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**PRESIDENT**  
Ralph A. Wolff

July 3, 2012

Elizabeth Tice  
President and CEO  
Ashford University  
13500 Evening Creek Drive North Suite 600  
San Diego, CA 92128

Dear President Tice:

At its meeting June 13-15, 2012, the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges (Commission) considered the report of the team that conducted a comprehensive review of Ashford University for initial accreditation, with a visit March 11-16, 2012. The Commission also had access to Ashford's report and exhibits submitted prior to the visit and your May 23, 2012 response to the visiting team report. The Commission appreciated the opportunity to discuss the review with you and your colleagues, Provost and Accreditation Liaison Officer Rebecca Wardlow, Chair of the Board of Trustees Meredith Leahy, and Board Member Karen Paulsen.

### Summary of Action

The Commission acted to deny initial accreditation to Ashford University. The Commission found 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. Described in more detail below, these areas, spanning across WASC's four Standards, are:

1. Student retention and completion, methods of tracking student progress, and support for student success (Criteria For Review (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 (CFRs 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 (CFRs 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 (CFRs 1.6, 3.9, 3.10).

Notably, Ashford was notified about WASC concerns in each of these areas by WASC and its Eligibility Review Committee in letters to Ashford dated May 23 and June 3, 2011, providing Ashford with early notice about these concerns. Given that there were multiple areas in which substantial compliance could not be demonstrated and that these areas fell into several aspects of the Standards of Accreditation, the Commission determined that a denial of initial accreditation of Ashford was the appropriate action.

The Commission noted that Ashford had recently made efforts to address the areas cited above and progress had been made; however, the impact of these pilots and new measures cannot yet be measured. The Commission also acted to permit the University to reapply for accreditation with a single visit in spring 2013, which would allow action by the Commission on the reapplication in June 2013.

### **Background**

Ashford University is currently accredited by the Higher Learning Commission (HLC) of the North Central region; its last accreditation by HLC occurred in 2006. Ashford's on-ground campus is located in Iowa, which falls within HLC's North Central region. Ashford is seeking accreditation by WASC because, since 2006, the primary locus of its activities has shifted from Iowa to California. This geographic change occurred in conjunction with a 2005 change in ownership and control of the institution. Since then, the scale of Ashford's operations and the nature of its degree programs also have changed significantly, with student enrollment growing more than tenfold as a result of a dramatic increase in online programs. Today, all but a small proportion of Ashford's students are served out of its San Diego headquarters, which houses its extensive online operation and is the home base for its leadership team and the vast majority of its faculty and staff. While Ashford remains accredited by HLC, new HLC policies requiring a substantial presence in the North Central region to qualify for HLC accreditation led Ashford to seek initial accreditation with WASC, which has authority to accredit institutions incorporated and having a substantial presence in California.

Ashford University first applied for eligibility to pursue initial accreditation by WASC in spring 2011. Ashford was found eligible to apply for WASC accreditation in May 2011 and, pursuant to its request, was permitted to pursue accreditation through a special, expedited process designed for institutions that are already accredited. Under this process, Ashford was asked to submit a comprehensive self-study report and exhibits that addressed all four WASC Standards of Accreditation and to provide information and materials to demonstrate Ashford's compliance with the WASC Standards. This report was followed by a single, comprehensive visit, described below.

In granting eligibility to apply for accreditation, the WASC Eligibility Review Committee and staff identified several areas for attention prior to the site visit under the WASC Standards and asked that these areas be addressed in the Ashford self-study report. These areas included the role of the governing board and the relationship of Ashford and its owner Bridgepoint Education, Inc.; the sufficiency of the full-time faculty, and faculty policies and governance; the adequacy of staffing and support to promote student success; detailed data on, and analyses of, student



retention and graduation; detailed information on recruitment and admissions practices; and financial and strategic plans. Following Ashford's eligibility review, and leading up to the site team visit, WASC staff was in frequent communication with University representatives about the review process.

In keeping with WASC policy and with guidance from the Eligibility Review Committee and WASC staff, Ashford submitted an extensive self-study, a set of required exhibits, and selected additional documents. The report was well-organized and written, but it would have been enhanced by deeper self-analysis, reflection, and inclusion of plans for improvement in identified areas. Following its initial review of the report, the WASC peer review team requested an extensive amount of additional documentation to verify information and to better understand the report narrative.

