

REPORT OF THE WSCUC TEAM
STRUCTURAL CHANGE VISIT

The Chicago School of Professional
Psychology: Merger with Dallas Nursing
Institute

September 12-13, 2018

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

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SECTION I – Overview and Context

A. Description of The Chicago School of Professional Psychology and Its Accreditation History

A. Description of the Institution and the Proposed Change

1. Overview of The Chicago School of Professional Psychology

The Chicago School of Professional Psychology (TCSPP) was founded in 1979 by psychologists and educators committed to advancing the field of psychology and providing professional training in a nonprofit setting. TCSPP immediately began the accreditation process, and in 1980 The Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools (NCA) awarded candidate-for-accreditation status, followed by regional accreditation from the Higher Learning Commission (HLC) in 1984. Professional accreditation followed as the Clinical Psychology Doctorate (PsyD) Program at the founding Chicago campus was awarded Provisional Accreditation by the American Psychological Association (APA) in 1987, and Full Accreditation in 1992, a status that it retains. During the summer of 1979, TCSPP became an Affiliate Member of the National Council of Schools and Programs of Professional Psychology (NCSPP). In 1980, TCSPP’s status was raised to Associate Membership; in 1985, a Full Member of NCSPP.

TCSPP began its first classes at temporary quarters at the YMCA Building, located on 30 West Chicago Avenue, and moved to the Fine Arts Building on Michigan Avenue in 1980. In 1986, following an extensive search, TCSPP moved to its next location, the historic Dearborn Station in Chicago’s South Loop. TCSPP gradually became known within the psychology profession for its emphasis on diversity and multiculturalism. It has been recognized by NCSPP for its contributions in the area of diversity and for its advocacy on behalf of the field of psychology. In 2004, TCSPP moved to its current Midwest home on the Chicago River at 325 North Wells Street. Space across the street in the Merchandise Mart was eventually added to accommodate classrooms and faculty offices for new programs in applied fields such as Applied Behavior Analysis, Counseling, Forensic Psychology, Industrial/Organizational Psychology, and School Psychology.

Over the course of these last 35 years, TCSPP has developed from a single-location, single-program graduate school to a national institution with 25 degrees and four certificate programs at multiple locations. In 2007 online programs and certificates were added. One year later, a Board of Trustees led-project established a national presence for TCSPP with locations on the west and east coasts. TCSPP began offering online and blended classes in Spring of 2007. TCSPP’s Los Angeles campus, at 617 West 7th Street, opened in summer 2008 and has become the main TCSPP campus, with an additional location in Irvine. The Washington, DC Campus, located at 901 15th Street NW, opened in the fall of 2009.

TCSPP serves 4,532 students in Chicago (which includes Xavier), Southern California (which includes Los Angeles, Irvine, and San Diego), Washington, DC, and online programs (Source: Spring 2018 TCSPP Census Report A). The programs currently offered at TCSPP include 13 doctoral degrees, one educational specialist degree, 13 master’s degrees (with two of those offered as a dual degree), three certificate programs, and two baccalaureate degrees. TCSPP offers 20 degree programs online, with online operations and academics configured as a virtual

“campus” with its own campus dean and dean of academic affairs. Online programs are affiliated with the main campus in LA. Now offering a portfolio of 29 undergraduate and graduate programs, TCSPP is viewed as a national leader in professional psychology and is currently expanding its offerings in behavioral and related health services.

The Chicago School of Professional Psychology works closely with an external partner, the TCS Education System. TCSES was formed by leaders from The Chicago School of Professional Psychology in February 2009. TCSES is a non-accredited, nonprofit corporation (509c3 Type II supporting organization), which contributes services to TCSPP and other accredited institutions. (See Section II below).

2. TCSPP Accreditation History

Due to the move of base operations to and incorporation in California, the institution applied for accreditation by the Western Association of Schools and Colleges (WASC) Senior College and University Commission (WSCUC) in November 2011 through an expedited process, combining a Capacity and Preparatory Review and Educational Effectiveness Review. WSCUC granted initial accreditation to TCSPP for a period of five years. TCSPP’s November 2013 Interim Report was reviewed and accepted by a panel of the Interim Report Committee.

In its letter dated June 30, 2017, the WSCUC Commission reaffirmed TCSPP’s accreditation for the maximum period of ten years. The Commissioners commended the institution in particular for:

1. The quality and level of communication among various stakeholders at the institution and across its campuses.
2. The use of the WSCUC accreditation review process to reflect on key institutional issues and make significant improvements as necessary and appropriate;
3. The use of an enhanced and expanded student success support architecture to improve student retention and degree completion. Particularly noteworthy is the adoption of best practices in student support from the university’s online programs to implement in its face-to-face programs.
4. The Engaged Professional Model that guides students’ curricular decisions, career choices, and future directions.
5. The significantly improved faculty governance system, including the National Faculty Council, the Academic Affairs Leadership Council, and the local Faculty Councils.
6. The further development of the academic and academic support review processes in a collaborative endeavor involving faculty, staff, and administration.

