

REPORT OF THE WSCUC VISITING TEAM

SEEKING ACCREDITATION VISIT 1

Stanton University

May 8 – May 10, 2019

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

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SECTION I. OVERVIEW AND CONTEXT

A. Description of Institution and Visit

Founded in 1996, Stanton University (Stanton) was initially a Christian faith-based institution located at 12666 Brookhurst Street, Garden Grove, California with a vision to develop Christian ambassadors within Theology, Oriental Medicine, and Early Childhood Education programs. Stanton was approved by the Bureau for Private Postsecondary Education (BPPE) in 2002. In 2007, the university's board of trustees added a Professional Golf and Golf Complex Management program and subsequently obtained SEVP certification to attract both domestic and international students. This began a shift in its educational mission by embracing the changing academic trends which focused on career-applicability. The golf program was substantially revised in 2016-2017 and now has an active cohort of students. In 2012, the university developed baccalaureate and graduate business administration programs to meet students' diverse professional goals. This broader scope of education created more diversity among the students and facilitated the gradual transition of the university's educational focus from religious programs to career-oriented programs. In August 2012, a medical massage therapy certificate program was opened, and students were recruited for the program the following year. However, this program has subsequently been discontinued.

In 2013, the university moved to a new modern facility located at 9618 Garden Grove Blvd., Garden Grove, CA. Stanton University's Korean Culinary Arts program was approved by the BPPE in June 2016. Currently, the university offers the following degree programs: Associate of Applied Science in Korean Culinary Arts, Associate of Applied Science in Golf and Golf Complex Management, Bachelor of Arts in Business Administration, and Master of Business Administration. The current enrollment is approximately 500+ students from about 17

countries. The full curriculum for the Culinary Arts Program has not yet been offered as the facilities have not been finalized.

In October 2017, Stanton was granted Eligibility by the WASC Senior College and University Commission (WSCUC), and a Seeking Accreditation Visit 1 was scheduled for May 2019.

The Seeking Accreditation Visit 1 Institutional Report (report) was drafted by an active university committee which included senior administrators (including the accreditation liaison officer), staff, and faculty. The committee solicited feedback and proofreading contributions from other staff members. The WSCUC review team found that the report was organized around the Standards and the Criteria for Review (CFR). The team reviewed the report and the supporting documents prior to the visit, followed by a team conference call to develop a number of questions and lines of inquiry to extend the review further. While the report provided the foundation for the visit, the onsite interviews, discussions, and the review of additional materials provided the information needed to answer outstanding questions and inform the team's findings.

Various stakeholders participated in the discussions and data analyses as part of the review process. Areas that received in-depth inquiries included finances and staffing, the assessment of student learning and institutional research, quality assurance processes, student services, faculty qualifications, facilities at the main campus and satellite location, and board governance. Discussions and data review for the aforementioned areas included the board chair and board members, the president, the vice president, the dean, faculty, staff, and students. All stakeholders indicated widespread knowledge of the report.

Finally, Stanton appeared to embrace the review process in the context of self-assessment, reflection, and improved effectiveness. For each of the Standard narrative sections,

the report included a synthesis and reflection section that included areas of strength and areas to be addressed or improved in the foreseeable future.

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

The team found that the institutional report aligned with the Letter of Intent (letter). In its letter, Stanton addressed the eligibility criteria that required further response; in its report, Stanton included an updated response to the issues identified in the letter. In its letter, Stanton described how it planned to prepare for the self-study process; in its report Stanton included a detailed statement on the report preparations. In its letter, Stanton identified its intended outcomes as part of the review process, including the assessment of student learning; in its report, Stanton articulated the assessment of student learning as objectives or outcomes.

The report was organized by the Standards and the CFRs. The team found that while the report was well organized and the attachments were clearly labeled, the report narrative and supporting attachments were lacking some information and created a need to request additional documents prior to and onsite during the visit. Additional documents provided by Stanton included the board governance documents; all syllabi; disaggregated demographic data on students, faculty, staff, and the board; list of committees, grievance process, diversity policy, and resumes or curriculum vitae for all institutional leadership.

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

Below are several recommendations made to Stanton University as part of the Eligibility Review and Stanton’s response.

***Criterion 7. Governance and Administration.** The administrative structure includes a President and one individual handling the role of Vice President, Chief Operating Officer, and Chief Financial Officer. Given the current enrollment, this arrangement may work but as enrollment expands, Stanton should develop a plan for reducing the responsibilities of the Vice President to avoid work overload.*

The addition of a part-time chief academic officer and expanding the role of Director of Business Affairs to assume some of the operational responsibilities of the VP/CFO/COO has helped to reduce the workload.

Criterion 9. Institutional Planning.

