

**REPORT OF THE WSCUC TEAM
SPECIAL VISIT**

To Cogswell Polytechnical College

September 11 - 13, 2019

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

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SECTION I – OVERVIEW AND CONTEXT

A. Description of the Institution and Its Accreditation History

Founded as a vocational high school in San Francisco in 1887, Cogswell Polytechnical College (“Cogswell”) became a two-year college in 1931, was approved to grant associate degrees twenty years later, and became a four-year college in 1971. WSCUC granted Cogswell candidacy in 1975 and initial accreditation in 1977. During the mid-1980’s, Cogswell relocated to Cupertino, California. Remaining in the Silicon Valley, its campus moved to Sunnyvale, California, in 1994 and to its current location in San Jose in 2015. Cogswell provided this mission and vision statement on its website:

To prepare students for success in the creative-technology industries by providing an extraordinary, real-world education inspired by the entrepreneurial spirit of our Silicon Valley location.

In fall 2019, Cogswell’s five academic departments enrolled 528 students in the following six undergraduate degree programs and one graduate program: digital art and animation (BA), game design art (BA), game design engineering (BS), Bachelor of Business Administration (BBA), computer science (BS), digital audio technology (BS), and entrepreneurship and innovation (MA). One program was being phased out (digital arts engineering BS) and enrolled a single continuing student. The program with the highest enrollment was digital art and animation, in which 187 students studied at the time of the visit. In the two game design majors combined – game design art and game design engineering – 226 students were enrolled. Eight students enrolled in the master’s program. At the time of the visit, almost 60% of the

undergraduate population had entered as first-time first-year students, and just over 40% had entered as transfers.

Roughly one-third of the undergraduate population was female, and the undergraduate population's race/ethnicity was reported to be 28% White, 22% Asian/Pacific Islander, 22% Hispanic, 8% African American, 5% two or more races, 2% international, and 1% American Indian/Alaskan Native, with 13% unknown race/ethnicity. The institution's four-year graduation rate for first-time full-time students entering in cohort year 2015-16 was 20% (cohort N=109), and the institution's four-year graduation rate for transfer students entering in cohort year 2015-16 was 58% (cohort N=59). The six-year graduation rates for cohort year 2013-14 first-time first-year students (cohort N=80) and transfers (cohort N=69) were 53% and 49% respectively.

Palm Ventures LLC has owned Cogswell since 2010, when the institution transitioned its status from nonprofit to for-profit. Following its Accreditation Visit of 2015, the Commission requested a Special Visit for fall 2017, which focused on the following five issues:

- The development of specific plans and processes for the provision of human, financial, facility, and information resources necessary to accommodate enrollment growth (CFRs 3.4 and 3.5)
- The completion of the revision of the Faculty Handbook to demonstrate that faculty policies, process, and practice are aligned and consistently applied (CFR 3.2)
- The development of systematic practices, governed by policy, for the selection, onboarding, scheduling, training, and evaluation of adjunct faculty members (CFRs 3.2 and 3.3)
- The development of online pedagogy, consistent with academic plans for this modality (CFRs 2.5 and 3.5)

- The development of expanded career services such that larger numbers of students are reached, academic advising is integrated with the effort, and enhanced data gathering on student placement is achieved (CFR 2.13)

Following the 2017 Special Visit, the Commission issued a warning to Cogswell and requested a Special Visit for fall 2019. The team evaluated the following issues according to the Standards on the 2019 Special Visit:

- Better inform itself about and adhere to WSCUC's policies, practices, and expectations regarding accreditation as required by WSCUC. (CFR 1.8)
- Document current and long-term financial viability and use that evidence in its planning processes. (CFR 3.4)
- "The institution periodically engage ... its multiple constituencies, including the governing board, faculty, staff, and others, in institutional reflection and planning processes that are based on the examination of data and evidence. These processes assess the institution's strategic position, articulate priorities, examine the alignment of its purposes, core functions, and resources, and define the future direction of the institution". (CFR 4.6)
- Modify graduation rate Key Performance Indicator (KPI) to a performance level that is more ambitious than the current KPI and show movement toward achieving the new goal. (CFR 2.10)
- The board of trustees specify the leadership organization of the institution and delineate the relationship among the positions of the President/CAO, COO/CFO, and CEO in a manner that complies with the requirements of WSCUC, and demonstrate that the resulting organizational structure can work effectively. (CFRs 3.6, 3.8, and 3.10)

- Engage in board development, using outside help such as that provided by the Association of Governing Boards (AGB), to foster a clear understanding of the board role in a higher education organization and to assist the Cogswell board in understanding the role of accreditation in promoting the effectiveness and sustainability of the institution. (CFR 3.9)
- Continue to strengthen collaboration among student services, including career services, and faculty who prepare students for employment and who offer the best link to industry, in order to assure enhancement of the students' experience and to aid in the institution's efforts to improve retention, graduation, and placement rates. (CFRs 2.10, 2.11, and 2.13)
- The Commission concurs with the institution's decision not to offer previously planned distance education degrees. Although previously approved, these distance education degrees are to be resubmitted to the WSCUC Substantive Change Committee prior to offering, should this decision be reconsidered. (CFRs 2.1, 2.10, 2.13, 3.2, 3.4, and 3.5)

Cogswell submitted no proposals for substantive change since the 2017 Special Visit, and no distance education programs were implemented; however, selected courses continue to be taught online in addition to the face-to-face offerings of these courses.

B. Description of Team's Visit and Review Process

The team began its preparation by considering the team report from the 2017 Special Visit and the subsequent Commission action letter. After reviewing Cogswell's 2019 Special Visit Report and its supporting documentation, each team member completed a WSCUC Special Visit worksheet, indicating observations regarding the report and the documents provided by Cogswell. A subsequent team telephone meeting focused on the aggregated responses in those worksheets and determined areas for onsite exploration, specific meetings for the visit, and additional materials required. The materials that Cogswell provided the team both prior to and during the team's visit included the following: budget documents; a description of the formal budget development process; financial reporting and an updated "income statement" for FY 18/19; documentation of the financial responsibility financial scores; board meeting minutes and the most-recent board meeting agenda; new program proposals and appendices; program planning and approval process documentation; job descriptions for executive management positions; an updated organization chart; agendas for the monthly all-employee meetings; strategic plan appendices; documentation regarding the terms of the student information system agreement with the vendor; the second-quarter key performance indicator (KPI) update for this year; updates to enrollment, retention, degree completion, and graduation rate reporting; documentation of the graduation rate target setting process; evidence describing collaborations among faculty and the career services area; online course-taking reports and analyses; D/F/withdrawal rates for selected courses; documentation of the planning process that supported the change to trimesters; student demographic reporting; staff training materials for the information systems; peer comparison data and reporting to support decision making; materials from the new student orientation; reporting of how many units transfer students bring in when they enter Cogswell; usage statistics for career services, employment rates, and salary information; and training materials for online instructors. Cogswell's staff was highly responsive

to these and other requests the team made for materials during the visit and deserves recognition for their effort to accommodate the team's needs.