Since its last comprehensive review in 2017, TCSPP has also had three substantive change requests approved by WSCUC. The request for the Dallas Branch Campus, where TCSPP is currently co-located with DNI, was approved January 13, 2017; the request to offer a new MA in Marriage, Family, and Couples Therapy was approved September 29, 2017; and the Bachelor of Science in Nursing was approved April 18, 2018.

(1) With regard to the substantive change request to establish the MA in Marriage, Couples, and Family Therapy, recommendations from the panel and responses by TCSPP include:

(a) “Future substantive change proposals would be strengthened by a document that clearly articulates the overall assessment strategy and the holistic and well-integrated process of evaluating Institution, Program, and Course Learning Outcomes that appear to be in place today.” The institution responded by updating its Academic Program Review manual which articulates the overall assessment strategy and integrated process of evaluating all learning outcomes; this detailed process will be applied to all acquired programs.

(b) “Program Faculty must carefully monitor the student-friendly readability of program syllabi, particularly in relation to the learning outcomes, to assure student clarity for program expectations and activities.” The institution responded by having a faculty panel review the institutional syllabus template and make revisions to the learning outcome hierarchy table to improve readability.

(c) “The institution must continue to enhance the collection of program need data that supports the prospective student interest in the proposed new programs.” The institution noted that The TCS Education System has strengthened its marketing team and improved its market research format to provide better data for assessing the sustainability of new programs or existing programs in new markets.

(2) With regard to the substantive change request to establish the Bachelor of Science in Nursing degree, recommendations from the panel and responses by TCSPP include:

(a) “Future substantive change proposals should address more specifically the WSCUC recommendations of previous substantive change reviews as well as Commission Action Letters providing details and specific actions related to recommendation issues, particularly in regard to student services.” The institution noted that TCSPP maintains a log of WSCUC commendations and recommendations, reviews them periodically to address all issues, and updates the log as substantive change action letters are received. The log is then used as a reference for the completion of future substantive change requests.

The visit team found evidence that TCSPP is moving forward effectively in its work on the new degrees. The institution’s leaders were fully aware of the recommendations and were using them as guidelines as they develop the academic programs.

B. Description of the Review Process and Visit

In its proposal submitted to WSCUC, The Chicago School of Professional Psychology (TCSPP) proposed to acquire the Dallas Nursing Institute and assume operations of its existing programs. Following closing of the transaction, DNI would become part of TCSPP’s Dallas branch campus, as TCSPP’s College of Nursing. This proposal falls under the WSCUC category “Change in Mission, Ownership, or Form of Control.” A Structural Change in this category typically calls for a site visit to evaluate the proposal.

The establishment of programs at a new degree level, in this case, the Associate’s degree level, also constitutes a Structural Change.

A panel of the WSCUC Substantive Change Committee was convened to review TCSPP’s proposed acquisition of DNI and its proposal to offer programs at a new degree level. The panel

carefully reviewed the institution's proposals and attachments. A conference call was held on July 23, 2018. On July 24, the WSCUC Director of Substantive Change communicated to the institution that the panel had acted to proceed to a site visit to consider the two proposals.

The visit team included on WSCUC Commissioner and two members of the Substantive Change Committee:

- Dr. Philip Clayton, Team Chair
- Dr. Vicky Bowden, Assistant Chair
- Dr. Andrew Wallis, WSCUC Commissioner

Prior to the site visit, the visit team requested some additional information pertaining to the two proposals. TCSPP provided the requested documents and reports in a timely manner. The institution showed transparency regarding details for the proposed acquisition. The additional items supplied included:

1. a more complete organizational chart;
2. some of the structures that the institution had mentioned on the call, including a list of the offices and job titles that will contribute to the educational success of the acquired institution within the broader work of TCS Education System consortium and of TCSPP;
3. clarifications regarding the legal details of the acquisition, including the legal entities involved and their roles before and after the acquisition;
4. costs related to the acquisition;
5. a brief statement of the ways that acquiring DNI to become a school within TCSPP may affect the culture of the institution going forward.

The visit team found the two Structural Change proposals to be well organized and clearly written. The institution provided complete documentation on the history and proposed plans for the acquisition. The visit team concluded that the proposal accurately portrayed the history, current situation, and future plans for the proposed acquisition. The effects on the various stakeholders were covered. The team noted in particular the fit of the proposed acquisition with TCSPP mission and with the present and immediate past strategic plan.

