

REPORT OF THE VISITING TEAM  
WASC Senior College and University Commission  
SEEKING ACCREDITATION VISIT 2  
For Institutions Seeking Initial Accreditation  
**To Pathways College, Inc.**  
March 24-25, 2020

Team Roster

Craig Swenson, Chair  
President and CEO, Ashford University

Ruth Heinrichs, Assistant Chair  
Institutional Effectiveness Consultant

Susan Collins  
Vice President for Finance and Administration, Saint Mary's College of California

Bree Cook  
Vice President, Academic Affairs, Pacific Oaks College

Margaret Martyn  
Campus Dean, The Chicago School of Professional Psychology

Tamela Hawley, WSCUC Staff Liaison  
Vice President, WASC Senior College and University Commission

The team evaluated the institution under the WASC Senior College and University Commission (WSCUC) Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the 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. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that results in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be made available to the public by publication on the WSCUC website.

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## **SECTION 1 – OVERVIEW AND CONTEXT**

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

Pathways College, Inc. (Pathways) is a small, nonprofit college based in Pasadena, California that offers all instruction via online modality. The institution was established in 2015 by Mr. John Hall, the founder of a group of Los Angeles-area charter schools. Pathways is focused on providing low-cost, accessible bachelor's degrees to non-traditional students who, for reasons of accessibility and cost, are less likely to attend a more traditional post-secondary institution. Pathways enrolled its first cohort in January 2017 and is anticipating graduating its first class in 2020.

Pathways applied to WASC Senior College and University Commission (WSCUC) for Eligibility in June 2017 and in September 2017 Eligibility was granted through August 2022. The first Seeking Accreditation Visit (SAV1) took place in spring 2019. Following the SAV1 visit, the WSCUC found that Pathways had complied with Standard 1 at a level sufficient for Initial Accreditation, Standards 2 and 4 were considered sufficient for Candidacy. However, the commission concluded that Pathways had not demonstrated compliance with Standard 3 at a level sufficient for either candidacy or initial accreditation. In a letter dated July 12, 2019 WSCUC scheduled a second visit Seeking Accreditation Visit (SAV2) for fall 2020; upon further correspondence the visit was moved to spring 2020.

The SAV2 team received the report from Pathways in January 2020. The team conducted a pre-visit conference call. Due to the novel coronavirus (COVID-19) pandemic, all subsequent team and site visit meetings were conducted via video or telephone conferences.

The initial team meeting on March 23, 2020 involved a review of the schedule, to confirm the writing assignments and to ensure that all requested documents were available for

review. The institutional interviews or meetings were hosted by Pathways using the video conferencing tool GoToMeeting. Pathways arranged that their staff, faculty, students, and members of the Board of Directors were available for these meetings. The team met at the end of each day of the visit using a virtual platform hosted by WSCUC. These meetings provided the team members an opportunity to reflect on the meetings, discuss findings, and determine the institution's level of compliance with WSCUC standards using the WSCUC "Compliance with the Standards Checklist."

### **The Institution's Seeking Accreditation Visit Report: Quality and rigor of the Review and Report**

Prior to the March 2020 visit, the team reviewed Pathways' self-study and found that Pathways had organized their report around the CFRs. The report was well-written, clear, and well organized. The report included narrative and documentary evidence relating to the institution's compliance with WSCUC Standards, primarily related to those which were previously found insufficient to warrant Initial Accreditation. It appeared to have encouraged broad participation of the faculty, staff, administration, and members of the Board of Directors.

During the visit, the team met or spoke with members of the management team, admissions staff, Board of Directors, faculty, and students. The team found Pathways' staff to be aware of and committed to the college's mission. Their level of enthusiasm for Pathways was mirrored by the students, who were appreciative of the opportunity to speak with the team.

