

## REPORT OF THE WSCUC TEAM

For Reaffirmation of Accreditation

To: California Southern University

March 11-13, 2020

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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**

California Southern University (CalSouthern) is a private, for-profit institution with its campus in Costa Mesa, California. Founded in 1978 by Dr. Donald Hecht, the school began offering education as Southern California University of Professional Studies and changed its name to California Southern University in 2007. From its inception, CalSouthern has served adult students (whom it calls learners) using a distance approach to education, predominantly through use of an online modality. Some programs add on-ground learning with an experiential component as a required portion of the curricula. From a geographic location report generated on August 13, 2019, enrollment includes 3,376 (88%) learners from the United States and 449 (12%) international learners from 77 countries.

CalSouthern offers both non-degree certificates and degree programs. There are several pre-baccalaureate and post-baccalaureate certificates in psychology and business. The degree programs cover multiple degree levels: associates, bachelor of science, bachelor of arts, master of science, master of arts, and doctorates in psychology, business, and law. These certificates and degree programs are housed in one of six schools listed in order of highest to lowest enrollment: behavioral sciences, business and management, law, criminology and criminal justice, education, and nursing. It should be noted that the Juris Doctor, Master of Science in Dispute Resolution, and Master of Science in Law are currently in teach out.

California Southern University was initially accredited by WSCUC in 2015. This is its first re-affirmation visit and team report. There were several substantive change applications and approvals between 2015 and 2017. One program application,

the Doctor in Education, was denied and the institution did not re-submit this application.

The appendices to this report include an evaluation of distance education programming and reviews of four areas of compliance with federal expectations.

## **B. Description of Team's Review Process**

Due to health issues, two team members served the CalSouthern visit remotely, but fully participated in interviews using the telephone or CalSouthern's video conferencing system and examined documents provided online and onsite. These team members also fully participated in confidential team meetings without hindering the flow of information or deliberations.

The team reviewed all materials provided by the university along with the California Southern University Institutional Report for Reaffirmation (institutional report), Commission action letters, Graduation Rate Dashboard data, materials from the initial accreditation visit (SAV2) in 2015, and supplemental materials requested first prior to the team's Offsite Review (OSR) on September 4-5, 2019 and multiple times after the team's OSR. On several occasions during the campus visit of March 11-13, 2020 the team reviewed communications from 18 learners and 14 faculty and staff (30 of 32 signed) sent to the confidential email account prior to and during the visit. Of the 18 learners, 15 were in psychology programs, nine of whom were uniformly complimentary. Seventeen (17) of the 32 individuals had concerns that fell into the following major themes: academic practices, employment practices, transparency, and leadership behaviors. The team also viewed written communications from additional employees who directly contacted the WSCUC liaison, expressing concerns that reflect the same themes as those in the confidential account.

When on campus, the team members met with multiple constituencies in order to further explore the issues raised as a result of reading the institutional report and additional documents and those issues identified for further inquiry in the September 2019 “Lines of Inquiry” document produced during the Offsite Review:

- Systematic approach to continuous improvement
- Pedagogy
- Faculty
- Assessment
- Capacity.

During the visit, there were several times at the conclusion of a group interview that individuals indicated they wanted to meet privately with team members. These employees, both staff and academic personnel, were hesitant to speak freely in the scheduled meetings indicating fears of retribution from leadership if certain issues were raised. The commentary received in these private meetings aligned with employee concerns, such as the lack of transparency and questionable employment or academic practices, that were mentioned in the confidential emails.

The schedule was collaboratively developed by the ALO and the team assistant chair with one exception; the team requested to interview three individuals holding the position of vice president on special assignment. Only one was made available. There was concrete evidence provided to the team by multiple employees that the university president did not want these vice presidents to be interviewed.

### **C. Institution's Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence**

The team found that California Southern University's institutional report covered the appropriate areas as requested, but was neither thorough nor satisfactorily supported by evidence. In addition to asking for access to online courses and materials, the team felt it necessary to request approximately 140 documents between August 2019 and March 2020 to provide both context for the institutional report and evidence to support the statements made in it. All team requests for additional information and data were addressed in a courteous and timely manner. However, many documents did not provide operative terminology and definitions; were incomplete, inconsistently labeled, or unorganized; or contradicted one another. There were several inconsistencies found when comparing the institutional report itself with the CalSouthern website and the report attachments. For example, there was inconsistent use of the terminology for the governing board (both "board of directors" and "board of trustees"). There was one member of the board listed on the website at the time, but several other names provided in the report. Some documents appeared incomplete even shortly before the visit. One was 2019 financial information. It was explained by the university president on site that CalSouthern received a ransomware demand in fall 2019 and, because of the institution's unwillingness to pay a ransom, one server remains locked. The team was informed that, to the best of its ability, CalSouthern has recreated the missing data.

The most difficult area for the team to understand was the regularly changing organizational structure. The team received four different organizational charts: June 2019, August 2019, December 2019, and March 2020. During this ten-month period, a new president was hired and fired within 16 days while the current president moved to and back from a president emeritus position; a chancellor reporting to the president was

hired three months before the visit; three individuals held the position as head of human resources; three individuals served as the dean of the school of business; and the provost (and ALO) and director of institutional research (IRAD) both resigned one week before the visit. This frequent change in personnel, especially those in leadership positions, made it difficult for the team to determine the appropriate personnel to interview during the visit. In several interviews, most of the individuals had less than one year of experience, which created a barrier in the team's sense of CalSouthern's progress since the 2015 initial accreditation visit due to lack of institutional history.

In the meeting with the WSCUC Steering Committee, which represented several key departments, it was apparent that a comprehensive approach was used in the development of the institutional report. Despite the recent departure of the institution's ALO who led the report development, members of the committee were able to speak clearly about how they worked with various sub-groups to collect information and validate the report. The members were also able to speak to specific gaps discovered as a result of this process and plans for future development, such as improving technology and putting more emphasis on first term retention strategies. The members indicated that initiatives for improvement that were started in 2015 after the initial accreditation visit were set aside and it was not until preparing for the reaffirmation visit that action plans were redeveloped and emphasized. An example was working on the Faculty Senate Bylaws. CalSouthern did provide some reflection on strengths and weaknesses in the WSCUC Standards Worksheet yet, in Component 9: Conclusions of the institutional report, there were several areas mentioned as strengths, but no reflections on areas for improvement.

## **SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS**

### **A. Component 1: Response to previous Commission actions**

In its communications following the SAV2 in 2015, the Commission raised three issues for the university's attention and action: faculty scholarship, assessment outcomes, and faculty governance. As will be elaborated in the following pages, CalSouthern has made some, but not meaningful, progress in all three areas:

- Faculty scholarship: The Commission expected clarification of and expectations for faculty scholarship and structures that require and support it (CFR 2.8).

CalSouthern has defined a policy on scholarship in its Mentor Handbook and should be recognized for including payment to faculty (whom they call mentors) for publications and presentations. But the policy did not clearly outline expectations or a support structure for faculty research or scholarly inquiry.

CalSouthern provided evidence that some faculty are involved in publication and presentations. It appears, however, that the productivity of faculty is not evenly distributed across all programs and it remains unclear how the institution supports time and training for faculty to be active scholars. See Standard 2.

