

## **REPORT OF THE WSCUC VISITING TEAM**

### **SEEKING ACCREDITATION VISIT 1**

For Institutions Seeking Initial Accreditation

**To: Lincoln University**

April 16 – 19, 2018

#### **Team Roster**

Linda Buckley (chair), Former Associate Vice President for Planning, University of the Pacific  
Sharlene Sayegh (assistant chair), Director of Program Review and Assessment and  
Accreditation Liaison Officer, California State University, Long Beach  
Donald Taylor, Assistant Vice President, Academic Programs and Educational Effectiveness,  
California State University, Sacramento  
Jeanine Hawk, Former Vice President / CFO, Alliant International University  
Eric Klein, Dean, Honors College, Ashford University  
Tamela Hawley, Vice President, WSCUC Staff Liaison

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.

## TABLE OF CONTENTS

	Page numbers
<b>SECTION I. OVERVIEW AND CONTEXT</b>	<b>2</b>
A. Description of the Institution and Visit	2
B. The Institution's Seeking Accreditation Visit 1 Report:	3
• Alignment with the Letter of Intent	
• Quality and Rigor of the Review and Report	
C. Response to Issues Raised in the Eligibility Review Committee Letter	4
<b>SECTION II. EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC'S STANDARDS</b>	<b>7</b>
<b>A. Organizing the Team Report on Compliance with WSCUC Standards</b>	
Standard 1	7
Standard 2	9
Standard 3	13
Standard 4	19
<b>B. Presenting Issues, Analyzing Evidence and Formulating Conclusions</b>	<b>25</b>
<b>SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION</b>	<b>27</b>
<b>SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS</b>	<b>28</b>
<b>SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS</b>	<b>28</b>
<b>APPENDICES</b>	<b>31</b>
Four Federal Compliance Forms	31

## **SECTION I – OVERVIEW AND CONTEXT**

### **A. Description of Institution and Visit**

Lincoln University (LU) is a private, non-profit, non-sectarian university that is based in downtown Oakland, California. The university was founded in 1919 in San Francisco by Dr. Benjamin Franklin Lickey. At its inception, the university was established as a law school to train veterans returning home from World War I (WWI). It offered evening classes for working adults and part time students. In 1993 the law program separated from LU and in 1999 the university moved to its own campus in Oakland consisting of three buildings that are located next to each other.

The mission of LU is to provide outstanding educational programs in specific target disciplines that equip students with the knowledge, skills, and values for successful professional careers in a global society. The university currently enrolls about 650 students from the United States and over 60 countries around the world. The university is mostly a business school offering the BA in Business Administration, MBA and DBA, the MS in International Business and the MS in Finance Management. LU also offers the BS in Diagnostic Imaging. The majority of LU students are enrolled in its graduate programs. LU does not have any off-campus sites or offer any distance education programs. Together, these degree programs underlie the University's objective to transform the lives of its students while contributing to the economy, culture, and quality of California and the world.

The university is able to pursue its educational mission by employing about 38 instructors (27 of them with terminal degrees) and about 50 staff employees. Some faculty members hold dual appointments as administrators in addition to full instructional loads. For example, the

President, the Provost, Assistant Provost, Administrative Vice President, and Dean of students are actively involved in teaching, including serving as core leads in various academic programs. LU is governed by a Board that includes 12 trustees, and an administrative and faculty structure.

### **Accreditation History**

During the period 1990-2017, the university was accredited by the Accreditation Council of Independent Colleges and Schools (ACICS). Following the U. S. Department of Education's revocation of ACICS as an Accreditor in December 2016, the U.S. Department of Education granted provisional accreditation to LU until June 2018. In addition, the California Bureau of Private Post-Secondary Education granted LU its exempt status, which remains valid until December 31, 2018. Although the accrediting authority of ACICS has been reinstated, LU has decided to continue seeking WSCUC accreditation. In May 2017, the university was granted Eligibility status for Accreditation by the WASC Senior College and University Commission (WSCUC). This Seeking Accreditation Review is the next step in that process.

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

Overall, the SAV 1 team found the institutional report to be clearly written, well organized, and fairly accurate in its portrayal of the condition of the institution. Moreover, the SAV 1 team found the LU report to be in alignment with its Letter of Intent to Apply for Accreditation.

The report documents engagement with the key issues identified in the letter granting eligibility by the Eligibility Review Committee. It also acknowledges areas of strength and needed improvement discovered through the self-study process. In addition, it included a synthesis and reflections at the conclusion of each Standard section, and three of the most

important issues emphasized under that Standard were addressed. To support compliance with the Standards and accompanying WSCUC Criteria for Review, LU provided evidentiary documentation that was easily accessible to the review team. Additional documents that were requested during the site visit were promptly provided by the Chief Academic Officer, Vice Provost, and Assistant to the President.

While the institutional report established the foundation for the campus visit, the onsite interviews and discussions with a cross section of key stakeholders provided the additional information needed to answer outstanding questions and inform the team's findings. During the site visit, the visiting team found that the administrators, faculty, staff, and students are deeply committed to the University's mission and objectives. All of the stakeholders who were interviewed demonstrated in-depth knowledge of the institution's mission and educational philosophy although there was generally less familiarity with educational effectiveness processes and structures.

The SAV 1 team would like to acknowledge LU's engagement in the initial accreditation process and the time and energy the community has invested in the process. Furthermore, the team would also like to express its appreciation for the self-reflective manner in which the report was written, as well as the openness with which community members responded to questions and requests for additional information from the team.