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

### **A. Standard 2 - Achieving Educational Objectives Through Core Functions**

1. Teaching and Learning CFRs 2.1, 2.2, 2.2a, 2.3, 2.6, 2.7

Since the SAV1 visit the team found evidence that Pathways has made significant progress in their teaching and learning processes and achieving educational outcomes. In the July 12, 2019 letter WSCUC indicated that Pathways had not fully developed their upper division courses. Since that time, Pathways has fully developed their upper division courses in both the BA in Business Administration and BA in Liberal Studies programs, which reflects programs appropriate in content, standards and degree level and levels of achievement for graduation and processes to ensure meaning, quality and integrity of degrees (CFRs 2.1, 2.2). Courses now have high level learning outcomes that are clearly outlined and linked to assignments in each course. Capstone courses integrate the feedback from the Business Program Advisory Board (Advisory Board) and reflect what graduates will need to be able to know and do upon graduation. The Learning Outcome Manager in Canvas, the Learning Management System (LMS), allows faculty members to complete assessment rubrics separate from grading assignments for the course and to capture the learning outcomes of each student. The Canvas Learning Outcomes Manager is used by all faculty who were actively involved in setting the Student Learning Outcomes (SLOs). Faculty representatives have also worked directly with the Manager of Assessment and Accreditation and the Instructional Designer-Online Advocate (Instructional Designer) on implementation. Pathways is to be commended for using best practices for online learning with faculty leading the charge in developing detailed course outlines which include an assessment map for course/student learning outcomes and core competencies.

The WSCUC July 12, 2019 action letter also indicated the lack of mature assessment or program reviews and that the Pathways had not yet included benchmarking or external review. When the Advisory Board met in the fall of 2019, they suggested capstone projects for both the BA in Business and the BA in Liberal Studies programs. The faculty then had the opportunity to

review those suggestions and adapt them with their academic expertise. Faculty has clearly been responsible for the development of curriculum and establishing clear learning outcomes, programs, policies, and advising as required. In addition, the Pathways team found that data collected, using the student learning outcome manager and the program review results, informed them that students needed more writing support. These data led to the creation of the student Writing Center (CFR 2.3).

Students who met with the visiting team were positive about their experience and are clearly engaged. The previous WSCUC action letter had indicated a need for improved faculty and student communication. Students had indicated a desire for increased engagement with faculty. That feedback led to the development of the Communication Plan which now provides policy and practice for interaction and communication with all internal and external stakeholders. Faculty and students now report that communication between faculty and students has seen improvement and that administration has improved their communication on the achievement of their strategic goals. The additional resources in the Writing Center clearly address the need for writing support as well. Students indicated that they are now able to receive concrete and consistent feedback on their writing.

It is commendable that Pathways has created a detailed workflow to document the procedure for processing student inquiries and taking prospective students through the admissions and enrollment process (CFR 2.5).

All co-curricular units have completed an annual report as part of the College's Institutional Effectiveness Plan as outlined in the updated March 2, 2020 Annual Report. The Library Services Annual Report, dated March 11, 2020, specifies a large number of resources and electronic databases available to students. However, the report indicated that the overall use

of academic databases is low. The Instructional Designer reported that faculty have already begun implementing the goal of using library databases in completion of course assignments as a way to address this issue.

The BA in Business Administration program review was extensive and covered all areas of student learning and spoke consistently achieving learning outcomes (CFR 2.6). In the Program Review faculty discussed how teaching pedagogies have evolved based on student feedback in course evaluations. One suggestion was to implement mandatory synchronous meetings every week in every course. However, after implementation, this policy was adapted and synchronous meetings were required based on the needs of specific courses (CFR 2.7). The Advisory Board is a key external group that provides input on learning outcomes and capstone projects which reflect what graduates will know and be able to do. It is commendable that Pathways has implemented a program review process and have completed the review for the BA in Business. The review provided data that have led to program improvements and that have informed faculty decision making. Further program reviews are scheduled and should be completed within a year.

The Chief Academic Officer (CAO) has developed a detailed Faculty Development Policy and Plan which provides additional professional development for faculty (CFR 2.8). The new peer review system requires that a faculty member observe another faculty member's course and then to provide feedback that may assist that colleague in future courses. The CAO also reviews this feedback to ensure quality teaching and learning. The Instructional Designer also monitors each course weekly to provide feedback to instructors as well to review student progress. An upcoming faculty workshop will review the communication and notification capabilities in Canvas to ensure greater communication between faculty and students. Four

workshops are offered a year, two in the fall and two in the spring. Data from the peer review system are also used to provide information on training needed by the faculty as a whole. Several faculty members noted that the peer review system is working well and the feedback provided has impacted their teaching in a positive way. A new Memo of Understanding (MOU) with Claremont Lincoln University provides a 10% cash discount for faculty, staff, and Pathway College graduates to attend Claremont Lincoln University to receive additional professional development and training.