After arriving in San Jose for the visit, the team held an executive session at the hotel to discuss the visit schedule, the approach for the visit, and the documents received from Cogswell subsequent to the request for additional materials. The team conducted the visit at the Cogswell campus in San Jose from September 11 through 13, 2019, holding meetings with the CEO, the CAO, the CFO, the dean of students, and leaders of the following areas at Cogswell: institutional research and quality assurance, new program development, admissions, marketing, career services, compliance, and human resources. The team interviewed the board of trustees, members of the faculty senate, the WSCUC steering committee, the executive committee, the strategic planning committee, academic advisors, department directors, and instructional designers/curriculum developers, and held open meetings of faculty, staff, and students. A confidential email account, hosted by WSCUC, provided the team with messages sent from Cogswell's faculty, staff, and students. A room was designated at Cogswell for the team's review of documents and its private deliberation and debriefing during the scheduled hours of the visit.

C. Institution's Special Visit Report: Quality and Rigor of the Report and Supporting Evidence

The team appreciated Cogswell's Special Visit Report for the clarity of its prose and its organization. In contrast to the materials submitted by the institution for its previous Special Visit, this report appropriately documented the institution's progress in addressing the issues identified by the Commission action letter. Many exhibits elaborated effectively on the points

raised in the report, and altogether, this institutional presentation allowed the team to evaluate Cogswell's gains in the areas of this review.

Institutional involvement was extensive in preparing Cogswell's Special Visit Report, and the report itself provides evidence of the board's and executive committee's engagement in considering the issues identified by the last Special Visit team report. When the team met with Cogswell's WSCUC steering committee, it heard that Cogswell's Accreditation Liaison Officer had led several formal meetings of the committee, along with ad hoc meetings. The committee's process involved reviewing the previous team's report and recommendations, as well as that previous visiting team's suggestions offered in the body of the report. Leaders from the institution's areas or offices most closely involved with the subject matter drafted chapters of the Cogswell Special Visit Report. After an initial edit, the document was recirculated to the chapter contributors and to the CEO and chair of the board, and then sent out to all faculty, staff, and the board for their feedback. Faculty in particular felt that preparation for the previous Special Visit had not incorporated their contributions, and they responded to this request for feedback to the draft report with substantive suggestions and comments that articulated common points and perspectives. Approval of the report was an item on the board's agenda for June 2019.

The team notes that the Special Visit Report describes how Cogswell responded to the Commission action letter, for example by engaging in board development exercises, hiring key administrators, or delaying the launch of degree programs. When evaluating Cogswell's decision-making processes that led to action, the team found that analysis supporting the specific choices made was not articulated in detail for each issue addressed in the report. During the visit, however, the team was able to learn more from its interviews and from the additional evidence received before and during the visit.

SECTION II – EVALUATION OF ISSUES UNDER THE STANDARDS

A. Issue 1: WSCUC Compliance

Statement from the Commission Action Letter

The Commission requires the institution to: “Better inform itself about and adhere to WSCUC’s policies, practices, and expectations regarding accreditation as required by WSCUC. (CFR 1.8)”

Evidence Reviewed by the Team

The entire Cogswell Special Visit Report as well as all the exhibits itemized in the report were reviewed as providing evidence of understanding WSCUC’s policies, practices, and expectations regarding accreditation, as were the onsite interviews with individuals and groups throughout the college. In addition, the team noted specific references to actions related to educating the institution regarding WSCUC accreditation in the following:

- Accreditation steering committee agenda (October 2018)
- All-employee meeting presentations (April 2018)
- Community accreditation status updates (March 2018 and March 2019-May 2019)
- Session and poster presentations at ARC (2018 and 2019)
- Board agendas (December 2018, March 2019, and June 2019) and minutes (September 2017 through June 2019)

- The AGB workshop agenda and report (December 2018), which included a focus on the board's responsibilities to WSCUC, an examination of issues presented in the 2017 Special Visit Report, and a discussion of issues noted in the WSCUC Commission letter
- The agenda of the board's governance committee (June 2019), which included sections devoted to further review of WSCUC policies and issues relevant to the Special Visit, as well as plans for further board development

Analysis of Institutional Action Effectiveness

The self-study appeared to reflect authentic engagement with the review process, WSCUC accreditation in general, and with WSCUC's expectations. (CFRs 1.7 and 1.8) The onsite visit and discussion with multiple individuals and groups affirmed that engagement and understanding. The team noted that the campus had effectively used multiple methods to make accreditation goals and aspects clear.

The Cogswell community has spent much time and energy reviewing and understanding WSCUC's Standards, policies, and expectations. While Cogswell has focused on those items associated with the Special Visit, its understanding of WSCUC goes well beyond that scope. Cogswell included consideration of the Standards in almost everything it does. For instance, Cogswell tied CFRs to its inclusive strategic planning (CFR 4.6), which -- while not necessary for a strategic plan -- will help with future WSCUC compliance. Among the most affirming moments in the visit was the testimony of a board member that Cogswell was becoming a "learning institution" and was improving because of that. Moreover, the report itself is much more candid than the previous one and suggests an integrity previously lacking in communication with the team and Commission. (CFRs 1.7 and 1.8) The evidence of changes

and the narrative responded to the Commission's concerns, showing the earnestness with which Cogswell embraced the necessary improvements. In addition, the report suggested and the visit confirmed broad participation in WSCUC training and events. (CFRs 3.3 and 3.6)

While the team found no issues of non-compliance, challenges remain for an institution that is itself in transformation and yet to mature in its full appreciation of accreditation. At times Cogswell's view of some WSCUC expectations still appeared superficial. For instance, a trustee referenced a check that accreditation was believed to place on supporting students financially, and several times during the visit, the team perceived a tension sometimes felt at Cogswell between the necessity of assuring quality and continuous improvement and the imperative to face serious financial exigencies that may require an expeditious approach, such that quality considerations and inclusivity in planning could be questioned or even jettisoned. (CFRs 4.3, 4.4, and 4.6)