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

On April 25, 2017, the panel of the Eligibility Review Committee (ERC) of the WASC Senior College and University Commission (WSCUC) conducted its evaluation of the application for Eligibility submitted by Lincoln University (LU) for the purpose of obtaining WSCUC accreditation for the institution. Seven areas were specified in the Eligibility Criteria in

order for LU to come into sufficient compliance with WSCUC's Standards for Candidacy and ultimately for Initial Accreditation.

The Eligibility Review recommendations and the institution's responses are noted below..

### ***Governance***

The Eligibility Review Panel expressed concern regarding the absence of gender diversity on the Board of Trustees, and the board is slowly responding to this concern, recently appointing a woman to the board. (CFR 1.4)

LU has responded to recommendations regarding the president serving multiple roles by revising its organization and adding a CFO, COO, and a Provost. In addition, a Vice Provost and Director of Institutional Research have also been added. Additional organizational alignments occurred as a result of this shift including the elimination of deans and the addition of faculty department chairs. However, the visiting team has identified that full-time faculty are now playing multiple administrative roles and in some cases are overextended. (CFRs 3.7, 3.8)

The Audit and Finance Committee of the Board of Trustees has been split into two committees and their roles have been clarified. (CFR 3.9)

### ***Financial Resources***

The Eligibility Review noted concern with regard to the revenue dependence on student tuition. The institution is still heavily dependent on tuition revenue, especially from international students which currently comprise 85% of their enrollment. The institution continues to be challenged by declining enrollments, effected by the institution's accreditation status and the changing political climate around immigration and visas. The visiting team believes that revenue diversification has yet to be addressed. (CFR 3.4)

### ***Institutional Planning***

LU has dedicated time and effort to institutional planning over the last year, including the development of a gap analysis and a strategic plan progress report developed by the provost. The board received and approved the amended strategic plan in 2018. (CFR 4.6)

### ***Degree Programs***

With regard to the concern for differentiating degree levels, evidence was presented of institutional, program, and course learning outcomes along with curriculum mapping and rubrics. The recommendation still exists that the institution will want to do further work on clearly defining expectations for different degree levels.

### ***Educational Objectives and Assessment of Student Learning***

With regard to the concerns about educational effectiveness and program assessment, the university has developed an embedded assessment process that requires faculty to use graded course assignment evaluations that are mapped onto the CLOs, PLOs, and ILOs. While much has been done by LU in the area of objectives and assessment, further maturity will be needed to ensure consistent faculty understanding of this process before the next visit. (CFR 2.3, 4.3)

### ***Faculty***

With regard to the concern regarding faculty involvement for shared governance, LU has developed a faculty governance framework. However there is still a need for faculty engagement at levels consistent with robust faculty governance. (CFR 2.4, 3.10)

### ***Student Success***

The newly established Institutional Research function operates with a full-time faculty release. Further disaggregation and analysis of data will be needed in order to address issues of student success. (CFR 2.10)

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

## **A. Organizing the Team Report on Compliance with WSCUC Standards**

### **STANDARD 1: Defining Institutional Purposes and Ensuring Educational Objectives**

#### ***Integrity and Transparency***

LU has defined a mission and objectives that are closely related to its educational philosophy. The mission states that LU strives to “provide traditional educational programs in diverse fields of study, delivered by experienced educators, and leading to outstanding employment opportunities for American and international students.” The students, faculty, staff, and administration gave a clear understanding of this mission and demonstrated a deep commitment to the University’s mission and objectives. (CFR 1.1).

Documentation provided to the visiting team indicated that LU is making a concerted effort to ensure that student satisfaction and achievement data are being consistently collected. LU has also made a concerted effort to ensure that student enrollment data and achievement data (including retention rates, graduation rates, and program-level GPA) are also made public. (CFR 1.2)

LU’s institutional policies on freedom of expression for faculty and students are clearly articulated in the Catalog and Faculty Handbook. These policies clearly emphasize the institution’s commitment to academic freedom while simultaneously striving for accuracy and respect for others (CFR 1.3).

#### ***Institutional Report and Supporting Materials***

LU aspires to take a proactive approach to diversity in the context of its ambition to be a global university with a diverse multicultural student body and faculty. At the present time, LU has approximately 650 international students from over 60 different countries. LU’s policies on

diversity and inclusion are publicly available, as is the institutional commitment to the principles enunciated in the WSCUC Diversity policy.

During the visit, LU's focus on diversity and inclusive excellence emerged as a core value in fostering sensitivity to a multicultural climate. It is clear that the institution views diversity as essential to the academic environment. However, the institution has not developed key performance indicators as benchmarks to continue the development of a diverse community, a diverse workforce, and engagement with diverse worldviews and perspectives (CFR 1.4).

LU is a private, non-profit, non-sectarian educational institution of higher learning that operates under the IRS non-profit designation. The Board has recently created policies and by-laws that are clear, and should be regularly assessed to ensure that they are consistent with WSCUC requirements. There are no apparent affiliations that would detract the institution from fulfilling its mission and objectives (CFR 1.5).

LU has published and has readily accessible policies on its website and Catalog, including disability, financial aid, and transcripts and records policies. LU's Faculty Handbook outlines the institution's human subjects in research policy (as well as other IRB policies). The institution also has clearly defined policies governing student grievances such as the Student Complaint Log. The institution is encouraged to develop a system in which student complaints can be tracked and maintained for institutional analysis and reflection. (CFR 1.6)

LU appears to have appropriate policies and practices in place to operate the University in the scope of current laws and regulations, as well as the personal welfare of students, faculty, staff, and administration. Grievance procedures for students and faculty are published and appear appropriate for due process. There have been some recent changes to ensure that policies

and handbooks are regularly reviewed and that employees are educated and updated on employee practices and procedures. (CFR 1.7).