- a) **Strategic Plan.** *Earlier in this letter, the panel commended Stanton for its Strategic Plan which is written at a high level with general goals. On the phone call, the institution mentioned that the plan includes an assessment each quarter matching funds to the budget. By the time of Seeking Accreditation I (SAVI), the panel recommends that the institution further break the plan into year-by-year goals tied to budget expectations and a written plan for the campus and Board to monitor the plan on a regular basis.*

The university responded to this issue and to the issue regarding strategic enrollment planning (Criterion 9 c below) by a) adding *enrollment planning and management* to the strategic planning process, b) changing the format of the strategic plan documentation to include the person or office responsible for completing the action indicated and c) added a specific timeline. This is a good first step, and the team recommends that Stanton develop a clearer integration of the strategic plan with future plans for enrollment and the annual budget planning cycle.

- b) **Program Review.** *The institution has elements of a program review process but not one that meets WSCUC recommendations. Currently program review is seen as a continuous review of program throughout the year but does not involve a comprehensive process. The panel recommends that Stanton develop a formal program review process taking into consideration WSCUC's Program Review Resource Guide found on the WSCUC website. By the time of SAVI, the institution should have completed preparation of a formal program review policy and carried out at least one program review with evidence of changes being made as a result of the review. A key part of the review should include assessment of learning outcomes.*

The university completed a program review of the Business Administration BA curriculum following a comprehensive process taking into consideration WSCUC's Program Review Resource Guide. This was a good first step, and the team recommends that Stanton complete program reviews for the rest of the programs.

*c) **Enrollment Management.** The panel did not find a formal enrollment management plan which will be needed by SAVI to demonstrate a plan for increasing enrollment.*

The university has developed a “Strategic Enrollment Management Model” with clear goals and phases integrated into the strategic plan. The team recommends the University continue to refine and implement the plan. More formalized effort needs to be made towards student recruitment to achieve the 15% annual growth goal that would be consistent with the trajectory of recent years.

*d) **Institutional Research.** WSCUC emphasizes the importance of gathering and using data in a formal structure. The evidence from institutional research can be used for numerous areas including retention, time to graduation, strategic planning, financial planning, program review, and educational effectiveness measures. Stanton is not large enough to hire a fulltime Institutional Research Director but someone on campus needs to be responsible for this area working in cooperation with others, not just to collect data, but to use the information for improvement and data-driven decision making.*

The university has taken steps to address the institutional research issue, including the creation of a Director of Institutional Assessment position and a Director of Academic Affairs/Institutional Research position. These two individuals demonstrated excellent collaboration and have successfully rolled out several learning and management systems to aid in this work.

***Criterion 11. Educational Objectives and Assessment of Student Learning.** The panel found good evidence that Stanton has developed student and program learning outcomes and curriculum maps for each program with effective faculty input. However, they did not find strong evidence of the assessment of student learning which will need to be developed in more depth by the time of SAVI.*

The University has developed and implemented an assessment plan/policy of Student Learning with appropriate training activities for faculty members and outcomes clearly identified in the course syllabi and we recommend continued refinement of assessment.

***Criterion 14. Student Success.** Because Stanton has so many international students, the panel recommends that a greater support system be developed to meet the needs of these students, beyond those described in the Eligibility Application and on the phone.*

Stanton University has identified different/various initiatives to build and improve upon the existing programs/services offered. The University needs to continue to develop student support

services and assess their impact. These programs include: Peer-Mentor Program, local housing information for students, local transportation information, public services information, Meet & Eat program in the library each academic term, study guides, quarterly school newsletter, resume and cover letter assistance, library workshops, OPT workshops and immigration attorney seminar, community events, OPT partnerships, and alumni tracking.

SECTION II. EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC'S STANDARDS

Standard 1. Defining Institutional Purposes and Ensuring Educational Objectives

The institution defines its purposes and establishes educational objectives aligned with those purposes. The institution has a clear and explicit sense of its essential values and character, its distinctive elements, its place in both the higher education community and society, and its contribution to the public good. It functions with integrity, transparency, and autonomy.

The team found Stanton demonstrated evidence of compliance with Standard 1 at a level sufficient for candidacy. The team found that the core principle of Standard 1 was understood at a sufficient level to support continued development.

Additionally, Stanton evidenced the initial development and implementation of structures, processes, and forms that operationalize the CFRs, and understood principles or intentions held at multiple relevant organizational levels.

Institutional Purposes

Stanton's vision, mission, objectives, and goals are well articulated and form the basis for the curriculum design. Stanton's statements have been formally approved by the Board of Trustees and appear on the Stanton webpage and in the catalog, as well as in postings around campus. Throughout the visit, the team confirmed that management, administrators, faculty, staff, volunteers, current students, and alumni are all aware of Stanton's mission and are

extremely motivated by its goals. (CFR 1.1)

The institution offers an Associate of Applied Science in Korean Culinary Arts, an Associate of Applied Science in Professional Golf and Golf Complexes Management, a Bachelor of Business Administration, and a Master of Business. The degree programs support Stanton's mission and values. (CFR 1.1)