The team believes, however, that Cogswell will be able to find a pathway to speed without the sacrifice of quality. In the case of new program development, comprehensive planning was accomplished and approvals secured within three months. The process incorporated iterative review that involved faculty, staff, and the administration. (CFRs 3.7, 3.10, 4.3, and 4.6) This speed and quality was accomplished because Cogswell hired a facilitator for new programs who helped develop a system that can guide further program development. (CFR 3.1) In the area of program review, a quicker iteration is planned without the loss of quality, as the process at the time of the visit was cumbersome and required cycles of review that were too slow to effect changes while keeping pace with the Silicon Valley industries that the programs serve. (CFRs 4.1, 4.3, 4.4, and 4.7) The team believes that Cogswell can advance its processes while keeping quality intact, serving students, positioning the college for success, and complying with WSCUC Standards and expectations.

Findings and Conclusions

In general, the team found Cogswell compliant on all Standards and notes that the institution has embarked on a path of understanding that will mature and help the college both satisfy the requirements of accreditation and the needs that it has to grow enrollment and reputation. The team recognizes the importance of the leadership of the CAO in these efforts. Moreover, it acknowledges the contributions of the many members of the Cogswell community not only to reach understanding and compliance but also to leverage that understanding to improve the college.

For that reason, the team commends Cogswell for its use of the WSCUC process to build transparency and to invest in educational best practices among the institution's constituents, including the board. (CFRs 1.8 and 3.6)

B. Issue 2: Finance and Planning

Statement from the Commission Action Letter

The Commission requires the institution to: "Document current and long-term financial viability and use that evidence in its planning processes. (CFR 3.4)"

Evidence Reviewed by the Team

- Cogswell 2019-2022 Strategic Plan
- Implementation Plan (as part of 2019-2022 Strategic Plan)

- Budget development process documentation
- Budgets
- 2019 FY Forecast as of Aug 2019
- Financial Responsibility Composite Scores and Reports
- Cogswell's Special Visit Report
- KPIs
- Interviews with Cogswell leadership
- WSCUC Annual Financial Report (2016-2018)

Analysis of Institutional Action Effectiveness

Following an Accreditation Review visit March 10-12, 2015, and a Special Visit September 19-21, 2017, the Commission indicated concerns about the institution's current and long-term financial viability and Cogswell's ability to use evidence in its planning process. (CFR 3.4) In particular, the 2017 team stated that "given the strong concerns by the 2015 team, the 2017 Special Visit team expected to receive a more thorough and complete presentation and analysis of the current and future financial picture of the institution." The team acknowledges that Cogswell recognized the urgency in more effectively addressing the Commission's concerns about its financial sustainability. This was demonstrated by the college's efforts to create a strategic plan to focus on financial sustainability and enrollment growth. In interviews with stakeholders at all levels, it was evident to the team that the institution was conducting regular evaluations of its performance on the operational measures that were developed to move towards financial stability. (CFR 1.7)

Cogswell's new strategic plan (2019-2022) emphasized the need to attain financial sustainability and made this one of its primary goals. The plan referenced reducing Cogswell's current deficit

in 2019, achieving break-even levels in 2020, and attaining profitability in 2021. As part of the strategic plan, there were operational measures focused on how to achieve these annual objectives. One of these measures involved the development of an annual budget process. In keeping with the revised strategic plan, the new budget process linked budget targets to enrollments and expenditures. It also provided reporting tools that tracked enrollment outcomes for each term and applied any necessary updates in terms of revenues. The team heard during interviews with staff how this information was shared to all campus stakeholders to ensure broad-level awareness of the budget's link to actual performance. These reports also provided a greater level of detail on expenditures, increasing the ability of managers to incorporate cost controls and to make revisions to the budget plan. While substantial improvements in financial planning and reporting have been made, the team acknowledges that building on these efforts is necessary. Specifically, the team urges continued efforts to develop a budget projection model that integrates with strategic planning, and the team emphasizes the importance of enrollment management. These improvements will provide the institution with a framework to support more effective decision making. The new campus leadership including the CFO has the experience and financial expertise to continue developing a more sophisticated financial planning model. (CFRs 3.4, 3.6, and 3.8)

Financial stability was a primary focus of the Special Visit with a noted concern regarding the continued downward trend in enrollment. The enrollment numbers previously reviewed in 2017 showed a drop in overall enrollment by 8.1% and a 33% decline in new starts as of fall 2017. The institution developed several initiatives aimed at reversing the downward trend in enrollment. Specifically, Cogswell focused effort on increasing new starts. The college transitioned from a traditional two-term academic calendar to a three-term (trimester) model. With that transition, Cogswell added three additional mid-session starts in October 2018. This allowed prospective students to start classes at six different starts throughout the year. The

implementation of mid-session starts provided more flexible time periods for students to enroll at the institution and contributed to some of the new start increases that Cogswell experienced over the past year. The college also implemented several new student-related measures aimed at improving the effectiveness of recruitment efforts. This included the implementation of a new student review process in which admissions advisors and financial aid representatives collaborated to assess the status of each applicant and to identify opportunities to better target support. Additionally, an online new student orientation was introduced. In interviews with the vice president of admissions, this online orientation was established to more successfully integrate new students into the online learning modality prior to matriculation. New students were required to participate in this online orientation before starting an online class. These combined efforts resulted in a 47% increase in new starts.

Cogswell developed several other measures to improve its financial performance. The college embarked on a series of initiatives aimed at increasing tuition revenues by encouraging current students to enroll in more courses. First, Cogswell's transition to the trimester calendar as of fall 2018 resulted in providing three 15-week terms, each offering a full allocation of course offerings, with the expectation that current students would enroll in a higher number of courses throughout the year. To encourage students, Cogswell established a scholarship that rewarded those students who enroll in all three terms and who take 15 units per term. The college also introduced a tuition lock policy that guaranteed the tuition rate would remain the same for any student entering the institution who enrolled in a minimum of 12 credits per trimester and maintained continuous enrollment. Although Cogswell recognizes the need to improve its financial performance as an institutional priority, the team could not find specific evidence of an institutional review process that was used to inform the decision to transition to a trimester model. (CFR 4.1) While the analysis to measure the specific financial impact of some of these

methods was at the formative stage, in August 2019 Cogswell projected a 10% increase in gross revenue over the previous year.