- Assessment outcomes: The Commission expected aggregation and analyses of findings over several additional cycles of assessment and program review, including summative indicators of student learning and co-curricular programs (CFRs 2.10, 2.11). According to the institutional report, additional documents, and interviews, CalSouthern appears to have conducted only five of seven scheduled data analyses through program reviews from 2015 to 2019, but has built a framework for assessment. The Institutional Effectiveness Plan (IEP) was revised in 2018 and again in early 2019. The plan is well developed and will

support learner learning, institutional effectiveness, and data driven decision making in the future (CFRs 4.1, 4.2, 4.4). See Standard 2, Components 5 and 6.

- Faculty governance: The Commission expected development of additional policies and protocols that would clearly codify the scope and authority of the Faculty Senate's activities (CFR 3.1). According to the institutional report, Faculty Senate Bylaws were not approved until 2018. Regarding protocols, the was confused about Senate positions from the evidence presented: nine of the 14 positions had been filled via elections according to the institutional report; eight members were listed on attachment Committee Membership; and 14 members were interviewed on the team visit. As prescribed by the Bylaws, the membership is evenly dispersed among faculty representatives from the various schools. The Bylaws also indicate that faculty members would be initially appointed to the Senate and meeting minutes available during the visit indicate deans from various departments were nominating members. Apparently elections to this Senate had occurred prior to the visit to add additional members. In meeting with the Senate members, it appears they have been active for approximately one year, predominantly working on building the membership and organizing the internal committees. The past chair of the Senate reported at the visit that his one-year term had just concluded in the previous week and a new chair was in place. From the visit, it is apparent to the team that the Faculty Senate is still organizing and has not had the opportunity to provide a dedicated and consistent voice in shared governance at this institution. The scope and authority of the Senate activities may be codified in the Bylaws, but they were not yet fully operational by the visit. See Standard 2.

**B. Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators**

This team report will address the Standards and Criteria for Review in multiple ways and in detail according to the themes of the Components below. Here the team offers general observations regarding the California Southern University's fulfillment of the Standards, as reflected in its institutional report, submitted materials, and the team's visit to the Costa Mesa, California campus.

**Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives**

*The institution's formally approved statements of purpose are appropriate for an institution of higher education and clearly define its essential values and character and ways in which it contributes to the public good.*

Institutional Purposes

CalSouthern has publicly defined its purposes and priorities with a mission, strategic objectives, goals, and learning outcomes. The mission of California Southern University was recently updated and states, "We prepare learners to succeed in a world that we have yet to imagine. We do this through active learning, respecting diversity and promoting intellectual freedom."

The institutional report provided a 2019-2024 Strategic Plan. According to this plan, CalSouthern has prioritized six strategic objectives:

1. Academic excellence through the evaluation of program offerings, faculty and faculty credentials, and staff

2. Identify institutes with particular appeal and of critical importance to the university and move them into a position of local and national leadership while working to prevent other programs from losing such stature
3. Maintain a culture that supports quality teaching across all schools of the university
4. Enhance existing connections across schools to provide educational opportunities for learners and improve the quality and stature of disciplines
5. Implement strategically focused cost-effective enhancements to the infrastructure to support academic excellence
6. Connect outreach and public engagement with CalSouthern's global focus.

But in this same plan, there were four “umbrella” goals listed: quality, sustainability, technology, and growth. There were action plans applied to each of these goals. It is unclear how these goals relate to the previously mentioned objectives. There was also a Section V: Excellence in Organizational Stewardship and Servant Leadership with additional objectives and action plans. Again, it is unclear to the team how this fifth area is related to the other objectives and goals. During the visit, the members of the President’s Cabinet were able to speak about the strategic plan, but other employees, including faculty, were not familiar with it (CFR 1.1).

There are many policies publicly available in the California Southern University Catalog (Catalog) that support learner success (CFRs 1.2, 1.3, 1.5, 1.6). Learning outcomes are published on the academic programs’ websites, course syllabi, and in the Catalog. Seven

institutional learning outcomes (ILOs) are aligned to program learning outcomes (PLOs) and mapped to WSCUC Core Competencies (CFR 1.2). See Standard 2 and Component 4.

The team commends CalSouthern for its development of a new mission, strategic plan, learning outcomes, and a framework for assessment.

#### Integrity and Transparency

Faculty rights and academic freedom are clearly stated in the Mentor Handbook, although information gathered in interviews indicates that a top-down approach is occurring to revise courses, sometimes without faculty input. The Catalog, available on the website, specifies the rights and responsibilities of learners. There is mention of academic freedom for learners in the Educational Objectives section, but there is no explanation provided about how academic freedom is supported for learners.

CalSouthern is a diverse institution servicing a global student body and workforce. There is attention paid to engaging the international learners in co-curricular activities that support their academic success and there are program learning outcomes directed to student learning in the areas of cultural and global diversity. During the visit, employees predominantly expressed appreciation for the diverse working environment. CalSouthern is commended for its diverse, passionate, and student-centric staff, faculty, and board.

Throughout the team's interaction with CalSouthern, there were numerous contacts between WSCUC and employees who confidentially reported deceptive, unethical, and/or retaliatory actions at the university. In one known case, the faculty member writing to WSCUC with these claims was dismissed within two weeks of sending an email to WSCUC from a work computer. Samples of inappropriate behavior reported to WSCUC include alterations of syllabi against faculty wishes; preferential treatment for select learners (including a board member); pressure to admit learners who do not meet program

requirements; promotion of employees to leadership positions for which they do not have the appropriate credentials or experience; and unclear or unenforced hiring, advancement, and dismissal procedures. From the interviews, it is apparent there is, at best, a divergent campus climate. Some individuals are very engaged and purposeful, speaking highly of the institution, while others express fear and concern about favoritism and unfair employment practices. In the President's Cabinet interview, rebuilding trust was named by officers as an important future activity, but few action plans were put forward for how it could be addressed. The team recommends that CalSouthern focus attention to rebuild trust within the university community through consistent and fair employment policies and practices, attention to campus climate, and open communication (CFR 1.7).

Regarding transparency with WSCUC, one element of concern was raised before the visit by an internal report that data systems at CalSouthern were accessed through phishing in fall 2019, with a ransom payment demanded to regain access to the data. This incident, verified by the president on site, was not reported to WSCUC or communicated to learners whose private data may or may not have been compromised. It was reported to the team from multiple individuals that staff members were allegedly warned to not discuss lack of access to data to WSCUC. Further, from interviews during the visit and written evidence provided in the confidential emails, certain employees were told to stay away from the campus so as to not be interviewed by the WSCUC team. From the confidential emails and persuasive information available to the team, we have a grave concern that CalSouthern does not use open and honest communications with WSCUC. The team recommends that CalSouthern operate in good faith with external entities (CFR 1.8).

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

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

### Teaching and Learning

According to its website, CalSouthern offers 20 degrees at associate, bachelor's, master's, and doctoral levels and 13 certificates in six schools. Courses are facilitated by faculty mentors. Degrees that are professional in nature, including business programs and the baccalaureate degree and master's degree in nursing, rely on professional accreditation as the primary method used to assure appropriate content, standards, and faculty capacity for their programs (CFR 2.1).

The Mentor Breakdown by Program 2018-2019 identified a total of 207 mentors in three categories: core, adjunct, and full-time. The Seniority Faculty Update 2019 for AY 2015-2019 (SFU19) listed only two active full-time faculty mentors. See table 1.