2. Scholarship and Creative Activity CFR 2.9

The Faculty development policy provides an incentive form/compensation protocol for faculty to participate in various assessment and in-service development. The faculty development plan is a detailed three year plan that outlines requirements for participation in in-service workshops, service to the community, professional development in their discipline as well in the scholarship of teaching and learning (CFR 2.9).

3. Student Learning and Success CFRs 2.10, 2.13

Students provide feedback via course evaluations for every class. Both the faculty and the CAO review all of the course evaluations. Based on student feedback, and the desire to be able to improve classes during the semester, the evaluations were moved from week seven to week four (CFR 2.10). The Institutional Effectiveness Office (IEO) Annual Report, updated on March 2, 2020, addresses student learning and success but it is clear that the priority of IEO has been to achieve accreditation and that the Manager of Assessment and Accreditation will address more of the research and review of aggregate data functions as a second priority once accreditation is achieved.

Based on the program review for the BA of Business Administration, a new Writing Center was designed implemented to support students (CFR 2.13). Tutoring has been offered but has not been utilized by students. A faculty member for the English Department who is overseeing the Writing Center is also investigating ways to update tutoring resources that would better fit students' needs. A new class was developed to onboard students to online learning, library resources, tutoring and advising services and to be fully aware of all resources as they first entered the College.

The Instructional Designer serves as a direct support to students and reaches out to each student individually on a bi-weekly basis. This individual also has access to the LMS and is able to watch student progress in each course. The faculty provide discipline specific and career advising to students.

#### Standard 2 Summary

Pathways has focused its attention on meeting the CFRs of Standard 2. The combined efforts of the administration, staff, and faculty were evident in the response to the data which was gathered through the online survey and through assessment processes. The program review has been completed for the BA in Business Administration and as a result the Writing Center and the Communication Plan were developed. Even though Pathways has not yet had a graduating class, the SAV2 team finds that Pathways meets Standard 2 at a level sufficient for Initial Accreditation. Only the WSCUC is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

#### **B. Standard 3 - Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability**

1. Faculty and Staff CFRs 3.1, 3.2, 3.3

The faculty is comprised of 17 part-time faculty members. Of these three to five faculty are teaching during any one term. The faculty members have opportunities to perform additional assignments for stipends, including course design, serve on committees, etc. (CFR 3.1). In the visiting team meeting a diverse group of faculty, with experience teaching at several institutions, spoke of the support they received from the Instructional Designer as well as support from other faculty through the peer review process. The CAO has developed an extensive faculty development plan that maps out a faculty's growth over three years (CFR 3.2). The plan documents attendance at in-service workshops, feedback on student evaluations, feedback from peer review, participation in professional development in both their discipline and scholarship of teaching, extra assignments such as course development, service on committees, and service in the faculty senate. Pathways has created a Faculty Senate to ensure that the voice of the faculty is reflected in institutional governance and faculty coherence despite faculty being hired on a per course basis. As the student population increases, the college plans to hire a full-time faculty. The faculty will oversee the management of programs in the future.

There was evidence that staff attended professional conferences including WSCUC sponsored conferences. While the part-time faculty are committed, the team recommends hiring a full-time faculty member to own the curriculum, its assessment and continual improvement and to ensure continuity for the students (CFR 3.10), which was recommended by the SAV1 team.

## 2. Fiscal, Physical, and Information Resources CFR 3.4

Fulfilling the mission of the college will require financial stability and independence. Currently the college balance sheet shows negative net assets. To continue its operations in a fiscally responsible way Pathways has implemented two strategies. The first is to ensure cash flow by drawing against a loan from a non-profit entity in which the founder/president of

Pathways participates. The financial plan provides for the repayment of the loan from future revenues for the next several years. This will make it more challenging for the college to accumulate positive net assets in the near future. While the founder/president communicated a personal commitment to supporting the long-term financial stability necessary to cover operating expenses, the team recommends that the college's capital structure and capacity become an active point of discussion between the founder and the Board of Directors in order to ensure that there is clarity in documenting how that ongoing sustainable support will be ensured as Pathways pursues its mission (CFR 3.4).