The team recognizes the progress made by the school to increase revenues and the positive developments with new student enrollments. As an institution dependent on tuition, Cogswell experienced the positive impact on gross revenues brought by the enrollment increase; however, the fiscal environment remained challenged. The college continued to experience a shortfall in total students as it was forecasting an 8% decline in total students by the end of the fiscal year. Cogswell recently lowered its projections for new starts in September 2019, forecasting 95 new starts on a budgeted target of 125 and increased projections for annual attrition from 13% to 20%. The institution also had projected a significant increase in expenditures, 13% over the previous year, due mainly to additional staff/faculty hires, higher investment in marketing, and new scholarship offerings. With these additional expenditures and the continued decline of total student enrollment, Cogswell projected a deficit (EBITDA) in 2019.

Findings and Conclusions

At the time of the visit, Cogswell had taken positive steps to address its financial shortcomings and had built momentum towards achieving stability. While progress was made, the institution continued to function with a significant operational deficit. As such, the team remains concerned about the college's ability to restore financial sustainability. Some evidence that might point to growing stability may complicate the picture. In Cogswell's 2019 Special Visit Report, the college made reference to exceeding the acceptable levels of the Financial Responsibility Composite Score as an indicator of financial health. Examination of the Financial Responsibility Report, however, showed a substantial infusion of capital offsetting operational losses. The institution recognized that institutional investor support played a key role in that

offset. The implementation of several initiatives designed to address the financial deficits, however, demonstrated merit and showed positive early results, but more time will be needed to understand fully the long-term impact of these efforts to increase enrollments. This will require the institution to build on its financial planning model so that it can effectively track and analyze enrollment patterns and revenue projections, thus ensuring tangible strides towards sustainability. As noted too, Cogswell projected another year of declining student enrollments. After some early success in new starts in the fall 2018 and spring 2019 terms, the institution was forecasting to miss its summer 2019 new student target. With the institution's volatile enrollment history, continued progress will be necessary to provide more compelling evidence of financial sustainability. (CFR 3.4)

The team recommends that Cogswell find ways to address the shortfalls in enrollment that impact the financial stability of the institution. (CFR 3.4)

The team also recommends that Cogswell effectively integrate a financial planning model that includes a projection process that better aligns with the realities of the institution. (CFR 3.4)

C. Issue 3: Communal Planning

Statement from the Commission Action Letter

The Commission requires the institution to: "...periodically engage... its multiple constituencies, including the governing board, faculty, staff, and others, in institutional reflection and planning processes that are based on the examination of data and evidence. These processes assess the institution's strategic position, articulate priorities, examine the alignment of its purposes, core functions, and resources, and define the future direction of the institution. (CFR 4.6)"

Evidence Reviewed by the Team

- List of strategic planning meetings
- Minutes from board of trustees meeting approving the strategic plan
- Cogswell 2019-2022 Strategic Plan
- Strategic plan update presented at the all-employee meeting on April 24, 2019
- Excerpt from Q1 board book showing WSCUC status updates
- Institutional SWOT analysis
- Interviews during the visit with the vice president of institutional research and quality assurance, the strategic planning committee, the executive committee, the board, faculty, faculty governance organization, staff, and director of new program development

Analysis of Institutional Action Effectiveness

Cogswell is involved in multiple planning processes, such as planning for the Special Visit and strategic, new program, enrollment, and financial planning. Multiple stakeholders performed the environmental scanning that became the basis for the strategic plan and the plan was reviewed and iterated by multiple groups, although according to interviews with the board and Cogswell administrators, the board had no direct input into the strategic planning process. Many action items that came out of the strategic plan, such as the development of new programs and the improvement of enrollment, were likewise subjected to an inclusive method of planning and development. In most cases, this planning involved the use of data. Cogswell's community has engaged in an intentional planning process that is integrative and responsibility-based, particularly through the institution's thoughtful SWOT analysis, which effectively articulates its

landscape. In addition, the team found all institutional stakeholders aligned around the core purpose and identity of Cogswell, which is providing project-based learning in technology and media that prepares students for careers in Silicon Valley and beyond. This alignment has helped to unify the community in approaching its various planning tasks. (CFRs 4.3 and 4.6)

In particular, the team was impressed by the creation of a faculty governance system that was not present during the previous visit. The new system was described to the team by both the faculty senate and the CAO. The senate, a representative body that included both full-time and adjunct faculty members, extended the faculty's presence beyond the advocacy of the college's program heads, who were also involved in Cogswell's planning processes. In its role, the senate served as a conduit for dialogue between the faculty and the executive committee. The CAO was an important participant in this exchange of information. (CFRs 3.7 and 3.10)

The team, however, noted several areas for improvement in the process of ongoing planning. Although Cogswell's Strategic Plan included an evaluation of the institution's performance in meeting its goals through tracking KPIs associated with that plan, the team found that quantitative indicators were not always sufficiently focused on the desired goals and for that reason might not be actionable or effective. The team found a good example of this problem in student success rates that are discussed in the "Issue 4: Graduation Rates" section of this report. (CFRs 4.1 and 4.6)

The team also notes that Cogswell sought to align its resource allocation with its strategic goals and, as described in a meeting with the strategic planning committee, budgets requests, which roll up from each department on campus, refer to the goals of the plan. However, individual interviews with the CFO and subsequent group interviews revealed that the resource allocation process had yet to be fully formalized and documented. The status of this process was

representative of other new processes at Cogswell, such as new program development, which shared a focus on institutional goals and required the participation of multiple constituents. The team observes that the effectiveness of a strategic approach at Cogswell will be predicated on having actionable data, and thus advises the college to hone its institutional learning in resource allocation protocols, performance measures, and tracking. This is particularly important because as an institution struggling towards profitability, the need for effective expenditure will require a close union between finance and planning. To that end, the team encourages Cogswell to establish and convene a budget and resource allocation committee comprised of diverse organizational personnel promoting necessary awareness of data, strategy, and budget. (CFRs 3.7, 4.1, and 4.3)