School	Full-time	Core	Adjunct	Total
<b>Business &amp; Management</b>	0	6	47	53
<b>Criminal Justice</b>	0	1	11	12
<b>Nursing</b>	0	0	12	12
<b>Education &amp; Undergraduate Studies</b>	0	0	2	2
<b>Behavioral Sciences</b>	2	10	68	80
<b>Law</b>	0	7	41	48
<b>Total Faculty</b>	2	24	181	207

Table 1: Seniority Faculty Update 2019 AY 2015-2019

During the visit, administrators and faculty did orally indicate that, with recent new hires, there were five full-time faculty in the School of Behavioral Sciences, five full-time faculty in the School of Business, and one full-time faculty in the School of Education, but no full-time faculty in the Nursing, Criminal Justice, or Law programs (CFR 2.1). There was no evidence presented to document the new hires at the time of the visit.

The team received confusing and contrary evidence in the numbers of adjunct and core faculty, core faculty being adjuncts who have compensated duties in addition to mentoring. The SFU19 listed a total of 24 core faculty mentors across all schools with only two adjunct and no core or full-time faculty mentors shown for the School of Education. However, the CalSouthern website listed 16 faculty serving the School of Education. Of the 16, five were not included on the SFU19, ten were listed as adjuncts in other schools, and one was listed as core faculty for the School of Business and Management. For the School of Nursing, the SFU19 listed 12 adjunct faculty mentors and no core faculty. Nursing faculty listed on the website included six of the 12 faculty mentors from SFU19 and an additional six who were not listed on the SFU19. This suggests a 50% turnover in nursing faculty mentors since August 29, 2019.

Admissions requirements are identified in the Catalog. Each program clearly defines the number of allowable transfer credits that can be applied toward CalSouthern degree programs. The degree programs are articulated in the Catalog and the credit hour policy, as written, adheres to federal policy (CFR 2.2).

Student learning outcomes at the institutional and program level are reflected in the Catalog (CFR 2.3). Curriculum maps for the bachelor's, master's, and doctoral programs correlate program learning outcomes to student learning outcomes at the course level and identify courses and assignments where program learning outcomes are introduced, re-enforced, and mastered (CFRs 2.4, 2.5, 2.6). See Standard 4.

According to a Standard Operating Procedure document provided onsite, the Curriculum Committee is the institutional body responsible for the overall design, management and evaluation of the curriculum (CFR 2.4). A CalSouthern Committees document includes a Curriculum Committee with two administrative members and four faculty members, only two of whom are also senators. It is unclear to the team if the institutional Curriculum Committee includes representation from the Faculty Senate or its own Senate Curriculum Committee, especially as the senators had no response when asked about the charge of the institutional committee. Therefore, the team is concerned that the Faculty Senate and its committees had limited roles in curriculum development, management, or evaluation. While CalSouthern provided lists of committee memberships demonstrating that individual faculty mentors are involved in areas of shared governance such as assessment, the team saw little or no evidence that the Faculty Senate itself had representation on university committees and is unsure of the role and authority of the Senate.

The Faculty Senate members were able to give a concrete example of recently approving a rubric to be used for oral defense presentations and indicated they have been actively involved in helping to select the new learning management system (LMS). Of the two joint administrative-faculty committees, the Technology Committee has not met, but the Library Advisory Committee appears to be staffed and operational. Other committees listed in the Bylaws, such as the Nominating, Personnel, and General Education Committees, had apparently not yet met as the meeting minutes requested by the team were not made available by the visit. Lack of evidence of meaningful Faculty Senate representation on curricular issues and in university governance, and the observation above in section 2 that the Faculty Senate is still organizing, led the team to recommend that CalSouthern strengthen the Faculty Senate by continuing to develop a more engaged role in university decision making. This includes

expanding the functions of Senate committees and representation on university committees (CFRs 2.4, 3.10).

The institutional report explained that the process of program review was challenging, due to assessment data collection that resulted in misalignment between assessments and learning outcomes, and that a revamped three-phase assessment plan was developed. During the visit, the team learned that the learning outcomes and signature assignments uploaded to LiveText had been realigned and data had been collected only for the first phase of the revised assessment plan. Therefore there was no analysis of the data available for the team to review in the institutional report or at the time of the visit. The team recommends that CalSouthern fully execute all three phases of the assessment plan and act upon results to make informed decisions to improve student learning (CFRs 2.6, 2.7, 2.11).

### Scholarship and Creative Activity

Faculty are provided monetary incentives for scholarly activity including publications and presentations of their scholarship. However, according to the Summary of Faculty Scholarship, between 2015 and 2018 only 31 current and former faculty mentors participated in scholarly activity, of which 23 were from the School of Behavioral Sciences (CFR 2.8). Many have not been engaged in research and scholarship for more than five years. The team reviewed samples of teaching evaluations, which appear to rely primarily on learner evaluations. There was little or no evidence of evaluation linking scholarship, teaching, student learning, and service (CFR 2.9). These issues, in addition to those raised in Component 1: Response to Previous Commission Actions, lead the team to suggest that CalSouthern give renewed and additional attention to faculty scholarship in the future.

### Student Learning and Success

Learners are expected to progress through one course per eight-week term over a six-term calendar year, resulting in completion of 18 credits per year. Learners are required to complete at least one course every six months to maintain active status. Upon approval by their academic advisor, learners may elect to take multiple courses to accelerate their completion rate. The university has limited data on the racial and ethnicity of learners due to confusion about the demographic categories that could be selected by learners prior to March 1, 2020. Therefore accurate disaggregation of data on student success could not be provided by the visit. The team suggests that aggregated and disaggregated data be tracked and analyzed in the future (CFR 2.10).

As an online university, co-curricular activities are provided through a single-portal online format referred to as the CalSouthern Learning Center, where learners also can access their degree plan and coursework. Through a Library Advisory Committee interview and learner focus groups, it appears that the library has the resources and ability to support learners. The librarian participates in co-curricular activities such as a Career Café, as well as providing online training webinars for instruction in APA writing and use of online search engines. Interviewed learners unanimously commended the library team for prompt responses, stating they often received answers and documents within one to two hours from the time of the request. Psychology learners did provide the suggestion that a standardized APA format be used across the entire university, with standardized tutorials available in one place on the library website.

However the team was not provided with evidence documenting the assessment of the effectiveness of co-curricular activities. Learner feedback was positive in a survey conducted after participation in scheduled activities, but limited response provided only anecdotal

evidence of satisfaction with and appropriateness of the activities. Increasing attendance and participation in feedback will assist in determining the effectiveness of co-curricular activities and strengthen the learner experience (CFR 2.11).

Each learner is assigned an academic advisor who provides guidance and support to succeed in their academic program. While many learners commended their advisor, others reported undesirable turnover. According to the document Attrition-Turnover by Position (ATP), from January 2016 to November 2019, advisor positions increased from six to 13 or, according to a different document (2019\_Attrtion and Retention), to 14. But in the four year period of time shown in the ATP, 11 advisors voluntarily resigned and six were involuntarily terminated (CFR 2.12).

Information about admissions, degree requirements, course offerings, and educational costs are available on the CalSouthern University website. Learners with documented disabilities are accommodated on an individualized basis. The most common accommodation is up to two 30-day extensions at no additional cost to provide the learner with additional time to complete course assignments (CFR 2.13). A transcript evaluator reviews and assigns credits based on a review of the learner's official transcripts. Clear guidelines are published in the Catalog pertaining to the maximum number of transfer credits per program. However, from interviews and trends in the confidential emails, the team learned of situations where credits were inappropriately applied (CFR 2.14).

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

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

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

#### Faculty and Staff

According to the Faculty Manual, mentors are evaluated annually in the area of teaching. While there is a heavy reliance on learner evaluations and no evidence of links to scholarship, the deans reported during the interview with the team they do actively monitor mentor engagement and provide feedback. The team received no information on staff evaluation policies and practices in the institutional report or appendices, other than an assertion by human resource personnel in an interview that a new performance evaluation process would lead to pay increases only if employees exceed expectations.

