts of the world indicated in discussion with the review team a keen knowledge of one another's work and shared goals.

Collaboration occurs in faculty review and development as well. Seasoned faculty train new faculty members in use of Forum and then coach them by providing feedback to videos of their classroom performance. Faculty receive a month-long orientation to the science of learning as practiced at Minerva, from Minerva faculty. Faculty each receive US\$1000 for professional development, and they can have student workers assigned to work with them as research and teaching assistants. (CFR 3.3)

Staff engage in professional development work collaboratively to develop themselves and one another in regular meetings. Staff members look forward to getting together in person again, post-pandemic, for their annual meeting in San Francisco, they reported to review team members. External development is supported through tuition assistance and professional training programs that are work-related. (CFR 3.3)

Fiscal, Physical, and Information Resources (CFRs 3.4, 3.5)

At the time of the visit Minerva was engaged in managing the transition from financial dependence on Minerva Project to financial independence. As an evolving institution, the measures of financial performance on which WSCUC teams usually depend, including multiple years of audited financial statements for trend analysis, were not available. As an innovative institution, Minerva's start-up funding and ongoing financial stability also were unusual by WSCUC standards. As has been noted elsewhere in this report, Minerva Project substantially funded the creation and growth of Minerva Schools leading up to the incorporation of the latter as Minerva Institute in 2013 and its separation from Minerva Project at the start of Fiscal Year 2020. Accordingly, the team requested and received additional financial documentation

regarding both Minerva Project and Minerva, and during the visit the team spent extra time with Minerva's CFO and president.

Minerva's strategy for independent financial sustainability is to establish an endowment of sufficient market value to prevent annual operating deficits, to replace Minerva Project's generous funding with philanthropic gifts from the founder, Minerva board members and private donors, and to continue to control operating expenses.

From FY17 through FY19 Minerva Project contributed "Launch Grants" totaling \$38.8 million (Seeking Accreditation Report, p. 66), which offset operating deficits during the very early startup phase of Minerva Schools. Further, Minerva Project charged Minerva at cost for the use of the Forum and eschewed all Forum licensing fees, an additional subsidy that leadership measures cumulatively in the millions of dollars. While enrollments have "...leveled off into a steady state with about 600 total students..." as of the time of the visit and fund around 35% of total expenses, Minerva's five-year plan calls for net tuition to increase primarily through enrollment growth to the level that it funds around 50% of expenses. The CFO noted that the projections call for most of the growth to occur with expanded graduate offerings – not from undergraduate enrollment growth. He also shared that Minerva will try over time to reduce the discount rate modestly through the recruitment and marketing program, while remaining need blind and while maintaining a comparatively low tuition price level. The coronavirus pandemic did not impact undergraduate enrollments, which were down 2.1% in FY 2020, demonstrating demand for Minerva through the crisis. With these facts regarding enrollment revenue, Minerva is committed to funding the rest of its operations through gifts and endowment.

The team met with the chief advancement officer to explore Minerva's fundraising goals and progress. Minerva's inaugural fiscal audit showed \$37.7 million of contributions and scholarships in FY20, dwarfing the reported \$8.97 million of net tuition and fees for the same

period. While accounting rules require the recognition of these gifts all in FY 2020, \$7.5 million of the total is payable in one to five years. \$10.7 million was a gift of shares of Minerva Project, which Minerva plans to liquidate on the secondary market in the coming year to pay expenses in FY 2022. The team learned about a recent major gift (“seven figures”) as an example of the appeal to philanthropists of Minerva’s unique approach to higher education. Without alumni, the goal of replacing Minerva Project’s Launch Grants with ongoing philanthropy will be challenging, but the team believes it is attainable. When the team met with the Minerva board, they said that they are engaged in outreach for the fundraising effort. The team encourages Minerva to continue its fundraising efforts to replace Minerva Project Launch grants with donor support.