WASC undertook a thorough review of the institution and its self-study, exhibits, and documentation to ensure that the team would fully understand the institution and be able to evaluate it fairly and objectively under WASC Standards. The team consisted of 12 persons, each with extensive experience in higher education and specialized expertise in one or more areas of the WASC Standards. The team spent more than five days conducting the visit, traveling to both the Iowa campus and the operation in San Diego. Prior to the visit, the team undertook extensive preparation, including holding multiple conference calls to discuss preliminary observations and develop lines of inquiry, observing online classes, and examining thousands of pages of additional documents provided by Ashford. A pre-visit analysis of financial material was undertaken by a major auditing firm, which led to recommended areas for attention by the team. An electronic survey of students was conducted by WASC in addition to the usual WASC-hosted confidential email account to provide students and others with the opportunity to send comments to the team.

The Commission noted that during its entire relationship with WASC, in this review and the process leading up to it, Ashford has been cooperative and open with the WASC staff and team, and has evinced a desire to utilize the WASC process to examine and improve the quality of the education that it provides. This commitment was reflected in Ashford's responsiveness to requests for additional information and materials and in its implementation of changes undertaken prior to, during, and after the WASC evaluation process.

Ashford University has a number of strengths that were acknowledged by the team and the Commission. The University has a clear institutional identity and commitment to "affordability and accessibility," an evident spirit of innovation, and enthusiasm for serving a large and diverse student population. The Commission acknowledges the importance of this mission, which needs to be matched with institutional responsibility for assuring sufficient student support and academic quality for this important student population. Further, the Commission notes the substantial investment Ashford has made in improving and supporting the Iowa campus for residential students. The Commission commends the effective working relationship of the established administration, faculty, and staff in Iowa and the cadre of newer leaders and personnel in California. As the team noted, the Iowa campus serves as an "anchor identity" for the thousands of online students and is highly valued and supported. Finally, the Commission

commends the Ashford faculty and staff, which the team found to be “loyal and engaged” and dedicated to providing a quality education.

Ashford has experienced dramatic growth in a short time – moving from 10,000 students in 2007 (the year following Ashford's last reaccreditation by HLC) to nearly 100,000 students in 2012, with new students entering 50 times a year. The challenges that this rapid growth and enrollment model present to management, quality, and student success cannot be overstated. Although the team found that Ashford has sought to keep pace by building its infrastructure to support this large number of online students, many of its most promising initiatives are recent, some only undertaken within the last year. The Commission acknowledges Ashford's efforts, many of which are important in addressing identified areas of needed improvement, but finds that the impact of these new and important undertakings cannot yet be measured and assessed.

As stated in the WASC document, “How to Become Accredited,” for initial accreditation, the institution must demonstrate “substantial compliance” with each of the WASC Standards of Accreditation. As noted in detail below, the Commission found that Ashford did not demonstrate such substantial compliance with one or more elements of each of the four WASC Standards of Accreditation.

### **Commission Analysis**

The Commission endorsed the findings of the team report and identified the following areas of noncompliance with WASC Standards:

**Attrition, support for student achievement, and adequate levels of degree completion.** The WASC Standards of Accreditation place great emphasis on student achievement and success. Retention of students, their persistence toward a degree, and completion of their desired degree within a reasonable amount of time are of critical importance. The Commission evaluated Ashford's effectiveness in this area in the context of the University's mission, the nature and qualifications of the students that the University serves, the programs it offers, and the modalities that it uses to deliver instruction. As detailed in the team report, a large proportion of students who enter the degree programs at Ashford withdraw, most within a short period of time – nearly 128,000 students have withdrawn in the last five years, during which time 240,000 new students were enrolled. This level of attrition is, on its face, not acceptable. The Commission does not have a single quantitative metric for retention and graduation rates, but relies on the characteristics of each institution cited above, the institution's analysis of and attentiveness to its retention and graduation data, the quality and clarity of its student data systems, and the steps being taken to improve identified areas in need of improvement.

As found by the team, Ashford has not yet developed a method to collect and display data on retention, persistence, and completion in a manner that can be easily understood, that lends itself to analysis, and that accounts for each student who is recruited and enrolled in a degree program. Ashford has only recently sought to understand and examine its high levels of attrition and to develop programs to support students to succeed in meeting their educational goals. The team found that in the months before the visit Ashford had initiated 11 action steps to improve

retention and that some of them were only being piloted. As stated by the team, “Controlling the enrollment process and improving persistence will be a challenge....”