Sufficiency of faculty is addressed above in Standard 2. It appears that there are sufficient staff when all positions are filled. While a review of faculty credentials revealed a few mentors in nursing and psychology programs teaching masters programs without terminal degrees, the vast majority of mentors and staff members have appropriate qualifications and there is evidence of diversity.

With regard to professional development for faculty and staff, the institutional report listed a myriad of faculty development opportunities, including ongoing faculty orientation and faculty training via WebEx and webinar. The faculty mentor orientation includes training on assessment, including the use of LiveText (CFRs 2.4, 3.3, 4.4). Faculty Center personnel talked about instructor resources; online links to facilitate online instruction; monthly meetings to facilitate best practices; and an online learning consortium of higher education schools/instructors which shares best practices and facilitates peer to peer interaction. As

CalSouthern transitions to Canvas, a “Faculty Center” page is planned to provide one stop shopping.

Human resources personnel provide onboarding for all new hires. The president and senior leadership reported that, at the time of hire, every staff member develops a professional development plan that is reviewed by the president. Additionally, the president has instituted a leadership program, and all staff have the opportunity to apply. However, in confidential emails and interviews some staff expressed their opinions that there was significant bias in the leadership program selection process (CFR 3.3).

#### Fiscal, Physical and Information Resources

CalSouthern has historically been challenged by the lack of the proper level of resources to maintain, grow, and sustain a regionally accredited institution of higher education (CFR 3.4, 3.5). The lack of investment and talent to manage the institution’s proprietary Enterprise Resource Planning led to massive loss of data in November 2019. Much of the financial data was lost and financial statements had to be constructed by hand. Many accounts were not reconciled and analyzed properly. This led to audit adjustments in 2018 of [REDACTED] for an institution with just over [REDACTED] in revenue. These issues lead to a question around the accuracy of the final 2018 audited financials.

Recently, CalSouthern has undertaken a significant multi-year effort to invest in resources for the financial reporting (accounting/financial system), student information system (operations) and online learning management system (CFR 3.5). The implementation of these systems will have a profound positive impact on the institution. Phase 1 focuses on the implementation of Colleague Student, Colleague Finance, Ellucian Mobile (Application Edition), and Evisions Argos (Reporting Software). Implementation will improve the user experience and self-service functionality across the institution. The main focus throughout

Phase I is to provide solid technology and business processes. Phase II will focus on the implementation of Intelligent Learning Platform (LMS Integration), CRM Recruit, Ellucian Workflow, and upgrading to Ellucian Mobile Platform Edition. This will provide users with a better way to view, understand, and maximize the value of institutional data. The financial reporting system has been mostly implemented, with many parts of the implementation of the other components at various stages of completion. Phase II will start in May 2020 with the completion of the majority of the implementation for all of the information technology (IT) investments to be completed by December 2020 and remaining components by May 2021. The move to a Software as a Service-based IT infrastructure will enhance security through the following: firewall, end of point protection, monitoring and alerting, data center protection, backups and disaster recovery and data privacy protections (CFR 3.5). The total cost for the projects will be over [REDACTED] over five years for Ellucian and [REDACTED] over three years for Canvas for a total of over [REDACTED] (CFRs 3.4, 3.5). The team commends CalSouthern for implementation of a plan to update technology that will improve the learning experience, financial reporting, and operations.

The financial resources of CalSouthern are driven through the tuition revenue generated by enrollments. Historically, the institution has needed investment which came from the support of the shareholder who has injected capital over the past ten years. For 2019, CalSouthern had a relatively strong balance sheet and no debt. Also, if needed, it can draw on a line of credit which is available from Bank of the West. For the income statement for 2019, the institution generated total revenue of [REDACTED] and an overall net income of just over [REDACTED] (CFR 3.4). As part of the strategic planning process, CalSouthern developed multi-year financial pro formas. The plan shows a continued commitment to invest in personnel and resources with an overall net income (as a percentage of revenue) which is less than 2019 (due to continued investments).

## Organizational Structures and Decision-Making Processes

The CalSouthern board of directors meets on a quarterly basis and is passionate about California Southern University. At the time of the visit, the board was comprised of six members and had a committee structure. However, the current size and membership does not assure that all of the committees have a quorum of independent members or that there is a robust committee structure with multiple chairs. The president asserted in the Written Statement to WASC Team 3.12.20 that, by intention, the “board interacts only with the president” (page 8) and that the last presentation given by an administrator to the board was in fall 2018. In interviews, none of the current members of the Cabinet reported attending board meetings or engaging with its members through presentations. The team recommends that CalSouthern increase the number of independent members on the board of directors, strengthen and document its committee activities and actions, and expand its perspectives of institutional operations and effectiveness from multiple sources (CFR 3.9).

Finally, the leadership of CalSouthern continues to be in constant change with multiple resignations, terminations, retitling of positions, and other changes which were very difficult for the team to track. The team was concerned about the inability of the institution to attract and retain leaders which meet the needs of a WSCUC accredited institution (CFR 3.6). According to the document Attrition-Turnover by Positions and uncontradicted in interviews, 36 non-faculty employees resigned and 90 non-faculty employees were involuntarily terminated from January 2016 to January 2020.

Some notable involuntary terminations over four years included the following titles:

- 2 Presidents
- 1 Chief Academic Officer  
(another two also resigned)
- 1 Chief Technology Officer
- 2 Deans, School of Education
- 3 Deans, School of Nursing  
(another also resigned)
- 1 Dean, School of Business  
(another two also resigned)
- 1 Executive Dean, Curriculum  
and Program Developer
- 1 Human Resources Manager  
(another two also resigned)
- 1 Senior Director, Academic  
Advising
- 1 Director, Admissions
- 1 Director, Faculty Training and  
Development
- 1 Chief Officer, Compliance
- Executive Vice President, Chief  
Operating Officer

While it is understandable for an institution to make changes in order to bring in more talented employees or those better aligned with the leadership and its vision and mission, this large number of resignations and terminations tells a different story at CalSouthern: one of misaligned culture and vision. Constant and large turnover results in tremendous pressure on an institution's human resources capacity and leads to operational uncertainty (CFRs 3.1, 3.4, 3.6). These factors, as well as the concerns expressed in Standard 1 above, cause the team to recommend that CalSouthern build a coherent and stable leadership structure that operates with integrity, honesty, transparency, and accountability (CFRs 1.7, 3.6).

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

*The institution engages in sustained, evidence-based, and participatory self-reflection about how effectively it is accomplishing its purposes and achieving its educational objectives.*  
*The institution considers the changing environment of higher education in envisioning its future. These activities inform both institutional planning and systematic evaluations of*

*educational effectiveness. The results of institutional inquiry, research, and data collection are used to establish priorities, to plan, and to improve quality and effectiveness.*

### Quality Assurance Processes

Despite initiating the use of LiveText prior to the 2015 SAV2 visit, there has been little implementation of a system-wide approach to assessment data collection and the capacity for analyses has been sporadic. CalSouthern found during an Assessment Summit in April 2019 that the assessments in LiveText were not adequately aligned to institutional learning outcomes and that accurate and meaningful assessment was not possible with the system in place. Additionally, misalignment of PLOs and other deficiencies prohibited the university from accurately analyzing the collected results for meaningful academic and curriculum changes. As a result, the university developed and in Q3 2019 began implementing a three-phase standardized assessment cycle for assessing student learning outcomes across all programs.

