

REPORT OF THE WASC SPECIAL VISIT TEAM

To Ashford University

April 1 - 5, 2013

Team Roster

Garry D. Hays, Chair

Eileen D. Heveron, Assistant Chair, National University

Michael C. Allen, Fresno Pacific University

JoAnn Carter-Wells, California State University, Fullerton

R. William Cash, Academy of Art University

Jeffery J. Keith, Sterling Partners

Joseph M. Slowensky, Chapman University

Ralph A. Wolff, WASC Liaison

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

Table of Contents

	Page
Executive Summary	3
Section I Overview and Context	5
A. Description of Institution	5
B. Quality of the Special Visit Report and Supporting Evidence	7
C. Description of the Team Review Process	8
Section II Evaluation of Issues Under the Standards	
A. Student retention and completion, methods of tracking student progress and support for student success (CFR 2.6, 2.10-2.14)	12
B. Alignment of resource allocations with educational purposes and objectives (CFR 3.5)	18
C. A sufficient core of full-time faculty members, and a faculty model that provides for faculty development and oversight of academic policies and ensures the integrity and continuity of academic programs (CFR 3.2, 3.11)	22
D. An effective system of program review (CFR 2.7)	29
E. An effective system for assessing and monitoring student learning and assuring academic rigor (CFR 2.1, 2.2, 2.6, 4.4)	34
F. An empowered and independent governing board and a clear and acceptable relationship with the parent company (CFR 1.6, 3.9, 3.10)	42
Section III Findings and Recommendations	50
Appendix Comparative Summary of the findings included in the July 3, 2012 Action Letter of the WASC Accrediting Commission for Senior Colleges and Universities with those discussed in detail in the following <i>Report</i>.	53

Executive Summary

The following *Report* describes the findings and recommendations of the WASC site visitation team in its review of Ashford University's response to the six issues identified in the July 3, 2012 Action Letter of the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges (Commission). In that Action Letter the Commission denied Ashford's application for initial accreditation, but permitted the University to reapply with a Special Visit no sooner than Spring 2013.

After several months assessing comprehensive materials submitted by Ashford and conducting a site visit April 1-5, 2013, the team found an institution that has been fundamentally transformed and whose culture has been changed in significant ways, including a shift from a market-driven approach to an institution committed to student retention and success, a transformation that is enthusiastically supported by the Board of Trustees, the new President, administration, faculty, and staff. The following key findings are discussed in detail in the *Report*.

An expanded Board of Trustees, with a new Chair, and a President appointed in October 2012, have significantly strengthened the leadership of the University and have made fundamental changes in order to explicitly define the University's relationship to its parent company and to establish the independence and autonomy of the Ashford Board.

Technology and data are proactively used in a variety of ways to support programs and initiatives to enhance student retention and success.

Consistent with its emphasis on student success and academic support, Ashford has strategically and thoughtfully reallocated significant resources away from marketing and recruiting to student support, retention, and instruction.

A plan for hiring, orienting, and training sufficient full-time faculty is in place and is being adhered to; there is an ongoing program of faculty development; and an effective faculty governance system has continued to evolve and improve.

A robust system of program review—characterized by national best practices—is in place, is effectively providing data for faculty self-study and external reviewers, and findings are tied to the improvement of student learning and program quality.

A dynamic and comprehensive assessment system—focused around a culture of learning and student success, driven by technology, and utilized in strategic planning—has been implemented and is continuing to evolve.

Ashford's accomplishments over the last year have, indeed, been impressive and significant and—based on the systems in place, the cultural transformation, and the evident commitment of the Board, administration, faculty, and staff—there is reason to believe that these changes are sustainable

In addition to detailed discussion of these findings, the *Report* also includes areas in need of ongoing attention, further improvement, and/or expansion. Those findings are summarized in the following recommendations.

1. Continue the first-year retention efforts and expand them to include the entire undergraduate and graduate student life cycle.
2. Continue the development and implementation of the University's comprehensive model of assessment for the general education program that combines the use of capstone and graduation level assessments with standardized exams that are benchmarked against peer comparison institutions.
3. Complete the cycle of program reviews for all degree programs, maintaining a strong focus on academic quality.
4. Continue to examine the rigor of courses in a variety of ways using established processes and standards, including the continuation of program review by qualified external evaluators, to insure that students are achieving intended learning outcomes at a level appropriate to both courses and degrees.
5. Continue to develop, within the faculty governance committees, review structures and criteria for evaluating annual program assessment efforts and program review results.

Section I Overview and Context

A. Description of Institution

In 1918 the Sisters of St. Francis established Mount St. Clare College in Clinton, Iowa for the purpose of preparing teachers for local and mission schools. In 1962 the mission was expanded to include an evening program for non-traditional students with job and family responsibilities, and in 1967 the College became co-educational. The institution's mission evolved further with the offering of baccalaureate degree programs in 1979 and graduate degrees in 2003, the same year that the name was changed to The Franciscan University. The institution has been accredited by the North Central Association of Colleges and Schools (now the Higher Learning Commission of the North Central Association—HLC) since 1950.

In 2005 The Franciscan University was acquired by Bridgepoint Education, Inc. (Bridgepoint) and it became Ashford University, a for-profit Limited Liability Company. The University offers associate degrees in business and professional studies, education, and liberal arts; baccalaureate programs in business and professional studies, education, health and human services, and liberal arts; and master's degrees in business, public administration, organizational management, education, teaching and learning technology, and health care administration. As of March 25, 2013 Ashford served 79,277 students (including currently enrolled, those on leave, and those in the matriculation process), just over 900 of whom were on the Clinton campus which continues to offer traditional, on-campus programs. Of students both online and campus based, 75% were pursuing a bachelor's degree, 13% an associate, and 11% a master's; the other 1% of the students are non-degree seeking. The curriculum is offered through four colleges: Business and Professional Studies (39%); Health, Human Services, and Science (23%); Education (21%); and Liberal Arts (16%). It is significant to note that the comparable number of students for 2012 was 91,481, the reduction being attributable to decisions made by Ashford—discussed below in this *Report*—in response to the Commission Action Letter (Action Letter) of July 3, 2012.

The University is staffed by 3,075 employees, 2,094 in San Diego, 473 in Clinton, Iowa, 288 in Denver, and 220 offsite.

Bridgepoint, founded in 2004, is a publicly traded company based in San Diego that describes itself as “a provider of postsecondary education services.” In addition to Ashford University, Bridgepoint owns the University of the Rockies in Colorado Springs, Colorado which offers master’s and doctoral programs in social and behavioral sciences. Bridgepoint also owns several educational technologies, including Waypoint Outcomes that provides learning and assessment software for collegiate and K-12 educational institutions—including Ashford—and Constellation, a technology that provides digital course materials. As is noted below, Bridgepoint offers a number of services for Ashford University.

With the creation of the online division in San Diego—and its rapid growth—the substantial presence and headquarters of the University shifted from the HLC region to that of the Western Association of Schools and Colleges (WASC) and, as a result, Ashford applied for eligibility status in August 2010. In April 2011 the Eligibility Review Committee determined that Ashford had sufficiently met the twenty-three criteria to be granted Eligibility Status and that it could seek initial accreditation under WASC’s Pathway B policy. Ashford applied for Initial Accreditation in May 2011 and a site visitation team conducted a visit to the Clinton campus March 11-13, 2012 and to the San Diego location on March 13-16, 2012.

During its June 13-15, 2012 meeting, the Commission considered the team report and acted to deny initial accreditation on the basis that “Ashford had not demonstrated at this time that it complied with multiple aspects of the Standards of Accreditation at a substantial level, which is the requisite degree of compliance for initial accreditation.”

Specifically, in its July 3, 2012 Action Letter the Commission noted the following areas:

1. Student retention and completion, methods of tracking student progress and support for student success (CFR 2.6, 2.10-2.14);

2. Alignment of resource allocations with educational purposes and objectives (CFR 3.5);
3. A sufficient core of full-time faculty members, and a faculty model that provides for faculty development and oversight of academic policies and ensures the integrity and continuity of academic programs (CFR 3.2, 3.11);
4. An effective system of program review (CFR 2.7);
5. An effective system for assessing and monitoring student learning and assuring academic rigor (CFR 2.1, 2.2, 2.6, 4.4); and
6. An empowered and independent governing board and a clear and acceptable relationship with the parent company (CFR 1.6, 3.9, 3.10).

The Commission also granted permission to reapply for accreditation with a single site visit in Spring 2013 in order to allow Commission action on the reapplication during its June 2013 meeting.

B. Quality of the Special Visit Report and Supporting Evidence

Ashford submitted a reapplication for initial accreditation on October 22, 2012. The *Reapplication Report (Report)* was developed in a transparent process and with extensive involvement of Ashford personnel, including task forces for each of the issues addressed, faculty, staff, senior management, the President, and the Board of Trustees.

The *Report* is well-written and clearly organized around the six issues identified in the Commission Action Letter and noted above. Where the 2012 team found the University's report at that time lacking "in-depth or sophisticated understanding of the assets and vulnerabilities of the institution" this team received a *Report* that represents a sincere, earnest, and good faith effort to address those issues in a thoughtful and self-critical manner. In each case actions taken since the 2012 visit are described and supported by evidence and data integrated into the *Report* and by fifty-five exhibits attached to the *Report*. The team requested that forty-four additional pieces of evidence and data be provided in advance of the visit and that other documents be available in the team room. Ashford also provided electronic access to core courses in seven different

programs—both undergraduate and graduate—selected by the team, and seven General Education courses.

The Ashford Accreditation Liaison Officer (ALO) and other members of the University were responsive and helpful in providing documentation requested, and it was well-organized, indexed, and easy to use.

C. Description of the Team Review Process

The visit was initially scheduled for two and one half days on site plus a half-day team meeting before. Subsequently, in response to a request from the Ashford President, an additional day was added in order to provide three full days of interviews. The team was comprised of seven evaluators, and the President of the Commission served as staff liaison.

The team held an all-day meeting at the WASC office on December 6, 2012 for the purposes of reviewing the issues to be addressed, as noted in the Commission Action Letter, and planning the site visit. The team gave special attention to the identification of data and other evidence that would permit it to verify the results of actions taken by Ashford. In an effort to assure that there was understanding and agreement on the data requested and how those data would be displayed, two team members and staff from Ashford held two conference calls prior to the visit. This proved to be very helpful during the visit; as discussed in subsequent sections of this report, the team was able to verify results reported by Ashford and, in fact, was impressed by efforts underway at the University to assess impact.

During the December 6 meeting the team also met for an hour with the President of Ashford—who had only recently assumed his position—and two of his senior administrators. Subsequently, the team held a conference call on March 5 and another team meeting in San Diego on April 1 prior to the start of the visit on April 2. The University provided well-equipped and comfortable team rooms both at the campus and at the team hotel. The visit concluded at Noon on April 5.

The visit was organized, and team assignments made, around the six issues identified in the Commission's Action Letter and addressed in this report. After a meeting with the President, the first three sessions of the visit were devoted to overviews of the Ashford student life cycle, its academic model, and its assessment system.