In multiple documents and during team meetings with Minerva leadership, Minerva explained the intent to establish an endowment sufficient to balance ongoing operations. In their “Financial Analysis of Minerva Institute-Minerva Project,” Minerva explains there are two pledge agreements to gift a total of 6.6 million shares of Minerva Project Stock to Minerva once Minerva is granted initial accreditation. The Financial Statements acknowledge the pledges in the notes, but do not include their value on the reports due to this condition. At the most recent pricing valuation (July, 2019), these shares would be worth \$67 million, which “...will serve as the core of a quasi-endowment in perpetuity beginning in FY27 or later.” The president noted in discussions that Minerva Project’s share price has increased substantively since their first offering in 2012 (\$1.33). She also shared that Minerva plans to hold as many of these shares as feasible to sell at a later date and realize the expected future increase in share value.

The team notes that it is unusual for an institution to hold such a concentrated investment while also noting that Minerva is both unusual and innovative. The team sought evidence of Minerva Project’s financial status precisely because Minerva’s plan relies on the success of

Minerva Project to a considerable degree. It is not required under WSCUC policies for the independent for-profit partner in this arrangement to disclose their audited financial statements. Nonetheless, Minerva Project provided, on condition of strict confidentiality and with the advice that their audit report is proprietary, their profit and loss statement from FY 2020 (“Minerva Project Financial Information”). The document is consistent with the unaudited five-year operating projection they provided. Minerva Project also agreed to include their CFO in a team meeting. The team is grateful for the unusual and very responsive inclusion of additional documents and for participation by Minerva Project’s CFO in support of the visit.

The team concluded that Minerva’s plan for financial sustainability is grounded in documented achievements and financial progress to date, and that their goals of developing philanthropy and an endowment to support ongoing expenses are credible. (CFR 3.4)

Minerva is innovative and unusual in that it does not have a campus, it does not own any buildings, and it does not plan to ever do so. In discussions with faculty, staff and students, there were no concerns identified about Minerva’s facilities resources. However, there were concerns regarding the future of library resources now that Minerva is becoming independent of the KGI (“Plan for Library Services after Accreditation”). The plan for faculty members to serve as reference librarians and for the Statewide California Electronic Library Consortium to provide the foundation of access to resources should be monitored over the coming few years. (CFR 3.5)

Minerva does not participate in Title IV funding in part to avoid the significant costs associated with compliance and oversight of federal loans, for which the majority of their international undergraduate students are ineligible. As the Minerva CFO explained, Minerva during its early years as an independent institution intends to keep close tabs on expenses. The team recommends that Minerva be careful not to underfund staff resources while acknowledging the need for careful expense management.

Organizational Structures and Decision-Making Processes Resources (CFRs 3.6, 3.7, 3.8, 3.9, 3.10)

With the announcement just prior to the visit that the interim president was selected to be Minerva's first permanent president, the institution has a full-time CEO and a full time CFO (CFR 3.8). Throughout the course of the visit, the team met with a number of academic and administrative leaders who convinced the team that, for a newly independent institution, Minerva has sufficient and well-qualified administrators. The creation first of Minerva Schools and then Minerva demonstrated that Minerva's leadership has operated with integrity and has accomplished much in a relatively brief period. The discussions with the president regarding the creation of the network of international offices, staff, community connections, visas, and placement opportunities alone assured the team that Minerva has effective leadership. (CFR 3.6)

As reported elsewhere, the team met with Minerva's board of trustees and concluded that the board functions independently to safeguard Minerva's mission, and understands this to be one of their primary responsibilities. The team received and reviewed minutes of board of trustees' meetings, which document that they are overseeing Minerva's operations and policies to the high standard consistent with WSCUC requirements. The institution is so new that understandably the board has not yet had occasion to assess the performance of the president. However, the team did receive the job description (Exhibit 3.30) and Minerva Institute Board Policies (Exhibit 3.35) which delineate the board's responsibility to "...evaluate CEO performance annually." (CFR 3.9)

Following the review of substantial documentation of institutional policies, and discussions with faculty, staff and students, the team concluded that Minerva has well-defined decision-making structures and procedures. The team did hear some comments regarding rapid changes in personnel and job assignments that can at times confuse community members seeking

guidance or assistance; however, for a new institution, the team considered such changes to be expected. (CFR 3.7)

Initially the team identified faculty leadership of the academic enterprise as something needing exploration. The Forum's ownership or half-ownership of all intellectual property, and the nature of teaching using Forum at Minerva, caused the team to seek affirmation of faculty control of courses, curriculum, program development, and other central academic issues. However, through the meetings and discussions with faculty, the team came to understand that faculty have the ability to modify, adjust and redirect the curriculum through Forum, and that the provost has academic authority and leadership in partnership with the faculty that is characteristic of other excellent institutions under the purview of WSCUC. (CFR 3.10)

Conclusion. The team's finding, which is subject to Commission review, is that Minerva has provided sufficient evidence to demonstrate compliance with Standard 3 at the level of Initial Accreditation.