The dates of Sept. 12-13, 2018 were selected for the visit. The institution's ALO was especially helpful in working with the team's Assistant Chair in making arrangements for the visit and arranging the visit schedule.

On the afternoon and evening of September 12, the visit team met in executive session to review the materials and to finalize its questions. Administrators from the institution joined the visit team for a meal that evening. The conversations were helpful in providing background information in preparation for the campus visit the next day.

On Sept. 13 the visit team held meetings with a wide variety of stakeholders from TCSPP and DNI. The conversations were open, and representatives of the two institutions were open and forthcoming.

SECTION II – The Proposal to Acquire the Dallas Nursing Institute

The Chicago School of Professional Psychology (TCSPP) proposes to acquire the Dallas Nursing Institute (DNI) and assume operations of its existing programs. Following closing of the transaction, DNI would become part of TCSPP's Dallas branch campus, as TCSPP's College of Nursing.

Part 1: Specific Features

A number of features of the acquiring institution are listed below. Note that some of these topics are also covered in Section III below, which focuses on the structural change to offer degrees at a new degree level.

A. Management

The management team of TCSPP has engaged in detailed planning to integrate the proposed College of Nursing into the programs, structures, and curriculum of other existing and planned TCSPP programs. It is also working to prepare for incorporating the acquired programs into the TCSPP mission and vision.

The visit team found significant evidence of ways that TCSPP management has prepared for the proposed acquisition. A building has been purchased and renovated, and both TCSPP and DNI are currently co-located there. A tour of the facility showed it to be well laid out and well supplied. Because TCSPP and DNI both receive support services from TCSES, there have already been economies of scale from combining support services (admissions, marketing, etc.) within a single office. Library resources and work spaces have also been combined.

The visit team was presented with plans for the integration of DNI into TCSPP as the College of Nursing. The missions of the two institutions are clearly aligned. TCSPP has drawn from its experience with other campuses in careful planning for the new graduate school and its integration into the TCSPP system as a whole. In private meetings, DNI management was consistently positive about the support and professionalism that TCSPP brings. They affirmed the mission fit and the careful preparations that were underway.

The team also found that management had established a collaborative and collegial working relationship with DNI during the due diligence process, including exchanging information and best practices across disciplines and establishing a mutual learning process between the two institutions. Documents showed that steps are being taken to support the fiscal stability of TCSPP, including sustainable models of operation across its various campuses and programs.

In summary, ample evidence was supplied that management has been engaging in thorough advance planning in order to integrate the proposed College of Nursing into the programs, structures, and curriculum of other existing and planned TCSPP programs, as well as working to incorporate the acquired programs into the TCSPP mission and vision.

B. Program, Curriculum, Pedagogy

The visit team received written accounts of the plans for integrating DNI into the programs, curricular offerings, academic standards, and pedagogy of the TCSPP. Face-to-face interviews confirmed the written materials. The team was able to meet with a number of the deans and administrators responsible for developing and integrating curriculum, degrees, and programs. The team found ample evidence of a culture of integration across programs. Deans

showed awareness of curricular content outside their own school, and evidence was presented of ways that they strengthened their own programs through these connections.

The institution takes an interdisciplinary approach to many of its programs, which offers resources to students not available in a strictly disciplinary environment. This is an important strength given the demographics of TCSPP students. The visit team was also impressed by collaboration between schools and campuses, and by the integration of content from the “online campus” into face-to-face courses and programs.

C. Faculty

The visit team was not able to gather significant evidence about the school’s faculty. Most curricular content appears to be prepared by instructional design specialists, and faculty teach the material that has been prepared. In particular, the team was not able to view faculty in a teaching role nor to review lectures by faculty in online courses. For this reason, we cannot comment directly on the quality of faculty instruction or the level of creativity that faculty bring to their classes.

D. Assessment and Educational Effectiveness; Student Demographics and Needs

TCSPP has been rated highly on its evaluation procedures in previous interactions with WSCUC. This has included alignment of learning objectives (ILOs, PLO, and SLOs) with the mission of the organization; gathering assessment data; and using disaggregated data to evaluate and improve existing programs.

These strengths of the institution were clearly evident during the visit. The presentations by deans showed the ability to assess educational effectiveness for their programs. The team received detailed comments about the types of TCSPP students and their needs, and administrators often reminded the team that their priorities and ethos were student-focused. In particular, all persons interviewed stressed that they will be able to meet the needs of the DNI students as their institution becomes the College Nursing.