In addition to the President, the team—or members of the team—met with the Chair and Past Chair of the Ashford Board of Trustees, the Chair of the Board's Finance Committee, the Board of Trustees, Executive Vice President for Academics, Provost, Vice President for Finance, Vice President of Admissions, Senior Vice President Enrollment Management and Services, Senior Vice President for Administrative Services, Vice President for Planning and Effectiveness, Vice President/Registrar, Vice President for Online Student Services, Director of Student Retention and the Retention Committee, Faculty Institutional Effectiveness Council, Faculty Assessment Committee, the Faculty Professional Development Committee, twenty-three full-time faculty members and twenty associate faculty, seventeen Faculty Senate members, nine members of the Faculty Senate Curriculum Committee, three faculty involved in the New Faculty Experience program, six faculty assigned to high risk courses, the Institutional Research Team, eight Academic Advisors, six Admission Advisors, the Executive Deans and senior faculty whose program reviews were reviewed by team members, twelve representatives from each College who have responsibility for program reviews, the Assessment Team, the Internal Strategic Planning Committee, and twenty-one students.

In addition, the team interviewed the Bridgepoint CEO, Executive Vice President for External Affairs and Chief Academic Officer, Senior Vice President for Human Resources, Senior Vice President for Marketing, Vice President and five employees of the Student Inquiry Center (described below), and the Senior Vice President/Chief Marketing Officer. At the request of the University, team members met two members of the external Transitional Council, established in August 2012 to serve as advisors to the new President with regard to the changes Ashford has been implementing. Team representatives also met with a partner of the University's external audit firm. In all, the team conducted over forty sessions.

All parties with whom the team met were engaging, open, knowledgeable, and candid about issues the University has, and is, confronting. Moreover, the team was struck by the enthusiasm and passion which employees have about the mission of the University, their students, and Ashford's educational model.

As required, the University notified students, faculty, and staff of a confidential email account provided for the purpose of soliciting any comments that might be of assistance to the WASC team. The team reviewed close to six hundred emails, all but eighteen of which were submitted by students. Thirteen faculty submitted emails and five were submitted by staff.

Approximately two hundred emails from students only included their personal email or phone number; it became apparent that they thought they would be contacted for a phone interview or a survey. Of those that provided written documentation concerning their Ashford experience, approximately three hundred were highly positive and close to one hundred were negative. The students who have had a positive experience indicated they had tried other institutions, including traditional as well as online, and that Ashford best met their needs, had high quality instructors, and advisors who cared. Negative comments generally concerned advisors, finance troubles, and some instructors, all of which are similar to complaints typically heard at most institutions. A few students were concerned about the rigor of their programs or about the lack of college readiness of their fellow students in class. These issues were reviewed by the team when it met with various groups and are discussed below.

Staff comments were all positive. Of the thirteen faculty who provided feedback, eight were highly positive and five were highly negative. Their concerns were probed through the team's inquiries throughout its meetings.

The team's analysis and evaluation of the progress made in addressing the six issues that were the focus of the visit are discussed and documented in the respective sections of this

Report. However, the team believes that its findings need to be framed in a larger context. Thus, we offer the following observations.

It is abundantly clear that the University—its Board, administration, faculty, and staff—heard, and took to heart, what the Commission said in its Action Letter. This observation also applies to the CEO of Bridgepoint.

Not only did the Ashford community hear the Commission, it has responded in a highly positive, substantive, and enthusiastic manner. On more than one occasion the team heard the comment that, while initially shocking and difficult, it was “the best thing that could have happened.” What have resulted are self-reflection and evaluation, significant change, and excitement for that which is now occurring. Frankly, when the team first met on December 6, members were skeptical that the University could accomplish what it needed to since the 2012 visit. That skepticism was dispelled. Indeed, the changes that have occurred in such a short time border on being revolutionary. They include what the team considers to be a number of “best practices” and what can become a model for online higher education for a non-traditional student population.

Equally significant, for reasons discussed in the following sections, there is evidence that the change in culture and “ways of doing business” are real and sustainable, particularly given the leadership being provided by an expanded Board of Trustees, a new Chair of the Board, and the relatively new President, and the commitment of an engaged faculty and staff.

This is the context within which the team presents its findings.

Section II

Evaluation of Issues Under the Standards

A. Student retention and completion, methods of tracking student progress and support for student success (CFR 2.6, 2.10-2.14)

At the time of the March 2012 visit, Ashford was still in the preliminary stages of several initiatives aimed at improving retention and completion rates. In its letter of July 3, 2012, the Commission noted that student retention and degree completion within a reasonable timeframe were critical issues. The March 2012 site visitation team found what it described as an unacceptably high withdrawal rate and a lack of methodology to collect and display data on retention, persistence, and completion in a manner that could be easily understood and lend itself to analysis. The Commission also noted that concerted and systematic approaches to improve retention, persistence, and completion, with evidence-based plans, targets, and timelines were not in place and changes that had been made were too recent for impact to be measured.

At the time of its reapplication, Ashford had implemented several programs to increase student retention and completion rates. These programs are now running and are showing great promise, with indicators all pointing towards increases in student success and retention.

The programs include a student-success dashboard designed to target students most at risk for attrition, a two week orientation period for those students with no previous post-secondary experience, the development of a university-wide graduation and retention committee, and the creation of a conditional admissions period during which students experience the University for three weeks at no monetary risk. The University has a stated goal of increasing undergraduate one-year retention by 10% within three years. While behind schedule for the first-year goal, attributable to differences in goal and program timelines, the University is tracking at making that up—and more—in exceeding the year-two goal (CFR 2.10).

Ashford has thoroughly revised its inquiry intake process. A key aspect of the revision is the inclusion of a pre-screening process completed by Bridgepoint as a part of its *Shared Services Agreement (Services Agreement)* with Ashford (discussed in Section II F below). The purpose is to confirm the potential for Ashford to be a good fit for the prospective student. Staff in Bridgepoint's Student Inquiry Center purposefully screens students against criteria established by Ashford, with retention as the main goal. Specifically, the Student Inquiry Center determines that the prospect is twenty-two years old, or older, has a computer, is a high school graduate, and that Ashford offers the program in which the prospect is interested. If a prospect meets these qualifications she/he is handed off to staff at Ashford where the decision to admit or not is made. Previously, all inquiries were handled by Ashford admissions staff, requiring large amounts of screening and follow-up time. By contracting this initial screening process with Bridgepoint, the admissions staff is able to focus on more qualified leads and spend more time attending to the needs of each applicant and student (CFR 2.12). At this time, Ashford has found that this particular effort has not led to an increase in student retention and it is investigating why this is and what changes or updates need to be made to improve.

For those students without previous post-secondary experience, a two week orientation period led by a full-time faculty member is required prior to admission. This no-charge orientation is used to help teach students the skills they will need to be successful in post-secondary online courses. Teaching both study and life skills, it also orients students to online learning in an open and non-threatening environment. This has resulted in a 0.6% increase in four-month progression for the September 2012 cohort, and a 0.7% increase in five-month progression for the August 2012 cohort.

Those who successfully complete the orientation period, and all those who have previous post-secondary experience, then enter a three-week conditional acceptance period in which they are enrolled in their first credit-bearing course. This conditional acceptance time and, if applicable, orientation period is referred to as the "AU Promise." This is used to help ensure that Ashford really is a good match for the student and the student is academically prepared to handle the University's coursework. During the "AU Promise"

period, a student has the ability to “opt-out” and walk away from the University with no charge, no academic units, and no financial aid having been disbursed (CFR 2.13).

If at the end of the conditional admissions period the student is academically unsuccessful, the University terminates the relationship. If the University terminates the relationship, the student has the ability to go through the orientation period and re-attempt the conditional admission period one time. If a student is still unsuccessful at the end of the second attempt, the relationship is terminated for a one-year period of time from the last day of attendance. Again, the student leaves with no charge, no academic credits, and no financial aid having been distributed. In total, this represents 20% of those entering baccalaureate students not matriculating past the conditional admissions period (14% opting out, 6% being academically unsuccessful). Overall, these programs have led to increases in two-month progression rates by 8.9% for Associate’s, 6.2% for Bachelor’s students, and 3.2% of graduate level students.

During students’ first courses they are monitored on a weekly basis by their Admissions Counselor or University Advisor and/or their Student Advisor by a weekly report referred to as the REAL report. Ashford’s unique educational setting and methodology allow for a greater level of student tracking than utilized at most institutions. The REAL tracking dashboard identifies known risk factors: time spent logged into class, time spent reading class texts, current grade, and number of days since last participation activity.

Admissions Counselors, University Advisors, Student Advisors, Teaching Assistants, and faculty receive weekly reports on how their students are doing, who they need to reach out to, and for what reason. The time to contact a student is then tracked to confirm that follow-up is occurring. The University is to be commended for its use of technology and proactive approach in reaching out to, and advising, students (CFR 2.10).

The Vice President for Planning and Effectiveness, a President’s Cabinet level position, chairs the Retention and Graduation Committee, which takes a holistic, university-wide look at the student life cycle, from initial contact via Bridgepoint through completion with Ashford. The team includes representatives from all four colleges, institutional

effectiveness council, institutional research, assessment, student services, admissions, faculty, student finance, registrar's office, student affairs, and the Iowa and Denver locations. Bridgepoint also has two representatives to help facilitate communication back to the marketing and student inquiry groups on decisions that are made. This team discusses how current programs are performing, what improvements can be made, and who will be the responsible party for implementation and follow-up. The committee, however, has to this point restricted its conversations to undergraduate level first-year retention rate initiatives. The team recommends that the University continue its first-year retention efforts and begin broadening its efforts to include the entire student life cycle for undergraduate and graduate students (CFR 2.10).

The team found that the University uses both internal and external measures to track and confirm student progress. Results from the National Survey of Student Engagement (NSSE) and Noel-Levitz are used to help establish external benchmarks and expose internal needs. The University also uses the SmarterMeasures tool in its orientation course. This tool collects information on a variety of student readiness metrics for the online academic environment which the students are then able to reflect on, and build action plans from, in consultation with their faculty member.

The University has decreased the maximum headcount in entry point courses, which has led to increased student-faculty interactions, but mixed retention result. Course completion for EXP (Experiential) 105 is up 2%, but Psychology 202 is down 2%. All the entry point courses have had their maximum enrollment reduced from sixty students down to forty, with the exception of Philosophy 103 which is pending the hiring of additional faculty.

The greatly increased number of Student Advisors allows for greater follow-up to ensure student engagement. By reducing the total number of Admissions Counselors by more than half, the University is demonstrating its commitment to student success. The total number of Admissions Counselors has been reduced from 2,301 in July 2012 to 923 (including Admissions Counselors and University Advisors) in March 2013. In that same

timeframe, Student Advisors increased from 300 to 441, creating a student to advisor ratio of 200:1. This ratio was reached through examination of standard practices with operational peers.