Standard 4

Of the four broad, holistic Standards of Accreditation, Standard 4 represents the WSCUC expectation that an institution of higher education be organized to ensure a commitment to quality assurance, institutional learning, and improvement. Therefore, the institution's response to Standard 4 is to an extent a summative, capstone reflection of the capacity and effectiveness of the institution to sustain its vision and aspirations while ensuring the highest levels of quality, student achievement and institutional learning. In this context, in its self-study review report and during the team visit, Minerva demonstrated solid evidence of its commitment to assure quality and improvement. The institution has also established an authentic learning culture embedded into its unique model and educational structure. This model, grounded in its

three components of fully active learning, cross-contextual scaffolding, and outcomes driven assessment, is a unique and authentic response to Standard 4.

Minerva well illustrated to the team a proven track record of effective implementation and monitoring of quality assurance (QA) processes as well as accountability and evidence for securing results. Becoming familiar with Minerva's unique and systematic approach to the science of learning and improvement during the visit was critical in that it provided an opportunity to see the Forum system's features and tools for formative and summative assessment of learning outcomes and to hear from institutional research staff, faculty, and administrators describe the day-to-day work of making improvements based on data collection and analysis.

Quality Assurance Processes (CFRs 4.1, 4.2)

Minerva is committed not only to using established methods of quality assurance in academic and non-academic areas, but to innovating and improving upon them in order to serve as a model for higher education writ large. New curriculum and program approval processes are in place, as well as systematic program review and assessment plans. Data are collected regarding the achievement of learning outcomes not only on a regular basis, but weekly through the Forum learning platform. These data are analyzed, interpreted and tracked for use by the provost, deans and faculty for areas in need of improvement. These improvements are often made quickly, by the next term. Learning outcomes achievement is made visible through the Forum platform to students on a regular basis throughout courses so that they too can track their own achievement progress.

Curricular change, based on formative and summative assessment of student learning, takes place on a regular and ongoing basis. Minor changes are made by faculty through recommendation and collaboration with their head instructors, track leads, and college leads.

Major changes are made through a formal approval policy and process that was revised this year to be distinct from the KGI policy and process and includes review by the Faculty Curriculum Committee, the provost, and the Minerva board. A schedule of formal program review of all Minerva programs is underway with completed self-study reviews and external reviews of two degree programs –BS in Computational Science, and BS in Social Science– and the general education program (in a year-long Cornerstone Course), with the rest underway or planned for the next two years. Action items associated with the program reviews were developed with stated measures of the expected effectiveness associated with each item. For example, the track leads in social sciences and computational sciences are discussing adding a set of math requirements for the economics track students that may include calculus and linear algebra, in addition to the statistics requirement, to improve outcomes achievement in economics (Exhibit 2.37).

In addition to assessment and evaluation of academic programs, a co-curricular program review was completed annually of Minerva’s Student Life teams which comprise the Coaching and Talent Development (CTD) team, the Counseling and Psychological Services (CAPS) team, Student Affairs and Operations (SAO) team, and the Student Experience Program (SXP). An extensive and comprehensive assessment report of the work of these co-curricular teams was conducted in May 2020. For each of the Student Life teams, the report shared goals and learning outcomes, methods of evaluation of the goals, results, improvements, and action items. One example of an action item that Minerva’s CTD team is expected to make this year is to ensure alignment of the CTD outcomes with the school’s revised Professional Development Integrated Learning Outcomes (Exhibit 2.43). (CFR 4.1)

The overall work of Minerva is guided by its three-year strategic plan; as the institution completed the first year of this plan, the focus was on completion of goals one and two:

“1. Achieve self-sufficiency and independent status as Minerva University, including separation

from KGI and separate accreditation from WSCUC,” and “2. Meet high expectations for student achievement, graduating students who are thoroughly prepared through their academic and experiential learning to contribute to creating a better world.” (Exhibit 4.04) During the review meetings, it became clear to the team that work was already underway for the achievement of goals three and four: “3. Develop and offer additional educational programs that help to fulfill our mission and contribute to our financial health,” and “4. Provide higher education thought leadership through research, presentations and publications.” See the section below that addresses CFR 4.6 below for more information regarding Minerva’s strategic plan. (CFR 4.1)

Minerva’s institutional research (IR) is directed by its provost and a research analyst and comprises data collection, analysis, and reporting on student achievement, persistence and adequacy of its co-curricular programs. Annual reports include enrollments, leave of absence, student retention, assessment of learning outcomes, student life assessment, CLA+ external assessment of student learning outcomes achievement, internship participation, faculty retention, and IPEDS. Data are collected and reported to IPEDS, although it is not required since Minerva does not participate in Title IV federal financial aid programs. Recently IPEDS neglected to post Minerva’s data on its web site. Minerva is working with IPEDS staff to make sure this error is corrected. Students complete end of course evaluations for each class, with results distributed to individual faculty and to the dean and track leads. The team also learned in the IR meeting that student life staff receive weekly community care initiatives reports which assist them in pointing students to mental or physical health resources and support if needed.

In addition to these traditional forms of data collection and reporting, the IR function at Minerva is used to analyze vast amounts of data collected from Forum. Every live, synchronous online class is recorded and these recordings are analyzed for evidence of learning outcomes achievement and teaching effectiveness. One example of how these data are used regarding

teaching effectiveness which was cited in the self-study report and demonstrated in a review meeting is the effectiveness of “cold calling” on students (calling on students who have not volunteered to speak) to increase voluntary student contributions. Forum data are also used to assist faculty in improving assessment effectiveness. Reports are shared with faculty, for example, to help them see which students are late on assignment submission and when they themselves are late completing assessments. Deans receive these assessment reports as well. (CFR 4.2)

An annual review of IR effectiveness by the provost surfaced some concern about IR capacity. As a result, new procedures are in development to more easily permit faculty and administrators to request and prioritize requests for data reports. These new procedures will be enhanced by the future planned development of a new data warehouse through which those seeking data reports will be able to self-generate them, which will speed the time to securing reports that are outside the usual data reporting schedule. Overall the team found Minerva’s IR capacity to be sufficient to meet the requirements for CFR 4.2.

Institutional Learning and Improvement (CFRs 4.3, 4.4, 4.5, 4.6, 4.7)

Minerva is indeed a new and innovative institution with a built-in culture of continuous evidence-based improvement. The administrative team is exceptionally well-qualified and committed to intentional design of curriculum and pedagogies based on learning science and ongoing assessment of effectiveness of methods of instruction. The Forum learning platform collects data for assessment purposes in real time and the data are analyzed continuously. Focus groups and student surveys are conducted on a regular basis. (CFR 4.3)

Minerva’s SAV1 self-study reports that its faculty are recruited for their interest in excellent teaching using active learning techniques. Faculty evaluation places a premium on excellent teaching, with research and service in support of the former. Continuous improvement

of teaching is supported through peer mentoring. Faculty share the results of their assessment of student learning in their courses which insures consistent evaluation of and feedback to students.

(CFR 4.4)

Minerva has two graduating classes so far and over 200 alumni. A new Alumni Council was created recently, which will serve as a vehicle for communication between Minerva and its alumni base. A Coaching and Talent Development Team (CTD) helps students secure internships and develops relationships with employers, who provide feedback to CTD through surveys about student intern performance. This information is analyzed and used to make curricular and co-curricular improvements. (CFR 4.5)

As reported in its self-study, Minerva has developed a strategic plan for 2020-2023 which was adopted by its board of trustees. The plan includes a strategic vision and four major goals to help realize the vision, as well as an overview of the ongoing tasks in support of continuous improvement and excellence. The plan is developed in further detail by each of the four area teams in academics, student life and services, outreach, and finance. Data are gathered and reviewed for progress in meeting the goals on a quarterly basis. (CFR 4.6)

As a new institution committed to the transformation of higher education, Minerva was created in response to disruptive changes in technology, learning science, and changes in the global economy and society. Its design makes the institution inherently nimble and responsive to rapidly changing societal forces. This is evidenced by its rapid improvement cycle in curriculum and student services, and creative and principled responses to social challenges, as evidenced by its insightful and sophisticated precedent program of discussions to respond to issues of racial injustice. (CFR 4.7)

Conclusion. The team's finding, which is subject to Commission review, is that Minerva has provided sufficient evidence to demonstrate compliance with Standard 4 at the level of Initial Accreditation.

SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION

The 2013 Handbook of Accreditation focuses attention on areas of emphasis that require institutions to address in the next review including the following components: (1) *Degree Programs: Meaning, Quality, and Integrity of Degrees*; (2) *Educational Quality: Core Competencies, and Standards of Performance at Graduation*; and (3) *Sustainability: Preparing for the Changing Higher Education Environment* and additional topics. WSCUC asks institutions to write essays in their self-study reports that describe and analyze the institution's position on each of these aspects in the context of mission, institutional planning, and improvements (identified in the SAV1 process for strengthening educational effectiveness and sustainability).

In its SAV1 report (page 161), Minerva Institute noted that it would prepare itself by:

... establish[ing] a Steering Committee of faculty, administrators and staff to lead the self-study, which will address these three key areas of the WSCUC Handbook. Below is a short list of some of the ways that these areas would be examined:

- *Meaning, Quality and Integrity of Degrees*
 - *Analysis of data on perceptions of the meaning and distinctiveness of Minerva degrees from both internal and external sources*
 - *Analysis of assessment data from internal and external sources demonstrating the depth and quality of learning*
 - *Review of outcomes related to graduate achievement and success over time, reflecting on quality*
 - *Examination of the scaffolding of curriculum to demonstrate structural integrity and coherence of degrees*
 - *Review of policies and practices to assess institutional integrity*
- *Core Competencies and Standards of Performance*
 - *Comparison of WSCUC Core Competencies and Cornerstone Curriculum including the Habits of Mind and Foundation Concepts*
 - *Analysis of results of assessment of student learning of Habits of Mind and Foundation Concepts at the time of graduation*
 - *Collection and analysis of externally validated data about learning at the time of graduation through surveys and other methods*
 - *Study of differentiation of undergraduate from graduate learning outcomes*

- *Changing Higher Education Environment*
 - *Environmental scans in connection with strategic planning to ensure understanding of emerging and future trends and patterns*
 - *Continued research and exploration of the science of learning and integration of latest research into pedagogy*
 - *Continued research into the needs of employers to better understand how to prepare students for the future*
 - *Identification of and engagement with other entities known for innovation and forecasting of future trends and patterns.*

Minerva's current processes, organizational structure, culture, and performance are already addressing these issues on an ongoing basis. The steering committee structure, the ways outlined to address the three areas indicated by WSCUC, and most importantly, the essential characteristics of Minerva outlined above provide strong evidence that it is a learning organization that engages in thoughtful processes of planning for the future.

SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS

Institutions seeking accreditation complete the *Inventory of Educational Effectiveness Indicators* (IEEI) as part of their SAV1 report. Along with the required federal compliance forms, the institutional report and findings of the review visit, the IEEI contributes to the team's evaluation of the institution's level of compliance with the Standards of Accreditation and CFRs. The inventory assigns responsibility for interpretation and analysis of data to appropriate stakeholders. (CFR 4.5)

WSCUC requests that the IEEI include brief information for each degree program, for general education (if applicable), and for the institution as a whole. The IEEI is expected to provide a high-level comprehensive overview of the institution's assessment processes. An institution committed to student achievement and educational effectiveness has a system in place for documenting and using evidence to set standards of student performance and to improve

learning. The indicators asked for in this exhibit are expected to reflect how an institution systematically approaches quality assurance and improvement.

The team reviewed Minerva's IEEI to understand how comprehensively and successfully the institution addresses both the quality of its students' learning for general education and degree program, including the Master's of Decision Analysis (MDA), and for the institution's quality of learning and assessment infrastructure (CFRs 4.3, 4.4). In this regard, the team found the submitted IEEI to be sufficient, comprehensive and aligned with the evidence captured during the review visit. It provides an overview of how Minerva demonstrates its robust system of data gathering and analysis including functional student learning outcomes assessment and program review. The IEEI indicates Minerva's commitment to quality assurance and improvement of educational results over time, a key value in Standards 2 and 4.