A second strategy involves diversification of the college's revenue stream, as recommended in the SAV1 report. One means by which expanding the source of operating revenues is occurring is through offering certificate programs. These programs will be expanded over the next year and should generate positive net revenue for the college. The college has made progress on planning for its financial future, establishing the certificate programs as well as continuing its degree program. While these strategies are laudable, the SAV2 team recommends that Pathways would also benefit from establishing institutional advancement efforts that could help fund and support the unique mission of Pathways (CFR 3.4).

Since the SAV1 visit, the college has increased its focus on the marketing area by engaging consultants to assist with internet/social media marketing. The implementation of new marketing strategies has begun. A new student information system, Campus Café, has been implemented to track students from inquiry through enrollment. The college has also established a detailed flowchart for the admissions process. As part of its strategic planning process the team recommends that Pathways prepare a more comprehensive marketing and enrollment management plan that is integrated with the operations and financial plan (CFRs 3.4, 3.7).

### 3. Organizational Structure and Decision-Making Processes CFR's 3.6, 3.7, 3.8 , 3.10

In October 2019 a new Chief Executive Officer/Chief Academic Officer (CEO/CAO) was appointed. This individual was uniquely positioned for Pathways with experience in both higher education teaching and administration as well as student assessment. With the current size of Pathways the college leadership believes that it will be difficult to separate these functions until a student body of 250 students is achieved. However, the SAV2 team recommends the separation of the CEO and CAO function to ensure the effective continued operation of the college (CFR 3.8).

At the time of the SAV1 visit the position of Chief Financial Officer (CFO) was vacant. The role of CFO subsequently has been assumed by an employee of the shared services firm that provides administrative support for the college. This individual is an experienced CPA and is qualified to serve as the CFO. The current model employed is adequate for the financial oversight of the college (CFR 3.8).

Through senate representation, faculty meetings, and as additionally requested by administration, members of the part-time faculty are available to provide academic oversight of the quality of curriculum and instruction. These faculty members are employed while teaching their classes but some are not active every semester. While the dedication of these faculty is evident, the team recommends that the college employ a full-time faculty member to assure consistent faculty oversight of issues related to academic program quality and the consistency of instruction (CFR 3.10).

### Standard 3 Summary

The team finds Pathways compliant with CFR's 3.1, 3.2, 3.3 and 3.6 sufficient for initial accreditation. The team was impressed with the efforts of Pathways to show evidence of compliance with the WSCUC Standards of Accreditation, the team observes, as mentioned in a previous section, that the institution continues to operate at a deficit. The team recommended that, in order to assure long-term financial sustainability, the current financial structure of the institution to ensure financial stability, merits review. Funding of operating deficits is currently supported by Pathways' ability to draw against a loan from an entity related to the founder/president. If granted candidacy, and is approved by the U.S. Department of Education, Pathways' students will have the ability to seek Title IV grants and loans. Based on this, the team has judged that Pathways is compliant at a level sufficient for candidacy with CFRs 3.4, 3.7, 3.8 and 3.10. However, the founder/president, CEO, and Board of Directors should review the capital structure of Pathways in order to document the means by which its Board of Directors can remain confident in its ability to continue to meet its obligations and be a sustainable entity capable of continuing to meet the WSCUC Standards of Accreditation.

Only WSCUC is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

### **C. Standard 4 - Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement**

#### 1. Quality Assurance Processes CFRs 4.1, 4.2

Pathways has undergone a second strategic planning process that included multiple stakeholder groups which looked at current data and research and addressed specific needs of the institution. Pathways facilitated its first program review in the BA of Business Administration

program. The review involved the faculty, staff, administrators and the external Advisory Board. One of the actions based on this review included implementing a Writing Center to provide students additional support in that area (CFR 4.1). Initial efforts at assessment and program review have resulted in decisions regarding the Writing Center but it appears that changes to course offerings were not involved in the initial data collection and review (CFR 4.2). Pathways plans to begin using Tableau for analytics and Campus Café has analytics built into it. The Manager of Assessment and Accreditation is spearheading the institutional research role and the CAO assists.