The team identified factors that may inhibit full community participation in planning. As an instance, the team notes the lack of full vetting in the change from the semester to the trimester system cited earlier in this report as an important innovation for greater revenue production. While the executive committee deliberated briefly on the decision, the team observes that the CEO drove the decision and that the impact on students was never fully researched, in particular its impact on student finances and on internships, which require taking a term off. It appeared to the team from its meeting with the executive committee, as well as in its review of memos surrounding the change, that Cogswell had not fully accounted for the financial needs of its students, many of whom work in order to pay for their education. No one at the college was able to quantify for the team the percentage of students who worked while they attended Cogswell and whether or not the summer was an important time for students to earn money to support their education. Given the large number of Pell and Cal Grant recipients, the presence of an on-campus food pantry, and the reported increase in scholarships for students, the team expected that such information would be readily available. The team believes that Cogswell would benefit from a wider involvement of the community in the planning process as well as a

better understanding of the data needed for analysis and decision making. Moreover, the team regards the lack of data cited to support the initiation of trimesters to have been a symptom of a larger issue around the use of actionable data in decisions. Additionally, in several interviews Cogswell's administrators expressed impatience with processes that, in their view, stood in the way of speedy decision making and implementation. The team, therefore, advises caution about jettisoning communal planning in favor of expediency and instead suggests that procedures and processes be streamlined in ways that preserve core functions and community participation. (CFRs 4.3 and 4.6)

Finally, the team notes that Cogswell's Strategic Plan displays a detailed flowchart of institutional planning processes and the review cycle, complete with a visual representation of "closing the loop" (page 11); however, insufficient time had passed since the plan's inception for Cogswell to be able to demonstrate continuous improvement. The team hopes that the next visit will provide opportunity to examine the success of such iterations.

Findings and Conclusions

At the time of the visit, the planning processes at Cogswell had become multiple and were generally undertaken by the whole community. New organizational structures evolved to support that planning. In addition, the CEO and the director of institutional research and quality assurance track important goal-focused measures at Cogswell. Those measures were reported and reviewed on a weekly, monthly, and quarterly basis by various stake-holding bodies. The team acknowledges this distinct accomplishment. The volume of data produced created an environment well-primed for using data in more focused and effective decision making; moreover, the engagement of the community in planning and improvement, which was enthusiastically undertaken and aligned, offered promise for enabling Cogswell to reach its

goals. For the college to achieve this success, the team urges Cogswell to advance beyond data interpretation toward statistical analysis that adopts inferential methods, analysis that attempts to investigate a stated hypothesis and engages in analytical techniques that demand high-quality evidence and useful data. The team advises Cogswell to explore how and when the use of data analysis instead of data interpretation would benefit the institution's continuous improvement processes. (CFRs 4.1 and 4.2)

The team commends the culture of collaboration that has been fostered among all institutional stakeholders, who share a strong identification with Cogswell's commitment to project-based learning and an education in technology for careers in Silicon Valley and beyond.

The team commends an effective faculty senate that includes adjunct faculty representatives and is actively engaged in decision making and strategic processes. (CFR 3.10)

The team recommends that Cogswell move beyond purely quantitative description in order to inform decision making and long-term planning with the analysis necessary to promote effective action. (CFRs 4.1, 4.2, and 4.6)

D. Issue 4: Graduation Rates

Statement from the Commission Action Letter

The Commission requires the institution to: "Modify [its] graduation rate Key Performance Indicator (KPI) to a performance level that is more ambitious than the current KPI and show movement toward achieving the new goal. (CFR 2.10)"

Evidence Reviewed by the Team

- Retention and graduation rate reports
- Transferred Units Report (reporting transferred credits and number of students who transferred credits since fall 2010 by source college)
- Cogswell's WSCUC Graduation Rate Dashboard (GRD)
- Graduation Rates Comparison Analysis – 2018 (documentation regarding how graduation rate targets were set)
- Cogswell 2019-2022 Strategic Plan
- Interview during the visit with the vice president of institutional research and quality assurance

Analysis of Institutional Action Effectiveness

During the visit, the team learned about the process Cogswell used to set its new graduation rate KPI goals for both four-year and six-year completion rates. Using IPEDS data accessed via the NCES website's reporting tools, the vice president of institutional research and quality assurance created summaries of the graduation rates of peer institutions defined as follows: small for-profit colleges; six institutions offering similar degrees in the types of majors offered at Cogswell; and general categories of institutions, such as private for-profit, public, and private nonprofit. The CAO and the vice president of institutional research and quality assurance worked with academic departments, the dean of students, the dean of education, faculty representatives, and the director of career services to review the data to establish more ambitious graduation rate KPIs as part of the strategic planning process. The group considered the profile of Cogswell's current students as well as the current graduation rates per academic

program, which ranged between 20% and 30%. In light of the short-term nature of the strategic plan's goals (from 2019 through 2022), discussion between the administration and the program directors determined that an initial year-one goal of 35% for the four-year graduate rate would be sufficiently ambitious. The initial six-year rate goal was set at 55%. (CFR 4.1)

The team appreciates the collaborative nature of this rate-setting effort at Cogswell, highlights its effective use of peer comparison data tools as part of the process, and notes that the rate was set at a higher level than the institution's expectations at the time of the last visit. The team also observes that the KPI target was set using a peer comparison of fall full-time first-time entering student graduation rates; however, as the KPI of Cogswell's Strategic Plan, this target rate was intended for comparison to the performance of an all-student full-year cohort that combined both full-time first-time students and transfers. Transfer students entered Cogswell bringing in, on average, 25 units from their prior studies, which amounts to slightly more than what the Cogswell GRD indicated as the average institutional units completed per student in one year: 21 (five-year average). As stated earlier in the team report, Cogswell's entering cohorts were small, and the transfer population accounted for approximately 40% of some full-year entering cohorts. The team finds the target-setting activity to have been at odds with how the targets were used as KPIs, given the lack of an "apples-to-apples" comparison. A full-year entering cohort of full-time first-time students might be appropriately assessed against the target without strain; however, adding transfer students to the cohort, students who clearly come with a somewhat advanced standing to Cogswell, would introduce noise in a graduation rate analysis. (CFRs 2.10 and 4.1)

Further, when the team asked for the basis of the year-to-year increases in the targets that were set, the explanation was that the most attention was paid to the graduation rate targets for the first year of the strategic plan and the last year of the strategic plan, and the difference was split

to set the second-year rate. Given the acceleration of the targets over this period of time, the team suggests an analysis of retention rates for the cohorts who would be completing on this timeline. For example, a very small number of students may ultimately determine whether the goals are met, and these students may or may not be approaching their fourth year of study on schedule, given the retention statistics for their entering cohort. The team advises Cogswell to remain ambitious in the graduation rate targets it sets, but to take into account the brief time interval during which the institution aspires toward increasing its graduation rates and to include a feasibility analysis in all rate-setting exercises. The team was told that Cogswell intended to revisit the rate targets annually, which the team views as an opportunity for thoughtful consideration of the college's student success goals and a statistical analysis to support continued improvement. Further, the recent increases seen in the representation of non-traditional students among those entering Cogswell should be considered in such an analysis. (CFRs 2.10 and 4.2)