Minerva's IEEI shows the planned measurement of achievement of learning outcomes associated with what at traditional institutions is called general education through its measurement of students' HCs. These HCs align with WSCUC's required core competencies. Program level learning outcomes of all degree programs exist and findings of the analysis of learning outcomes assessment take place every term in all degree programs. These findings lead to action plans which are enacted nearly immediately, as the team learned in review meetings with faculty and program leaders.

The team noted that program reviews for the BS in Computational Sciences and in Social Sciences were completed in 2019-2020 and that these reviews include data on achievement of student learning objectives. (CFR 2.7) An additional program review in 2020-2021 is underway for general education. In 2021-2022 program reviews are planned for the BA in arts and humanities, the BS in business, and the BS in natural sciences. The final program review for the MS in Decision Science is planned to take place in 2023-2024. An integral component of the

Minerva undergraduate programs is the experiential learning through residency in leading cities around the world (the city as laboratory). While the impact of this experience on overall educational effectiveness should be captured in the current set of indicators, the team suggests the inclusion of an indicator specific to the assessment of the effectiveness of that experience. Such an indicator could inform the future design of this unique feature of a Minerva education and the selection of cities.

Given Minerva's IEEI, as well as strong evidence of and commitment to ongoing review of assessment plans and achievement of learning outcomes provided in the self-study report and as learned in review meetings with the team, Minerva has satisfied the IEEI requirement.

SECTION V. COMMENDATIONS AND RECOMMENDATIONS

The following are the team's commendations and recommendations.

Commendations

The team commends Minerva Institute for:

1. An extraordinarily well written, organized, and clear self-study report.
The report directly, fully, and concisely addressed the Standards and provided germane supporting documentation.
2. The development and successful execution of a new model of liberal arts education based on scientific evidence on effective pedagogies.
While higher education is rife with ideas for reform, Minerva Institute is not only a well-conceived model that incorporates the results of learning science, but also a full and successful implementation of that concept that was achieved in what is record time for this sector.
3. Minerva team members at all levels that are highly suited and deeply committed to the institution's mission.
Minerva has succeeded in assembling a remarkable group of talented people that are well-placed in the organization to maximize their contribution to its success.

4. An institutional culture and organization that encourages learning, innovation and collaboration.

Minerva is truly a learning organization, informed by data and evidence, continually looking for ways to improve its outcomes, with faculty, staff, and students who do their work not in isolation but collaborating toward holistic objectives.

5. A strong student-centered emphasis on teaching excellence.

Minerva faculty are a self-selected set of academics passionate about teaching and learning eager to improve their pedagogy and focused on student success.

6. A sophisticated Forum technology platform designed to support active learning, outcomes-based curriculum, and assessment.

While Minerva's pedagogy and curriculum design are the foundation of its educational model, the Forum platform is a remarkable technological medium for greatly facilitating its implementation and has rightly drawn worldwide interest.

7. Leveraging the global diversity of its students, faculty, and locales to enrich the educational experience.

The combination of multiple global urban locations, the ability to draw faculty from around the world through its virtual learning platform, and the highly international student body are intentionally leveraged in the design of the curriculum, leading to an enriched educational experience and to globally and multiculturally literate graduates.

Recommendations

The review team makes the following recommendations to Minerva Institute:

1. Continue to monitor the appropriate balance between breadth and depth of the curriculum. (CFRs 2.2, 2.2a)

There is an inherent albeit healthy tension between the time dedicated to holistic, overarching skills and abilities aimed at in the Cornerstones curriculum and the subject matter proficiency that may be needed by Minerva graduates. Achieving balance between these two objectives requires continuing attention.

2. Focus on the proper balance between rapid innovation and consistent quality in the academic programs. (CFRs 2.1, 2.10)

Minerva's focus on frequent innovation and experimentation in pedagogy and curriculum design carries a potential risk of inconsistent quality outcomes over time, restricted opportunities to monitor long term trends, and differential impact on student cohorts. It should be possible by focused attention to reduce risk in this area, and to measure the degree of consistency in achievement of learning outcomes with Minerva's sophisticated metrics.