The same cannot be said of DNI assessment practices prior to the acquisition. On a number of points, the team would have judged DNI to be out of compliance in the areas of educational effectiveness and assessment. Program Review processes for the new College of Nursing will need to be reviewed and improved by TCSPP administrators. The team therefore recommends that TCSPP work closely with DNI to develop comprehensive assessment and program review processes that will position TCSPP to be ready for its next WSCUC review interaction.

E. Student Services

The transition of student services from DNI to TCSPP is made easier by the fact that The Chicago School Education System already supplies the majority of support services for both organizations. As mentioned earlier, the functions of registrar, admissions, and financial aid are already being carried out by the same persons in the same office.

The TCSES model means that many of these services are no longer offered at the individual campuses. For example, when a student calls in to her home institution, she may well be talking to a financial aid officer who is located at the TCSES offices. From the standpoint of the Chicago

School — the system as a whole — student services personnel may be embedded or not embedded as they carry out their job functions. Obviously, such an approach means that student services are less personal than the traditional model; a large number of the services are offered through a system and not through an individual. But it also allows the Chicago School Education System in most cases to raise the quality and reduce the cost of providing student services.

Budget materials and interviews show that TCSPP will be increasing the budget for many student services. The institution is preparing to offer strong library services, IT support, writing and tutoring centers, LMS, and other TCSPP-based support structures for the proposed College of Nursing. Review processes for the new College of Nursing will need to be put in place to ensure that the needs of students at the new College are identified and supported, aggregated and disaggregated student achievement data tracked, satisfaction and campus climate measured, and progress toward degree retained (CFR 2.10).

The visit team received detailed information from current DNI staff about the particular needs of the first-generation students at the Institute. DNI is to be commended for the highly personalized student services being offered and their remarkable commitment to the success of their students.

The team urges TCSPP to retain student services that respond to these distinctive needs of these students. It may be that, over time, this type of student no longer enrolls at the new College of Nursing. But it would be unfortunate if the “legacy students” currently at the Institute lose the distinctive forms of support that they are currently receiving. There is institutional wisdom at DNI about how to maximize the success of this particular student population. It is a possible side effect of the acquisition that these positive features will be lost within the system.

Part 2: Systemic Features

A. Board Relations

Meetings with the Boards of TCSPP, DNI and TCS Education System

The visiting team had numerous questions for the TCSPP and DNI boards about their interrelationship, their independence and their respective activities and opinions of the proposed merger. Given the complexity of the organizational structure and the proposed merger, the team held two distinct meetings with the different boards: TCSPP and DNI. The Team also spoke with members of the TCS Education System board in the course scheduled interactions during the day. Importantly, the Team needed to understand more fully the costs and structure of the acquisition and the financial/governance relationship in the current TCS-ES and DNI vendor-client relationship so that it could understand the value of subsuming DNI under TCSPP through the creation of TCS-TX (DNI).

Following up on the themes and questions raised during the July 23rd conference call, the visit team asked questions about organizational structures and relationships, board membership, board engagement and activities, and, during the course of our visit schedule, we requested records of recent meetings. We also inquired about the history and relationships of the various boards, as well as about the decision of TCSES to acquire property in Dallas and to forgive lease payments and service fees.

The reason for all of these questions and lines of conversation was largely due to the visit Team's perception that the structural change documentation could have presented the interrelationships more clearly. It should be said, though, that TCS-PP, TCS-ES and DNI were transparent and open. In each meeting, board members were informed, accurate, and forthcoming about the merger and related matters, answering all questions and providing all requested documentation.

It was established that the TCS Education System (TCSES) had forgiven over 6 million dollars in debt accumulated by the Dallas Nursing Institute, but discussions with the boards as well as board minutes made clear that debt forgiveness had been done free and clear of any quid pro quo expected on the part of DNI. In short, the acquisition appears to the visiting team to be in good faith for all parties and to be of benefit to students at both institutions. This is discussed in somewhat greater detail below.

The team agrees that WSCUC standards surrounding board and institutional governance were met (CFR 3.6-3.9 and Governing Board Policy). Documentation and oral responses from the board members were aligned with what we heard from other representative groups also provided evidence of compliance by increasing financial stability and information and other resources for DNI (CFR 3.4 and 3.5) with an opportunity to augment the offerings and programming for TCS-PP students.

B. Financials

Should the proposed acquisition occur, DNI will be under the auspices of TCSPP, which since 2012 has continuously ended the fiscal year with a surplus and shown strong growth in its total net assets, ending FY 2017 with \$82.5M in net assets, and \$42M in unrestricted assets (Source: 2016-17 Audited Financial Statements). The team believes that the value of regional accreditation will strengthen the financial position of the nursing program overall and that a number of synergistic curricular possibilities can and will be explored between TCSPP and DNI that will enhance opportunities for students at both institutions.