## 2. Institutional Learning & Improvement CFRs 4.3, 4.4, 4.5, 4.6, 4.7

During the SAV2 visit the college demonstrated significant progress in utilizing the Learning Outcomes Manager in Canvas to collect student learning outcome data. Faculty shared that they had significant input in creating the learning outcomes and were using the learning outcome manager.

Pathways has reviewed all co-curricular units and created goals, metrics, and includes both quantitative and qualitative data tied to objectives. The library, admissions, student advising, and institutional effectiveness followed this process (CFR 4.3).

Through the work of the Instructional Designer and CAO, it is clear that faculty are focused on assessing student learning in every class. Utilizing the Learning Outcome Manager in Canvas, assignments are connected to student learning outcomes and assessed. Syllabi clearly outline the connections of the student learning outcomes (SLOs) to the assignments so that students are aware of how the assignments are linked to the learning outcomes as well. This process has only been in place for one term, so data are in the early stages of collection. When sufficient data are available the college will perform analyses that will suggest curricular and

instructional improvements (CFRs 4.4, 4.5). The team commends the college on these efforts and encourages that they continue to receive consistent attention.

The IEO Annual Report Updated March 2, 2020 clearly demonstrates the integration of academics, co-curricular, and operational processes at Pathways. There is obvious reflection and prioritization of meeting goals for continual progress. It was clear after meeting faculty and staff that there is passion for improvement and growth at Pathways (CFR 4.6). However, it is important that planning for improvement and growth be integrated with marketing, operational and financial plans (CFR 4.6).

While meeting with the stakeholders at the institution, it was evident to the team that the leadership is experienced in the changes in higher education and the challenges facing all institutions. It was also evident that, outside of the CEO/CAO, there appears to be a lack of higher education experience, particularly in the business/operations arena and on the Board of Directors (CFR 4.7).

#### Standard 4 Summary

In the process of conducting program review and the resultant development of the Writing Center and the tutoring endeavor, Pathways is making progress in creating an organization committed to quality assurance, institutional learning, and improvement. The nascent efforts in institutional research also bode well for the future of data collection and analytics. The team therefore concludes that Pathways is in overall substantial compliance with Standard 4, having found CFRs 4.1, 4.2, 4.3, 4.4, and 4.5 at a level sufficient for initial accreditation and CFRs 4.6 and 4.7 at a level sufficient for candidacy. Only the WSCUC is

authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

### **SECTION III – OTHER ISSUES FACING INSTITUTION**

As Pathways moves forward in planning for its future, recent global developments will have a large impact on the institution. Societal changes due to the coronavirus (COVID-19) pandemic will alter implementation of programs. Current and potential students are now more concerned with either maintaining their current employment or finding new employment. Students' inability to pay or even to enroll in the college may have a dramatic impact on the financial condition of the institution. There may be further delays in the implementation of certificate programs which were started to provide ready income for Pathways. Enrollment in the degree programs of Pathways may also be affected as students may now find it impossible to pay tuition in addition to their normal living costs. While with accreditation comes the possibility of students to access government grants, uncertainty about the government to provide those grants may affect the enrollment of future students. With such an impact on the cash flow not only may Pathways need additional loans from its outside party but also its ability to repay existing loans may be affected.

### **SECTION IV – CONCLUSION, COMMENDATIONS, RECOMMENDATIONS AND FINDINGS**

Since the SAV1 team visit, Pathways has demonstrated significant improvement and has made progress in numerous areas. The team commends the senior administration, the staff, and the faculty for their sustained focus on improving the institution.

As Pathways continues in its efforts to achieve initial accreditation, particular attention on certain challenges is warranted. These challenges related primarily to taking concrete steps to buttress the financial sustainability of the college.