Stanton has clear education objectives with publicly available information on student performance, retention and graduation on the university web site. Additional internal reports and processes used for decision making and continuous improvement were also discussed and reviewed with relevant staff and faculty. The institution is continually making a concerted effort to improve the measurement of student achievement and should continue its efforts to refine its educational objectives and goals. (CFR 1.2)

Integrity and Transparency

Students, faculty, and staff are made aware of Stanton's commitment to, and policies and practices on, academic freedom in their respective catalogs and handbooks. Conversations with faculty and students indicate that this has not been a matter of concern at the institution. (CFR 1.3)

Diversity is one of the key pieces of Stanton's mission. The visiting team noted that staff and faculty exemplified the diversity of the local community in its composition. The current students are almost entirely international representing 17 countries, with no single national origin exceeding 25% of the overall student population. To date this diversity has been mission driven but organic in achievement. Going forward the institution should be more intentional in its enrollment and employment planning for the diversity of its students, faculty, staff, and board. (CFR 1.4)

Stanton is an independent nonprofit public benefit educational corporation exclusively formed to provide “outstanding educational opportunities at the university level in selected disciplines to equip students to pursue and succeed in professional and vocational endeavors,” per its bylaws. The board is self-perpetuating per its bylaws and verified in conversations with board members. (CFR 1.5)

Stanton is approved by BPPE, and this information is clearly displayed at its campus and on its website. Recruitment information is also available on the website as well as on all published brochures and catalog which articulate clearly the degree program pace and requirements, as well as all fees. The institution requires applications to sign an affirmation acknowledging that the institution is not WSCUC accredited. (CFR 1.6)

The written procedures for student, faculty, or staff grievances are clearly articulated in the catalog, the faculty handbook, the student handbook, and the staff handbook. Grievance policy statements, tuition refunds, and other important student information are clearly printed in the catalog. The faculty handbook provides a clear understanding of grading expectations in terms of timing and grading scales using standardized rubrics. (CFR 1.6)

Stanton has been audited by an external agency (Charles C. Jeong & Co.) for the past three years. The board financial and audit committee is responsible for review and recommendations to the entire board. The team requested and received two years of audited and the most recent year’s unaudited financial statements as well as monthly fiscal statements for the last four months since the start of the institution’s fiscal year. The institution is tuition dependent and has had positive balances annually. Both the President and Vice President have voluntarily accepted salaries much below market rate. The institution should develop a board-approved success plan for key leaders that includes fiscal planning as appropriate. (CFR 1.7)

The leadership has documented their commitment to transparency in all communications with WSCUC and have stipulated, in writing, their commitment to operating an institution with openness and integrity. The team found that all relevant changes have been communicated in a timely manner. (CFR 1.8)

Standard 2. Achieving Educational Objectives through Core Functions

The institution achieves its purposes and attains its educational objectives at the institutional and program level through the core functions of teaching and learning, scholarship and creative activity, and support for student learning and success. The institution demonstrates that these core functions are performed effectively by evaluating valid and reliable evidence of learning and by supporting the success of every student.

The team found Stanton demonstrated evidence of compliance with Standard 2 at a level sufficient for candidacy.

Teaching and Learning

Stanton University is a mission driven organization with very passionate individuals serving in various leadership roles. All educational programs offered at Stanton have sufficient and experienced faculty for current student enrollment levels. Stanton is aware that as enrollment grows, so does the need to hire more full-time faculty and supporting staff and is very supportive of this effort. The Academic Leadership decision tree and personnel commitment to the growth of Stanton should have clear job roles and responsibilities.

All relevant material including program requirements, course descriptions, outcomes, matriculation process, faculty and student handbooks are available on the website. Admission requirements are well detailed on Stanton’s website, identifying specific entry-level criteria and

guidelines for interested students. All undergraduate degree requirements, including general education and core competencies are available on the website. (CFRs 2.1, 2.2, 2.2a)

All programs have clearly identified learning outcomes and expectations for student learning are set at all levels and are reflected in curricula, programs, policies, and advising. During the visit, it was very evident that Stanton has a robust system and plan in place to assess student-learning outcomes. The team recommends Stanton to make every effort to apply the outcomes data in making meaningful improvements to the courses and programs that are offered. The team also noticed and commends Stanton's effort towards developing signature assignments and completing the course learning outcomes assessment. (CFRs 2.2b, 2.3)

Although the information provided on its website and Student Catalog for the public and is quite helpful for students' decision-making purposes, the team found the institution could further develop and improve upon the existing processes. (CFR 2.4)

During the visit, it was noticed and affirmed by many members of the Faculty that Stanton does not have an active Faculty Senate. It was also observed that Stanton lacks formal committee or process for developing new curriculum, new programs or concentrations, and other initiatives undertaken to help improve student's learning. The team encourages Stanton to establish committees (standing/ad-hoc) with appropriate membership and guidelines to address these concerns. (CFR 2.4)