DNI, on its own, has been operating with a structural deficit, showing losses of \$1.26M, \$1.54M, and \$1.74M(Est.) during FY 2016, 2017 and 2018 respectively (Source: "DNI – 5 Year Financial Projections"). Increasing enrollments in 2017, 2018 are a positive sign, however, and help support the projections showing decreased deficits in the future and further underline the good working relationship between DNI, TCSES and TCSPP. Irrespective of the positive outlook for enrollment, with or without the proposed acquisition, it was important to the team to understand what was going to happen to the accrued debt and whether it would potentially undermine what the team otherwise viewed as a synergistic and mutually beneficial acquisition.

To understand the financials we believe it is important to understand the structures of the legal entities controlling the organization and the shift they will undergo. TCS-PP is proposing to acquire DNI by substituting the legal entity that operates TCSPP (The Chicago School – California, Inc., "TCS-California") as the sole member of the legal entity that operates DNI (TCS Education – Texas, Inc., "TCS-Texas"). TCS Education Systems ("TCS") is currently the sole member of TCS-Texas. This substitution will be accomplished by an amendment to the bylaws of TCS-Texas that replaces TCS-California for TCS.. TCS-California would then contribute the assets of TCSPP existing Dallas branch campus to TCS-Texas so that TCS-Texas

would hold all of the assets of the Dallas branch. Consistent with the governance requirements of WSCUC, the governing board of DNI (i.e., TCS- Texas’s Board of Trustees) will be dissolved. The Board of Trustees of TCS-California will continue as the governing board of The Chicago School and all of its branch campuses.

During our discussions with board members, as well as the transition team and financial officers, we came to understand that TCSES had relieved DNI of over \$6M in debt during their June, 2018 board meeting. This debt relief from TCSES has already occurred and DNI is free and clear of those obligations irrespective of the outcome of the proposed acquisition. Our conversations during our site visit also helped us understand that this debt was to a certain degree “managerial” in nature and related to fees for services, but also other real costs. So, on the one hand, this acquisition is not a purchase per se, but on the other hand these financial transactions prior to the proposed acquisition are relevant to understanding the commitment and working relationships between the institutions and their boards and the proposed consolidation of the assets at the Dallas branch of TCSPP. To be clear, the visit team believes that unburdening of its debt DNI vastly improves the prognosis for all institutions involved and it supports the acquisition. We should state too, for clarity’s sake, that WSCUC does not accredit systems, and the financial viability of TCS-ES therefore falls outside our purview.

In short, unburdened of this debt, and under the umbrella of TCSPP, DNI and the proposed TCSPP Dallas branch will likely be a self-sustaining and sustainable institution. ADN and LVN pricing, cost structure and enrollment projections (irrespective of the acquisition) do show that growth will be necessary but that they are reasonable and doable. Moreover, regional accreditation is an important factor in nurse placement and suggests that growth in enrollment and reputation will be beneficial to the institutions and their students.

C. TCS Education System and Its Members

Among the mandates for this visit team was to understand the relationships between the legal entities and service providers affected by the proposed acquisition. It became possible to carry out this task because of the overall strength of the institution’s proposal. As should be clear from this report, there are many attractive features of the proposed merger; TCSPP is in a strong fiscal position; an experienced management team is in place; the mission fit is excellent; and the proposed merger is, in the team’s judgment, in the overall interest of the DNI students.

To state the team’s conclusion upfront: *we do not believe that TCSPP is out of compliance with existing WSCUC Standards and policies.* The following comments, then, are offered with the goal of helping the Structural Change Committee to understand the institutions, their legal relationships, and the kinds of compliance issues that are raised by these arrangements.

The Chicago School of Professional Psychology works closely with an external partner, The TCS Education System (TCSES). In the interviews, TCSES was often referred to as The Chicago School, and we use that nomenclature here.

TCSES is a non-accredited, nonprofit corporation, classified as a 509c3 Type II supporting organization, which contributes services to TCSPP and other accredited institutions. Its legal relationship to The Chicago School of Professional Psychology is as an external partner contributing services.

Leaders in The Chicago School of Professional Psychology formed TCS Education System in February 2009. The Chicago School is based on a consortial model. It provides support services for several different educational institutions, with the goals of decreasing the costs of support services, increasing efficiency, and making effective use of resources. TCSPP is one of these institutions.

When institutions become affiliated with The Chicago School, legal documents outline their relationship and responsibilities. TCSPP executed a Services Agreement with TCS Education System in June, 2011, which remains in effect.

In June 2016 an “Open Consortium Agreement” was signed between all TCS Education System schools, including TCSPP, and four other accredited institutions, including the Dallas Nursing Institute. Through the consortium agreement, each institution becomes a “Member Institution” and an “affiliate” of The Chicago School. This agreement results in a number of affiliations between the member institutions.