The SAV1 report called out the importance of diversifying sources of revenue. Team members agreed that the introduction of externally funded certificate programs suggest progress in the area. If successful it offers a promise of establishing an additional, stable revenue source. At the time of the SAV2 visit it was too early for the team to assess the success of these efforts. In the face of a growing financial crisis, publicly funded programs that focus on retooling the skills of displace workers may represent an additional opportunity for the college. These revenues can be tapped to support future growth in core degree programs.

In the short term these efforts represent what may be an imperative for the sustainability and growth of the college. At the same time, the leaders of the college will want to guard against the natural temptation to allow success in this area to distract its focus on building those core programs that are integral to the institution's stated mission.

Enrollment management has become a perennial challenge for all but the most selective colleges and universities. This challenge has proven more difficult during the past few years, due to complex factors that include changing demographics and increased competition. The COVID-19 virus and its rapid spread is now challenging institutions across the spectrum. Because it is an online institution, does not have to support a physical campus, and its staff and faculty can work remotely, Pathways may not be impacted as severely as other more traditional institutions. The college could, in fact, prove to be an economical alternative for students who have been displace and whose academic plans have been threatened. Being prepared to scale-up

quickly, if necessary, is something the Board of Directors and senior administrators may wish to consider.

Pathways is clearly committed to seeking WSCUC accreditation. The institution is to be lauded for the progress it has made since the seeking accreditation 1 visit. The team appreciates the effort that went into providing additional information and for being able to accommodate the virtual visit, which was conducted seamlessly and professionally.

### **Commendations**

The team commends Pathways College, Inc. for:

1. using best practices for online learning with having developed assessment rubrics embedded in their learning management system (LMS). In addition, course syllabi are developed by faculty using detailed course outlines which include an assessment map for course/student learning outcomes, and core competencies;
2. implementing and successfully completing a Program Review process for Business Administration major, with a Liberal Studies and general education program review planned within a year. Faculty and Administrators were able to utilize data received from the program review process to implement a new writing center and first semester learning support course for all new students;
3. creating a detailed workflow to document the process for processing student inquiries and taking prospective students through the admissions and enrollment process;
4. demonstrating a Commitment to the Mission on the part of the Board;
5. having an established assessment plan which includes active engagement by the faculty.

## **Recommendations**

The team recommends that Pathways College, Inc.:

1. review the institution's capital structure and capacity to fulfill the requirements for the implementation of future plan (CFR 3.4);
2. prepare a comprehensive marketing and enrollment management plan which is integrated with the operations and financial plan (CFRs 3.4, 3.7);
3. separate the CEO and CAO function for the effective operation of the college (CFR 3.8);
4. hire a full-time faculty member to own the curriculum, its assessment and continual improvement and to ensure continuity for the students (CFR 3.10).

## **Findings**

1. Standard 2: Achieving Educational Objectives through Core Functions

The team finds that Pathways College meets this Standard at a level sufficient for Initial Accreditation

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

The team finds that Pathways College meets this Standard at a level sufficient for Candidacy

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

The team finds that Pathways College meets this Standard at a level sufficient for Initial Accreditation

## **SECTION V – PREPARATION FOR REAFFIRMATION**

It was clear that extensive and comprehensive preparations were done to complete the SAV2 report. While spearheaded by the Manager of Assessment and Accreditation, it was clear that all of the staff participated and provided extensive feedback in the process. In addition, faculty members shared that they were given the opportunity to provide feedback on the report. The members of the Board of Directors indicated extensive engagement in the process. With such extensive community engagement and communication, Pathways has cleared the way to having an effective process for responding to WSCUC Standards of Accreditation through self-study. The institution will need time to develop methods for collecting the outcomes of its first graduating class and using that information to support current students. In addition, as student enrollment grows, the team expects that Pathways will continue to increase its capacity to provide academic support for those students. For now, Pathways is well on its way to preparing for future accreditation engagements with WSCUC.

## Inventory of Educational Effectiveness Indicators (IEEI) Form

The IEEI requests brief narrative information for each degree program, for general education (if applicable), and for the institution as a whole. The IEEI provides a comprehensive overview of the institution's assessment processes that teams, the Commission, and the institution itself may use to evaluate educational effectiveness.