The university completed a program review of the Business Administration BA curriculum following a comprehensive process taking into consideration WSCUC's Program Review Resource Guide. The team advises Stanton to finish all program reviews according to the established schedule including a review of the Signature Assessments and Course Learning Outcomes for all courses offered. Use Assessment data to make improvements to programs and

offerings. Build upon existing assessment structure to help improve all programs and degrees offered at Stanton. (CFR 2.4)

During the visit, it was confirmed that faculty initially collaborated to shape the student learning outcomes. In addition, interviews suggested that faculty participated in daylong quarterly mandatory faculty meetings. This is where the faculty have conversations about student performance, outcomes assessment & evaluation, curriculum changes and all other relevant academic decisions. However, the collective responsibility in the area of student learning assessment was unclear due to a lack of definition in roles and responsibilities. This might be, at least in part, due to the fact that institutional leaders hold multiple responsibilities. (CFR 2.4)

The team found that the institution would benefit from further developing outcomes that are more directly measurable. Though there was sufficient evidence of ongoing academic assessment planning, insufficient evidence was provided regarding annual reporting of outcomes and decision-making based on the outcome data to improve student learning. (CFR 2.5)

Teaching effectiveness was assessed through student evaluations of instruction, exit interviews, and faculty self-evaluations made as part of the annual performance review. However the review team found that a formal evaluation process is not in place. The team recommends that Stanton develop a comprehensive faculty and staff evaluation process, which will be reviewed periodically. (CFRs 2.5, 2.6)

Stanton has adopted CANVAS as the Learning Management System (LMS) in 2017. In the interviews with the Assessment and Institutional Research personnel, it was very clear that ILOs, PLOs, and rubrics are uploaded and ready to use in Canvas, which makes assessment much easier. (CFR 2.7). Stanton also selected Taskstream by Watermark as the campus assessment tool. Faculty can use VIA as part of regular course assessment or for a program- or

school-based portfolio assessment however; the use of portfolio feature has been briefly put on hold due to integration issues. We hope this will be resolved as Stanton moves forward with their new initiatives and Strategic Planning Process. (CFR 2.7)

Stanton's first comprehensive program review of its Bachelor of Arts in Business Administration (BBA) indicates a thoughtful initiation of the process, which was build around the WSCUC Resource Guide for Best Practices in Program Review. The recommendations within the review offer a clear direction for addressing improvements. The institution should focus on implementing the recommendations and work towards program reviews of other programs offered at Stanton. (CFR 2.7)

Scholarship & Creative Activity

Based on conversations with faculty and administrators, the university provided a written statement on Scholarship & Creative Activity clarifying material found in the faculty handbook and student catalog. According to the statement, Stanton encourages faculty to engage and to link scholarship to teaching. During the visit, it was observed that Stanton's leadership is very committed to providing resources to accomplish this endeavor; however, metrics for evaluating faculty on these dimensions are not evident. (CFRs 2.8, 2.9)

It was also noted during the visit that Stanton does not have an active plan or process for Professional development. Individual faculty plan and fund their own professional development activities. The team encourages Stanton to develop a comprehensive plan that will be very beneficial to enhance their personal and professional growth. Stanton needs to consider how scholarship will be embedded into faculty hiring and promotion. (CFRs 2.8, 2.9)

Student Learning & Success

Stanton has provided graduation data through 2018; however, most of the academic programs have changed during the time period reviewed, providing an incomplete picture of the institution (multiple programs have been retired while current programs are relatively new). Tracked data show the number of graduates, graduation and completion rates, placement rate and salary/wages. More disaggregate evidence was provided to the visiting team based on age, gender, ethnicity, and country of origin. The evidence provided was deemed sufficient by the visiting team. (CFR 2.10)

Stanton has a great assessment team with a clear understanding of the breadth and width of assessment and the team hopes Stanton can utilize this expertise to build upon the existing infrastructure to reflect to all programs and offerings to improve students' learning and experience. (CFR 2.10)

During the visit, it was noted that co-curricular programs are an integral part of students' learning experience at Stanton. The visiting team did not see substantive review or assessment of these programs. The team commends many faculty and staff of Stanton for showing their enthusiasm to improve the existing co-curricular programs offered at Stanton to improve students' learning experience and ultimately contributing to students' success. (CFR 2.11)

Stanton University has adopted a Code of Conduct for all employees whose primary duties include student recruitment and admissions functions. All recruitment and admissions personnel must sign a written acknowledgment that they have reviewed and agree to abide by the standards of conduct. Stanton's website has all the information outlining program structure, costs, and requirements to support recruitment efforts; however, during the visit the team noted that there is no one person handling the marketing effort to recruit students. It was noted during

the visit that individual staff members based on their personal connections, language skill, and background would recruit individually for the institution. This might have worked for Stanton in the past; however, as the institution reviews job responsibilities, greater clarity in this area would be beneficial. As Stanton desires to increase enrollment, student support services will need to be systematized in order to adequately and effectively meet the needs of all students, including the satellite campus. (CFR 2.12)