According to the proposal, at this time, the legal relationship between TCSPP and TCSES is solely through the management services agreement. The current services include:

- Marketing – Web, SEO-SEM, Consulting, Leads, Advertising
- Admissions & Retention Services
- HR & Benefit Services
- IT Helpdesk, Application & Network Services
- Academic/Student Services – Student Finance, Library, OIR, Registrar Support, International Services, CAO, and Instructional Design
- Accounting/Finance – A/P, Payroll, GL, Reporting, Audit, FP&A
- Legal & Compliance

There are many strengths in the formal and informal relationships between the member institutions. Administrators from the schools meet together on a regular basis, share knowledge, and are able to share access to programs.

The compliance issue involves the provision of academic services by a non-accredited institution. We repeat: *the team does not believe that TCSPP is out of compliance with existing WSCUC Standards and policies.* Some arrangements raise no complexities. For example, the “Open Consortium Agreement” specifies that “Member Institutions are coordinating both academic and non-academic services.” The same is true of the provision of non-academic services by TCSES. The area of complexity involves the provision of academic services. For example, employees of TCSES advise the member institutions on the development of academic programs. There are close connections of administrators of TCSES with the academic program officers of member institutions, including TCSPP. These close connections make it difficult to assess whether a non-accredited institution is carrying out functions that WSCUC policies limit to accredited institutions.

SECTION III – The Proposal to Offer Degrees at a New Degree Level

A. Background

DNI was founded in 1991 as a private institution with the mission of training nursing professionals, and currently offers two degrees: an Associate Degree in Nursing (ADN) leading to licensure eligibility as a Registered Nurse (RN) onsite, and Bachelor of Science in Nursing (BSN), which is an RN to BSN bridge program offered via distance learning. DNI also offers an onsite certificate program in Licensed Vocational Nursing (LVN).

The Institute is nationally accredited by the Accrediting Bureau of Health Education Schools (ABHES). Serving approximately 225 students, DNI is co-located with the Dallas branch campus of TCSPP at 2101 Waterview Parkway in Richardson, Texas. DNI has been a member of the TCS Education System since December 2013.

B. Proposal

If the structural change is approved, the DNI students will become TCSPP students effective with the date of completion of the proposed change, following receipt of all required regulatory approvals including the WSCUC Commission approval letter. As part of TCSPP, the former DNI students would begin receiving the support services afforded TCSPP students. The DNI library would become part of the TCSPP University Library system.

If the acquisition is approved, DNI will become the College of Nursing at TCSPP. Students in the LVN and ADN programs will then become part of the TCSPP Dallas Campus community. Current BSN students will complete their program as it stands, and new BSN students will be enrolled in the TCSPP BSN program.

With the publication of the subsequent Student Handbook and Academic Catalog, the DNI student handbook and academic catalog will be subsumed into the TCSPP student handbook and academic catalog. Students will receive orientation to TCSPP during the transition.

TCSPP therefore requests approval from WSCUC to offer degrees at a new level. In particular, approval is sought for the new level of an Associates Degree at TCSPP.

C. The Structural Change Proposal and Site Visit

The site visit thus included a review of the Associate Degree in Nursing (ADN) Program and the Certificate in Licensed Vocational Nursing (VN), which are the academic programs that TCSPP would acquire under this acquisition. A full structural change proposal was submitted by TCSPP prior to the site visit.

The visit included focused meetings with the leadership and faculty of the ADN and VN programs. The structural change documents were thorough and provided the information necessary for a full review of the proposal. They presented a nursing program that DNI has held to high academic and nursing accreditation standards. Under the acquisition plan, TCSPP will assume control of the following Dallas Nursing Institute (DNI) programs:

- Vocational Nursing (VN Certificate)
- Associate Degree of Nursing (ADN) with two tracks:

- Direct Track (High School to RN Track)
- VN to RN (transition) Track

TCSPP gained WSCUC approval to implement a RN to BSN program in 2018. Thus the acquisition of DNI by TSCPP will create a new College of Nursing at The Chicago School that includes vocational, associates and bachelor's degrees in nursing. It should be noted that the Associates degree has institutional accreditation granted by the Accrediting Bureau of Health Education Schools (ABHES) since 1999. The Texas Board of Nursing (TBON) granted approval in 2009 for the associate's degree to be offered by DNI.

D. Faculty

The faculty currently teaching in the DNI program were sufficient in number and meet the necessary qualifications for teaching in VN and ADN programs (CFR 2.1; CFR 3.1). No new faculty are planned to be added at this time. Faculty are currently paid on an hourly basis, and will be converted to faculty term salaried contracts upon completion of the acquisition.