Additionally, the institutional effectiveness plan was redefined in fall 2018 and in early 2019 with an implementation date of Q4 2019. The institutional research staff is currently activating new approaches to measuring graduation and retention data. The turnover of staff, data disruption from the ransomware demand, and an antiquated data system have hindered their ability to advance the institutional effectiveness plan.

CalSouthern has graduation rates that have trended lower over the last four years in nearly all programs. While the PsyD graduate rates steadily increased from 35% in 2015 to 48% in 2018, the BA, BBA, BSCJ, MBA, MS, DBA and JD programs have consistently declined. See table 2.

<b>Year</b>	<b>BA</b>	<b>BBA</b>	<b>BSCJ</b>	<b>MBA</b>	<b>MS</b>	<b>DBA</b>	<b>PsyD</b>	<b>JD</b>
<b>2015</b>	63%	52%	NA	69%	56%	52%	35%	42%
<b>2016</b>	57%	48%	67%	56%	53%	43%	36%	21%
<b>2017</b>	46%	58%	45%	42%	63%	38%	42%	33%
<b>2018</b>	38%	35%	10%	41%	47%	23%	48%	18%

Table 2: Historical Graduation Rates 2015-2018

CalSouthern has historically struggled to find a methodology to measure undergraduate graduation rates with its monthly course starts and bachelor completion programs. During the visit, the institutional research team described a new process for measuring graduation and is now applying this methodology. Learner first year retention in 2018 appeared to be improving in a range of 78 to 100% depending on the program. Even though overall first year retention for 2019 fell slightly to approximately 72%, the team commends CalSouthern for implementation of a retention plan resulting in increased first year retention rates.

As a result of the self-study, the WSCUC Steering Committee identified the need to create a schedule informing the programs and faculty of their program assessment period. One was not provided to the team to review. The institutional report also recognized the need to create a calendar for Academic Program Review and a timeline for implementation of recommendations resulting from the review (CFRs 4.3, 4.5). However, at the time of the visit the timeline for implementation of recommendations had not been provided to the team (CFR 4.2).

CalSouthern's institutional report stated that indirect and direct measures (signature assignments, retention and graduation rates, licensure pass rates as applicable, and surveys) are used as a means of evaluating institutional effectiveness (CFR 4.2). Results of indirect

measures, such as graduation rates, licensure pass rates, and employment placement data, were provided to the team. Faculty mentors are involved in the assessment of student learning by means of signature assignments within their courses. During onsite interviews the assessment process was more clearly defined including how assessment artifacts are collected and distributed to faculty for assessment, as well as use of rubric norming procedures which follow standards of best practice. However, the requested indirect evidence in the form of survey results were either partial or not provided to the team.

CalSouthern has identified the need to update their processes for improved efficiency and the generation of high-quality data that may be used for continuous quality improvement. This process was implemented in Q3 2019. It is expected that, with time to mature and prioritization of assessment practices, the results of Academic Program Reviews (APR) and learner assessment will assist CalSouthern in making strategic decisions (CFR 4.1).

CalSouthern shares information obtained around key performance indicators and its assessment data with all university stakeholders as stated on the Institutional Effectiveness webpage (<https://www.calsouthern.edu/institutional-effectiveness/kpi>) (CFR 4.2).

#### Institutional Learning and Improvement

The institutional report stated that CalSouthern analyzes its effectiveness, engaging internal stakeholders through student learning assessment and program reviews (discussed elsewhere), as well as through advisory committees and surveys. Interviewed advisory committee members reported meaningful engagement with their schools. Regarding surveys, the team learned that CalSouthern utilized a homegrown survey using Survey Monkey for assessment of campus climate. The survey was labeled CalSouthern FACULTY

SURVEY\_2019\_Data\_All\_200219. Results indicated 85% overall satisfaction with 89 respondents and 74 complete responses. As calculated by the team, the survey response rate would represent approximately 44.5% if estimating a faculty of about 200 as per the SFU19. The survey report provided no indication of the precise identity or exact size of the target audience or the length of time the survey was available. These factors led the team to question the validity of the institution's climate assessment methodology and results (CFR 4.3).

Through a process of grade analysis and evaluation, CalSouthern assesses the rigor and effectiveness of its grading policies and practices (CFR 4.4) while recognizing the need for more faculty mentor engagement and the need for an increase in faculty development seminars. CalSouthern recognizes the need to include all stakeholders, alumni, employers and practitioners in the development of a strategic plan to ensure long-term effectiveness and sustainability of the institution (CFRs 4.6, 4.7). CalSouthern utilizes faculty input in its strategic planning by assigning some mentors to participate on committees; this process includes both full-time and core faculty members. CalSouthern may want to include all faculty, including adjuncts, in the strategic planning process. CalSouthern might also consider increasing the number of current learners and alumni who participate in the assessment and alignment of educational programs (CFRs 2.4, 2.5).

In summary, CalSouthern has recently started the implementation of new financial reporting, student information, and online learning management systems and has improved quality assurance and institutional learning processes. The team recommends that CalSouthern implement a functional, valid, and reliable data collection, analysis, and reporting system that supports a culture of evidence and improvement (CFRs 4.1, 4.2, 4.3). See Components 4, 5, 6.

### **C. Component 3: Degree Programs: Meaning, quality and integrity of the degrees**

The “CalSouthern Difference” is described in the institutional report as the point of distinction that distinguishes CalSouthern from other institutions. The CalSouthern Difference implements a philosophy of curriculum development focused on guiding learners to acquire knowledge. The Faculty Mentor model defines the faculty mentor responsibilities as “monitoring, evaluating and reporting the learner’s academic progress through a faculty mentoring model to deliver [asynchronous online] instruction in academic programs” (institutional report, page 10). The faculty/learner model is designed to provide “specialized one-on-one learning” consistent with the CalSouthern goal to “maintain flexibility in delivery of programs to meet the needs of the University learners” (page 8). The team reviewed 48 courses, including syllabi and course activity in the learning management system. Faculty mentor monitoring was evident by the data provided to the mentor of the learner’s activity, such as posts uploaded to the discussion forum and submission of assignments.

In the current learning management system (Compass), faculty mentors monitor the frequency and date of submission of discussion posts for their assigned learners. In interviews with faculty mentors, their participation in discussion forums was described as responding to questions posed by learners; this was also observed in all team member reviews of the forums. Monitoring was also observed by mentor posting of procedural reminders to learners to begin submitting discussion posts.

Evidence of faculty providing evaluation of, feedback on, and grading of assignments submitted by learners was observed within the learning management system. Faculty reported learner progress through grading of assignments and assigning grades for the courses.

Therefore, team members reviewing the learning management system found evidence of monitoring, evaluating, and reporting consistent with the written faculty mentor expectations.

According to the Faculty Mentor Handbook, the faculty mentor must contact each learner who is assigned to their course within the first week of the class via telephone, video conference (preferred), or the CalSouthern email account. Additional required contact includes initiating contact if the mentor does not receive the learner's first assignment by the suggested due date. The Handbook recommends that the mentor also initiate contact at the end of each week when the learner has not participated in the discussion forums or submitted any assignments (page 8). The requisite contact is procedural rather than substantive (CFR 2.5). The team confirmed, through review of the LMS and interviews with learners and faculty mentors, that interactions between faculty mentors and learners are primarily learner-initiated as part of the active self-learning model. The team recommends that CalSouthern redesign the educational model to assure faculty-initiated, regular, and substantive interaction with students (CFRs 2.5, 4.4 and Distance Education Report).