Stanton has an active student council that is engaged in providing support and also individual mentorship to current and prospective students. Stanton's student service website has information on campus life, immigration, housing, transportation, and health services. The team reminds Stanton that as enrollment grows, so does the need for additional support services to cover the needs of all students and these programs/services should be regularly evaluated for continuous improvement. (CFR 2.13)

Stanton attracts many transfer students from nearby institutions. Stanton provides clear information to transfer students and timely transcript review to determine equivalences for prospective transfer students. The team reviewed documents provided to students, and well as conducted interviews with students and staff, painting the picture of a clear pathway for transfer students. The institution is investigating partnerships and articulation agreements, but none had been finalized at the time of the visit. (CFR 2.14)

Standard 3. Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

The institution sustains its operations and supports the achievement of its educational objectives through investments in human, physical, fiscal, technological, and information resources and through an appropriate and effective set of organizational and decision-making structures. These

key resources and organizational structures promote the achievement of institutional purposes and educational objectives and create a high-quality environment for learning.

The team found Stanton demonstrated evidence of compliance with Standard 3 at a level sufficient for candidacy.

Faculty and Staff

The team found the faculty and staff to be passionate, engaged, and appreciative of the diversity of students. Their “can-do” attitude seemed perfectly aligned with the fact that 100% of the students are International students and 90% have English as their second language. The faculty and staff’s commitment to the mission is reflected in Stanton’s ability to create several new degree offerings in new fields (Business Administration, Golf Management and Culinary Arts) and subsequent hiring and incorporating new faculty in the last several years. (CFR 3.1)

With the changing nature of the academic programs offered, a faculty staffing plan is necessary to address growth and the consideration and introduction of additional academic programs (CFR 3.1)

Most of the staff report to the Vice President and are evaluated annually. A faculty Handbook clarifies employment issues of faculty, as well as faculty specific issues such as faculty responsibilities and common grading rubrics. An Administrative Handbook is thorough and well organized. However, Stanton needs to implement a staff development and evaluation system based on best practices (CFR 3.2 & 3.3)

The Chief Academic Officer and the Dean of the School of Business Management are part-time (20% and 30% respectively). As the institution continues to focus on the quality of academic programs, greater planning and resource investment will be necessary to provide proper academic leadership (CFR 3.4).

Fiscal, Physical, and Information Resources

Stanton generates monthly and quarterly financials vs. budget using Quickbooks Online and derives student accounts receivable and revenue information from Populi. Quarterly financials are presented to board and they are currently breaking even. However, one reason for the break-even status is due to a few key leaders donating their time and energy, and several of the key academic roles are very part-time. The staff in the Business Office is largely on-site and full-time, except for the Director of Business Affairs who works 1/3 of her time from Korea. The Business Office staff are responsible for tuition and fees collection and the student invoices are generated by the Registrar out of Populi. There do not seem to be any issues with collection. Students who do not pay are withdrawn and need to leave the country as they are all on F-1 visas. Most students are on 3-month payment plans. The adjunct faculty are at present considered independent contractors (1099) and Stanton is considering adding them as part-employees (W-2). Stanton has an annual audit that is presented to the Finance/Audit Committee and the board, and their audits have been clean (CFR 3.4).

In 2013, the university moved to a new modern facility located at 9618 Garden Grove Blvd., Garden Grove, CA. This facility is well situated in a community with many Korean and Vietnamese families and businesses as evidenced by the building signage when we drove around the neighborhood and the shopping center the main campus is in. The classrooms, library, student lounge appeared in very good shape and offered a clean, well-lit, modern environment for students. The brand-new kitchen lab facilities designed specifically for the Korean Culinary Arts program, nearly complete, are well-appointed and modern. Stanton plans to lease an area on the first floor below their second story campus and create a “café” that will offer the products

of the Korean Culinary Arts program to the surrounding community, and thus introduce the community to both the program and Stanton University. (CFR 3.5)

Stanton also has a satellite site located at 3700 Wilshire Blvd Suite #100, Los Angeles, CA, which has three classrooms, a conference room, an office and a kitchen/lounge are for the students (see Appendix, Off-campus location). This site was established in January of 2015, replacing another in Los Angeles County. This location is very close to the Los Angeles subway, bus lines, and is on Wilshire Blvd. in an area with lots of shopping close by including restaurants, theaters, and affordable apartment housing. The first-floor location affords very attractive signage on the windows and they have leased signage on the building facing Wilshire Blvd. Most of their students at that campus are “walk-ins” brought in by the signage facing Wilshire Blvd. One of the professors, who was mentioned several times by the students, told the team that he discovered Stanton when he was riding his bike and saw the sign. The parking is provided underground and in the parking structure across the street for \$4.00/day. (CFR 3.5)

All the facilities appear to be very well chosen and well suited for Stanton University’s mission and student body (CFR 3.5).