It appears LU's board, president, administration, faculty, and staff have been actively involved and supportive throughout the institution's journey toward initial accreditation by WSCUC. LU recognizes that WSCUC is critical to the success of the University and its programs. Its communication with WSCUC has been straightforward and candid and maintains a public record of its Eligibility status on its website. (CFR 1.8) To summarize, the visiting team recorded ample evidence to determine that Lincoln University demonstrated compliance with Standard 1 sufficient for initial accreditation with the understanding that the Commission makes the final determination regarding compliance. Areas of particular strength include LU's mission (CFR 1.1) and its approach to academic freedom (CFR 1.3).

## **STANDARD 2: Achieving Educational Objectives through Core Functions**

The heart of Standard 2 is the relationship between teaching and learning and how scholarship and creative activity enhance educational objectives and the mission of the institution.

### ***Teaching and Learning***

Lincoln University has established program learning outcomes appropriate to each degree level (CFRs 2.2a, 2.2b, 2.3) and has worked to incorporate the program learning outcomes into each course offered on campus. Its *Learning Outcomes Handbook* serves as a curricular guide for every class and includes course descriptions and alignment of course learning outcomes to program and institutional learning outcomes. It operates as a de facto standard course outline (CFR 2.3). Because the *Handbook* is prescriptive, it appears that individual faculty and faculty as a unit, concentration, or program do not have full responsibility for setting SLOs and choosing

appropriate program level assessment methods (CFR 2.4). In meetings with the Assessment Committee and the Curriculum Committee, the team learned that faculty are involved, but their involvement appears to be limited to the embedded assessments in each course and not in the larger analysis of student achievement of program learning outcomes. The team encourages greater faculty involvement of assessment at the program, rather than class level.

The general education program is inconsistently understood by different stakeholders at the institution. Some faculty believe the coursework is simply remediation for international students enrolled in a degree completion program. Others view the general education curriculum as part of a "liberal education" as defined by the Association of American Colleges and Universities (AAC&U). Because there is inconsistency in the approach to and understanding of general education at Lincoln University, there is inconsistency in application of the approaches of general education that continues through the upper-division level and is fully realized at the capstone level within a major (CFR 2.2a). The institution is encouraged to write a self-study and engage in a program review of the general education program accounting for these inconsistencies. In particular, the institution is encouraged to define what general education means for LU in relation to higher education in the US.

At the time of the site visit, two programs had recently undergone program review, the BS in Diagnostic Imaging and the Master in Business Administration (CFR 2.7). The Inventory of Educational Effectiveness Indicators stated that other programs were reviewed in 2016 and 2017, but now that LU is seeking different disciplinary accreditation for its business programs, it will need to review its other programs soon as well. The program review process as articulated in the program review handbook is systematic and detailed, though more ownership by stakeholders involved in each program is necessary for writing self-studies and a policy for

establishing a follow up during the successive cycle should be developed. The Diagnostic Imaging program has developed a solid model for continuous improvement with its externship evaluations and provides numerous opportunities for authentic learning for its students (CFR 2.5).

### ***Scholarship and Creative Activity***

Though many faculty publish and remain active in their respective fields, scholarship and creative activity are not emphasized at the university and there is little financial support for professional development of this sort; limited stipends are provided by the president's office on an ad hoc basis for travel for presenting at conferences (CFR 2.9). The institution does maintain an Institutional Review Board (IRB) which is described in its "Policy and Procedure for Conducting Research," but is not linked to regular resources (monetary or otherwise) to support research activity for faculty and students. The institution's process, policy, and procedure for retention and promotion are unclear. The institution distributes a document entitled "Individual Faculty Development Plan" by which it tracks membership in professional organizations, publications, and presentations, but there is not a clear connection between the articulation of these activities, institutional financial support of them, and the mission of the institution itself (CFR 2.8).

### ***Student Learning and Success***

Lincoln University maintains an office of Accreditation, Compliance, and Quality Assurance under which the Director of Institutional Research serves. The institution provides data, but has not yet developed a framework for providing consistent, public, longitudinal data

tracking student success. In particular, student satisfaction or campus climate data is extremely limited (CFRs 2.5, 2.10), and while there are "student input forms" for interested students to describe a course they would like, and of course end-of-term student evaluations, the institution lacks a systemic and overarching analysis of student perceptions of their experience on campus, both curricular and co-curricular. Moreover, data collection and analysis reflecting trends and gaps in student success are in the nascent stages. Implementation of workshops by the library staff and the Committee on Teaching and Learning for faculty and staff to develop an understanding of student success issues are an important step in this area. (CFR 2.11)

The institution clearly engages in advising and financial aid counseling (CFRs 2.12, 2.13), but is encouraged to centralize these offices for better communication with students.

The institution's transfer of credit policy is clearly listed on its website and is in compliance with the CFR (2.14)

The visiting team determined that Lincoln University demonstrated compliance with Standard 2 sufficient for candidacy with the understanding that the Commission makes the final determination regarding compliance.

Strengths in Standard 2 include the Lincoln University faculty, staff, and administration efforts to create a center for teaching and learning. The development a resource website and recent opportunities and strategies to engage faculty in improving teaching and learning represent important progress. The institution is encouraged to continue this support for the scholarship on teaching and learning (CFR 2.11). An area requiring marginal attention is the development of a formalized framework of assessment for student services, building on the surveys already provided to students after activities, and developing a schedule for program review of academic support programs (CFRs 2.11, 2.12, 2.13). The areas in this standard

requiring the most attention are enhanced financial support for faculty research, scholarly, and creative activity and further development of the program review process, including a review of general education (CFRs 2.2a, 2.8, 2.9).