\*The relevant definition of "program" as presented in the glossary of the *2013 Handbook* is "a systematic, usually sequential, grouping of courses that forms a considerable part, or all, of the requirements for a degree in a major or professional field."

**How can institutions use this exhibit?** Institutions will want to be explicit about expectations for student learning and to ensure that every degree program has in place a quality assurance system for assessing, tracking, and improving the learning of its students. This exhibit can assist institutions in determining the extent to which they have assessment systems in place, and what additional components or processes they may need to develop. Institutions may draw upon or reference this document in preparing institutional reports.

**Why is WSCUC interested in this information?** An institution committed to student achievement and educational effectiveness will have in place a system for collecting and using evidence to set standards of student performance and to improve learning. The indicators asked for in this exhibit reflect how an institution approaches quality assurance and improvement systematically. Institutions submit the IEEI to WSCUC as follows:

- **Reaffirmation and Seeking Initial Accreditation:** The evaluation team will review the institution's IEEI to help understand how comprehensively and successfully the institution addresses both the quality of its students' learning and the quality of the learning and assessment infrastructure. Teams and institutions are encouraged to treat this exhibit as a developmental document: the institution can indicate what activities it already engages in and what remains to be done.
- **Mid-Cycle Review:** Institutions submit an update of their IEEI with the Annual Report in the year of the institution's Mid-Cycle Review as a set of indicators related to educational effectiveness and student achievement.
- **Interim Reports:** Institutions submitting Interim Reports concerned with educational effectiveness submit an updated IEEI with their report when requested by the Commission.

### What 2013 Standards are addressed by this exhibit?

The indicators listed in this exhibit collectively demonstrate an institution's commitment to quality assurance and improvement of educational results over time (CFRs 4.1, 4.3, and 4.4). Specific standards related to academic quality and effectiveness are addressed by the IEEI as follows:

- Educational objectives are widely recognized throughout the institution, are consistent with stated purposes, and are demonstrably achieved (CFR 1.2)
- All degrees have clearly defined levels of student achievement (CFR 2.2)
- Undergraduate programs ensure the development of core competencies (CFR 2.2.a)
- Graduate programs establish clearly stated objectives (CFR 2.2.b)
- Student learning outcomes and standards of performance are clearly stated at the course, program, and, as appropriate, institutional level (CFR 2.3)
- Learning outcomes and standards of performance are developed by faculty, who take collective responsibility for establishing appropriate standards of performance and demonstrating through assessment the achievement of these standards (CFR 2.4)
- The institution demonstrates that its graduates consistently achieve its stated learning outcomes and established standards of performance (CFR 2.6)
- All programs offered by the institution undergo systematic program review, which includes analyses of student achievement of the program's learning outcomes; retention and graduation rates; and, where appropriate, results of licensing examination and placement, and evidence from external constituencies such as employers and professional organizations (CFR 2.7).

APPENDIX

COMPLIANCE WITH STANDARDS AND FEDERAL REQUIREMENTS

### Inventory of Educational Effectiveness Indicators

Category	(1) Have formal learning outcomes been developed?  <i>Yes/No</i>	(2) Where are these learning outcomes published (e.g., catalog, syllabi, other materials)?	(3) Other than GPA, what data / evidence are used to determine that graduates have achieved stated outcomes for the degree? (e.g., capstone course, portfolio review, licensure examination)?	(4) Who interprets the evidence? What is the process?	(5) How are the findings used?	(6) Date of the last program review for this degree program.
At the institutional level:	Yes	Catalog, website	Selected in course assessments in every course, capstone projects in selected courses	Faculty, Advisory Board These are assessed as part of the program review process	Findings are used to make changes in individual courses, the overall curriculum, and support services.	
For general education if an undergraduate institution:	Yes – same as institutional	Catalog, website	Selected in course assessments in every course, capstone projects in selected courses	Faculty, Advisory Board These are assessed as part of the program review process	Findings are used to make changes in individual courses, the overall curriculum, and support services.	
List each degree program: 1. BA Business Administration	Yes	Catalog, website	Selected in course assessments in every course, capstone projects in selected courses	Faculty, Advisory Board These are assessed as part of the program review process. The first full program review will happen after the first BABA graduate, in 2021.	Findings are used to make changes in individual courses, the overall curriculum, and support services.	Scheduled: Initial – February 2020, Full – Spring 2021
2. BA Liberal Studies	Yes	Catalog, website	Selected in course assessments in every course, capstone projects in selected courses	Faculty, Advisory Board These are assessed as part of the program review process. The first full program review will happen after the first BABA graduate, in 2022.	Findings are used to make changes in individual courses, the overall curriculum, and support services.	Scheduled: Initial – February 2021, Full – Spring 2022