Organizational Structures and Decision-Making Processes

The team found the leadership to operate with high integrity, quality, responsibility and accountability generally and believe they have made effect decisions to handle past financial issues created by external changes that affected student enrollment (CFR 3.6 & 3.7).

The Chief Academic Officer and the Dean of the School of Business Management are very part-time (20% and 30% respectively). The team recommends that Stanton develop and implement a faculty and academic leadership staffing plan that ensures all roles and responsibilities are fulfilled (CFR 3.7).

The President and the Vice President have key roles and broad responsibilities, but have voluntarily been compensated at rates far below competitive salaries. While this compensation level may have been appropriate when the institution's focus was ministry and the the president and vice president had pastoral duties, and allows the institution to operate "in the black," it is not sustainable. A Board-approved succession plan for these individuals and other key leaders that includes fiscal planning as appropriate, needs to be developed. (CFR 3.8)

The governing board meets quarterly and has four standing committees. The committees meet on the same day as the board meeting to accommodate the busy travel and work schedules for the board members (CFR 3.9)

While faculty handbooks exist and quarterly mandatory faculty meetings are held, the governance roles, rights and responsibilities for all categories of faculty needs to be developed. (CFR 3.10)

Standard 4. Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

The institution engages in sustained, evidence-based, and participatory self-reflection about how effectively it is accomplishing its purposes and achieving its educational objectives. The institution considers the changing environment of higher education in envisioning its future. These activities inform both institutional planning and systematic evaluations of educational effectiveness. The results of institutional inquiry, research, and data collection are used to establish priorities, to plan, and to improve quality and effectiveness.

The team found Stanton demonstrated evidence of compliance with Standard 4 at a level sufficient for candidacy.

Quality Assurance Processes

Stanton has established a deliberate set of assessment-related practices that are designed to ensure quality in academic and non-academic areas. The institution has emerging quality-assurance processes that seek to engage various stakeholders and has the capacity to provide the data needed for institutional planning and systematic evaluations of educational effectiveness. However, much work is needed in demonstrating sustained, evidence-based use of robust student-level comparative data. (CFR 4.1, 4.2)

Stanton utilizes the *Strategic Planning Committee* as a “major player in the quality assurance process.” The committee is comprised of internal and external stakeholders, meeting quarterly, to “affirm the mission and goals and to discuss/plan future initiatives for the university.” The review of material and subsequent team visit found adequate evidence of a focus on assessment and educational excellence. Quality assurance processes are in place and data collection, analysis and interpretation are at a beginning stage. The current capacity is adequate to support decision making practices. The offices of Assessment and Academic Affairs/Institutional Research should be commended for creating systems and processes that will support robust data analytics. Evidence of sustained use of this data system will demonstrate thorough and widespread evidence of commitment to quality assurance. The team encourages further development and support for faculty involvement in and agency over evaluation of student learning at the course and program level. (CFR 4.1, 4.2)

Institutional Learning and Improvement

The team reviewed the academic program review protocol, faculty evaluation processes, strategic planning process, and assessment in preparation for the visit. The team found a culture at Stanton that supports data-driven decision making. This is evidenced by integration of their

LMS and Assessment Management System (AMS) infrastructure. However, review of agendas, minutes, and responses to interviews suggest additional focus on a broad understanding of data sources, analytical processes, and use of data to inform decisions is warranted. Additionally, faculty ownership and engagement with direct and indirect assessments and involvement in academic program decisions is recommended. (CFRs 4.3, 4.4)

It is evident that the professional golf management faculty have open communication and a shared vision that include faculty engagement and voice. This program may serve as a model for other programs to follow. Faculty and program leaders will find support in the staff who demonstrated an understanding and willingness to utilize data to guide teaching and learning. (CFRs 4.3, 4.4)

The team reviewed the academic program review protocol, faculty evaluation processes, strategic planning process and document, and assessment plan in preparation for the visit. It was evident, in both the self-report and through campus interviews, that Stanton has begun to assess institutional effectiveness. Overall, the team found that Stanton is developing systems to support data-driven decision making; however, implementation of assessment plans is at their infancy. Engagement and involvement of appropriate stakeholders, including faculty, should be emphasized and supported to enhance the effectiveness decisions related to institutional effectiveness. (CFR 4.5)

Stanton has an ongoing committee that operationalizes the strategic plan. The committee has representatives from multiple constituencies and uses data to inform decision making. (CFR 4.6)

Although Stanton has demonstrated a capacity to anticipate the changing landscape of higher education (e.g. eliminating oriental medicine program and shifting of mission focus), the

team did not find evidence in the self-study or in our interviews to suggest an ongoing anticipatory process in place currently. Further, in depth, conversations and planning, engaging all stakeholders (faculty, administrators and board) is encouraged. Coupling current enrollment management plans with strategic planning and program development initiatives will help facilitate these efforts. (CFR 4.7]

Identification of Other Changes or Issues the Institution is Facing

The institution plans to enroll its first full cohort into the Korean Culinary Arts program imminently with a final building permit from the city of Garden Grove. There is strong interest in securing additional certification of the Korean Culinary Arts program from the Republic of Korea as the first certified program outside of South Korea.