The Student Advisors receive clear training and support in helping students with academic, high level financial aid, and select life issues. As noted, one of the main tools Student Advisors use to assist in these efforts is the REAL dash board. The REAL dash board pulls student information from three separate transactional systems (Learning Management System, Textbook system, and Student Information System) to consolidate and provide risk factor analysis in a single location. The REAL tool then has standardized ways for the Student Advisors to help students with particular items, such as tip sheets, guides, and how-tos, all of which are available and can be sent and tracked directly from the REAL tool (CFR 2.13).

Ashford is no longer allowing exceptions to the admissions age requirement policy; now students who do not have an Associate's degree must be at least twenty-two years old to apply for admission. This has led to the minor effect of having reduced the percentage of students under twenty-two of age from 3.9% in July 2012 to 0.6% in December 2012. While this shows clear compliance with its policy, the University may wish to consider conducting an additional review of this policy to confirm its overall benefit.

Ashford has sunset two Associate's degrees (Business and Organizational Management). This decision, proposed by the faculty and approved by the Board of Trustees, was made because metrics analyzed through the program review process showed a lack of viable career opportunities and decreased student likelihood of completion. This decision to decrease the number of offered programs in an effort to help ensure student success demonstrates a desire to place student success over other priorities. It is expected, based on students currently in the program, to take approximately 2.5 years to complete a teach-out. While program review and assessment are discussed in D and E of this Section, it should be noted here that the University has embedded Student Learning Outcomes throughout the academic programs and is able to confirm that it is using program reviews

and assessment of student learning in a consistent and systematic way for retention and graduation issues (CFR 2.6).

The Departments of Institutional Research and Assessment and Evaluation, within the Office of Institutional Effectiveness, collect and analyze data with appropriate disaggregation. Ashford regularly examines information about its student body, including retention, graduation, and stop-out data. The University then uses this information to inform its decision-making process, such as updates to the REAL dashboard system, development of the AU Promise, and restriction of enrollment by age (CFR 2.10, 4.5).

Given the concern expressed in the Commission Action Letter, it should be noted that Ashford has shifted from a by-semester approach to graduation and retention rates to weekly examination and annualized outside reporting cohorts. Retention and graduation rates are being tracked internally on a weekly basis and are grouped according to workable and understandable cohorts. The change from fall to annualized cohorts represents an important shift. Using external benchmarking data, Ashford has developed peer comparison groups—based on IPEDS data—which allows the University to better understand how it is performing in comparison to its peers. The systems in place allow Ashford to clearly monitor retention and graduation rate performance (CFR 2.10).

The realignment of Admissions and Student Advisement in overall size and scope, along with ongoing regular review of Admissions, is assessed according to the University's core competencies on a regular basis. Student Advisement is assessed on customer service related competencies weekly with overall performance being reviewed quarterly (CFR 2.11).

Student Advisement is open from 6:00 am to 6:00 pm, Monday through Friday; Admissions is open from 6:00 am to 6:00 pm Monday through Friday and 6:00 am to 4:00 pm on Saturdays. When the responsibility for student advisement transfers from Admission staff to Student Advisors depends on the level of admissions personnel

initially assigned (Admissions Counselor or University Advisor). Students are introduced to their Student Advisor at the time of their first course, but remain able to communicate with their Admissions Counselor or University Advisor after that responsibility has transferred to the Student Advisor. This increases the number of potential touch points a student can reach out to for assistance and insures a comfortable transition for the student (CFR 2.12, 2.13, 2.14).

B. Alignment of resource allocations with educational purposes and objectives (CFR 3.5)

In its July 3, 2012 letter, the Commission summarized the previous team's observation as "...historic spending patterns [show] relatively high funding levels for recruitment compared to resources to support academic quality and student services." In prior years, Ashford was increasingly relying on continued growth in new enrollments in order to generate revenue and profitability without the required focus on student success.

The current visiting team found that Ashford had strategically and thoughtfully reallocated significant resources across the entire student life cycle in order to positively impact student success. This was achieved through an Ashford University specific collaborative budget process, re-assignment of significant numbers of people from Bridgepoint to Ashford, addition of numerous student support resources, large reductions and reassignment of recruitment specific personnel, and the hiring of instruction related personnel, including full-time faculty.

Budget Process

Ashford University has created a collaborative and inclusive budget process, which is driven by the Board of Trustees of the institution. The process focused on connecting resource allocation to the current strategic plan, which called for the institution to drive these allocations around initiatives to increase student success. The main factors of the resource allocation included decreased class size, the Ashford Promise (discussed above), increased numbers of full-time faculty, dramatic reductions in the number of Admission Counselors, increased student services personnel, faculty development funds, re-assignment of 156 key personnel from Bridgepoint to Ashford, and continued

investments in academic technology. The results of the re-allocation from fiscal year 2012 to fiscal year 2013 have been dramatic, with over \$120,000,000 in increased expenditures in Instructional Costs and Services while Marketing and Promotional have actually decreased during the same time period.

Resource Re-Allocation Results

The vast majority of the changes made were completed in the second half of 2012 and as part of the 2013 budget. The results for 2012 can be seen on a *pro forma* full year basis as if the changes were made January 1 (see Table 1). Also, the full effect of the re-allocation is very clear in the fiscal year 2013 budget. Evidence presented to the team show the institution is tracking on an actual basis very close to the 2013 budget; therefore, the changes have proven to be valid.

The institution has focused its resources away from marketing and recruiting and more towards student support, retention, and instruction. Re-allocation started with the restructuring of the admissions department. As noted previously, the number of Admissions Counselors, combined with an increase of Student Advisors from 300 to 441 as of March 31, 2013, reduced the advisor-to-student ratio from 300:1 to 200:1. Also, significantly more full-time online faculty members have been hired bringing the total count up to 217 at the time of the visit. Throughout the reorganization process the institution continued to hire additional personnel to fill the needs of a more student-focused organization including, 12 people in Planning and Effectiveness and a total of 178 in academics (including the additional full-time faculty). The total incremental hires were 231 through March 31, 2013 (for the period of January 1, 2012 through March 31, 2013).

Table 1 below gives a view of the major expense categories on a 2012 *pro forma* basis and 2013 budgeted basis. The 2012 *pro forma* creates a full year view as if the shift of personnel from Bridgepoint to Ashford, reduction in Admission Counselors, increase in Student Advisors, and other direct student support changes were made as of January 1, 2012. The *pro forma* numbers allow for a more comparative analysis. The student

support expenditures continue to increase while the marketing and promotional decreased from 2012 to 2013.

Table 1: Profile of Operating Expenditures for 2012 and Pro Forma Including Organizational Changes, Shared Services, and 2013 Budgeted (in thousands).

	Pro Forma	Budgeted
	2012	2013
Scholarships and eBook Vouchers	133,162	133,825
Instructional Costs & Services	327,613	391,293
Marketing & Promotional	294,594	243,355
General & Administrative	4,104	17,818
Total	\$759,472	\$786,291

Table 2 below gives a view of the overall summary trends for revenue and major expense categories for Actual 2010-2012 and budgeted for 2013. The budgeted revenue for 2013 is projected to be lower than actual 2012 by over \$80 million. This is due to the focus on bringing in students who will be more likely to succeed (Ashford Promise). At the same time, Instruction Costs and Services have increased dramatically, especially over the past couple of years. This will lead to decreased profitability, but a financially sustainable institution as resources are allocated across the student life cycle.

Table 2: Summary of Operations for 2010-2012 Actual and 2013 Budgeted (in thousands).

	Actual		Actual		Actual		Budgeted	
	2010	%	2011	%	2012	%	2013	%
Revenues, net	\$688,619	100%	\$902,228	100%	\$938,136	100%	\$854,877	100%
Instructional Costs & Services	156,235	23%	216,131	24%	270,151	29%	391,293	46%
Marketing & Promotional	161,453	23%	209,719	23%	247,522	26%	243,355	28%
General & Administrative	12,977	2%	18,184	2%	4,104	0%	17,818	2%
Total Costs and Expenses	330,665	48%	444,034	49%	521,778	56%	652,465	76%
Other Income	591		737		522		169	
Net Income	\$358,545	52%	\$458,932	51%	\$416,881	44%	\$202,580	24%

Chart 1 presents a line graph to show the increased allocation to instructional spent on a per student basis for the time period of 2008-2012 actual, 2012 *pro forma*, and 2013 budget. On a per student basis, instructional spending is targeted to increase by 16.5% from 2012 *pro forma* to 2013. Additionally, the spending on instruction per student has increased by 166% from 2008 to 2013. The impact of the resource changes on student outcomes (retention, graduation) should become even more pronounced over the next few years as the full effect of the changes take hold.

Chart 1 : Instructional Spend per Student: 2008-2013

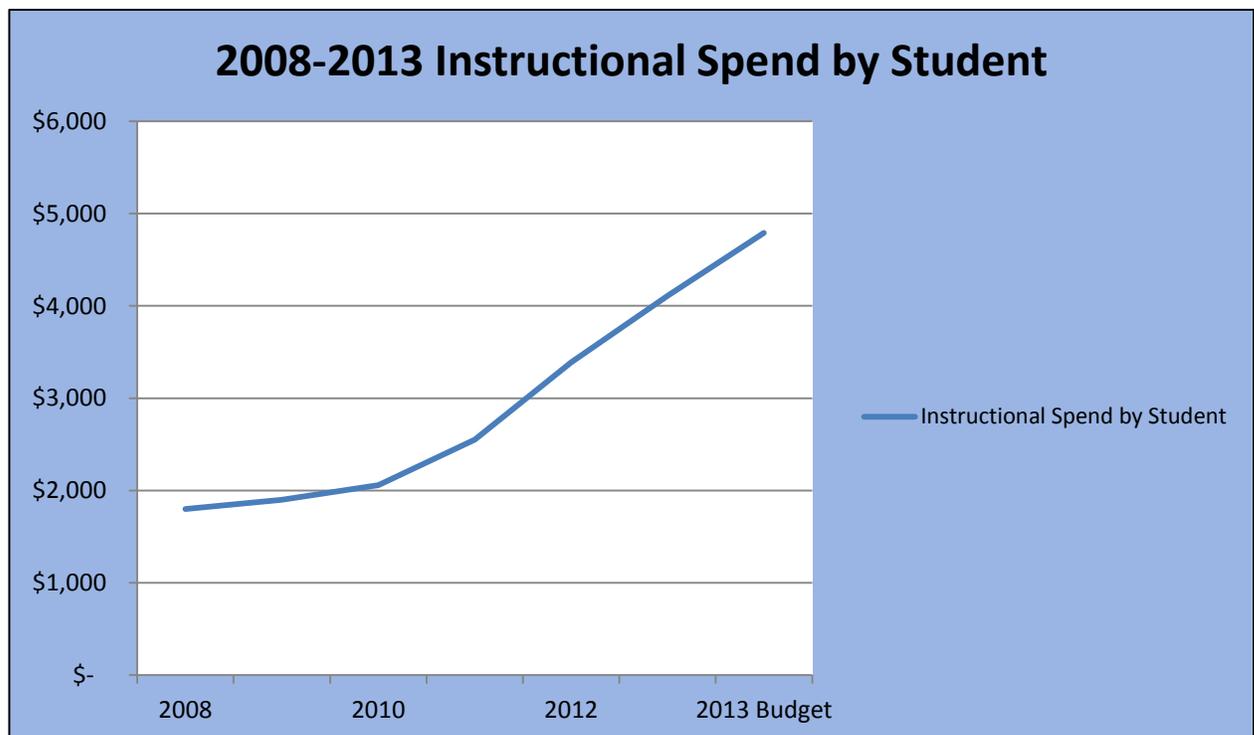


Chart 1: Instructional Spend by Student 2008 to 2012 Actual, 2012 Pro Forma and 2013 Budget.