**STANDARD 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability**

*Faculty and Staff*

Lincoln University (LU) has 19 full-time and 14 part-time faculty members, leveraging a qualified adjunct faculty to meet its instructional requirements. The solution to the need for expanded administrative capacity, as noted in the Eligibility Review, has been to give faculty assigned time for administration. Full-time faculty are released approximately 25% for other duties including administrative posts. Some faculty manage more than one functional area. For instance, the provost is also the acting department head for the Finance and Investments department while continuing to teach. The current board chair serves as adjunct faculty. With regard to staff, the institution has 21 full-time administrative staff members. The institution prides itself on cultural diversity, and the cultural and gender balance of students and staff is strong. However, the faculty is not as gender-balanced, though recent hires show movement in this direction. (CFR 3.1)

In interviews with faculty and staff, the visiting team learned that LU does not have formal processes for recruiting faculty. Faculty hires are based on internal recommendations and include interviews with the department chair and faculty, provost, and the president. The institution places high value on a prospective faculty member's previous teaching experience in addition to having experience in an international, cross-cultural setting. While the university has committed to the principles of equal opportunity in hiring, it is not clear given the current process how that is ensured. Lincoln University has not developed a distinctly graduated salary

schedule for full-time faculty that is a scale with increments for length of service, degrees, and related experience. There is a faculty salary schedule which contains ranges by rank; however, final salary is negotiated with the president. (CFR 3.2)

Once hired, new faculty members receive the faculty handbook along with an orientation meeting with the provost to cover institutional practices. LU maintains a peer review and mentoring process that utilizes a Course Observation Instrument and a Self-Observation Instrument. The university also collects end-of-course surveys from students, which reflect on the academic preparation of the faculty, level of teaching, and assessments used during the course. The results are reviewed and summarized by the department chair and provost. In addition, the Committee on Teaching and Learning has developed a self-service website for teaching resources and is developing workshops for teaching development (CFR 3.3)

The hiring and evaluation policies for administrative staff at LU are well established but the hiring process is informal. The visiting team found that the administrative staff did receive formal annual performance appraisals that could identify opportunities for personal improvement. The team received a printed document outlining the process for promotion, though some elements of the document appear to be outdated. The team recommends that LU implement a formal recruitment and hiring process to ensure that the faculty and administrative staff hiring processes adhere to their newly adopted policies. (CFRs 3.1, CFR 3.2)

### ***Fiscal, Physical, and Information Resources***

Lincoln University recently completed the development of a strategic plan and detailed gap analysis. While LU is developing a formalized annual budget process that is based on the new organizational structure, it is not clear how this process integrates back to the strategic plan.

The Board has received a three-year financial plan that is based on historical enrollment trends.

The Board affirmed during a team interview that the Board of Trustees receives financial information from the CEO and provost. The institution reported positive net incomes and increased operating cash balances in the last two fiscal years ending on July 31, 2017, as noted in their audited financial reporting package. Cash reserves are significant and currently support approximately nine months of operating costs.

The University uses international student recruitment agencies to market across the globe, and in 2017 85% of enrolled students held F-1 visas. In 2017 LU experienced unanticipated enrollment declines resulting from the Department of Education's deauthorization of ACICS accreditation as well as political instability over immigration and visa policies. Applications for fall 2018 are currently down more than 30% from the previous year. The admissions officer tracks student applications and yield trends; however, the university could benefit from a coordinated cross-functional, targeted enrollment management effort that informs realistic resource planning scenarios in response to external impacts that are resulting in enrollment declines. For example, it is not clear how enrollment trends directly inform budget development and revisions and how forward-looking financial plans are reset as enrollments shift. The team learned of some strategies for balancing the budget in the event of enrollment declines such as increasing tuition, reducing course offerings as demand falls, and limiting international student employment on campus. Given the current dependence of the university on international student revenue and the volatility that exists in this area, the university should also seek diversified revenue sources. (CFR 3.4)

The University owns the 14,000-square foot main campus building in Downtown Oakland accessible by public transit. Existing classroom space can accommodate up to 1,000

students and the university intends to cap enrollment rather than expand its facilities. The University provides conference/student study rooms in addition to a renovated student lounge and WiFi network access throughout the entire building. The library is housed in a leased facility across the street and is well organized with a small collection of physical texts, digital resources (e.g., LexisNexus) and 11 computer workstations to support students in their studies. Even though LU supports only 45 students in the Diagnostic Imaging program, the institution provides quality instructional facilities with modern ultrasound technology in its laboratory. A student computer lab houses 40 personal computers running standard software packages including Microsoft Office. Three computers contain SPSS statistical software. Cloud-based Office 365 is also available to students. Three full-time staff support all administrative, teaching and student hardware and software. LU has dedicated a significant amount of fiscal and human resources to support educational technology and maintains current hardware, software and virtual applications that support the institutions educational objectives. The university also has entered into two leases for a total of seven student housing units which are leased to students on a per room basis. LU covers the cost of the move, cleaning, and furniture.