CalSouthern degrees are designed to support the university's mission of "preparing learners to succeed in a world we have yet to imagine." According to the university, this is accomplished through active learning, respecting diversity, and promoting intellectual freedom (CFR 1.1). The curriculum is designed as an outcomes-based, active self-learning approach. The team observed the self-learning approach to commonly include assigned textbook reading, discussion posts, and completion of activities such as written assignments, slide presentations, or video presentations. According to interviews, curriculum design is primarily conducted by curriculum developers with varying degrees of input from faculty mentors from the different schools within the university.

Learners are provided the flexibility of monthly class starts. This flexible start date model coupled with small enrollment in course sections, many with only one learner, appear to result in staggered pacing of learners proceeding through courses. As a result, limited peer-to-peer interactions were observed among the learners' activity within the learning management system, despite written expectations in syllabi for sharing experiences with and learning from peers and a grading rubric for postings that assesses how well the learner integrates from other learner(s)/mentor (CFR 2.5).

The team learned through interviews with faculty mentors, academic advisors, graduate learners, and curriculum developers that limitations within the current LMS (Compass) preclude the technical capability for faculty mentors to include more engaging instructional materials in courses. These technicalities impose limitations on the types of interactions that can be initiated by faculty mentors. Consequently, the team learned that there is campus-wide enthusiasm for the anticipated transition to Canvas as the new LMS. A transition team is executing the gradual and incremental transition of the new Student Information System (SIS), Ellucian, module by module. At the time of the visit, the financial module of Ellucian was the first to be completed and was being tested. The transition to Canvas will include integration of Canvas and Ellucian. The university's leadership anticipates completion of the transition from Compass to Canvas and Ellucian by fall 2021.

The university primarily offers three-credit asynchronous online courses in eight-week terms. Doctoral project courses in the School of Behavioral Sciences and the School of Business provide 16-week terms. In accordance with the Credit Hour Policy, a three-credit course is designed with the expectation of learners spending a minimum of 135 hours on

academic work, with 45 hours of academic engagement and 90 hours of preparation. The number of assignments per three-credit hour course varies greatly, from 15 to 28 assignments over the term. This would indicate that academic engagement and preparation could vary widely as well. It was unclear how the credit hour policy was applied consistently to courses. Course developers determine the amount of learner work expected in each course to achieve the learning objectives. A suggested timeline for pacing of weekly academic activities in order to complete the course requirements within eight-weeks is included in course syllabi (CFR 2.6).

The institutional learning outcomes and program learning outcomes are the means for determining the meaning and integrity of degrees. Institutional learning outcomes align to program learning outcomes for each degree program. Student learning outcomes are included in course syllabi, and are linked to course assessments. Professional standards and career readiness are benchmarks used by the university to determine the integrity of degrees (CFR 2.1).

#### **D. Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation**

##### **Assessment of Student Learning**

The previous feedback from the Seeking Accreditation Visit 2 asked for significant improvements to the assessment process to improve accountability to student learning and to improve future assessment of learning. At the time of the visit, CalSouthern had taken steps to begin strengthening its ability to monitor and assess student learning. The University Assessment Committee is responsible for ensuring program reviews and assessment plans and reports to meet standards and adhere to the assessment plan that was recently implemented (CFRs 2.6, 2.7). LiveText is used to receive assessment submissions for evaluation of ILOs and PLOs.

At the time of the visit, members of the Council reported that data collection was occurring in LiveText in accordance with phase 1 of the new assessment plan. However, sufficient data had not yet been collected for analysis of the learning outcomes.

### Achievement of Core Competencies

As stated above in Standards 1 and 2, learning outcomes are published, aligned, and embedded into programs and courses (CFR 1.2). Additionally institutional learning outcomes are mapped to WSCUC core competencies (CFRs 2.2, 2.4, 2.6. 2.7, 4.3).

- Written communication: ILO 3 - Effective communication in writing across settings, purposes and audiences
- Critical thinking: ILO 1 - Apply specific subject matter in a chosen field of study that leads to personal and professional development and ILO 7 - Exercise critical thinking and reasoning in judgment, decision-making and problem solving
- Oral communication: ILO 4 - Effective communication orally demonstrating well-organized thoughts, ideas and opinions in a coherent presentation
- Information literacy: ILO 2 - Using a variety of information accurately and appropriately and ILO 6 - Make informed decisions that meet professional standards of ethical and legal behavior
- Quantitative reasoning: ILO 5 - Apply the use of logic, numbers, and/or mathematics to a scientific system of inquiry from which to draw logical conclusions.

### Standards of Performance at Graduation

CalSouthern relies on programmatic accreditation and licensure approvals as two means of evaluating the standards of performance at graduation. For the School of Business and the School of Nursing, the institution relies on programmatic accreditation by the Accreditation

Council of Business Schools and Programs (ACBSP) and the Commission on Collegiate Nursing Education (CCNE). As examples of licensure approvals, California Southern University's School of Law is registered as an unaccredited correspondence law school with the Committee of Bar Examiners of the State Bar of California. This allows graduates of the Juris Doctor program, who have complied with Title 4, Division 1 of the Rules of the State Bar of California, to sit for the California Bar Exam and upon passing it to practice law in California. The Board of Psychology of the State of California accepts California Southern University's Doctor of Psychology (PsyD) degree as meeting the educational requirements for licensure as a psychologist in California.

At the institutional level, the standards of performance at graduation are evaluated using assessment data from courses with signature assignments that are uploaded to LiveText. Course capstones, doctoral defenses, as well as indirect survey data and licensure data, are also used to assess educational quality. However, as described above, the university reported that significant deficiencies in the process of conducting assessment were identified in April 2019, resulting in the subsequent development and implementation of updated assessment procedures.

#### **E. Component 5: Student Success: Student learning, retention, and graduation**

CalSouthern evidences learner success using key performance indicators which measure the university's overall and program specific graduation rates, course completion rates, learner satisfaction, and learner retention rates, in addition to the demographic composition of the student body. Graduation, course completion, and enrollment trend data were provided.

CalSouthern makes available to stakeholders, faculty, staff, and prospective learners the results of key performance indicators, assessment data, and learner satisfaction on their Institutional Effectiveness webpage.

CalSouthern recently updated their policies and definitions around completion, graduation, and retention rates in a document New Policies and Definitions. CalSouthern developed a Satisfactory Academic Progress (SAP) procedure in July of 2019 with an update in December 2019. Learners failing to maintain SAP are placed on probation. Learners have two semesters to show progress to meeting SAP. However, as the institution just updated and enacted this policy, an SAP report was not made available to the team and it is unclear if the institution is following the procedures.

CalSouthern promotes learner success by the utilization of the following: individualized academic advising, tutorial referrals, disability services, library services, military advising, career development webinars, new learner orientations, learner organizations, alumni services, peer coaching, and the CalSouthern Student Advisory Council. Limited assessment of the effectiveness of advising and co-curricular activities was provided. More in-depth tracking and assessment of effectiveness would provide CalSouthern with valuable data which may be used in future APR action plans and institutional improvements.

In an effort to enhance the efficacy of the assessment process CalSouthern hired a dedicated institutional research and assessment specialist, but that position and that of chief technology officer suffered resignations and terminations over four years, one resignation the week before the team visit. However, during interviews held on campus, the research analyst outlined strategies to strengthen the institutional research (IR) functions at CalSouthern using better collection, analysis, and dissemination of information with the new technologies. The IR and assessment teams stated in interviews that they are excited about the new technology systems and improved IR strategies being implemented and are looking forward to strengthening their efforts to benefit the institution (CFRs 2.7, 2.10, 4.1, 4.2, 4.3, 4.6, 4.7).