The team found that WSCUC's Graduation Rate Dashboard (GRD) is not used widely at Cogswell as a tool to understand student success, which is a critical component of the college's enrollment strategy. The institutional research staff has presented the GRD to Cogswell's assessment committee and to the institution's management, by explaining its statistics and use cases. At the team's request, the vice president of institutional research and quality assurance provided an insightful explanation of the impact of recent enrollment trends and cohort sizes on the measures calculated by the GRD. The team encourages the proposal of Cogswell's institutional research leadership to create versions of the GRD specific to academic programs, in an effort to provide academic directors with the dashboard's perspective on student completion. With so many students entering Cogswell throughout the year and with the substantial transfer population Cogswell serves, the team recognizes the potential value that the

GRD could offer Cogswell as it responds to the needs of its undergraduates. (CFRs 2.10 and 4.2)

Findings and Conclusions

The team finds that Cogswell set more ambitious graduation rate KPI targets and demonstrated an increase in graduation rates, according to full-year cohort reporting made available at the visit. These full-year rates, however, showed improvement only when both full-time first-time students and transfer students were combined into a single group for reporting, and only for the six-year rate (47% to 51%). The four-year rate trend line was close to flat at 34%. The full-time first-time student four-year rate declined from 25% (2013-14 cohort) to 20% (2015-16 cohort), while the transfer four-year rate increased during the same time frame (43% to 58%). The six-year rates for the full-time first-time and transfer cohorts from 2013-14 were more comparable (53% and 49%, respectively). The team appreciates that graduation rates can differ from year to year because of what may be only slight changes in the number of completing students when cohorts are as small as those at Cogswell; however, the largest defined subpopulation at Cogswell – entering full-time first-time students – demonstrated the lowest four-year graduation rate.

After reviewing these graduation rate performance gaps, the team urges Cogswell to set separate graduation rate targets for full-time first-time students and transfers, and further, to set meaningful targets for other defined groups such as non-traditional students or students from underrepresented races/ethnicities. Disaggregated graduation rates were already calculated for many of these categories at Cogswell; however, setting separate target rates would focus attention more clearly on each group's unique needs, and would enable more sophisticated approaches to improving student success. (CFR 2.10)

The team recommends that Cogswell set separate retention and graduation rate targets for disaggregated student groups. (CFR 2.10)

D. Issue 5: Organization

Statement from the Commission Action Letter

The Commission requires that: “The board of trustees specify the leadership organization of the institution and delineate the relationship among the positions of the President/CAO, COO/CFO, and CEO in a manner that complies with the requirements of WSCUC, and demonstrate that the resulting organizational structure can work effectively. (CFRs 3.6, 3.8, and 3.10)”

Evidence Reviewed by the Team

- Organization chart
- Minutes from the board of trustees meetings (September 2017 through June 2019)
- Meetings during the visit with faculty, staff, and administrators
- Employee satisfaction survey (Noel Levitz) results

Analysis of Institutional Action Effectiveness

In January of 2018, Cogswell hired a President/CAO and then-serving CEO/CFO retreated to the position of CFO. This new hire was made under the stipulation – agreed to by both the board and the individual – that the CEO responsibilities would be included in the position only on an interim basis; when a permanent CEO was found, this individual's sole responsibility

would be CAO/Provost. Accordingly, when the new CEO was hired in June 2018, the former CEO/CAO vacated the Presidency and retreated to the CAO/Provost position (although the board did not formally approve this change until March 2019). With a single individual no longer serving as both CEO and CFO (or CEO and CAO), Cogswell's compliance issue with CFR 3.8 was resolved.

Additional noteworthy changes in Cogswell's administration since the 2017 Special Visit include: a new chief compliance officer (June 2018), a new vice president of admissions (September 2018), a new CFO (October 2018), a new vice president of marketing (January 2019), and a new vice president of human resources (May 2019). Several other personnel turnovers accompanied these new hires.

The large number of changes in Cogswell's management, which all took place over a brief period of time, could have created a toxic environment ripe for spawning turf wars and the erection of impenetrable silos. In general, evidence reviewed by the team suggests this did not occur. In discussions with various administrators, Cogswell's environment at the time of the visit was described as collegial and characterized by transparency, trust, and a commitment to a common purpose. Faculty remarked on noticeable improvements that resulted from separating the functions of the CEO, the CFO, and the CAO. Staff generally echoed these feelings; however, some staff responses to the 2019 administration of the Noel Levitz employee satisfaction survey point to continuing tension, or outright conflict, between departments. A few comments suggest that some employees perceived a decline in the work environment since the administrative turnover. Clearly, there was a need for Cogswell to further explore the factors that generate these perceptions and remediate the causes of employee dissatisfaction. The HR office was taking the lead in this effort.

Findings and Conclusions

At the time of the 2017 visit, a single individual served in the dual roles of CEO and CFO, in clear non-compliance with CFR 3.8. At the time of the visit, Cogswell had one individual serving as CEO, a different individual serving as CFO, and a third individual serving as CAO. This change was accompanied by a complete turnover of other high-level administrators. The current administration was in place for only a short period of time, but most of the early indicators suggested that the members functioned effectively together and regarded themselves as members of a team with a common goal.

Accordingly, the team commends Cogswell for assembling a group of engaged and experienced leaders who were committed to the success of students and the institution, and who willingly collaborated to foster that success. (CFR 3.6)

The organizational structure at the time of the visit resulted in practices that were more inclusive than those in place during the 2017 Special Visit; however, an essential voice notably absent in dialogue with the leadership of the institution was that of the students. No student leadership group was identified as participating in the strategic planning process, and the team's meeting with current students confirmed their engagement with Cogswell, their dedication to the education they were receiving, and the value of their potential contributions to the college with their voices.