LU does not have a learning management system. However, several faculty have individual Canvas accounts that support their individual classes. LU has facilities and technology capability sufficient for its educational programs, and is considering upgrades to integrated, administrative systems to replace many manual systems. (CFR 3.5)

### ***Organizational Structures and Decision-Making Processes***

LU has recently developed a framework to foster positive and meaningful engagement among the faculty, which was previously achieved through informal communications. However, faculty engagement in shared governance remains at a nascent stage. The institution is

developing a faculty committee model designed to provide appropriate governance around the areas of program delivery and improving student learning outcomes. The faculty are scheduled to meet a few times a year to discuss topics like student outcomes and curriculum changes. The administrative staff does not have a similar framework from which they can participate in decision-making or receive information and updates in their respective business areas, so communication tends to operate informally. Senior leadership meets with the president on an as needed basis. (CFR 3.6)

Following the Eligibility review, the institution underwent a major administrative reorganization in order to decentralize decision-making processes. In interviews with administration, the visiting team learned that the new administrative structure appears to be in a formative stage. As a small institution, LU operates effectively with a limited number of administrative professionals, a reality that aligns with its mission of providing an affordable education. Despite the reorganization, the team did not find evidence that lines of authority and decision-making were clear among existing staff across functions of academic support, financial planning and management, academic planning, and assessment. The team found that some staff members were less familiar with the organizational changes and their roles within the new structure. With the need for more constant and comprehensive data collection and disaggregation, and the creation of the provost and CFO position, LU should work to clarify scope of authority and responsibility across all its staff and administrative positions, highlighting the expertise of its personnel, so that functions related to human resources, facilities, and financial administration are clearly understood. (CFRs 1.7, 3.6, 3.7, 3.8)

Full-time faculty and administrative leadership are overextended and play various functional roles. The CFO position was recently created and the controller was promoted into the

position and continues to manage the accounting functions of the university. However, the provost, who also serves as full-time faculty and has a business and finance background, has assumed the core strategic aspects of the CFO role and communicates financial information to the board. (CFRs 3.6, 3.7, 3.8)

The long-serving Board of Trustees indicated in the visiting team meeting a strong commitment to the university. The Board previously operated informally and is working to develop more formal practices. Interviews and evidence (e.g. meeting agendas, minutes, and the new board subcommittee structure) revealed that their involvement in decision-making, planning, and assessment was primarily receiving information from the president. The board has completed annual formal evaluations of the CEO/President of the institution and self-evaluations of board effectiveness. However, conversations with board members indicated that further professional development on board best practices would be beneficial. There is also some question surrounding the institution's payments to board members. The board meets 1-2 times per semester and was unpaid at one point. The visiting team believes that board compensation in the context of current institutional conditions and priorities should be reconsidered. In addition, LU should continue its movement towards greater gender balance in recruiting additional board members. To help address areas for growth, including the implementation of the university's strategic plan, university advancement and appropriate roles of the board subcommittees, the board should continue its self-review and training and further develop its oversight over compliance with policies and effectiveness of ongoing operations. (CFR 3.9)

In summary, the visiting team determined that Lincoln University demonstrated compliance with Standard 3 sufficient for candidacy with the understanding that the Commission makes the final determination regarding compliance.

Strengths in Standards 3 include the university's technology resources (CFR 3.5) and its initial efforts to create an organizational administrative structure that will lead to more decentralized decision-making processes and greater institutional capacity. The institution should continue to develop this area before the next review (CFR3.6). The areas requiring the most attention are budget projections and planning, enrollment management, and human resources development. (CFR 3.4)

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

*Quality Assurance*

As evidenced throughout the Institutional Report, Lincoln University has begun to establish a systematic approach to quality assurance. Evidence of this effort is demonstrated in the university's *Institutional Effectiveness Plan*, which describes all of its degree programs, including their course content, requirements, and evaluation, and lays out the structures and processes for ensuring program quality.

According to the plan, at the course level instructors meet annually with their chairs to review their course evaluations, and to align their course objectives with assignments, instructional methodology and assessment measures. Since the university only recently created departmental chairs, this process is relatively new. Review of syllabi provided evidence of student learning outcomes (SLOs) in courses throughout the curricula, and use of multiple measures of learning. All syllabi are reviewed every semester by the department chair and the assistant provost to ensure quality, currency, and appropriate alignment with learning outcomes. The course learning outcomes are aligned with program learning outcomes (PLOs), and institutional learning outcomes (ILOs), and faculty assign grades for all levels of learning outcomes through assignment grades that are mapped to the various outcomes. This process has

been instituted since the Eligibility Review and will need time for development and refinement. While the process is tracked by the IR Director and assistant provost, the team found the process to be difficult to verify at the level of the graded assignments. Interviews with faculty indicated that the practice of assessing and tracking the PLOs and ILOs has not been uniformly adopted. As the institution continues to implement this process, it will be important to determine the extent to which it provides meaningful information on student learning to the faculty. Moreover, it will be important in the next review to demonstrate how the assessment data lead to changes that impact student learning. (CFR 4.1)

According the *Institutional Effectiveness Plan* curricula are developed and reviewed during an iterative process through the joint efforts of individuals and committees at the faculty, departmental, and administrative levels. However, in discussions with administration, the team learned that curriculum is actually developed by the administration, and the course level content is developed by faculty. Conversations led the team to understand that the administration is working toward faculty taking greater responsibility for the development of new curricula. Administration envisions that proposed new courses, concentrations, or programs will be reviewed by the Curriculum Committee of the Faculty Association and the Office of Institutional Research. Once approved by the Curriculum Committee, they will be reviewed and approved by the provost and the president. In the case of a new program, a proposal will need Board approval as well. This process is a work in progress. (CFR 4.1)

The *Educational Effectiveness Plan* states that quality assurance of faculty takes place through student surveys, class visits by chairs and administrators, and self-evaluations. Senior leadership confirmed that faculty undergo peer review at least once per year and their classes are evaluated by students each semester. Responsibility for faculty quality resides with the provost,

who meets with faculty on a regular basis and who has begun to hold meetings with the newly appointed chairs following the institutional reorganization. The Institutional Report provided a table of faculty research and scholarly activities. However, the listing was not organized along timelines, so it was difficult to determine the yearly level of scholarship activities. Going forward the Provost's Office should maintain records of faculty scholarship and creative activities disaggregated by year and by type of activity, so the level of activity is more transparent. Although the university considers itself to be a teaching-focused institution, faculty are expected to be involved in scholarship and creative activities, and they are given some limited support by administration to attend conferences and webinars. (CFRs 4.3, 4.4, 4.5)