The new assessment cycle will standardize assessment of student learning across all programs. As indicated above in Standard 2, the process as outlined will be conducted in three phases. Phase 1 will identify PLOs to be assessed, contacting faculty teaching those courses to alert them to the upcoming assessment and the need to prepare any assessment activities. The assessment must include both direct and indirect measures and will be documented using an Assessment-Reporting Template (ART) which was provided onsite during the visit. Next, during Phase 2, assessment activities are collected and assessed, and results reviewed by the faculty with submission of the data and reflections to the University Assessment Committee. Phase 3 includes documentation of assessment activities and results and “closing the loop.” With the recent implementation of Phase 1 only, the evaluation of the new assessment plan could not be done by the team and will need to be conducted as the plan continues and matures.

**F. Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence**

CalSouthern utilizes Academic Program Review as a means of evaluating the rigor and quality of the degree (CFRs 4.3, 4.4, 4.5, 4.6). Each school conducts an APR for each degree level offered. APRs are conducted by program faculty, members of the Dean’s Council, and learners.

CalSouthern indicates in the institutional report, “Most recommendations stemming from these reviews can be classified into one of four major categories: Program resources, shared- governance and communication, learner issues, and curriculum and program goals” (page 46). Action plans are created to “close the loop” and the results are shared on the institution’s website, in meetings, and through formalized APR reports. During the visit, it was discovered that results are reported up to the President’s Cabinet, the president, and to the board of directors.

However, the data provided about the APR process were problematic. The institutional report stated that CalSouthern conducts APRs on a five-year cycle as shown in an appended schedule (5Year Cycle Chart, page 45). However, the chart in the Institutional Effectiveness Plan (page 18) contradicts this. It demonstrates that APRs were or will be conducted in as few as three and as many as eight year intervals. Of the seven APRs of non-teach out programs scheduled between 2015 to 2019, the team received the reports for only five, despite requests to the contrary. These issues called the accuracy of the schedule into question.

In its institutional report CalSouthern indicated that its “culture and practices in the areas of quality assurance and improvement have evolved significantly since its initial accreditation. CalSouthern has built institutional capacity in the areas of program review and annual assessment reporting...” (page 49). However, it was not until the Assessment Summit held in April 2019 that it was found that the data collection and analysis processes within LiveText were insufficient. Subsequently the Institutional Effectiveness Plan was revised and provided to the team onsite in March 2020. In it the issues found during the Summit were addressed and the new plan was stated to have been implemented in Q4 2019. This sequence of events would seem to contradict an evolutionary approach referenced in the June 2019 institutional report. In the end, with maturity of the new technologies and IEP policies, CalSouthern has positioned itself to meet its aspirational goal of increasing institutional capacity in assessment and annual program review thus improving institutional quality in the future.

#### **G. Component 7: Sustainability: Financial viability, preparing for the changing higher education environment**

California Southern University is well suited for the ever-changing higher education environment. The institution is focused on offering affordable degree programs with zero percent interest loans. This, combined with a flexible online delivery and mostly variable cost

model, allows the institution to be more nimble and adaptive than most traditional “on-ground” universities. As stated above in Standard 3, CalSouthern has consistent shareholder financial investment, a relatively strong balance sheet, and plans for continued commitment to invest in personnel and resources.

**H, Component 8: Optional essay on institutional specific themes** Not applicable

**I. Component 9: Reflection and plans for improvement**

The concluding essay in CalSouthern’s institutional report proudly displayed several strengths:

- The CalSouthern Difference that focuses on quality programming
- A unique faculty mentor model
- Commitment to learner success and curricular improvement
- Focus on process improvement
- Devoting resources to revamping technology.

Though the strategic plan is focused on several important objectives that will advance the institution, the team observed hesitancy in both the institutional report and many interviews to discuss weaknesses. However, through other interviews, the WSCUC team was able to tease out reflections for further development from leadership, the governing board, staff, and faculty.

These included:

- Completing the search for and hiring a new president
- Building trust and improving communication within the workplace
- Continuing to advance the initiatives for assessment and institutional research to appropriately ensure curriculum improvement
- Improving technology
- Revamping or developing employment policies and practices

- Collecting and utilizing “clean” data for decision making.

### **SECTION III – OTHER TOPICS** Not applicable

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

In its institutional report, California Southern University emphasized its focus on global learning delivered in a convenient and flexible online model. According to her Written Statement to WASC 3.12.20, the current president indicated that, since 2018, she has implemented many business practices that have created necessary departments, aligned resources with institutional objectives, and focused on personnel who support the institution’s revised mission. The team observed a common focus on learner success, especially through one-to-one mentoring with learners and several student services initiatives that produced a positive trend in the first year retention rate in 2018. The team appreciated that CalSouthern is making a significant investment in technology upgrades. Finally, the team observed that, with low tuition rates and zero interest loans available to learners, the university offers opportunities for career advancement, especially for learners from lower income brackets.

There continue to be areas at CalSouthern in which strengths are offset by needs for improvement, thus inhibiting the furtherance of the mission and goals set out by the governing board and senior leadership. While there are a number of qualified, dedicated individuals in academic leadership and middle management, it is clear that most decision making comes from the president’s office and lacks a collaborative, shared governance approach to university advancement. The Faculty Senate is making progress in its development, but is just beginning to show its impact on a small number of academic issues. The governing board is passionate about the institution and regularly engages in board fiduciary responsibilities, but its membership and committee activities are not in compliance with WSCUC policy.

In the last two years, there have been so many and such frequent changes in personnel and lines of authority that it appears difficult to the team for many departments to gain traction in making and then sustaining the improvements that could propel the institution forward, especially in the areas of learning assessment and institutional effectiveness research. With high turnover, both voluntary and involuntary, the team has serious concerns about employee morale and apparent inconsistent application of employment practices. Adding to these concerns are reports of retaliation for speaking out against the institution's leadership and inconsistent disclosure of information with WSCUC.

At the heart of any university is the academic function. At CalSouthern, the non-degree and degree programs, especially those with programmatic accreditation, appear to have clear meaning, quality, and integrity and are supported by qualified and dedicated faculty. The university has an assessment plan which is well crafted and contains critical elements like signature assignments and the use of rubrics. However the plan must be implemented in a consistent and coordinated fashion and the institution's ability to sustain assessment is not evident given its history of relative inaction from 2015 to 2018 and the turnover in academic and research functional areas. There has been a lack of a systematic approach to using evidence for decision making. With little reliable and valid data related to direct student learning to review, it was difficult for the team to fully appreciate the efforts made toward student learning improvement and continuous quality assurance. Further it is troubling that graduation rates are low and decreasing in all but one school.

Finally, the online delivery model is self-paced, which adds a high degree of flexibility for non-traditional learners. But the online platform, monthly course starts, and very low numbers of learners in courses severely limit mentor-to-learner and peer-to-peer interactions. Compounding the limited interactions are expectations for faculty that have only three instructional functions: “monitoring, evaluating and reporting.”

In summary, CalSouthern shows promise and employs many talented and committed personnel. However, its processes and plans are aspirational, the evidence of its progress is limited, and structural and climate issues impede the effectiveness of the institution.