Faculty voiced pleasure and support of the acquisition. Faculty also voiced support of the nursing leadership and the dean's ability to lead an effective change process as the College of Nursing is developed (CFR 3.6).

Several months ago TCS moved DNI to its current new location in Dallas. Faculty and students have appreciated this move to a larger facility that is also in a safer location. A tour of the facility verified the high level of support provided for students to ensure their success. Several nursing skills labs and computer labs are utilized in the program to ensure students have opportunities to practice nursing skills and use computer-based learning and testing to meet their program outcomes (CFR 2.13). The number of computers and fully equipped simulation labs increased with the move to the new building. Students have good access to library resources, and by forming a new College of Nursing the expectations are to continue to enhance journal resources as needed to ensure student's information literacy needs are met.

D. Academic Programs

The academic programs were reviewed for rigor, adherence to accreditation standards, and ease of transition (mobility) from the completion of one degree to the start of another (e.g. VN to ADN to BSN). Clearly a goal of the merger is to provide a seamless pipeline of students who could complete one degree within the institution and then — either immediately or at a later date — could apply to complete the next steps in their academic journey with TCSPP (CFR 2.14).

Admission requirements for each type of degree were clearly stated and adhered to in the recruitment process (CFR 2.2). A review of course syllabi demonstrated the program outcomes were consistent with the degree level. The team also found evidence that students within a particular degree level are moving towards mastery of these outcomes (CFR 2.3). For the associates degree this includes successful completion of the NCLEX licensure exams that is required for all registered nurses (CFR 2.6).

E. Students

Student concerns, including student support services, have been covered in Section II above. Here we add only the importance of establishing clear pathways for the DNI students. That is,

the team urges the acquiring institution to explore pathways with DNI that will offer new transfer and advanced placement options for students.

F. Program Review

Program review is one of the areas that will be enhanced under the new partnership (CFR 2.7). While DNI has participated in course review, faculty review, and student evaluation, it was clear that they have not engaged in comprehensive program review processes as prescribed by WSCUC. Under the TCSPP model of services, it is expected that a more comprehensive and formalized plan for assessment and continuous quality improvement will be implemented.

Nursing leadership and faculty noted a number of benefits to DNI with the acquisition and development of the College of Nursing:

- The College would be regionally accredited. This enhances the ability of the school to gain access to clinical sites for their students. In addition the reputation of TCSPP will enhance opportunities for DNI to gain a wider variety of clinical opportunities.
- Library holdings will increase.
- Students will have access to a Writing Center.
- Students will have access to a tutoring center that includes NCLEX preparation.
- Faculty have opportunity to engage in more interdisciplinary academic pursuits with other colleagues within TCSPP
- Enhanced services will be provided to First Generation students.
- Increased support will be provided for Program Review and other annual assessments.

Summary

The strength of DNI's academic programs was well communicated in the materials presented to the visit team, and they were confirmed through the site visit. The visit team finds that the proposed acquisition will allow TCSPP to benefit from DNI's strong academic programs.

Although DNI faced challenges on a number of levels, it achieved excellence in providing strong and effective student support services. Current student support services offered by TCSPP do not address the needs of its particular student population as precisely. The team recommends that TCSPP work to preserve the strength of the student support services currently offered for the unique needs of the DNI student population.

SECTION IV – Findings, Commendations, And Recommendations

Structural Change Proposal: Acquisition

Commendations. The visit team commends the institution for:

1. Providing requested documents and reports in a timely manner, and for the transparency of The Chicago School of Professional Psychology (TCSPP) regarding details for the proposed acquisition.

2. Establishing a collaborative and collegial working relationship with DNI during the due diligence process, including exchanging information and best practices across disciplines and establishing a mutual learning process between the two institutions.
3. Focusing on student outcomes and the academic integrity of the nursing program
4. Engaging in advance planning to integrate the proposed College of Nursing into the programs, structures, and curriculum of other existing and planned TCSPP programs, and working to incorporate the acquired programs into the TCSPP mission and vision.
5. Preparing to offer strong library services, IT support, writing and tutoring centers, LMS, and other TCSPP-based support structures for the proposed College of Nursing.
6. Making management decisions that support the fiscal stability of TCSPP, including sustainable models of operation across its various campuses and programs.