The Lincoln University program review process is explicitly outlined in the university's Program Review Resource guide and is carefully aligned with WSCUC standards. According to the guidelines, programs undergo program review every 2-4 years, and according to the report, include both internal and external reviewers, alumni data, and employer data as well as student demographics and assessment of student learning. The first two program reviews were conducted in 2017. Program Review documents from these reviews, the BS in Diagnostic Imaging and the Master of Business Administration programs, provided evidence of a process that is in its initial stages of development. In the team's meetings with faculty, there were varying levels of knowledge among the faculty of the program reviews in their departments. Administration indicated that a systematic process for identifying external consultants had not yet been developed. A formalized action plan or MOU was not developed at the conclusion of the review; however, the Assistant Dean informed the team that an action plan would be developed at the Faculty Association meeting in April 2018. The program review process is a work in progress. (CFR 4.1)

The Office of Institutional Research (IR) plays an integral role in all quality assurance processes in collaboration with stakeholders across the university. In this sense, the Office of Institutional Research is a critical factor in the quality of the student experience and outcomes at Lincoln University. IR functions as the hub for the collection of demographic data related to students and faculty. The *Protocol and Procedures for Institutional Research* document defines the data sets collected and the process for collection. The annual Lincoln University *Institutional Research Report* includes some analysis of student demographics, retention and graduation rates, placement, GPA analysis, employer satisfaction survey results, assessment of co-curricular activities, faculty demographics by rank and gender, PT/FT faculty, faculty evaluations and peer reviews, faculty scholarship, and faculty development. This section of the report provides a solid foundation for understanding the characteristics of the student body and faculty. A more robust analysis of the data sets could provide the institution with meaningful data that identify areas for improvement and decision points for issues related to student success. In particular, more comprehensive, nationally normed satisfaction surveys for students and employers should provide fruitful information /data for further analysis and a source for comparative analysis. Moreover, further disaggregation of student and faculty data will likely lead to research questions that could improve the institution's understanding of the challenges to student success. A data report is disseminated annually to internal stakeholders. At this point, the IR Office is well positioned to shift from a compliance orientation to ongoing, continuous self-improvement, converting data to actionable information to better understand the student population and student experience. (CFRs 4.1, 4.2)

The second section of the *Institutional Research Report* focuses on student learning data as the Office of Institutional Research is also the central repository of departmental assessment.

The IR Report shows evidence of mapping of course learning outcomes and program learning outcomes and analysis of the PLOs with benchmarks based on the correlation of course assignments that are mapped to the course learning outcomes, program learning outcomes and institutional learning outcomes.. The institutional report also includes a sample of a course grading sheet that tracks course grades, graded assessment of the PLOs, and the ILOs. University administration provided the team with additional reports drawn from this data. While this process is well-designed, discussions with faculty indicated varying degrees of consistency in how assignments are graded and mapped. As indicated earlier, this process at a developmental stage. (CFR 4.1, 4.2)

### ***Institutional Learning***

Lincoln University's strategic plan was finalized in 2016 and extends until 2020. According to the Institutional Report, the planning process was led by the Board of Trustees and engaged faculty, staff, students, alumni and advisory groups. The process incorporated student data, academic data, and financial data. The plan includes three overarching initiatives:

1. Achieving accreditation approval from BPPE, WSCUC, and IACBE
2. Institutional stability through an organizational structure enhanced for quality assurance and continuous improvement
3. Institutional capacity for educational effectiveness

The *Strategic Plan Overview* document provides an extensive summary of the strategic plan itself and notes work that has been accomplished to date, including goals, objectives, actions taken to date, responsible parties for each objective, a timetable for actions and completion, required outcomes, resources needed, evidence of actions, and a description of continued review. Discussions with the provost and the board of trustees, revealed that during the planning process

the mission statement was reviewed and made more concise. The provost headed the planning effort with input from many others. While the *Strategic Plan Overview* provides a comprehensive overview of the work accomplished to date, a formalized process for tracking the implementation does not appear to be in place. (CFR4.6)

Lincoln University has also begun to consider further long range planning issues. As a part of its strategic planning process, the university considers institutional and environmental factors, especially in the context of its financial realities (CFR 4.7). The university envisions working to challenge the status quo through a focus on restructuring curricula to meet emerging needs in the high tech, globalized economy such as:

- 21<sup>st</sup> Century Skill development
- Greater use of problem based learning
- Robust university community collaborations
- Integrating communication technologies to better track and assess learning outcomes between the University and the communities where graduate live and work

This work is at the early stages of discussion and planning and, according to the president, will not be undertaken until after the institution achieves WSCUC accreditation.

In addition, in response to market analysis and the university's desire to implement a plan of controlled growth, LU is planning to open four new degree programs and a certificate program in the near future. As a part of these plans, the university has taken a conservative approach to financial plans to ensure continued financial stability. These plans are in the initial stages, and the team did not see evidence of the integration of these plans with resource planning.

In summary, the visiting team determined that Lincoln University demonstrated compliance with Standard 4 sufficient for candidacy with the understanding that the Commission makes the final determination regarding compliance.