	2008	2009	2010	2011	2012	2012 Pro-Forma	2013 Budget
Instructional Spend by Student	\$1,800	\$1,901	\$2,057	\$2,551	\$3,388	\$4,109	\$4,789
Ending Enrollment	31,392	52,439	75,967	84,713	79,738	79,738	81,706
Total Instructional	56,519,034	99,674,941	156,235,177	216,130,984	270,151,327	327,612,701	391,292,744

Overall, the Board of Trustees and leadership of Ashford are to be commended for their focusing of resources away from just acquiring students (marketing and recruitment) to the entire student life cycle. The changes in resource allocation are significant and clear in the evidence presented to the team. They will negatively impact the growth of enrollment, but will lead to increased retention, student outcomes, and the ability of the institution to remain financial sustainable (CFR 3.5).

C. A sufficient core of full-time faculty members, and a faculty model that provides for faculty development and oversight of academic policies and ensures the integrity and continuity of academic programs (CFR 3.2, 3.11)

In its July 3, 2012 letter, the Commission noted that the institution's faculty model was not yet sufficiently well developed or implemented, with collaborating evidence of its effectiveness, to ensure that all appropriate faculty functions are fulfilled. The Commission also noted the small core of full-time faculty members and lack of policies and practices concerning the faculty's role in governance and academic oversight.

At the time of its reapplication, Ashford had hired additional full-time online faculty and modified its faculty governance structure. It was in the process of clarifying various instructional roles of personnel, including those that supported the development and delivery of curricula and courses.

Sufficient Core of full-time faculty

When the March 2012 team visited, Ashford had fifty full-time faculty employed in the online programs. At the time of the reapplication, the University cited 158 full-time faculty members in its online programs. Now, Ashford's full-time online faculty count is 217; there are also 53 campus full-time faculty members in Clinton, Iowa.

Ashford cites a goal to have approximately 350 full-time faculty members by the close of 2013, based on a ratio of 12% to 14% full-time to part-time faculty. The ratio was chosen based on variables such as enrollment by college, needs of students in entry-point and high-failure rate courses, opportunities available to faculty in curriculum and instruction, and benchmarking institutions with robust online program presence such as National

University, Brandman University, University of Maryland University College, and others. In developing these ratios, Executive Deans reviewed enrollments, number of faculty assigned to courses, and number of faculty reporting to each College (including campus-based and full-time online remote). If special circumstances were relevant, these were also applied to the determination of the College to which the new faculty positions were allocated.

The team found that the institution is monitoring the hiring of the new online full-time faculty members closely to fulfill its goal of having a sufficient core of qualified and diverse full-time faculty (CFR 3.2). A month-by-month timeline for hiring, by College, has been developed and is being adhered to, monitored by the Executive Deans, and reported monthly to the Executive Vice President Academics and Provost. The Executive Deans of each College have developed advertisements and the Human Resources staff places ads, reviews application materials to ensure that all paperwork has been submitted, and conducts a preliminary telephone screening call to verify the applicant's intentions to be located in San Diego or remotely located. Each College's search committee then interviews candidates and makes the selection. Some of the newly hired full-time faculty members have served as associate (*i.e.* part-time) faculty for Ashford. These individuals have, therefore, had their faculty orientation and are known to be excellent teachers when hired; this has assisted the University in fulfilling its goal more quickly in some disciplines than originally expected (CFR 3.2).

One of the new initiatives reported in the University's *Report* concerns attention paid to faculty who teach in high risk, entry point courses (*e.g.*, EXP 105, Psychology 202, English 121 and 122, and basic math courses). This initiative includes the hiring of specialized instructors who have expertise in teaching adult learners with rich backgrounds in entry level aspects of their respective disciplines. In addition to the usual new faculty training (described below), this cadre of instructors in each College regularly holds meetings to learn about and resolve issues faced in the classroom by both students and faculty in these courses. As an example of training for the mathematics classes, the faculty in the first week of training went through the specialized Math labs used in their

curriculum just as a student would do, then focused on their faculty role in the teaching and learning process in the second week. Faculty teaching these courses are also engaging in empirical research projects on the courses and contributing to the literature on the adult re-entry student population (CFR 2.8, 2.9).

Provision of Faculty Development

Ashford University's model for faculty development begins with a comprehensive training program designed to ensure that faculty members understand the University's mission, student profile, and appropriate pedagogies for teaching adult learners, and can fully navigate the online system, among other goals. The New Faculty Experience course was designed by the Faculty Development team (who are all Associate Faculty in their disciplines) with input from full-time faculty members, the Provost, and Executive Deans. Once it has been completed, all new faculty members are assigned an Instructional Specialist mentor who assists them in their first course, coaches them as needed, and ensures that Ashford course requirements are met. Full-time faculty then watch over the new faculty members at the second course taught and provide support to three to eight instructors at any given time. Coaching and mentoring are also provided in future courses should these services be required. It is important to note that full-time faculty members attend a two-week Full-time Faculty Experience course once they have taken the New Faculty Experience course; this provides them with information on the roles and responsibilities of full-time faculty in addition to teaching (CFR 3.4).

The New Faculty Experience course was reviewed by the visiting team. It was found to provide new faculty with the opportunity to learn institutional expectations, policies, and procedures pertaining to teaching in the online environment. In addition, the new faculty member is provided with a simulated course (including a student to respond to) in which he or she must post their introduction, announcements, faculty guidance, and other important sections of each Ashford course. The faculty member must also respond to the student in the simulated course and post peer discussion topics. Each module has reading materials as well as a video or voice-over power point lesson and a facilitator assists the faculty as they proceed through this course. The course undergoes regular assessment

and data supporting additions, and changes to the course materials include end of course surveys of new faculty once they have completed the course as well as six months later; communications with the Colleges and with Instructional Specialists concerning the new faculty; and with faculty who are supporting them in the second course.

As reported by the 2012 visiting team, ongoing professional development for faculty includes Faculty Forum opportunities that enhance collaboration and understanding of faculty roles and responsibilities at the department and/or College level. The topics are developed by the faculty, and often are generated as a result of overarching findings from program reviews, end of course student evaluations, and peer review. Guest speakers have been brought in on occasion and the Forums are normally recorded and archived so that faculty who could not attend can view online at a later date; recordings are shared University-wide for all faculty members if applicable. Funding of \$2,000 per year per full-time faculty member is available for attendance at workshops, trainings, and academic conferences; this funding was made possible through work by the Faculty Professional Development Committee with the administration (CFR 3.4).

The online Faculty Resource Center is available to all faculty for additional training on demand, such as time management, working with particular types of technology in the classroom, how to support students with disabilities, and how to provide instructive feedback. The study of teaching and learning is supported through a new program called the University Faculty Fellows Program, which has just awarded its second round of research grants. A new initiative under consideration by the Faculty Development team is to add an entire area to the resource center addressing peer review since it is so important to the faculty contract process.

Finally, faculty can participate in professional learning communities at the University. For example, these communities can take the form of a task force that will investigate a particularly critical topic. Experts are brought in to discuss the topic with the faculty members and recommendations may come forward for implementation. The Critical Thinking Task Force is one such professional learning community at Ashford.

The team found that, building on the basic foundation that was available at the last visit, the work of faculty members in the area of their professional development through a variety of means has led to many changes in the last year. Scholarship awareness has increased and faculty groups such as the Professional Development Committee describe their efforts in terms of building a “culture of scholarship.” The influx of new faculty members is assisting in building this culture as many have established research skills and plans. A faculty member in each College has been appointed as a Research Fellow, with one course reduction, and these individuals work with colleagues in their own College, both formally and informally, on developing and implementing their scholarly agendas. Faculty members are working with administrators on future planning in this area, including the possibility of setting up a non-profit foundation so that Ashford University faculty may partake of federal grant opportunities and further refining research funding (CFR 2.8, 2.9).

Ashford University’s faculty members have made strides in establishing professional development venues that are appropriate to their disciplines and to the teaching and learning process unique to their institutional model. The University has an enormous database of diverse data pertinent to its educational model and its activities in terms of student support. It is suggested that Ashford's faculty members not only continue their efforts on discipline-specific scholarly work, but also explore utilizing Ashford’s massive databases to contribute to the literature concerning higher education's role in serving the working adult student population.

Faculty have sufficient oversight of academic policies and ensures the integrity and continuity of academic programs

Ashford’s full-time faculty members are the primary developers and overseers of courses, programs, instruction, professional development, and evaluation; they also participate in hiring and mentoring new faculty (CFR 3.11). In its *Report* Ashford provided extensive descriptions of the collaborators on the online instructional team (Table 7 in the *Report*) and the faculty support positions within these teams (Table 8). These tables clearly spell out the roles and responsibilities for full-time as well as associate faculty in these

processes. For example, full-time faculty ensure the integrity and continuity of academic programs through their participation in development, review, assessment, and revision of both courses and full academic programs and associated course and program rubrics. They ensure the oversight and support of associate faculty through mentoring and coaching.

Governance has changed as the University grew. Following changes adopted by the Faculty Assembly to its Constitution (in November 2011), an *ad hoc* committee was formed in March 2012 to address revisions to faculty governance, given the expanding online full-time faculty located in California. The process to make revisions included representative faculty from online and campus modalities from each College meeting under the leadership of a Faculty Assembly moderator and vice-moderator; College deans included discussions of governance on meeting agendas; and the Faculty Assembly accepted ideas forwarded to it from the faculty. In April 2012, the Faculty Assembly elected a full-time online faculty member as vice-moderator, while the campus based moderator was reelected. In Summer 2012, the two officers worked with the *ad hoc* committee as changes in the faculty Assembly constitution were being discussed. At the Annual Ashford Academic Conference in August 2012, the amended Constitution proposal was adopted and the organization became the Faculty Senate.

The revised constitution now features a representative voting body with equal representation from all Ashford Colleges and a revised standing committee structure. There is also one voting associate faculty member on the Senate. The four standing faculty governance committees were elected in September 2012 and each committee addresses areas that are the responsibilities of faculty. The Curriculum Committee, for example, reviews and approves new courses, programs, changes to program learning outcomes, and other curricular matters. General Education is a subcommittee under the Curriculum Committee. The Graduate Committee performs similar duties pertaining to graduate programs. The Institutional Effectiveness Council analyses program reviews, assessment, and student success data, and develops recommended action items based on this data. An Assessment sub-committee establishes and implements the University's

assessment plan, analyzes data, and makes recommendations for curricular changes based on the plan. The Professional Development Committee develops content and oversees the planning of all workshops and professional development activities, among other activities.