Recommendations. The visit team recommends that the institution respond to the following issues:

1. Begin to prepare the School of Nursing for the level of program review that WSCUC standards and CFRs require and that TCSPP has already instituted for its own programs, including data acquisition, curriculum maps, PLOs, a culture of evidence and continuing improvement.
2. Work to develop a systematic approach to providing the student services that are required for meeting the new diverse needs of first-generation nursing students.
3. Clarify and track the total cost of acquiring DNI.
4. Develop a plan for the particular programs on the Dallas campus, such as a health sciences center here on the DNI campus.
5. Consider the specific investments to make the new School of Nursing successful in its market.
6. Manage the transition from the current DNI board to the TCSPP and the transition of ES services which will now be provided through the PP structure.
7. Continue to monitor the financial viability and sustainability of the Dallas campus as a unit of TCSPP.
8. Establish formal structures for input of faculty into TCSPP decisions regarding curriculum, programs, and faculty affairs.

Structural Change Proposal: Acquisition: New Degree Level

Commendations. In addition to the Commendations covered above, The visit team commends the institution for:

1. Proposing an acquisition that will allow TCSPP to benefit from DNI's strong academic programs as they were presented in the materials and confirmed through the site visit.
2. Working to preserve the strong student support services that DNI has been providing, which effectively meet the needs of its particular student population.

Recommendations. The visit team recommends that the institution respond to the following issues:

1. Collaborate with DNI in order to expand support services, especially for first-generation students and others who bring to TCSPP distinctive kinds of student needs.
2. Work closely with DNI to develop comprehensive assessment and program review processes that will position TCSPP to be ready for its next WSCUC review interaction.
3. Explore pathways with DNI that will offer new transfer and advanced placement options for students.
4. Review and improve Program Review processes for the College of Nursing in order to ensure that the institution identifies and supports needs of students; tracks aggregated and disaggregated student achievement and satisfaction; creates a positive campus climate; and demonstrates students' timely progress (CFR 2.10).

[end]



The Chicago School of Professional Psychology
617 W. 7th Street
Los Angeles, CA 90017

October 30, 2018

Western Association of Schools and Colleges Senior College and University
Commission
985 Atlantic Avenue, Suite 100
Alameda, CA 94501

Dear WSCUC Commission:

On October 30, 2018, The Chicago School of Professional Psychology (TCSP), received and reviewed the Site Team Report of Findings from our Structural change request to acquire Dallas Nursing Institution (DNI) site visit September 13, 2018. First, we would like to thank the Site Team for their work on reviewing the proposed structural change requests. The Team worked to recognize our unique culture and while we do have items we wish to clarify further, we believe the team was able to validate for us our process of self-assessing and decision-making.

Based on the visit and the Team report, and in preparation for the Commission meeting on November 7, we felt it would be helpful for the Commission to have some statements of clarity from us regarding specific areas we believe the team may have misunderstood, and inadvertently misrepresented in their report. Therefore, we would like to take this opportunity to respond and highlight these areas as particular note for the Commission.

The Chicago School of Professional Psychology (TCSP) and the TCS Education System

The Team referred to the relationship between TCSP and TCS Education System as a consortium and because there are different definitions for what a consortium is, we would like to clarify the relationships between TCSP and TCS Education System. TCSP is one of five independent colleges and universities that work with the TCS Education System. Each institution has entered into substantially similar support services agreements that define the relationship and respective responsibilities of TCS Education System and the institution. TCS Education System, TCSP, and the other affiliate colleges and universities collaborate with one another to execute upon a shared mission of advancing student success and community impact. In addition, the affiliate colleges and universities pay for certain shared services from TCS Education System, which include:



- Marketing – Web, SEO-SEM, Consulting, Leads, Advertising
- Admissions & Retention Services
- HR & Benefit Services
- IT Helpdesk, Application, and Network Services
- Academic/Student Services such as - Student Finance (Financial Aid), Library, and Institutional Research
- International Services and Online Course Development
- Accounting/Finance – A/P, Payroll, GL, Reporting, Audit, FP&A
- Legal & Compliance

The nature of the services provided by TCS Education System are administrative and when services support academics, it is on a consultative basis and/or focused on implementing the academic concepts developed by TCSPF faculty. Each affiliate, TCSPF included, develops its own curriculum and, as needed, is supported by TCS Education System for implementation only.

Dallas Nursing Institute (DNI) and the TCSPF College of Nursing

Through these two structural change proposals, TCSPF intends to acquire the DNI and assume operations of its existing programs in their entirety, inclusive of their existing faculty, staff, systems, and services. DNI will become the TCSPF College of Nursing, but because TCSPF is assuming all existing employees, systems, and services, and because both institutions are currently affiliate colleges with TCS Education System, no services will be affected student facing or otherwise. Rather, services will be added and enhanced through resources TCSPF brings to the table that DNI otherwise would not have access to.

We hope the above information helps the Commission understand the current scope and direction of our mission. We thank the Team and Liaison for all their work and we are looking forward to discussing our acquisition, the site visit, and the Team Report when we meet with the Commission in November.

Sincerely,
Michele Nealon, Psy. D.
CEO/President