Strengths in Standards 4 include the university's initial efforts to create an organizational structure that will enhance the institution's institutional research capacity. The institution should continue to develop this area before the next review (CFR4.1). The institution also showed strength in the area of strategic planning and the *Strategic Planning Overview*. The institution should ensure continuation of this effort by creating a formal process for tracking the implementation of the strategic plan. (CFR 4.6) The areas requiring the most attention are the continued institutionalization of outcomes assessment and program review processes, faculty involvement in leadership and faculty governance, and faculty engagement in assessment and teaching and learning. (CFR 4.3, 4.4)

## **B. Presenting Issues, Analyzing Evidence and Formulating Conclusions.**

In the past two years Lincoln University has experienced significant changes, mostly brought about by external circumstances outside of its control. Examples of these changes include:

- 1) The national institution accreditor with which it was affiliated, ACICS, lost recognition from the US Department of Education. The consequent loss of accreditation has resulted in a precipitous drop in enrollment largely from international students.
- 2) As a result of the ACICS loss of recognition, the institution is required to secure recognition from the State of California, Bureau for Private Postsecondary Education (BPPE).

These two changes in circumstances have required the University, over the past two years to:

- 1) Investigate accreditation recognition appropriate to the degree level and subject matter of its educational programs;
- 2) File an Application for Approval with the BPPE, which requires annual reporting until the time that the University qualifies for WSCUC Initial Accreditation;
- 3) File and secure recognition with the regional accreditor, WSCUC, with its application for Eligibility, followed by the immediate steps, now in process, for qualifying to meet requirements for WSCUC Candidacy/Initial Accreditation.

An additional change of plans was to temporarily delay completing the programmatic accreditation with International Accreditation Council for Business Education (IACBE) and the Accrediting Bureau of Health Schools (ABHES) until time and resources will allow it to concentrate on this effort in the future.

Finally, the composition and character of the Lincoln University faculty will present challenges in the coming years. A large portion of the faculty is part-time (42%). In addition, six of the part-time faculty have both administrative and teaching responsibilities. These characteristics present challenges for constituting faculty governance committees and for generally maintaining faculty with a commitment to develop the shared governance necessary to support the academic infrastructure of the institution. In addition, many if not most of the faculty, are very senior and in the final phase of their academic careers. While this profile has the advantage of providing Lincoln with remarkably experienced educators, it also suggests the need for a solid succession plan that will ensure the future stability of the university.

### **SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013**

#### **HANDBOOK OF ACCREDITATION**

The Institutional Report briefly discussed degree programs, educational quality, and sustainability. The processes outlined by the institution include developing and nurturing lines of communication and maintaining transparency, continuing indirect and direct assessment emanating from the Office of Institutional Research, and engaging in market research to ensure that degree programs remain relevant and in demand. In particular, the institution intends to engage in student satisfaction surveys through the Office of Student Services.

Beyond this, the institution has not provided detailed discussion of the processes involved for examining each of these sections as articulated in the *Handbook*. First, the institution has not clearly outlined a process for defining the meaning, quality, and integrity of the degrees beyond stating it will seek reflection and input from multiple stakeholders. Second, the institution states the importance of institutional research, but is vague about identifying other processes both within IR and throughout the institution to ensure educational quality. Finally, the institution does not provide full analysis of the process by which it plans to ensure sustainability beyond market research.

To conclude, Lincoln University has very good ideas about moving forward, such as participation in the WSCUC Assessment Leadership Academy, the introduction of student satisfaction surveys, and the discussion of institutional sustainability, but has not fully elaborated on how these markers will frame a larger process of institutional improvement.

#### **SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS**

On a superficial level, the institution has done a thorough job completing the Inventory of Educational Effectiveness Indicators (IEEI or Inventory). The Inventory lists program review dates for various degree programs as well as articulates an assessment framework. The Strategic Plan promised two program reviews for WSCUC by April 2018 and the team reviewed two

program reviews on its visit, but the Institutional Report is unspecific in its reference to any program review occurring. The IEEI lists numerous dates for past program reviews though no evidence of these reviews was provided. Therefore, there is some inconsistency between IEEI claims and evidence provided by the institution.

The "special assessment tool" mentioned in the Inventory is a quantifiable chart that links embedded assessments with grading at the course level. Since course learning outcomes are all aligned to program and institutional outcomes, the result is a formulaic model of assessment that has merit (as discussed in the sections on Standards 2 and 4), but does not fully engage faculty with larger processes of student achievement in the major (as opposed to a class). In short, the special assessment tool is a place to start, not a place to end, and the WSCUC team encourages LU to find complementary qualitative assessment of student learning that demonstrates mastery "at or near graduation." Additionally, the integration of the WSCUC core competencies for the undergraduate programs remains unclear. Since LU is sending two members of its institution to the WSCUC Assessment Leadership Academy, the team believes that new tools will be incorporated over time. The WSCUC team encourages LU to use the Inventory to better map program level (as opposed to course-level) outcomes and then develop complementary assessment tools beyond the special assessment tool it currently uses.

The team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with the Standard. Final determination of compliance with the Standards rests with the Commission.

## **SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS**

Lincoln University has undertaken the Seeking Accreditation Visit with a great degree of seriousness and commitment. The institution is to be commended for its response to the

recommendations of the Eligibility Review, not only because of the rapidity of their implementation, but also because of the breadth and depth of the changes undertaken. An entirely new administrative infrastructure has been developed along with extensive quality assurance practices. The full implementation of these changes will take some time to mature. However, the passion and commitment of those with whom the team spoke bode well for the continuation and development of the work that is already well underway.