The team found that the new Faculty Senate is a college-focused representative system that is more agile than its predecessor organization, which had become unwieldy due to its size. The Senate and its Committees have members from both campus and online faculty bodies, include Associate faculty, and meet synchronously on a regularly scheduled basis. The Senators have time on their College meeting agendas to discuss Senate business with their constituents, and note that they meet with their own faculty colleagues regularly so that matters can be addressed at the College as well as Senate level. Senate minutes are sent to all faculty members for their information.

Senate members discussed the importance of shared governance, starting with oversight of academic programs as well as policies. They reported working collaboratively with the administration on issues that affect their work. An example of the evolving nature of shared governance at the University is that the administration brought the new Ashford Promise initiative to the Senate, discussion occurred, and the Senate agreed that retention was a shared goal and the Ashford Promise was worthy of ongoing faculty support. Other issues that have been discussed in an environment of collaboration include the similarities and differences in workload between campus-based and online faculty. The team found that the University has set a course to ensure that it hires and trains a sufficient core of faculty and is adhering to its schedule. Ashford is to be commended for its support of faculty in terms of using both a comprehensive orientation process, including the New Faculty Experience course, as well as an ongoing comprehensive faculty support and development system. It was also apparent to the team that the evolution of the faculty Senate is actively occurring with positive results. Faculty members as a whole, regardless of location, know and understand their roles and responsibilities in terms of program development and assessment, and participate cordially and collaboratively in shared governance. Their commitment to their students

and to their programs and colleagues is evident in their actions and is palpable (CFR 3.11).

D. An effective system of program review (CFR 2.7)

In its July 3, 2012 letter, the Commission noted that “Ashford has only recently adopted and implemented program review, and only a small fraction of academic programs have been reviewed—six out of approximately 80 programs.” The team also raised concerns about the reliability of learning outcomes assessment data, due to small data samples and lack of standards of performance in assessment tools.

In its reapplication, Ashford described actions taken to accelerate progress on the completion of program reviews and addressed how the University is improving standards of performance to ensure reliability of data, including the issue of small data samples. A consultant, experienced with WASC program reviews, was engaged to analyze Ashford’s program review processes. Subsequently, the faculty and administrators revised their program review model to create a faculty-driven process that placed program review high on the list of institutional priorities.

Prior to, and during, its visit the team reviewed all thirteen of the program reviews that had been conducted in the past year. Access to courses in several of these programs was also provided. The purpose of these course reviews—discussed in Section II E—was to confirm the linking of course objectives with student learning outcomes, verify the adequate rigor and appropriateness of course assignments, assess the appropriateness and application of rubrics, and compare the alignment of course assignments with course learning outcomes, including the quality of the capstone experience. These reviews also addressed the degree of faculty and student engagement, particularly the discussion threads among the students with their instructor.

During the visit, the team held meetings with the faculty and administrators involved in the program review process, and found a robust and effective revised program review process in place. Comprehensive and clear action plans had been developed for each of

the completed reviews. Qualified external reviewers from around the country with credentials representing both traditional nonprofit institutions as well as online for profit institutions had provided objective feedback that had been incorporated in the review, and to which appropriate responses were included in the recommendations and action plans. Departments took seriously the recommendations of the internal and external reviewers, and took immediate action to address the concerns that had been raised. It was clearly evident that faculty had created the program review process and, therefore, had ownership of program review (CFR 2.4). Overseeing this process is the Director of Program Review (a newly-created position), who reports to the Provost through the Office of Assessment Strategies and Instructional Systems (OASIS).

The team noted that there are still fifty-two new degree programs that have yet to be reviewed, although all are included in a master schedule for review at an appropriate time in the coming three years. Both the completed reviews and the course reviews conducted by the team noted concerns about a lack of course sequencing and prerequisites in some programs. In these cases, the team was assured by program leaders and faculty that the issues were being addressed. Concerns were also raised in the reviews regarding course rigor, as suggested by skewed or bimodal grade distributions, and there were other suggestions of low levels of student effort in some courses. The quality of the capstone experience, particularly when attempted within a five-week schedule, was also a concern in some of the program reviews. These suggestions, too, appeared to have been taken seriously by the program faculty.

An additional concern that arose, as the team reviewed the report of an external reviewer in one program, was about the qualifications of Teaching Assistants (TAs). In this particular program there was evidence that TAs without advanced degrees—and in some cases without a baccalaureate in the discipline—were grading papers and providing feedback to students. Most practitioners would likely agree that TAs should have appropriate qualifications in their respective disciplines if they are to grade papers or provide qualitative feedback to students. During the site visit, the team was encouraged to hear that, in this particular case, the use of TAs for grading was being discontinued and

faculty members will be taking over those responsibilities as class sizes are reduced—a result of using program review findings for quality improvement. The team was not able to determine whether TAs were appropriately qualified in every program and course that Ashford offers so would offer that this issue should be examined and addressed from a policy standpoint University-wide.

Faculty shared with the team how, as a consequence of the program review consultant's visit, a group of faculty members from the four colleges developed the program review guide following models suggested by the consultant. The program review guide was reviewed by the team prior to the visit and found to be in keeping with best practices in program review. This systematic program review includes assessment of student learning outcomes, retention/graduation rates, and external review (CFR 2.7). Ashford has also committed to having OASIS introduce faculty-determined rubrics into the Waypoint Data Reporting Tool, not only in all core courses in all majors, but eventually for all courses. At the time of the team visit, about one-third of the classes had been incorporated into Waypoint, and there is a plan to expand this by about twenty courses each month. Ashford has also reviewed its credit hour evaluation process, and has calculated credit hour equivalencies in its program reviews.

In preparation for program self-study, the Office of Institutional Research provides faculty with a data dashboard that contains evidence of program success, including longitudinal snapshots of program enrollment with demographic disaggregation, course completion rates, student persistence, and graduation rates (CFR 2.7).

As a part of the changes in faculty governance, discussed above, the team noted that faculty members have also made appropriate structural changes to reinforce the role of the Faculty Senate in oversight of the program review process. An Institutional Effectiveness Council was created by the Faculty Senate on August 11, 2012 as a standing committee of the faculty. Among the still-developing functions of this council are oversight of the program review process and incorporation of program review action plans into a larger set of recommendations for the Internal Strategic Planning

Committee's consideration and inclusion in the institutional budgeting process.

Ashford's administrative structure was also expanded through a new position, Director of Program Review, which was established within OASIS to coordinate and act as liaison to all Colleges for program review support and direction.

In reviewing Ashford's program review process, the team found that significant positive change had occurred since the last visit, and collaboratively rated Ashford University's program review process using the WASC "Rubric for assessing the integration of student learning assessment into program reviews." The overall consensus across all criteria on this rubric was that Ashford University had reached the "Developed" level in its program review process.

For example, regarding the criterion, "Required Elements of the Self-Study," the team found that Ashford has demonstrated that the faculty provides the student learning outcomes, conducts annual assessment studies, reviews the findings, and suggests resulting changes. A detailed action plan results from the program review, providing a roadmap of changes and improvements to be implemented for the next cycle of assessment studies. Likewise, when considering the criterion, "Process of Review," the team found evidence that internal and external reviewers analyze direct and indirect evidence of student learning and offer evaluative feedback and suggestions for improvement. The external examiners have sufficient expertise to evaluate these programs, and the departments utilize the feedback to guide their action plans. Evidence of this was observed by the team for those programs that had recently completed program reviews (CFR 2.7).

In terms of "Planning and Budgeting," there is evidence that the program reviews will be integrated into planning and budgeting processes, primarily through the appropriate school dean, but this process has not yet been formally established. The team suggests that Ashford define more explicitly in its program review process how the program reviews and the resulting action plans will be linked to the planning and budget process of the University and be provided appropriate oversight (CFR 4.2).

In understanding the “Annual Feedback on Assessment Efforts,” the team learned that programs receive annual feedback on student performance, using tools such as Waypoint and evaluative data provided by OASIS. This feedback is used by the departments to improve their work. With respect to “The Student Experience,” faculty in the recently-reviewed departments described how various methods were used to include students in the program review process. Results of the end-of-course surveys are included in the reviews, and several departments set up an active conference call with current students, recent graduates, and the external reviewers.

The team commends the Ashford University faculty for its efforts to develop and begin implementation of a revised program review process that is aligned with WASC expectations. While the revised process has just been implemented in the current academic year, there is strong evidence of faculty ownership of the process and a deep commitment to making appropriate adjustments as the process is applied to an ever-growing number of programs across the University. Executive support for program review is demonstrated in the establishment of an oversight administrator, the provision of adequate resources for data analysis and reporting, funding for the costs of the program review, and a willingness to incorporate action plans for planning and budgeting.

While the team was impressed with both the process and results of the second round of program reviews conducted by Ashford (the first under the revised process), it also wishes to note that much work remains to be done. Program reviews for the fifty-two new Ashford degree programs must be timely completed within the next three years according to Ashford’s schedule, and the newly formed Institutional Effectiveness Council must begin the task of evaluating each program review. Action plans and requests for new resource allocations should be prioritized according to strategic plan initiatives, and faculty governance should develop a model for ensuring that the loop is closed for each area of concern addressed in the action plans. Furthermore, the infrastructure for institutional administrative oversight of program review should be enhanced. The institution may wish to consider providing institutional and clerical

support to faculty during the course of program review, and administrative support to the Institutional Effectiveness Council in its efforts to ensure follow-through on program review action items. Collaborative opportunities appear to be developing between faculty governance and the new administrative Director of Program Review, but the possibilities for support and collaboration throughout the entire program review process have not been fully explored or developed.

E. An effective system for assessing and monitoring student learning and assuring academic rigor (CFR 2.1, 2.2, 2.6, 4.4)

In its July 3, 2012 letter, the WASC Commission noted that “... Ashford’s capacity to assess student learning in a systematic and manageable way in its large online division is also in the “initial” or “emerging” stages, as defined by WASC rubrics, and does not yet provide adequate assurance that students are learning what they are intended to learn” (CFR 2.4, 2.6). The Commission raised concerns about the pilot electronic system in place for the collection of outcomes assessment as well as the new rubric-based tools for assessing learning which would be used to demonstrate that students are learning as expected, and also expressed concern about the processes for making changes to improve learning where gaps were found based on the results from outcomes assessments. There were reservations about course rigor and the quality of online discourse between faculty and students. Overall, the Commission determined that Ashford had not demonstrated that it was in substantial compliance with Standards 2 and 4, in particular CFRs 2.1, 2.5, 2.6, and 4.6.

In its *Report*, Ashford noted that the Commission’s response brought an opportunity to reflect upon the University’s processes for assuring academic rigor and for assessing student learning. A narrative about the rigor employed in the faculty hiring process, the criterion based faculty qualifications profiles that have been developed for use in determining course assignments, and the training of all new faculty as described earlier in this report is provided. Specific expectations for responses to students and the amount and quality of student-faculty interaction within active discussions are also outlined. Ashford describes the development of a multifaceted performance monitoring and review

process for faculty that includes an annual peer review, a mentoring program, monitoring and support for faculty online performance by instructional specialists, student end-of-course surveys, and regular evaluation of faculty by Executive Deans that includes an analysis of performance data from these various sources.