The team recommends that Cogswell develop a vehicle for ensuring that students have the opportunity to participate in institutional decision making. (CFRs 2.10, 3.7, and 4.5)

F. Issue 6: Board Development

Statement from the Commission Action Letter

The Commission requires the institution to: “Engage in board development using outside help such as that provided by the Association of Governing Boards (AGB), to foster a clear understanding of the board role in a higher education organization and to assist the Cogswell board in understanding the role of accreditation in promoting the effectiveness and sustainability of the institution. (CFR 3.9)”

Evidence Reviewed by the Team

- MacTaggart (AGB) report/survey summary
- Board agendas (December 2018, March 2019, and June 2019) and minutes (September 2017 through June 2019)
- The agenda of the board’s governance committee (June 2019)
- Emails between the board chair and the CEO
- Interview during the visit with the board chair (individually and with the other trustees)
- Interview with the board of trustees

Analysis of Institutional Action Effectiveness

Following the 2017 meeting, Cogswell joined AGB. This resulted in AGB publications being sent to “several selected trustees and staff.” It is expected that, eventually, all board members will receive these publications. Additionally, a senior member of AGB facilitated a one-day development workshop for the board. A pre-workshop survey generated responses from 10 of

the 11 trustees, while nine trustees attended the workshop itself. The CEO also completed the survey and attended the workshop. These high participation rates point to recognition, among the trustees and the CEO, of the importance of developing the board. (CFR 3.9)

The workshop itself lasted several hours. The attendees engaged in discussions concerning the general characteristics of effective boards, as well as best practices. The WSCUC Commission findings, and their relevance to the board, were also discussed. Another topic was the role that committees could play in governance. This latter topic may have resonated with the board, as post-workshop board meetings appear to have made greater use of the board's committees, some of which were newly formed. In addition to a finance committee, the board has set up and activated both a governance committee and an academic affairs committee, and the board plans to set up and activate an audit committee, which would provide the four committees that the board indicated were recommended by WSCUC.

Beyond the creation of the new committees, it was difficult to gauge how the workshop, or how joining AGB, influenced the board's functioning; however, one clear operating characteristic of the current board was that the trustees showed great confidence in the current CEO. The board had hired the CEOs immediately prior to current one primarily for expedience, and during the visit, the team heard that the board considered them capable but not ideal matches for the institution. By contrast, the current CEO was seen as expert in higher educational matters and as sharing in the board's vision for Cogswell's mission and future development. Accordingly, members of the board trusted the current CEO and felt empowered to assist the CEO in developing and implementing his aspirational goals. From interviews with the chair and the CEO, as well as from their email correspondence that accompanied the Special Visit Report, it appeared that the chair participated in frank exchanges with the CEO in addition to the weekly

phone calls between them. One area still missing, but planned, was a periodic evaluation of the CEO that the team believes should be connected to the college's strategic goals.

As noted earlier, the trustees were not directly involved in shaping the strategic plan; however, they were kept apprised of its development by the CEO and voted to approve the plan. In addition, the board was indirectly involved in developing a new mission statement for the college. They provided feedback on the statement and approved a final version. Common agenda items for board meetings were reviews of institutional data (particularly enrollment and retention rates) and reviews of financial records. Overall, for the past two years, the board was involved more extensively in overseeing the institution's regular operations, rather than in exploring long-term goals and proposing or facilitating the development of innovative initiatives.

The team notes the impressive credentials of the trustees, consistent with the areas that the college serves, and the trustees' great enthusiasm for and engagement with the college. It should also be noted, however, that the board's membership did not reflect the diversity of the Cogswell student population. Diversity can be assessed in a variety of ways, but in high-technology industries there is concern regarding disproportionate participation of females in particular. The board similarly lacked a female trustee. Accordingly, the team advises the board to consider taking steps to incorporate female representation among its trustees.

Findings and Conclusions

The board appeared at the time of the visit to be functioning more effectively than was the case during the 2017 Special Visit. The trustees demonstrated a better understanding of both the accreditation process and their role in assuring that Cogswell students received a quality

education that meets the needs of employers in Silicon Valley and digital technology industries generally. In short, Cogswell complied with CFR 3.9.

All of the trustees shared a history of working in a fast-changing environment and justifiably prided themselves in recognizing and adapting quickly to changes in the technology landscape. The team believes that the professional knowledge and networks of the board could be used to a greater extent in two ways: in helping identify areas for new program development and in making direct connections between the college and potential industry partners. The development of the academic affairs committee is promising in the former area; however, in the latter area, the team sees no appropriate mechanism to leverage the board's capacity to help. The team encourages Cogswell's administrators and the board to explore opportunities for board members to help build stronger links between the college and industry and to foster more robust career pipelines for students.

G. Issue 7: Student Services and Faculty Collaboration

Statement from the Commission Action Letter

The Commission requires the institution to: "Continue to strengthen collaboration among student services, including career services, and faculty who prepare students for employment and who offer the best link to industry, in order to assure enhancement of the students' experience and to aid in the institution's efforts to improve retention, graduation, and placement rates (CFRs 2.10, 2.11, and 2.13)"

Evidence Reviewed by the Team

- Student Satisfaction Survey
- Cogswell Retention Report, Fall Entering Cohorts
- KPIs
- Examples of Collaboration Efforts between Career Services, Student Services, and Faculty (document)
- Interviews with career services, academic advisors, department directors, and faculty
- Additional onsite documents (e.g., Bottleneck Courses report, Retention Task Force report).

Analysis of Institutional Action Effectiveness

The 2017 team recognized efforts by the institution to offer career counseling services and noted that evidence was given regarding the extent to which graduates were employed. Cogswell provided data that showed an increase in the employment of graduates; however, there was no evidence that career services data was used to better align efforts with academics to improve student retention. (CFR 2.10)

Cogswell made organizational changes that resulted in career services and student services reporting to the new CAO. This change was instrumental in strengthening the collaboration among faculty, career services, and academic and student service advisement. Further, it integrated career services with academics and resulted in better communication in the form of on-going intra-departmental meetings, trainings, and events. In interviews with academic advisors, the team heard them reference how working more collaboratively with faculty to better

identify students who were experiencing challenges allowed them to gain efficiency in targeting support. One example of this targeted support was demonstrated in the efforts made by faculty and support staff to identify courses that acted as bottlenecks to student retention. Faculty provided advisors with a deeper understanding of those courses that yielded lower student performance and gave them access to content that could lead to improved achievement. These efforts directly supported student navigation of these low success courses and increased persistence.