The Commission acknowledges recent efforts to better understand the data on student success, to make changes in support programs, and to adopt policies that are designed to improve retention; for example, the new student orientation program and the class-size reductions that were being piloted at the time of the visit. However, concerted and systematic approaches to improve retention, persistence, and completion, with evidence-based plans, targets, and timelines, are not in place and the impact of recent changes cannot yet be measured. Therefore Ashford has not demonstrated substantial compliance with Standard 2, in particular CFRs 2.10-2.14.

**Adequacy and alignment of resources with educational purposes.** Related to findings about student completion are concerns about the alignment of Ashford’s resources with its educational mission. As noted by the team, “historic spending patterns [show] relatively high funding levels for recruitment compared to resources to support academic quality and student success.” In particular, the team noted that “spending on student recruitment constitutes over 31% of Ashford spending, well above spending for instructional costs and services, which ... include both direct spending on faculty and the administration of financial aid, student services and academic support.”

WASC Standards reflect the Commission expectation that “[r]esources are aligned with educational purposes and objectives” (CFR 3.5) and that sufficient qualified staff and faculty are employed “to achieve the institution’s educational objectives, to establish and oversee academic policies, and to ensure the integrity and continuity of its academic programs....” (CFRs 3.1, 3.2) Among the areas in which resources were found by the evaluation team to be inadequate are the availability and staffing of student advising and other support services. Among the examples noted by the team are that Ashford employs only 14 writing specialists and 38 instructional specialists for a faculty of 2600 and a student body of 90,000. (CFRs 2.11-2.14) As noted below, the academic infrastructure of faculty and leadership for the size and complexity of the institution is also inadequate, with about 50 full-time faculty members, most recently hired, and a small cadre of academic administrators to oversee the work of thousands of adjunct faculty members. (CFRs 2.1, 3.1-3.2)

Again, the Commission acknowledges that the University has taken some steps to address these concerns, but the evaluation team and the Commission were not able to assess the impact of changes at this point in time. The Commission therefore finds that Ashford has not demonstrated that it is in substantial compliance with Standard 3, in particular CFRs 3.1, 3.2 and 3.10. (Also see CFR 1.3)

**Adequacy of the Ashford faculty model and the role of faculty.** Ashford’s model of staffing and deployment of faculty can be characterized as “unbundled,” predicated on various functional aspects of the faculty role being divided among several categories of academic personnel, including those who are not designated as “faculty.” While the Commission is prepared to accept such divisions of roles, it found that the Ashford model in practice is not sufficiently well developed or implemented with enough evidence of its effectiveness to ensure that all crucial faculty functions are fulfilled. Without clear descriptions of each component of this model, an



evidence-based analysis of the appropriate qualifications and roles of each category of academic employee, and a description of working and reporting relationships among these groups, the Commission finds Ashford has not demonstrated that its model provides for a faculty “sufficient in number [and] professional qualifications” and with a “substantial and continuing commitment” to Ashford to meet WASC Standards.

The Commission found that a core of about 50 full-time faculty members, most recently hired, for the entire online division of more than 90,000 students, is not sufficient to provide leadership and oversight of an academic enterprise of the size and complexity of Ashford. (CFRs 3.1, 3.2, 3.11) Related is the lack of sound policies and practices about faculty, including the role of faculty in governance in the online division. At the time of the visit, Ashford had not established a clear role for the faculty to fulfill its responsibilities of oversight of the academic enterprise and had not set appropriate expectations about teaching load; advising and mentoring of students; and research, scholarship and creative activity of the faculty, especially in graduate-level programs where greater emphasis on these activities is expected.

The Commission finds that Ashford has not demonstrated that it is in substantial compliance with Standard 3, in particular, CFRs 3.1, 3.4 and 3.11.

**Effectiveness of program review.** The WASC Standards of Accreditation set forth the expectation that an institution has a process for systematic program review, which includes an analysis of various aspects of program effectiveness, including evidence of student learning, and which is connected to planning and budgeting. (CFRs 2.7, 4.4) 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. As noted by the team, Ashford is in the “initial” stages of program review development, which is not adequate for initial accreditation. In addition to the small sample of program reviews that were completed, the team found that small data samples and lack of standards of performance in assessment tools raised questions about the reliability of learning data, which is an essential element of effective program review.

The Commission found that Ashford has not demonstrated that it is in substantial compliance with Standards 2 and 4, in particular CFRs 2.7 and 4.4.