Ashford discussed its efforts to develop a comprehensive process for student learning outcomes assessment in its *Report*. The plan, originally developed by the OASIS in 2010 and reviewed and approved by the Faculty Assessment Committee, has now been launched. The usage of Waypoint Outcomes software has been significantly increased across all degree programs in early, midpoint, and capstone level courses. Course, program, and institutional learning outcomes have been developed using Bloom's Taxonomy to reflect appropriate cognitive skill levels, and comprehensive evaluation rubrics have been developed for use in courses, assignments, discussion board participation, as well as at the program and institutional levels. Ashford noted that, in addition to the measures mentioned above, other best practice assessment measures are also employed. Capstone projects, signature assignments, and standardized tests such as ETS Proficiency Profile, SAILS, and the Peregrine CPC Exam are used extensively. Data from student surveys such as NSSE, Noel Levitz, and end-of-course surveys complement these direct assessments.

Each of these assessment initiatives, Ashford noted, is faculty-driven. Faculty report, review, and discuss assessment findings annually. As noted previously, the Senate has created a new standing committee on Institutional Effectiveness, and faculty members interact regularly with Assessment Analysts in OASIS to design and review assessment protocols and data and determine implications for course refinement and student learning.

In preparation for, and during the visit, the team also reviewed the role of OASIS. The team observed that OASIS has designed a systematic and manageable infrastructure for assessment and educational effectiveness as well as training for full and part-time faculty. The team also accessed the Ashford assessment website (assessment.ashford.edu) which outlines the outcomes assessment model, institutional outcomes, institutional assessments

around student engagement and student satisfaction, and institutional improvement data. The team also reviewed evidence of reliability and generalization of findings with the use of the Waypoint tool along with evidence of faculty oversight with course rubrics, including an inter-rater reliability protocol.

To address the Commission's concern about course rigor and the quality and extent of discourse between faculty and students in online courses, Ashford described in its reapplication a rigorous internal new course approval process and noted that 517 out of 651 of its courses (as of August 2012) were externally validated by the Quality Matters Program. In conducting its research on the subject of course rigor and quality of discourse, the team reviewed a sampling of Ashford's online courses using a standardized evaluation protocol. The team selected sixty-two courses (graduate and undergraduate) that included seven lower division General Education courses, representing roughly 10% of online courses offered. All of the courses were designed for the institution's intensive, five or six-week session. Through the online course portal the team reviewed syllabi, outcomes, assignments, grades, discussion board and faculty/student conversations, methods of evaluation, and all information pertinent to each course. With the exception of the capstone courses reviewed, the team found that course learning outcomes were tied in most courses to assignments and were appropriate to the level of the courses.

While there was a range of faculty/student discourse present at the time of the team's review of courses (most courses were still in week one or two at the time of review), in some cases faculty engagement was very apparent. Instructors' posts in discussion board threads provoked deeper reflection and research on the part of students. This observation was later confirmed by students with whom the team met during the site visit. The level of discourse was not consistent across all courses reviewed, however. In approximately ten to twelve courses (15% to 20% of the small sample reviewed) the team found discussion board threads to be conversational and superficial, without much research required by students, and without much provocation posed by instructors. Because discussion board participation accounts for between 30% to 50% of a student's grade in many of the courses reviewed, the team agreed that maintaining high standards and

expectations for the level of faculty/student discussion board discourse was critical, especially for an online program with no face-to-face interaction between faculty and students. While there was much discussion with faculty during the site visit regarding the heavy weighting of discussion board participation in determining students' grades, the team felt that this instructional practice is still an area worthy of discussion by Ashford's faculty as courses are reviewed and programs are refined.

Thus, the team's review of Ashford's courses found mixed results within the small sample. Ashford is to be commended for its rigorous new course approval process and its use of the Quality Matters Program to externally validate course design, but the individual implementation of courses, and the inherent rigor in each course, was found to be inconsistent and often varied from instructor to instructor. In reviewing recently conducted program reviews, the team was also concerned to see that—as noted previously—some programs did not utilize course sequencing or prerequisites to provide students with a roadmap through the curriculum that could facilitate a natural and intentional progression to levels of mastery for each program learning outcome. To this end, it was heartening to the team to hear about the improvements made to those courses and programs (*e.g.*, History and English), and for the team to see how seriously the faculty in those cases responded to the criticisms made by external reviewers. In the cases of History and English, the team was given verbal assurances during a variety of interviews that many of the external reviewers' recommendations, such as designing course sequencing and prerequisites, had already been—or are in the process of being—implemented. While much work remains to be done in regard to improving course rigor and discourse between faculty and students in Ashford's courses, the team was encouraged to observe that Ashford's faculty members take seriously and act upon the recommendations of external program reviewers, and that they appear committed to quality and improvement of the courses they offer.

Faculty should continue to examine the level, quality, and rigor of courses in a variety of ways using established processes. The system set up by Ashford using Instructional Specialists to monitor the classroom aspect of online teaching is to be commended, and

perhaps this role should be expanded to include questions of course rigor, especially in terms of discussion board discourse. Evaluation of discussion board interaction on a course by course basis will insure that students are achieving intended learning outcomes at a level appropriate to both courses and degrees (CFR 2.1, 2.5).

Assessment Infrastructure

During meetings with various individuals and committees involved with assessment, the team probed a variety of topics, including the level of involvement of faculty and students in the assessment process and the roles and responsibilities of the various offices and faculty groups charged with the development, implementation, interpretation, dissemination, and utilization of the assessment data. The team was also interested in the opportunities for professional development and training of faculty in assessment methodology, beyond the Ashford setting, along with faculty involvement in student success initiatives. The team explored the role of faculty and various committees with Waypoint and the use of assessment findings for faculty to refine and modify their programs and courses. Other lines of inquiry were directed towards the role of faculty in developing and maintaining academic rigor with discussion around the grade distribution and high GPA reports.

The team was able to observe and confirm that Waypoint, Ashford's electronic system for assessing student learning using standardized rubric-based tools, has been tested, refined, and systematically deployed across programs. Now routinely used in approximately two hundred out of six hundred total courses at Ashford, Waypoint provides rich and valuable assessment data to Ashford's faculty and leadership. Ashford expects that the Waypoint rollout to 100% of its courses will be complete by the end of 2014. For the one third of faculty members using the Waypoint system in their classes now, the team heard nothing but praise. In fact many examples were provided from faculty members who were eager to get the Waypoint system established in their classes before their scheduled rollout date. Unfortunately, because of the time and energy required to properly and carefully integrate the system with each online course, OASIS,

the office responsible for the rollout, must adhere to a prioritized course-by-course implementation schedule.

OASIS provided team members with a convincing demonstration of the powerful Waypoint system for those courses currently using the assessment system. Faculty members are not only able to observe student performance data according to each course learning outcome, but also for the institutional, program, and general education learning outcomes supported in their courses (www.assessment.ashford.edu). Faculty members working with OASIS staff tag course assignments and corresponding rubrics according to the type of learning outcome each supports. For instance, a student project may contain a component that applies to the general education outcomes of written communication and critical thinking in addition to a course learning outcome.

While not yet completely implemented, OASIS has recently developed the capacity to collect and publish these data in an easy-to-read electronic dashboard that is accessible in real time to all faculty members. This dashboard (distinct from REAL dashboard) was demonstrated for the team during the site visit. The team also observed that OASIS has begun to collect some pertinent data in connection with General Education assessment and appears to be developing infrastructures to disseminate this data to faculty in the near future. Once OASIS packages and presents the data from these many sources to faculty in a coherent way, faculty must begin to analyze and interpret the success of the General Education program's learning outcomes at the baccalaureate level. The team heard numerous examples of how assessment data collected from Waypoint was incorporated into course and program level redesign strategies, and how improvements in student learning followed.

The team was also able to observe the learning outcome statements and rubrics that have been designed at the course, program, and institutional levels. For the sixty-two courses that were sampled and reviewed prior to the site visit by team members, it was found that course learning outcomes used appropriate Bloom's Taxonomy phrasing to reflect the cognitive skill levels required for the type of course. Furthermore, class assignments had

been deliberately and carefully aligned with course learning outcomes, and corresponding rubrics had been developed to measure student achievement of outcomes. These rubrics were provided to students in the online course materials so that the expectations for each project were clearly understood by both faculty and students (CFR 1.2, 2.3).

The team was encouraged to see the collaboration and enthusiasm between faculty, administrators, and staff in the collective efforts of implementing such a large scale and complex assessment plan. While the roles of each group were not always clearly defined and sometimes overlapped, faculty members, OASIS, and the Office of Institutional Planning and Effectiveness routinely work together to track trends, conduct data analyses, and design new strategies and systems to measure student learning at both local and global levels. OASIS Assessment Team members work with individual faculty members to accommodate a large variety of requests for specific types of outcomes data. It was clear that there is genuine excitement by both faculty and staff surrounding the possibilities that the new Waypoint system provides. New discoveries seem to happen frequently regarding the myriad ways that Waypoint data can be aggregated or disaggregated to provide helpful perspectives on student learning. The demonstrations of Waypoint and the user interfaces created by the OASIS staff made it clear that Ashford has tapped into a very powerful assessment tool and that the tool is being used effectively to measure student learning. Assessment data is immediately available to faculty, staff and administrators, and real time adjustments can be made to teaching strategies mid-course if necessary. Existing faculty members are effectively trained in the use of Waypoint dashboards for their courses and participate with OASIS staff in the integration of Waypoint with their existing course structures. New faculty members are introduced to Ashford's assessment management system during their New Faculty Experience orientation (CFR 4.4, 4.5, 4.6).

Thus, Ashford is encouraged to continue its rollout of the Waypoint system as outlined, concluding at the end of 2014. The team acknowledges the significant commitment of resources, training, professional development of faculty, and technological expenses that are being directed to the maintenance of the infrastructure dedicated to assessing student

learning. The OASIS organizational chart provided by Ashford showed thirty-four support staff positions devoted to assessment and curricular support. The Office of Institutional Planning and Effectiveness employs another twenty-nine support positions—four of whom are interns—in the areas of assessment and evaluation research, retention and graduation research, and institutional research. Ashford is encouraged to continue its demonstrated commitment of resources to measuring and demonstrating its institutional effectiveness in such comprehensive ways. The expenses have been significant, the progress has been commendable, the results to date have been effective, and the commitment must be continued.

The team also wishes to encourage Ashford in its plans to increase the use of signature assignments (common assignments administered across many courses, for example, in order to measure student achievement of a particular outcome) for the purposes of assessment. The team hopes that Ashford will consider increasing the usage of assessment data to monitor student performance using the newly developed Waypoint dashboard, which promises to be a valuable resource to faculty members. The team also wishes to suggest more extensive use of the REAL reports that are provided to faculty. While REAL systems are currently being effectively used in a student's first four courses to monitor progress in an effort to increase retention, Ashford is urged to determine if the use of REAL reports could be continued throughout each student's entire academic program. Ashford's faculty seemed to genuinely appreciate and value the use of the REAL reports because of their effectiveness in providing an early warning system to identify students at risk of failing or dropping out.