3. Ensure continued access to sufficient library resources after the end of the affiliation with Keck Graduate Institute. (CFR 3.5)

The team understands that efforts to secure equivalent access to online library resources, as well as staffing for reference librarian services are underway and recommends that they be successfully concluded prior to departure from the Claremont Colleges.

4. Assess the educational impact of the absence of physical laboratory courses, particularly in the sciences. (CFRs 2.1, 2.2a, 2.5, 3.5)

The decision not to include physical laboratory courses as part of the Minerva curriculum had obvious advantages in efficiency, but it represents an important missing element, particularly for the sciences major. The impact of this feature should be monitored and assessed over time to ensure that Minerva graduates are not disadvantaged by it.

5. Ensure greater transparency about all-in costs to students net of financial aid (as well as impact of work on ability to participate in internships). (CFRs 1.6, 2.12)

In meetings with staff and students, concerns were expressed that the criteria for financial aid were unclear to students, that students with high financial need were unable to reap the full benefits of the experiential components of a Minerva education and that unexpected changes in the commitment to loan maximum amounts were made after students were in mid-program. Minerva should provide clear and accessible information about the full cost of its programs, as well as an advisory that participating in unpaid internships might necessitate foregoing paid work to defray expenses.

6. Exercise care in balancing low cost and efficiency with staffing levels sufficient to provide adequate support to students. (CFR 2.13)

Some concerns were expressed about understaffing in certain functions that support students directly or indirectly. Minerva's commitment to provide top-quality education at

a lower cost than traditional institutions of higher education is commendable, but just as Einstein said that a scientific theory should be as simple as possible, but no simpler, so should staffing should be as lean as possible, but no leaner.

7. Continue carefully managing finances during early years of independent status. (CFR 3.4)

As Minerva transforms into an independent institution, it no longer will rely on annual infusions of funding from the Minerva Project to balance its budget. It will be important to monitor how the institution manages finances going forward, especially regarding: its shares of Minerva Project, its fundraising goals, and its plan to increase enrollment while reducing the discount rate.

Appendix A: FEDERAL COMPLIANCE FORMS

Minerva Institute

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

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

Credit Hour - §602.24(f)

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

(1) The accrediting agency meets this requirement if-

(i) It reviews the institution's-

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

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

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

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

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

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

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

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

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

Program Length - §602.16(a)(1)(viii)

Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered.

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

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

| Material Reviewed | Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.) |
|---|--|
| Policy on credit hour | Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| | If so, where is the policy located? Course Catalog |
| | <p>Comments: Policy is attached to CFR 2.1 as Exhibit 2.04 and included in the Course Catalog.</p> <p>Exhibit 2.04 shows a much more extensive credit hour policy than is shown on the web. At the time of this review, the link to the credit hour policy was inactive in the exhibit, but was active on the web. Minerva was made aware of this to correct it. The credit hour policy on the web is a KGI credit hour policy and not specifically Minerva’s policy. Minerva will adopt the KGI policy as its own credit hour policy.</p> |
| 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: Courses are developed in conformity with the credit hour policy and reviewed at the time of the program review and whenever modified. |
| 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 type="checkbox"/> YES <input type="checkbox"/> NO Not applicable as no courses are “on ground.” |
| | Comments: It is interesting to note that Minerva does not define its programs as “hybrid” despite the fact that it is “synchronous video” which most would define as online since online is not always asynchronous and “location-based” is face-to-face on ground. |
| Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i> | How many syllabi were reviewed? [MI] Several course syllabi for both undergraduate and graduate programs are provided as exhibits under Standard Two (Exhibits 2.08, 2.09, 2.20, 2.21 2.25, 2.26, 2.28, 2.29). |
| | What kind of courses (online or hybrid or both)? Courses are live, video-based synchronous courses and each has at least one assignment that is done on the ground (location-based assignment). |
| | What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA/MS <input type="checkbox"/> Doctoral |
| | What discipline(s)? Undergraduate degrees are offered in these majors: Arts & Humanities, Business, Computational Sciences, Natural Sciences, and Social Sciences; graduate programs is in Decision Analysis |
| | 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 |
| | <p>Comments:</p> <p>The unique program and curriculum design demonstrate strong academic design.</p> |