## B. Federal Requirements Forma

## 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? Located in the cloud-based shared faculty folder.
	Comments: Confirmed with Melinda in site visit.
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
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Each course is developed according to this policy. The policy was reviewed at the annual faculty meeting. Tim Short, Instructional Designer, works closely with faculty to meet guidelines.
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: N/A
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? 2
	What kind of courses (online or hybrid or both)? Online
	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)? Business Administration, Liberal Studies
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: We reviewed 2 additional upper level syllabi in the Learning Outcomes Manager demonstration in Canvas delivered by Beth and Tim Short.
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed?
	What kinds of courses?
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: N/A
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? 2
	What kinds of programs were reviewed? Online
	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)? Business Administration, Liberal Studies

	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:

The visiting team reviewed documents and the policy on credit hour was easily accessible and the institution does adhere to the procedure. It was noted that each course is developed according to this policy and the policy was reviewed at the annual faculty meeting (Faculty summit 2019). The Federal review determined that the work required did warrant the credit awarded. The Federal reviewed showed that programs offered are of generally accepted length. The Instructional Designer – Online Advocate works with faculty members using the Pathway Colleges developed “credit hour calculation tool” which helps estimate the hours students will spend on various learning activities in the courses, to ensure compliance with federal standards. The visiting team had the opportunity to review several upper level syllabi during the site visit and confirmed that the courses met the credit hour and program length policy.

### 3 - STUDENT COMPLAINTS REVIEW FORM

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

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <b>X</b> YES <input type="checkbox"/> NO
	If so, is the policy or procedure easily accessible? Is so, where? In the catalog and on the current student page of the website.
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <b>X</b> YES <input type="checkbox"/> NO
	If so, please describe briefly: Student will address issue with faculty first, if unresolved move to program advisor, then CAO. If still unresolved, student will submit a written statement to grievance committee.
	If so, does the institution adhere to this procedure? <b>X</b> YES <input type="checkbox"/> NO
Records	Does the institution maintain records of student complaints? <b>X</b> YES <input type="checkbox"/> NO If so, where?
	Pathways College keeps a complete binder of student complaints and an electronic log. Does the institution have an effective way of tracking and monitoring student complaints over time? <b>X</b> YES <input type="checkbox"/> NO
	If so, please describe briefly: Pathways College keeps a complete binder of student complaints and an electronic log.
Comments:	

\*§602-16(1)(1)(ix)

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

Review Completed By: *Bruce E. Cook*  
Date: *2/2/2020*

## 2 - MARKETING AND RECRUITMENT REVIEW FORM

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

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

\*§602.16(a)(1)(vii)

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

Review Completed By:

Date:

#### 4. Transfer Credit Review

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? In the catalog and on the admissions page of the website.
	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:  Page 14 of catalog <a href="https://www.pathwayscollege.org/wp-content/uploads/2019/07/PATHWAYS-COLLEGE-COURSE-CATALOG-2019-20-.pdf">https://www.pathwayscollege.org/wp-content/uploads/2019/07/PATHWAYS-COLLEGE-COURSE-CATALOG-2019-20-.pdf</a>  Admission Web site <a href="https://www.pathwayscollege.org/admissions/">https://www.pathwayscollege.org/admissions/</a>

The Federal Compliance review shows that the institution has a policy of formal procedure for accepting transfer credit. The policy is in the catalog and on admission page of the Web site. The policy has a statement of criteria established by institution regarding the transfer of credit earned at another institution. The CAO reviews all transcripts and makes recommendations for transfer.