### **COMMENDATIONS:**

1. Lincoln University has a clearly defined mission and objectives that are closely related to the institution's educational philosophy. Moreover, the students, faculty, staff, and administration have a clear understanding of this mission and demonstrate a deep commitment to the University's mission and objectives (CFR 1.1);
2. The university has institutional policies on freedom of expression for faculty and students that are clearly articulated in the Catalog and Faculty Handbook. These policies clearly emphasize the institution's commitment to academic freedom while simultaneously striving for accuracy and respect for others (CFR 1.3);
3. Staff and administration serving on the Committee on Teaching and Learning have articulated opportunities for faculty development, and are working to further engage faculty. The institution is encouraged to continue its support for the scholarship on teaching and learning (CFR 2.11);
4. LU has dedicated a significant amount of fiscal and human resources to support educational technology and maintains current hardware, software and virtual applications that support the institutions educational objectives (CFR 3.5).

### **RECOMMENDATIONS:**

1. Review general education policies and engage in an external review of the program at the earliest opportunity (CFR 2.2a);
2. Review and systemize its policy for providing financial support for faculty research, and scholarly and creative activity (CFRs 2.8, 2.9);
3. Develop a formalized framework of assessment for student services, building on current surveys distributed after student events, and develop a schedule for program-review of academic support programs. (CFRs 2.11, 2.12, 2.13);
4. Implement a formal recruitment and hiring process to ensure that faculty and administrative staff hiring processes adhere to newly adopted policies. (CFR 3.1 and 3.2);
5. Develop a coordinated enrollment management function that informs realistic resource planning scenarios in response to external impacts and seek diversified revenue sources. (CFR 3.4);
6. Continue to clarify roles and responsibilities and decision-making structures as many full-time faculty play significant administrative roles and leadership as a whole is overextended. (CFR1.7 and 3.8);
7. Continue development of the Board of Trustees and further institutionalize its committee structures. (CFR 3.9);
8. Supported by administration, expand faculty engagement in order to provide effective academic leadership. (CFR 3.10);
9. Increase support to the Office of Institutional Research to support using additional measures to gauge student satisfaction and campus climate, such as the National Survey for Student Engagement (NSSE). Moreover, deepen the quality assurance

work of the Office of Institutional Research by shifting from a compliance orientation to ongoing attention to quality through additional disaggregation of data and analysis of issues related to the student experience and student success. (CFR 2.10, 4.1, 4.2);

10. Further develop and institutionalize the assessment and quality assurance processes and expand faculty involvement in assessment and program review. (CFR 4.1, 4.3)

## **APPENDICES**

Four federal compliance forms

## FEDERAL COMPLIANCE FORMS

### OVERVIEW

There are four forms that WSCUC 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, WSCUC is required to demonstrate that it monitors the institution's credit hour policy and processes as well as the lengths of its programs.

#### **Credit Hour - §602.24(f)**

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

(1) The accrediting agency meets this requirement if-

- (i) It reviews the institution's-
  - (A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and
  - (B) The application of the institution's policies and procedures to its programs and coursework; and
- (ii) Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.

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

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

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

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

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

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

#### **Program Length - §602.16(a)(1)(viii)**

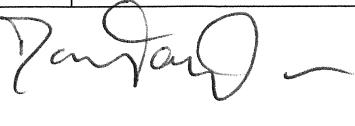
Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor's degree, and 30 semester credit hours for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

## 1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)	
Policy on credit hour	Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where is the policy located? Comments: <b>Catalog, website, and LU policies and procedures manual</b>	
	Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <b>LU Institutional Research Report, Program reviews, and Course approval for new courses</b> If so, does the institution adhere to this procedure? <input checked="" 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 checked="" 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? <b>N/A</b>
		What kind of courses (online or hybrid or both)?
What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral		
What discipline(s)?		
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 checked="" 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? <b>N/A</b>	
	What kinds of courses?	
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral	
	What discipline(s)?	
	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 checked="" type="checkbox"/> NO Comments:	
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? <b>Seven</b>	
	What kinds of programs were reviewed? <b>Traditional face to face</b>	
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral	
	What discipline(s)? <b>Business Administration, International Business, Finance Management, Diagnostic Imaging</b>	
	Does this material show that the programs offered at the institution are of a generally acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
	Comments:	

Review Completed By:

Date:

4/18/18 

## 2 - MARKETING AND RECRUITMENT REVIEW FORM

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

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	<p>Does the institution follow federal regulations on recruiting students? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: <b>Please see the Agent Agreement Template included as Appendix 2-1.</b></p>
Degree completion and cost	<p>Does the institution provide information about the typical length of time to degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: Please see the LU Catalog and weblinks: <u>Bachelor of Arts in Business Administration</u>; <u>Bachelor of Science in Diagnostic Imaging</u>; <u>Master of Business Administration</u>; <u>Master of Science</u>; <u>Doctor of Business Administration</u></p>
Careers and employment	<p>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
	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:   
Date: 4/18/18

### 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.

<b>Material Reviewed</b>	<b>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</b>
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, is the policy or procedure easily accessible? Is so, where? <b>Yes, in Students Handbook, website, and LU policies and procedures manual</b>
	Comments:
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: <b>The Complaints and Grievances Policies and Procedures for the students are included as Appendix 3-1.</b>
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Records	Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? <b>Dean of Students office</b>
	Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: <b>The Dean of Students keeps the information and follows through the complaints until resolution.</b>
	Comments:

\*§602-16(1)(1)(ix)

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

Review Completed By:

Date:

4/18/18

#### 4 – TRANSFER CREDIT POLICY REVIEW FORM

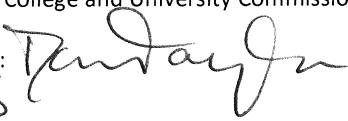
Under federal regulations\*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices accordingly.

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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy publically available? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? <b>Catalog, website. Partially in enrollment agreements.</b>
	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 checked="" 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:   
Date: 4/18/18