It is clear that this complex assessment system, created through a collaborative team approach of faculty, staff, and administrative entities such as OASIS, is dynamic in nature and will continue to evolve as it is implemented at all levels within the institution. Ashford's capacity to assess student learning in a systematic and manageable way in its large online division is in the "Emerging" and "Developed" stages in most areas, as defined by WASC's rubrics, with a robust technology driven data collection system that

provides feedback to both faculty and students about program and student learning outcome attainment (CFR 2.1, 2.5, 2.6, and 4.6).

General Education

Finally, while Ashford has developed a preferred sequence for its General Education competencies of Applied Ethics, Communication, Critical Thinking, Information Technology, and Mathematics, in reality the sequence appears to vary by the degree program and student study plan. While there are a variety of data collection procedures in place, the analysis and dissemination components are not yet well established. There are potential plans which will need to be reviewed by the appropriate Faculty Senate and University level committees to develop a five-year General Education Assessment Calendar focused on one General Education competency per year. This will be critical in order to create a strong program of General Education assessment with implications for program refinement and student learning. It was encouraging to observe that ETS Proficiency Profile and SAILS data are collected at graduation level to assess most General Education competencies, but these data have not yet been made available to faculty for the purposes of program improvement. Ashford noted that it expects that this distribution of data will occur soon.

Overall, Ashford University is commended for its efforts to develop a comprehensive assessment system focused around a culture of learning and student success, driven by technology, as part of the University Strategic Plan. Ashford should continue the development and implementation of its comprehensive model of assessment for its General Education program that combines the use of capstone and graduation level assessments with standardized exams that are benchmarked against peer comparison institutions.

F. An empowered and independent governing board and a clear and acceptable relationship with the parent company (CFR 1.6, 3.9, 3.10)

In its Action Letter of July 3, 2012 the Commission expressed a major concern about Ashford's independence from Bridgepoint to "assert control over the academic and fiscal elements of its programs" (CFR 1.6). At the time of the March 2012 site visit, the terms

and conditions under which Ashford University operated within the authority of its Sole Member, Bridgepoint Education, Inc., were defined in the *Fifth Amended and Restated Operating Agreement (Fifth Agreement)* and the *Fifth Amended Board Policy Manual (Fifth Policy Manual)*. The *Fifth Agreement* provided for a Board of Trustees of five to eleven members and included provisions for ensuring that a majority of Trustees at any given time would be appointed by “The Member,” which meant, in reality, the CEO of Bridgepoint. The CEO also appointed the Chair of the Board. Obviously, that was not an independent Board as required by WASC Standards and *Policy on Independent Governing Boards*.

A proposed *Sixth Amended and Restated Operating Agreement (Agreement)*, which would change this method of election, was shared with the 2012 team and would, the team was told, be implemented when Ashford was incorporated as a California (rather than Iowa) corporation, an event that could occur only after accreditation was granted by WASC. However, after the Commission Action of July 3, 2012, Ashford uncoupled incorporation in California from the implementation of the *Agreement* and the *Sixth Amended Board Policies Manual (Policies Manual)* which were approved by the Ashford Board of Trustees on September 29, 2012 as reflected in the minutes of that meeting.

A review of the *Agreement* and the *Policies Manual* provides evidence of significant and positive changes. There are to be at least seven Trustees and a maximum of seventeen, and the method of election assures that, regardless of the number, independent Trustees will constitute a majority. For example, if the Board is comprised of eleven members, independent Trustees will elect six and the Sole Member shall appoint five. Independent is defined as having no “contractual or employment interest in the University or the Sole Member” nor owning or exercising voting control over any shares of stock in Bridgepoint (CFR 3.9, WASC *Policy*). The President serves as an *ex-officio* member.

A conflict of interest policy is printed in both the *Agreement* and the *Policies Manual*. The policy provides that “a majority of the Board of Trustees shall not own or exercise voting control over shares of common stock in the Sole Member.” Any independent

Trustee who owned stock at the time the Agreement became effective was required to divest within six months. Also included is a provision that requires each Trustee to certify, on an annual basis, the amount of stock owned. Beyond the matter of ownership of Bridgepoint stock, the policy defines other forms of possible conflict, includes a process for disclosing such conflict, a requirement to abstain from voting when there is a conflict, and a provision that such conflict and abstention from voting be recorded in the Board meeting minutes (CFR 1.6, 1.8, 3.9).

At the time the reapplication was submitted, the Board was comprised of eleven members with the expressed intent to increase that number to seventeen. By the time of the visit there were fourteen Trustees and active recruitment is ongoing to identify three more. The *Policies Manual* provides for six committees: Academic Affairs and Governance; Financial Planning/Budgeting; Financial Audit; Executive; Nominating; and Strategic Planning, with explicit duties for each. Until additional members were added the Audit and Nominating Committees had no members and the functions of those two committees were performed by a three member Executive Committee. With the addition of new members the Audit Committee is now operative with three members, two of whom are independent. The Chair of the committee is a new Trustee with long experience as the Chief Financial Officer of an esteemed private, non-profit College.

The Board meets at least four times a year and more frequently as needed. A review of Board minutes indicates regular and special meetings and that the Board is giving attention to the issues confronting the University.

Under the *Agreement* the Board does not have authority to take such action as incurring financial obligations in excess of \$250,000 unless included in or contemplated by the University's annual budget; changing the purpose of the institution; entering discussions with regard to merger with another entity; allowing voluntary dissolution; or determining the distribution of Distributable Cash other than provided within the *Agreement*. For a subsidiary in a for-profit structure, these restrictions are not troublesome. Except for these actions the Sole Member "agrees that the responsibility for the management of the

University is delegated to the Board of Trustees, including the specific grant of authority of general oversight of the academic affairs of the University and approval of the annual budget.”

Following that statement is a listing of specific duties, including the appointment, evaluation, and termination of the President and the determination of compensation; oversight of all operations of the University; approval of the strategic plan and the annual budget; oversight of the curriculum and program recommendations made by the faculty through the governance system; approval and elimination of programs; and assurance of compliance with educational regulatory agencies. The same enumeration of duties is included with the job description of the Board in the *Policies Manual*. Also included is a section on Board/President relations that includes delegated responsibilities to, and expectations of, the President as well as a provision for the evaluation of the President. The Board has moved to implement this policy even though the President has not yet served a year. There will be an annual performance appraisal based on goals agreed to by the Board and the President (CFR 1.6, 3.9).

The Board is commended for the clarity and comprehensiveness of the *Agreement* and the *Policies Manual* and the manner in which these documents clarify the relationship between Bridgepoint and Ashford and clearly establish the authority of the Ashford Board as the governing body of the University.

Under the provisions of the *Agreement* the Bridgepoint CEO nominates a Trustee to serve as Chairperson of the Board, who must be elected by majority vote of the Board of Trustees. The term of the Chair is three years, although there is no limit on how many terms she/he may serve. A new Chair, with extensive and distinguished experience as a President of a major public university, was recently elected. A discussion with the Chair provided evidence of a forceful commitment to assuring a strong, effective, and autonomous Board for Ashford. The University has also recently created a position of Senior Board Administrator to provide administrative support for the Board.

Biographical information and an extended meeting with the Board provided evidence of

Trustees with impressive professional and educational backgrounds who are highly knowledgeable about—and conversant with—issues of higher education and who have, as their ultimate goal, provision of high quality education through the Ashford educational model. Also clear is the Board’s support for the President’s change of direction for Ashford from an emphasis on recruitment to student success.

The Trustees are in the early stages of a Board development initiative and have entered into a two-year agreement with the Association of Governing Boards for a consultant to assist in this effort, including systematic self-assessment of its effectiveness as a Board (CFR 3.9 Guideline). The consultant has already initiated the process and there is a clear commitment from the Board.

Related to the issue of sufficient autonomy of the Ashford Board of Trustees the Commission expressed concern about the lack of a “clear acceptable relationship” with Bridgepoint. At the time of the March 2012 visit the University’s budget was subsumed under that of Bridgepoint. Now Ashford—as discussed in Section II B above—has a separate budgeting process, and the budget is approved by the Ashford Board of Trustees. Also in response to the Commission’s Action Letter, Ashford has completed the process of producing a separate audit from its parent company, Bridgepoint. The University engaged the firm of PricewaterhouseCoopers, LLP to prepare its fiscal year 2011 and 2012 audits. The separate financial statements provided an accurate view of the University’s financial operations in a format which makes it clearly separate from the parent company’s consolidated financial statements. The separation allows the Board of Trustees to be the authority in engaging the auditors and presenting a clear and authoritative view of the accredited entity’s financial performance and position.

The Commission’s concern about Ashford’s relationship with Bridgepoint also resulted from the fact that a number of services were performed by Bridgepoint without a formal agreement that indicated what the services were, how they were agreed to, and how the costs to Ashford are determined. Various steps have been taken by Ashford and Bridgepoint to address this issue. Since the March 2012 visit a number of functions that

had been performed by Bridgepoint personnel were moved to Ashford. These included Student Affairs, Policy and Implementation, Student Access and Wellness, Alumni Affairs, Career Services, Institutional Research, Accreditation Services, and Institutional Effectiveness. As previously noted, some 156 Bridgepoint staff members were transferred to Ashford with reporting relationship to Ashford management. Moreover, the dotted lines between Ashford and Bridgepoint personnel—noted in the previous team report—no longer exist.

Bridgepoint still provides various services, but now those services are defined in the *Services Agreement*. Services that are mandatory include compliance audits of regulatory requirements, legal, payroll and taxes, employee benefits, and public and governmental relations. It should be noted, however, that Ashford has its own external legal counsel to represent it in matters related to Bridgepoint.

Bridgepoint provides support services in the areas of information technology, facilities and real estate, finance, human resources, marketing, data analytics, and certain learning products. Given the Commission's concern about autonomy in academic and fiscal matters, the team gave special attention to services in these two areas. The financial assistance referred to is access to software and "advisory services." In an interview with the Vice President for Finance the team learned that such services primarily include accounting functions. The agreement explicitly states that the Ashford budget "is the sole responsibility of Ashford representatives and must be approved by the Ashford Board of Trustees." Conversation with the Ashford Board and a review of Board meeting minutes confirm that such is, in fact, the case.

The human resource services include assistance with the recruitment of staff and faculty, employee relations, and human resources training for Ashford managers. The *Services Agreement* stipulates that all decisions with regard to hiring, compensation, and termination are the "sole responsibility and absolute discretion of Ashford." The Bridgepoint Senior Vice President for Human Relations confirmed that job descriptions

and minimum qualifications are established by the responsible Ashford personnel, such as Provost or a Dean, and that all applications are made available to that person.