The institution currently offers a few select courses online for its MBA program and is assessing this modality. The institution is exploring offering this program fully online, while also being cognizant of the face-to-face course requirements for international students on student visas. There are no other changes or issues facing the institution that have not already been addressed or planned by Stanton.

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

Degrees Programs: Meaning, Quality, and Integrity of Degrees

Stanton's mission clearly directs the development and implementation of degree programs. The institutional mission's four parts (affordability, quality, diversity, and career focus) have guided all discussions on the development of the golf management, business, and culinary arts programs. Learning outcomes are aligned with the institution's mission, and the curriculum is designed to support these learning outcomes. The institution conducts exit interviews with every student as data points to evaluate the meaning, quality, and integrity of the

degrees offered.

Educational Quality: Core Competencies, and Standards of Performance at Graduation

Stanton has included each of WSCUC’s five core competencies into its program learning outcomes; however, going forward all faculty will need to be able to play an active role in the assessment of the competencies at the course and program levels (versus administration-led). Even with the relatively small number of graduates from the current academic programs to date, mechanisms are in place institutionally to maintain successful graduation rates as enrollment grows.

Sustainability: Preparing for the Changing Higher Education Environment

The institution has successfully retired multiple academic programs that were not successful (theology, oriental medicine, massage therapy) over the last decade while investing in new programs (golf, business, and Korean culinary arts) resulting in significant enrollment growth and interest. The institution has had balanced books with carry forwards for multiple years and has moved locations to better meet the needs of its student community while also maintaining affordability. Stanton is primarily serving international students but has robust local transfers as well as international applicants. The board appears responsive and has embraced the changing mission and focus of the university, and the university leadership, faculty, and staff are enthusiastic and competent in their execution.

SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS

Stanton completed the Inventory of Educational Effectiveness Indicators (IEEI) form as part of its report. As discussed under Standards 2 and 4, further exploration of learning outcome alignment is needed. After an initial review of four syllabi, all syllabi were reviewed. Some inconsistencies were found between various levels of learning outcomes. The team would like to

see further evidence that findings are used to make improvements at the program- and institution-wide level in subsequent visits.

SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

Stanton addressed the Core Commitments and the Standards in its report and as part of the site visit. The team found that for all four Standards, Stanton demonstrated evidence of compliance at a level sufficient for candidacy. The institution understands the principles or intentions of each Standard at a sufficient level to support continued development; the institution is in the initial development and implementation of structures, processes, and forms that operationalize the CFRs; and the institution understands the principles or intentions held at multiple relevant organizational levels. Below are the salient commendations and recommendations with areas for continued improvement noted by CFR.

Commendations

1. Multiple individuals including leadership clearly articulated how the mission (affordability, high quality, diversity, and career focus) drives decision making for Stanton.
2. The institution successfully adapted a new mission in 2012 in response to changes in the external environment which led to the development of new academic programs and the sunsetting of existing programs.
3. The Offices of Assessment and Institutional Research work seamlessly and collaboratively to provide excellent products and services, including the roll out of several learning and management systems.
4. Quality facilities in well-chosen locations, including specialized equipment and technology for programs.

Recommendations

1. The team recommends that Stanton develop and publish clear policies for diversity of employees and diversity in enrollment planning. (CFR 1.4)
2. The team recommends that Stanton develop a Board-approved succession plan for key leaders that includes fiscal planning as appropriate. (CFRs 1.7 & 3.8)
3. The team recommends that Stanton develop a comprehensive assessment system using faculty-developed learning outcomes in order to use the feedback to improve student success. (CFRs 2.4 & 2.6)
4. The team recommends that Stanton complete program reviews for all degree programs. (CFR 2.7)
5. The team recommends that Stanton develop and implement an effective faculty evaluation system. (CFR 2.9)
6. The team recommends that Stanton implement appropriate student support services and assess their impact. (CFRs 2.11 & 2.13)
7. The team recommends that Stanton develop and implement a faculty and academic leadership staffing plan that ensures all roles and responsibilities are fulfilled. (CFRs 3.1, 3.4, & 3.7)
8. The team recommends that Stanton implement a staff development and evaluation system based on best practices. (CFRs 3.2 & 3.3)
9. The team recommends that Stanton define governance roles, rights, and responsibilities for all categories of faculty. (CFR 3.10)

10. The team recommends that Stanton develop thorough structures and processes that engage key stakeholders which demonstrate a commitment to systematic assessment and utilization of data to improve learning across all programs. (CFR 4.3)
11. The team recommends that Stanton provide evidence of an ongoing anticipatory process that involves key stakeholders and aligns with mission to guide program development, resource allocation and improvement. (CFR 4.7)

APPENDICES

Four federal compliance forms

- Credit Hour
- Marketing and Recruitment Review
- Student Complaints Review
- Transfer Credit Review