**Assessing student learning and assuring academic rigor.** Ashford has undertaken a variety of approaches to assess student learning, including having a number of courses reviewed externally. Nonetheless, 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. (CFRs 2.4, 2.6) Ashford’s electronic system for assessing learning in signature assignments using standardized rubric-based tools, which is being piloted, is promising but has not been thoroughly tested, refined or deployed across programs.

Serious concerns also exist about the rigor of coursework, which varied from course to course and was not always at the appropriate level for the course. In addition, there was variation in the quality and extent of discourse between faculty members and students in online courses, which is a key component of the Ashford instructional model. By way of example, the team noted that

faculty responses to required student posts were often limited to a few words of encouragement and lacking in substantive exchange between student and teacher. (CFRs 2.1, 2.5)

The Commission found that results from outcomes assessments at Ashford are not yet systematically collected and used to demonstrate that students are learning as expected or that changes are implemented to improve learning where gaps are found. The Commission finds that Ashford has not demonstrated that it is in substantial compliance with Standards 2 and 4, in particular CFRs 2.1, 2.5, 2.6, and 4.6.

**Independence of the Ashford governing board.** While Ashford is a subsidiary of Bridgepoint, Ashford is a separate entity seeking initial accreditation by the Commission. As such, Ashford must be able to demonstrate sufficient independence from Bridgepoint to assert control over the academic and fiscal elements of its programs. (CFR 1.6)

The Ashford board is only recently beginning to transition from one that has not operated independently from its parent company, with a majority of members, including the chair, appointed by the parent. Although the board is beginning to act more autonomously, draft agreements that would establish Ashford as having an independent board have not yet been implemented. (CFR 3.9)

Related is the matter of Ashford's working relationship with Bridgepoint. As noted by the team throughout its report, Bridgepoint provides a wide array of essential services to Ashford, but there is no formal agreement that indicates what these services are, how they are planned and agreed to, and how the costs are allocated. Given this situation, the Ashford board does not yet have sufficient control over its budget and plans, and key decisions about the allocation of resources continue to rest with Bridgepoint.

Finally, Ashford's financial results are reported in the Bridgepoint audited financial statements, which makes it difficult for the Commission to evaluate and verify financial viability and management of Ashford as an accreditable entity. The Commission finds that Ashford has not demonstrated that it is in substantial compliance with Standards 1 and 3, in particular CFRs 1.6 and 3.9, and the Policy on Related Entities.

### **Commission Action**

In sum, the Commission found that Ashford has not yet demonstrated "substantial compliance" with one or more elements of each of the four Standards, thus warranting denial of initial accreditation. The efforts of the University to address many of the issues cited in this letter hold promise but, as indicated above, have often been implemented only recently, without sufficient time to demonstrate that changes have satisfactorily resolved these challenges. Moreover, these issues represent a cumulative set of concerns that has led to the Commission decision.

Because the areas in which substantial compliance was not demonstrated spanned across several key aspects of each of the Standards, the Commission determined that a decision to defer action with another visit was not appropriate. As noted in the policy on Commission Decisions on

Institutions, deferral is appropriate if the institution needs to provide “additional information or” to demonstrate “progress in one or more specified areas before a positive decision can be made.” In this instance, information and progress in more than a few specified areas is required for the Commission to find that Ashford has met the Standards at a substantial level, as required for initial accreditation.

Given the above, the Commission acted to:

1. Receive the visiting team report.
2. Deny initial accreditation of Ashford University.
3. Permit Ashford University to reapply for initial accreditation with a single Special Visit no sooner than spring 2013.

### **Subsequent Procedural Steps**

Pursuant to the Commission’s Policy on Reapplication after Denial of Candidacy or Initial Accreditation, should Ashford reapply for accreditation by the Commission, it will be required to demonstrate that it has satisfactorily addressed the issues leading to the denial and that it can show that it has come into compliance with WASC Standards in these areas. To reapply for initial accreditation, Ashford must submit a detailed and documented report setting forth the actions that have been taken to address the issues that led to denial. The assigned WASC staff liaison and the previous team chair will review this material and determine whether Ashford has adequately addressed the issues leading to the denial, in keeping with the terms set forth in this action letter. The WASC staff liaison and team chair may determine either not to accept Ashford’s request or to recommend that Ashford be scheduled for the requisite visit for the purpose of re-evaluating the institution for initial accreditation. The reapplication report will serve as the report reviewed by the Special Visit team. The staff and team may request additional information and documentation, as needed, to provide a complete report for the team. In addition, Commission policy provides that if an institution does not reapply within two years of the Commission action, it will be required to reapply for eligibility.