Marketing assistance occurs in such areas as production of catalogs and promotional material, website support, and identification of prospective students. Meetings with the Ashford Senior Vice President for Enrollment Management and Services and two Bridgepoint marketing executives confirmed that content control of marketing pieces resides, ultimately, with Ashford. As discussed in Section II A above, Bridgepoint also provides support for Ashford's recruitment through its Student Inquiry Center.

The *Services Agreement* states that services provided by Bridgepoint are subject to the continuing review of the Ashford Board of Trustees, which is responsible for assuring that the various support services are carried out consistent with Ashford academic policies and procedures and with the requirements of regulatory bodies, including any accrediting agency. The fees for services must be consistent with the Ashford budget as approved by the Ashford Board of Trustees and negotiated on an annual basis. A schedule of shared services charges for 2013 includes \$66,601,025 for instructional related costs and services; \$65,862,072 for marketing and promotional services; and \$13,356,633 for general and administrative services for a total of \$145,819,730.

Conversations with the Chair of the Board, the Board, President, and Vice President for Finance provided evidence of a commitment to refine further various aspects of the *Services Agreement*. For example, metrics are being developed to evaluate not only the quality of service provided by Bridgepoint, but also the value received in relation to costs. There is, also, an ability for Ashford to use outside vendors if that proves to be advantageous in terms of quality of service, cost, or both. These provide further evidence of the Board's commitment to be an independent voice on behalf of the interests of Ashford.

Clearly, positive changes have been made since March 2012 to address the Commission's concerns about the ability of the Board to function as an independent governing body and to establish a "clear and acceptable relationship" between Ashford and its parent

company. Additionally, the Board has taken steps to strengthen the leadership of the University. As noted above, a new Board Chair was recently named. The new President holds a Ph.D. from a public research university, has served in various academic administrative positions, was President of a public university for sixteen years, and for five years served as Chancellor of a public university system. He also served as Chair of one of the regional accrediting commissions. Both individuals bring to Ashford depth and breadth of experience. The team consistently heard positive comments from the Board, administrators, staff, and faculty about the impact the President has had in a very short time—his vision, openness, and leadership qualities.

The Trustees and the President are commended for the fundamental changes made, in a short period of time, to empower and establish the independence of the Ashford Board and to clearly define the relationship with the Sole Member and the services performed for Ashford by the Member. The team found sufficient evidence, systems, and resolve to give confidence that the Board will continue to solidify and strengthen itself as an independent and autonomous governing body.

Section III Findings and Recommendations

As noted in the introductory comments and as discussed in detail throughout the *Report*, Ashford University has made remarkable and dramatic changes—within a very short period of time—in response to the Commission’s Action Letter of July 3, 2012. In the process, the culture of the University has been changed in significant ways. The University has become a more reflective, academically centered institution with the stated commitment of shifting from being market driven to quality driven. This conscious shift of the institution’s DNA, to which there is commitment and enthusiastic support by the Board, President, administration, faculty, and staff, and is highly commended (CFR 4.6 and Guideline).

The appointment of a new President and Chair of the Board—with high level experience in major public universities—and the election of a number of new Trustees with impressive professional and educational credentials have significantly and quickly provided Ashford with high quality leadership (CFR 3.9, 3.10).

The University is using technology and data proactively to reach out to, and advise, students in a highly individualized manner, a characteristic of the University about which students with whom the team met are highly complementary (CFR 2.10-2.14).

Ashford University is strategically and thoughtfully reallocating significant resources across the entire student life cycle in order to positively impact student success (CFR 2.10, 3.5).

The University is supporting its faculty through a comprehensive orientation process that includes the New Faculty Experience course and provides an ongoing faculty support and development system (CFR 3.4).

Ashford has developed a robust system of program review, based on best practices, that is effectively providing data for faculty self study and evaluation by qualified external

reviewers. Findings are tied to improvement of student learning and program quality, as well as to the effectiveness of student success initiatives (CFR 2.7).

Ashford University has also developed—through a collaborative team approach of faculty and support entities—a comprehensive assessment system that is focused around a culture of learning and student success, is driven by technology, and is a part of the University’s *Strategic Plan*; this system is dynamic and will continue to evolve as it is implemented at all levels within the institution (CFR 2.1, 2.6, 4.4, 4.5).

The clarity and comprehensiveness of the *Sixth Operating Agreement, Board Policies Manual, and Shared Services Agreement* delineate the relationship between Bridgepoint and Ashford and clearly establish the authority of the Ashford Board of Trustees as the governing body of the University, and such authority is being exercised (CFR 1.6, 3.9, 3.10).

It is in this context that the Team offers the following recommendations and suggestions.

Recommendations and Suggestions

1. Continue the first-year retention efforts and expand them to include the entire undergraduate and graduate student life cycle.
2. Continue the development and implementation of the University’s comprehensive model of assessment for the general education program that combines the use of capstone and graduation level assessments with standardized exams that are benchmarked against peer comparison institutions.
3. Complete the cycle of program reviews for all degree programs, maintaining a strong focus on academic quality.
4. Continue to examine the rigor of courses in a variety of ways, using established processes and standards, including the continuation of program review by qualified external evaluators, to insure that students are achieving intended learning outcomes at a level appropriate to both courses and degrees.
5. Continue to develop, within the faculty governance committees, review structures and criteria for evaluating annual program assessment efforts and program review results.

6. Most importantly, sustain the commitment and enthusiasm that has led to the changes and improvements during the past year.

In addition to these recommendations, it is suggested that Ashford and its faculty members not only continue their efforts on discipline-specific scholarly work, but also explore utilizing Ashford's massive databases to contribute to the literature concerning higher education's role in serving the working adult student population in an online modality.

Appendix

The following table provides a brief comparative summary of the findings included in the July 3, 2012 Action Letter of the WASC Accrediting Commission for Senior Colleges and Universities with those discussed in detail in the foregoing *Report*.

Commission Action Letter (July 2012)	Team Findings (April 2013)
<p>A. Concerted and systematic approaches to improve retention, persistence, and completion with evidence-based plans, targets, and timelines not in place and the impact of recent changes cannot be measured.</p>	<p>Goal of increasing undergraduate one year retention by 10% within three years.</p> <p>Effective collection and analysis of data, with appropriate disaggregation, on student progress and success, enabling evaluation of the results of institution's initiatives to support student outcomes.</p> <p>Student-success dashboard in place to target students most at risk of attrition.</p> <p>Thoroughly revised pre-screening process and admission requirements.</p> <p>Free two week orientation required for students without previous post-secondary experience, led by a full-time faculty member.</p> <p>Three-week conditional acceptance period in first credit-bearing course with ability to opt-out with no charge and no financial aid having been disbursed.</p> <p>Weekly monitoring during student's first courses with weekly reports to advisors, counselors, and faculty.</p> <p>A comprehensive system that takes a holistic university-wide look at the student life cycle from initial contact through completion with Ashford, with significant focus on first year undergraduate retention.</p> <p>Internal and external measures to track and confirm student progress.</p> <p>Significant increase in Student Advisors with corresponding reduction in Advisors to students ratio from 300:1 to 200:1.</p> <p>Retention and graduation rates tracked weekly and grouped according to workable and understandable cohorts.</p>

Commission Action Letter (July 2012)	Team Findings (April 2013)
<p>B. Inadequate alignment of resources for educational purposes; support for recruitment skewed in relation to support for academic quality and success.</p>	<p>Strategic and significant reallocation of resources across the entire student life cycle to positively impact student success, shifting the primary focus from marketing and recruitment to support, retention, and instruction.</p> <p>Collaborative budget process resulted in increase of \$120 million in expenditures for instructional costs and support services while marketing and promotional costs have decreased.</p> <p>Spending on instruction per student increased 166% from 2008 to 2013</p>
<p>C. Insufficient core of full-time faculty and a faculty model that provides for faculty development and oversight of academic policies.</p>	<p>Faculty hiring plan is in place and is monitored on a monthly basis.</p> <p>Full-time faculty supporting the online program increased from 50 at the time of 2012 visit to 217 with goal of 350 by the end of 2013</p> <p>Implemented comprehensive faculty development model that includes orientation, training, mentoring, and ongoing professional development.</p> <p>Funding of \$2,000 per year per full-time faculty for professional development.</p> <p>Roles and responsibilities of faculty and other members of Ashford’s instructional team are clearly defined and published.</p> <p>The Faculty Senate has continued to evolve and, through its committee structure, exercises control and oversight of the curriculum and academic policies.</p>
<p>D. Program review in the “initial” stage as defined by WASC rubrics</p>	<p>A robust and effective program review process, based on national best practices, is operative and includes external reviewers.</p> <p>Findings are tied to improvement of student learning and program quality</p>

Commission Action Letter (July 2012)	Team Findings (April 2013)
D. Program review in the “initial” stage as defined by WASC rubrics (Cont’d)	Program review has reached the “Developed” stage in the WASC rubric
E. Assessment capacity in the “initial” or “emerging” stages of WASC rubrics; electronic system for assessing learning promising, but not thoroughly tested or deployed across all programs; concerns about rigor; variation of quality and extent of student/faculty discourse in online courses.	<p>A powerful electronic assessment system has been tested and deployed across all programs and is routinely used in 200 of the 600 courses, with plans to complete a 100% roll-out by the end of 2014.</p> <p>Ashford’s capacity to assess student learning in a systematic and manageable way in its online division is “Emerging” and “Developed” in most areas as defined by WASC rubrics.</p> <p>A rigorous new course approval process, which includes external validation, is being utilized, but course rigor and the level of faculty discourse with students are inconsistent.</p> <p>Assessment analysts assist faculty with design of assessment protocols and review of data.</p> <p>Sixty-four staff positions (in two different administrative units) provide support for assessment and institutional research.</p>
<p>F. Board of Trustees must demonstrate sufficient independence from its parent company to assert control over academic and fiscal elements of its programs.</p> <p>Draft agreements that would establish Ashford with an independent Board had not been implemented.</p> <p>Majority of trustees, including the Chair, appointed by the parent.</p> <p>Financial results reported in parent company’s audited financial statements.</p>	<p>An Operating Agreement is in place and defines the relationship between Ashford and its parent company.</p> <p>The Agreement specifies that the Ashford Board has responsibility for managing all aspects of the University, including appointment of the President, approval the annual budget, and oversight of the curriculum.</p> <p>A majority of Trustees are independent and are elected by the Board; the Chair is elected by the Trustees after nomination by the parent company.</p>

Commission Action Letter (July 2012)	Team Findings (April 2013)
<p>F. Board of Trustees must demonstrate sufficient independence from its parent company to assert control over academic and fiscal elements of its programs (Cont'd).</p>	<p>Trustees have impressive professional and educational backgrounds, are knowledgeable about higher education issues, have a clear sense of their role, and have considerable expertise to oversee the operations of the University.</p> <p>The new Chair of the Board and the relatively new President have impressive backgrounds and experience leading major public universities and systems.</p> <p>Ashford has its own external auditor and separate financial statements.</p> <p>Service agreements specify services to be provided by the parent company; fees are negotiated annually and are approved as a part of the Ashford budget.</p>