Off-campus locations review

FEDERAL COMPLIANCE FORMS

OVERVIEW

There are four forms that WASCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:

- 1 – Credit Hour and Program Length Review Form
- 2 – Marketing and Recruitment Review Form
- 3 – Student Complaints Form
- 4 – Transfer Credit Policy Form

During the visit, teams complete these four forms and add them as an appendix to the Team Report. Teams are not required to include a narrative about any of these matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

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

Credit Hour - §602.24(f)

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

(1) The accrediting agency meets this requirement if-

(i) It reviews the institution's-

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

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

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

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

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

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

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

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

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

Program Length - §602.16(a)(1)(viii)

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

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <input type="checkbox"/> YES <input type="checkbox"/> NO
	If so, where is the policy located?
	Comments:
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed?
	What kind of courses (online or hybrid or both)?
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed?
	What kinds of courses?
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed?
	What kinds of programs were reviewed?
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)?
	Does this material show that the programs offered at the institution are of a generally acceptable length? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

Review Completed By: Bhagat Patlolla

Date: 03/22/2019

2 - MARKETING AND RECRUITMENT REVIEW FORM

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

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	Does the institution follow federal regulations on recruiting students? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Degree completion and cost	Does the institution provide information about the typical length of time to degree? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution provide information about the overall cost of the degree? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

*§602.16(a)(1)(vii)

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

Review Completed By: Bhagat Patlolla
Date: 03/22/2019

3 - STUDENT COMPLAINTS REVIEW FORM

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

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <input type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy or procedure easily accessible? Is so, where?
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <input type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly:
	If so, does the institution adhere to this procedure? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Records	Does the institution maintain records of student complaints? <input type="checkbox"/> YES <input type="checkbox"/> NO If so, where?
	Does the institution have an effective way of tracking and monitoring student complaints over time? <input type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly:
	Comments:

*§602-16(1)(1)(ix)

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

Review Completed By: Bhagat Patlolla

Date: 03/22/2019

4 – TRANSFER CREDIT POLICY REVIEW FORM

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

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? <input type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy publically available? <input type="checkbox"/> YES <input type="checkbox"/> NO If so, where?
	Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

(1) Are publicly disclosed in accordance with 668.43(a)(11); and

(2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

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

Review Completed By: Bhagat Patlolla

Date: 03/22/2019

OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX

Institution: Stanton University

Type of Visit: SAV1

Name of reviewer/s: Matthew Liao-Troth, June Klein, Bhagat Patlolla, and Brian Clocksin, accompanied by Mark Goor

Date/s of review: 9 May 2019

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed¹. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address

Stanton University
Los Angeles Learning Site
3700 Wilshire Blvd Suite #100
Los Angeles, CA 90010

2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a branch campus standalone location, or satellite location by WSCUC)

Site was established in January of 2015, replacing another in Los Angeles County. This is a satellite location.

Undergraduate and graduate courses in business (BBA and MBA) are offered at the site for the convenience of students who live in Los Angeles County and wish to avoid commuting to Garden Grove in Orange County.

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

The entire SAV1 team visited the site and interviewed two of the six faculty who teach at this location as well as one student who came in to meet with the team. In addition, the team met with the director of the site and academic and student support staff who are based at Garden Grove campus but provide services through weekly visits as well as email and phone support. Scheduling, admissions and student support processes and documents were reviewed.

¹ See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?	NA	NA
<i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)	The institution established this location to better fulfill their mission in terms of affordability, quality, diversity, and career focus of degree programs.	NA
<i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)	The location is externally and internally identified on a highly trafficked thoroughfare in downtown Los Angeles. The student council is active at this location.	NA
<i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)	The site has a full-time director, and provides three classrooms, a student meal room, and library resources.	NA
<i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)	The institution provides student services face to face on a weekly basis and virtually throughout the day. Students are primarily working professionals and have not put a large demand on student services to date.	NA
<i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)	Six faculty teach at this site. One is full time. Faculty meet quarterly across the institution to address curricular, assessment, and professional development issues.	NA
<i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)	The programs at the site are not independent of main campus programs. The faculty and academic administration review syllabi to ensure learning objectives, and grading rubrics are consistent across locations.	NA
<i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)	The small number of students taking classes exclusively at this location make meaningful comparisons difficult at this time.	The institution should continue to review for disparities in retention and graduation for students taking courses exclusively at this location as compared to main campus and address as appropriate.

<p><i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>	<p>The institution uses the same assessment processes for all locations. Because of small numbers, it is difficult to differentiate between effects for faculty and location.</p>	<p>The institution should continue to review for disparities identified in assessment of student learning at this location as compared to main campus and address as appropriate.</p>
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>	<p>The institution uses the same quality assurance processes at the off-campus site.</p>	<p>The institution should ensure that the unique characteristics of this location are considered when reviewing quality assurance processes.</p>