The Commission also requests a meeting between WASC staff and Ashford representatives, including senior leadership, faculty leadership, the accreditation liaison officer, and the chair of the governing board within 90 days. The purposes of the meeting are to discuss the processes available to Ashford and Ashford’s plans for moving forward.

The Commission's decision to deny initial accreditation is subject to the right of Commission review and subsequent appeal. Information concerning Commission review procedures is found in the Handbook of Accreditation under the heading “Commission Decisions on Institutions.” Please note that a request for review of this decision must be received in the WASC office by certified mail, within 28 calendar days of the date of this letter. Information about the subsequent WASC appeals process is found in the WASC Constitution, which is also available on the WASC website.



A public statement will be prepared in consultation with the institution for response to inquiries about this decision. The Commission reserves the right to make the final determination of the nature and content of the public statement. Enclosed is a copy of a draft public statement. Any comments you wish to make should be received in this office by 3:00 pm on July 6, 2012.

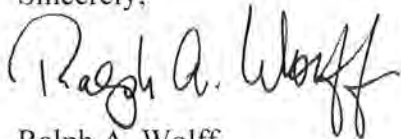
In keeping with WASC policy adopted in November 2011, this letter and the underlying team report will be posted on the WASC website on July 9, along with the public statement. If you wish to post a response to the letter and/or team report on your own website, WASC will also post a link to that response on its website. Any link that you wish to provide should be forwarded to the attention of Teri Cannon so that it may be included on the WASC website

In accordance with Commission policy, a copy of this letter will be sent to the chair of Ashford University's governing board in one week.

As noted in the Commission policy, team reports and action letters are foundational for institutional accountability and improvement. Institutions are expected to disseminate these documents throughout the institution for the purposes of promoting ongoing engagement and improvement and encouraging internal communications about specific issues identified in team reports and action letters.

Please feel free to contact me if you have any questions about this letter or the action of the Commission.

Sincerely,



Ralph A. Wolff  
President

RW/tc

cc: Linda Johnsrud, Commission Chair  
Rebecca Wardlow, ALO  
Meredith Leahy, Board Chair  
Andrew S. Clark, CEO of Bridgepoint Education, Inc.  
Sylvia Manning, Higher Learning Commission  
Members of the team  
Therese Cannon, Executive Vice President, WASC

Enclosure: Draft Public Statement

### **DRAFT Public Statement Regarding Ashford University**

At its meeting on June 15, 2012, the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges (WASC) acted to deny initial accreditation to Ashford University.

The Commission found that Ashford University was not yet in substantial compliance with elements of Standard 1 (Defining Institutional Purposes and Ensuring Educational Objectives), Standard 2 (Achieving Educational Objectives through Core Functions), Standard 3 (Developing and Applying Resources and Organizational Structures to Ensure Sustainability), and Standard 4 (Creating an Organization Committed to Learning and Improvement), as required for initial accreditation.

Pursuant to the Commission's Policy on Reapplication after Denial of Candidacy or Initial Accreditation, the Commission will permit Ashford University to reapply for initial accreditation with a single Special Visit no sooner than spring 2013. If the University chooses to reapply, it will be required to demonstrate that it has satisfactorily addressed the issues leading to the denial and that it can show that it has come into compliance with WASC Standards in these areas.

A copy of the visiting team report and Commission action letter from this review of Ashford University are available on the WASC website ([www.wascenior.org](http://www.wascenior.org)). Should Ashford University prepare a response to this action, WASC will post a link to that response on its website.

The Commission's decision to deny initial accreditation is subject to the right of Commission review and subsequent appeal. The University has 28 calendar days to file notice of its intent to seek a review of this action, and if the University does so, The Commission will so indicate on its website.

The Western Association of Schools and Colleges is comprised of three accrediting commissions: the Accrediting Commission for Schools, the Accrediting Commission for Community and Junior Colleges, and the Accrediting Commission for Senior Colleges and Universities. The Accrediting Commission for Senior Colleges and Universities accredits 162 baccalaureate and graduate degree-granting institutions, primarily in California, Hawaii, the Pacific Islands, and the Northern Marianas Islands. The Senior College Commission of WASC is one of seven regional accrediting commissions and is recognized by the United States Department of Education.

This statement has been reviewed and approved by the institution.

July 9, 2012