| | |
|--|--|
| Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i> | How many syllabi were reviewed? <u>8</u> |
| | What kinds of courses? Practicum, Internship/Research, Capstone; MDA Thesis. See Exhibits 2.16, 2.22, 2.30, 2.31 |
| | What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral |
| | What discipline(s)? Business Practicum; Internship can be in any major. Capstone and Thesis include sessions and independent work |
| | 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: This applies only to internships or research labs for credit; to a portion of the Capstone; MDA Thesis. |
| Sample program information (catalog, website, or other program materials) | How many programs were reviewed? <u>2</u> |
| | What kinds of programs were reviewed? BS Computational Sciences & BS Social Sciences |
| | 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)? BS Computational Sciences & BS Social Sciences |
| | 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: See catalog at 2.01 Course catalog was included at Exhibit 2.01 which includes extensive program information. |

Review Completed By: Lori Williams Date:4.16.2021

2 - MARKETING AND RECRUITMENT REVIEW FORM

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

| Material Reviewed | Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate. |
|----------------------------|--|
| **Federal regulations | <p>Does the institution follow federal regulations on recruiting students? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: No issues with federal recruiting regulations.</p> |
| Degree completion and cost | <p>Does the institution provide information about the typical length of time to degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO In Catalog, Student Handbooks, and website (Exhibits 2.01, 2.32, 2.32)</p> <p>Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO in Catalog, Student Handbook, website (Exhibits 2.32, 2.33)</p> <p>Comments: This information is readily available on the website at minerva.kgi.edu</p> <p>Undergraduate tuition is found at https://www.minerva.kgi.edu/undergraduate-program/tuition-aid/tuition-fees/ and graduate tuition at https://www.minerva.kgi.edu/graduate-programs/graduate-tuition/</p> |
| Careers and employment | <p>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO See Exhibit 1.03 Student Achievement Report on website.</p> <p>Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO See Exhibit 1.03</p> |
| | <p>Comments: This information is provided in the Student Achievement report posted annually on the website at Minerva.akgi.edu</p> |

*§602.16(a)(1)(vii)

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed By: Lori Williams Date: 2.28.2021

3 - STUDENT COMPLAINTS REVIEW FORM

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

| Material Reviewed | Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.) |
|------------------------------|--|
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints? X <input type="checkbox"/> YES <input type="checkbox"/> NO |
| | If so, is the policy or procedure easily accessible? Is so, where? Student Handbook, which is posted on the website and the student intranet the Hub |
| | Comments: The complaint policy was found on pp. 106-107 of the Minerva Schools Student Handbook for 2020-21. |
| Process(es)/ procedure | Does the institution have a procedure for addressing student complaints? X <input type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: No formal complaints have been received. They would be assigned for resolution to the senior-level administrator responsible for area in question, e.g., instruction, financial aid, student affairs. |
| | If so, does the institution adhere to this procedure? X <input type="checkbox"/> YES <input type="checkbox"/> NO Not applicable. |
| | Comments: When questioned about the procedure in sessions with faculty leaders, they were able to describe a process supportive of students in seeking remediation for grievances. |
| Records | Does the institution maintain records of student complaints? <input type="checkbox"/> YES <input type="checkbox"/> NO If so, where? The complaint would be kept in records of the Dean of Students. |
| | Does the institution have an effective way of tracking and monitoring student complaints over time? x <input type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: Dean of Students maintains records over time. |
| | Comments: Confirmed. |

*§602-16(1)(1)(ix)

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

Review Completed By: Lori Williams Date: 2.28.2021

4 – TRANSFER CREDIT POLICY REVIEW FORM

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

| Material Reviewed | Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.) |
|---------------------------|---|
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit? X <input type="checkbox"/> YES <input type="checkbox"/> NO |
| | If so, is the policy publicly available? X <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? In Student handbook, posted on the website at Minerva.kgi.edu and on the student intranet, the Hub. |
| | Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? X <input type="checkbox"/> YES <input type="checkbox"/> NO |
| | Comments: See CFR2.14 in the report. Transfer credit is relatively rare. |

*§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: Lori Williams

Date: 2.28.2021