Career services and faculty worked together to develop industry partnerships that not only increased student employment opportunities but also allowed faculty to better align the curriculum to industry standards. Faculty, who in many cases worked in the field in which they taught and whose programs were influenced by professional advisory councils, consulted with the career service advisors to improve their understanding of the job market. Cogswell also shared that this change allowed for closer interaction between faculty and students. Support for individual career counseling came through faculty assistance with career readiness workshops, mock interviews, and resume evaluations. Faculty were particularly instrumental as a key resource that engaged students in professional development and helped them understand how such growth aligned with their academic program. (CFR 2.11)

Findings and Conclusions

Cogswell reorganized career and student services by placing them under the supervision of the CAO. This shift integrated career and student services with academics to strengthen collaboration and to better align institutional efforts to improve student learning and success. This holistic approach to student success and learning was demonstrated by the partnerships between academic and student affairs in the development of a retention task force.

While still at a formative stage at the time of the visit, this task force was focused on increasing student retention and graduation rates, and the team could see that the task force's early results suggested it would benefit from leveraging Cogswell's institutional research function to develop initiatives that more directly address the factors that lead to student attrition. (CFRs 2.10 and 4.2)

The team commends Cogswell's authentic focus on student learning, degree completion, and career placement that has been made tangible through actions taken to bridge student services and faculty.

H. Issue 8: Distance Education

Statement from the Commission Action Letter

"The Commission concurs with the institution's decision not to offer previously planned distance education degrees. Although previously approved, these distance education degrees are to be resubmitted to the WSCUC Substantive Change Committee prior to offering, should this decision be reconsidered. (CFRs 2.1, 2.10, 2.13, 3.2, 3.4, and 3.5)"

Evidence Reviewed by the Team

- Cogswell's Special Visit Report narrative
- Curriculum vitae for and interviews with instructional designer and director of new program development
- Online Teaching Best Practices document

- Materials prepared to assist faculty in their development of online courses, including learning management system modules and the faculty “portal”
- Rubric for Online Course Evaluation
- Student Assessment for Online Success tool
- Student orientation online materials
- Proposal for the online Master of Science in Management and Leadership in Creative Technologies
- Grade distribution listed by modality
- Interviews with those who approve new programs: faculty senate and program chairs

Analysis of Institutional Action Effectiveness

In its 2019 Special Visit Report, the college averred that it had not introduced online education programs without submitting proposals for the approval of WSCUC’s Substantive Change process. This was reiterated by the CAO and CEO and confirmed by the team; however, the report and evidence, including the strategic plan, made clear that Cogswell intended to develop online programs and increase its capacity to deliver those nationally. In this regard, Cogswell had, as the report noted and the visit confirmed, augmented its capacity to make such expansion possible. The team identified the following additional resources implemented toward this end: online student orientation materials; new courses (not programs) offered online, including a selection of foundational courses, such as composition; and two new staff positions charged with spearheading initiatives aligned with the institution’s strategic plan regarding online education. In particular, the newly appointed instructional designer and new program development leader were timely hires, positioned alongside Cogswell’s curriculum development

staff to promote the institution's effort to tailor academic offerings to the needs of Silicon Valley and industry leaders. (CFRs 3.1 and 3.3)

As noted, the institution's decision to hire leadership in new program development suggested a methodical preparation for developing online programs, one of which the institution had advanced through internal approval processes at the time of the visit. Further, additional training was developed for faculty moving their on-the-ground courses into the online modality. Materials related to the development and teaching of online courses incorporated suggestions of the previous visiting team for following best practices. The team regards these efforts as an appropriate foundation for the development of online degree programs that will further the institution's success in this instructional delivery space. (CFRs 2.1, 3.1, and 3.3) The team observes that the new online master's program (Master of Science in Management and Leadership in Creative Technologies) that was being prepared for submission to the WSCUC Substantive Change process made use of these resources. The team, however, notes that challenges for Cogswell to develop effective undergraduate online programs may still exist. Comparing the current DFW rates for Cogswell's online foundational classes to their on-ground counterparts, the team learned that student success was generally lower online. While that should not be a concern for the cohort-driven master's program that Cogswell intended to propose, the team believes this course data could suggest a challenge for the success of online undergraduate programs should Cogswell add those in the future. The team advises Cogswell to address this challenge through understanding its students to a greater extent than it did at the time of the visit. The work of the retention task force may help. (CFRs 2.10 and 2.13)

Findings and Conclusions

The team offers a few suggestions to assist Cogswell as it frames its next steps. Appreciating the value of the materials shared during the visit, the team advises Cogswell to persist and to advance the instructional development opportunities for faculty that have recently been implemented in the learning management system and on the institution's website (the "portal"). The team further suggests that the online orientation and materials created to assess students' readiness for pursuing distance education be evaluated for their success and undergo appropriate continuous development cycles of review and improvement. In addition, the team advises caution in proposing programs that move away from Cogswell's mission or that stray from project-based learning, which the board, administration, and faculty all described as Cogswell's greatest strategic asset and marketable advantage.

SECTION III – OTHER TOPICS, AS APPROPRIATE

The team found no other topics requiring discussion in this report.

SECTION IV – COMMENDATIONS AND RECOMMENDATIONS

Commendations

The team commends Cogswell's:

- Use of the WSCUC process to build transparency and to invest in educational best practices among the institution's constituents, including the board

- Culture of collaboration that has been fostered among all institutional stakeholders, who share a strong identification with Cogswell's commitment to project-based learning and an education in technology for careers in Silicon Valley and beyond
- Effective faculty senate, which includes adjunct faculty representatives and is actively engaged in decision making and strategic processes
- Having assembled a group of engaged and experienced leaders who are committed to the success of students and the institution and who collaborate to foster that success
- Authentic focus on student learning, degree completion, and career placement that has been made tangible through actions taken to bridge student services and faculty

Recommendations

The team recommends that Cogswell:

- Find ways to address the shortfalls in enrollment that impact the financial stability of the institution. (CFR 3.4)
- Effectively integrate a financial planning model that includes a projection process that better aligns with the realities of the institution. (CFR 3.4)
- Move beyond purely quantitative description in order to inform decision making and long-term planning with the analysis necessary to promote effective action. (CFRs 4.1, 4.2, and 4.6)
- Set separate retention and graduation rate targets for disaggregated student groups. (CFR 2.10)
- Develop a vehicle for ensuring that students have the opportunity to participate in institutional decision making. (CFRs 2.10, 3.7, and 4.5)

APPENDICES

No appendices are applicable.