## **Recommendations**

1. Implementation of a plan to update technology that will improve the learning experience, financial reporting, and operations
2. Affordable programs with access to zero interest loans
3. Development of a new mission, strategic plan, learning outcomes, and a framework for assessment
4. Implementation of a retention plan resulting in increased first year retention rates
5. Diverse, passionate, and student-centric staff, faculty, and board

## **Recommendations**

1. Redesign the educational model to assure faculty-initiated, regular, and substantive interaction with students. (CFRs 2.5, 4.4 + referral to Distance Education Report)
2. Fully execute all three phases of the assessment plan and act upon results to make informed decisions to improve student learning. (CFRs 2.6, 2.7, 2.11)
3. Implement a functional, valid, and reliable data collection, analysis, and reporting system that supports a culture of evidence and improvement. (CFR 4.1, 4.2, 4.3)
4. Strengthen the Faculty Senate by continuing to develop a more engaged role in university decision making. This includes expanding the functions of Senate committees and representation on university committees. (CFRs 2.4, 3.10)
5. Increase the number of independent members on the Board of Directors, strengthen and document its committee activities and actions, and expand its perspectives of institutional operations and effectiveness from multiple sources. (CFR 3.9)
6. Rebuild trust within the university community through consistent and fair employment policies and practices, attention to campus climate, and open communication. (CFR 1.7)
7. Build a coherent and stable leadership structure that operates with integrity, honesty, transparency, and accountability. Operate in good faith with external entities. (CFR 1.8, 3.6)

## **APPENDICES**

**A Distance Education Review**

**B Off-Campus Locations Review** Not applicable

**C Federal Compliance Forms**

1. Credit Hour and Program Length Review
2. Marketing and Recruitment Review
3. Student Complaints Review
4. Transfer Credit Review

## **A Distance Education Review**

Institution: California Southern University

Type of Visit: Reaffirmation of Accreditation

Name of reviewer: Gloria Niles

Date/s of review: March 11-13, 2020

### **1. Programs and courses reviewed**

#### **Undergraduate degrees**

- a. AALS Associate of Arts in Liberal Studies
- b. BA Bachelor of Arts in Psychology
- c. BBA Bachelor of Business Administration
- d. BAS Bachelor of Applied Science
- e. BSCJ Bachelor of Science in Criminal Justice
- f. BSN Bachelor of Science in Nursing

#### **Master Degrees**

- g. LLM Master of Laws
- h. MA Master of Arts in Psychology
- i. MBA Master of Business Administration
- j. MS Master of Science in Psychology
- k. MSDR Master of Science in Dispute Resolution
- l. MSL Master of Science in Law
- m. MSLEEL Master of Science in Law Enforcement Executive Leadership
- n. MSN Master of Science in Nursing
- o. M.ED Master in Education

#### **Doctoral Degrees**

- p. DBA Doctor of Business Administration
- q. JD Juris Doctor
- r. PsyD Doctor of Psychology

#### **Business Certificates**

- s. Financial Management
- t. Human Resource Management
- u. International Business
- v. Leadership
- w. Management
- x. Project Management
- y. Strategic Leadership

#### **Psychology Certificates**

- z. (Pre-Baccalaureate) Addiction Studies

- aa. (Post Baccalaureate) Advanced Addiction Studies
  - bb. Healthcare Services
  - cc. Industrial Psychology
  - dd. Pastoral Counseling
  - ee. Sports Psychology
2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)

**Number of Programs Offered via Distance Education (all programs listed above)** 5 BA, 1 BAS, 2 BS, 13 Post-Baccalaureate Certificates, 9 Master degrees, 3 Doctoral degrees.

**Degree Levels:** Associate, Baccalaureate, Master, Doctoral and Certificates

**Platform/Delivery Method:**

Compass is used as both the Student Information System (SIS) and Learning Management System (LMS). The Institutional Report for Reaffirmation (institutional report) indicates that some faculty experimented with using Moodle in January 2019 (page 12) The institutional report states that the SIS and LMS chosen for implementation in 2020 are Canvas and Ellucian. The university has a transition team in place. At the time of the visit, the financials module of Ellucian was being tested. The university plans to implement Ellucian module by module, and then transition the LMS to Canvas. The university anticipates Ellucian and Canvas to be fully implemented by fall 2021.

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

**Documents Reviewed (Offsite Review) (G. Niles)**

- California Southern University Institutional Report for Reaffirmation June 2019 (institutional report)
- California Southern University website
- Exhibit C1-J Syllabus Revision Form
- Exhibit C1-H Faculty Senate Bylaws
- Exhibit C3-C ILO PLO Map
- Exhibit C3-D Assessment Process
- Exhibit C3-E Academic Program Review (APR) Guide
- Exhibit C4-A 2018 Academic Departments Annual Plan
- Exhibit C4-B Summary Assessment Report of Library and School of Behavioral Sciences
- Exhibit C4-C 2016 MBA Academic Program Review

- Exhibit C4-D Faculty Orientation Overview
- Exhibit C4-E Faculty Training Calendar
- Exhibit C4-M Faculty Profile Template
- Exhibit C4-F Faculty Mentor Handbook

**December 1, 2019 Documents (between Offsite Review and Accreditation Site Visit) (G. Niles)**

- 2A IEEI
- Academic Program Calendar Review Schedule (2015 - 2022)
- Academic Program Review documents
- 2B Learner Complaint Resolution Process
- 2C WASC EDIT - Organizational Chart
- 2.F Attrition and Retention - employees
- 2I Student Affairs - International Learners
- 2N Faculty - job descriptions (Core, Full-time, Adjunct)
- 2M Descriptions of Completed Faculty Evaluations
- 2K Internships Practica Assessed for International Learners
- 2G Learners and Mentors by Program
- 2H Learner Ethnicity and Age
- 2J International Learners Completion
- 2L Sample of Completed Enrollment Agreements
- 3A Credit Hours
- 3B Time on Task Determination
- 3C Activity Charts
- 3D Course Credit Policy
- 3E Policy on Course Time
- 3F Statement on Part-Time Completion Time
- 3G Learner Conditional Acceptance
- 3H Job Description of Person Accepting Transfer Credits
- 4A General Education Outcomes
- 4B All team members reviewed the Compass Learning Management System
- 4C Updated Curriculum Maps
- 5A Enrollment Data, Retention and Completion data for Certificates
- 5B Graduation Rates
- 5C Student Enrollment Dis-aggregation

**March 1, 2020 Documents (reviewed between Offsite Review and Accreditation Site Visit) (G. Niles)**

- #1 Satisfactory Academic Progress
- #1 New Policies and Definitions
- #2 Organizational Chart 02282020 Final
- #3 Position Descriptions

- #4 Resumes of New Positions, Promotions
- #5 Jan.Feb 2020 Report No of Learners in each course
- #6 Time to completion data
- #7 January Request for March HR 021220
- #10 Presidents Legal Updates to WASC

**Scheduled interviews during Accreditation Site Visit (G. Niles)**

- March 11 8:30 Team Meeting with President Finestone
- March 11 9:45 WSCUC Steering Committee
- March 11 10:15 Senior Staff Meeting
- March 11 11:30 Faculty Senate
- March 11 1:00 VP Student Affairs Dillon-Owens
- March 11 2:00 Curriculum Developers, (Chase, Mahan, Richey)
- March 11 3:00 Student Services Staff (Hoqoq, Folt, McCarley, Harris, Grubisic, Pozuelos)
- March 11 4:30 Instructional Technology Director (LMS): Menon
- March 12 8:15 Open Session: Adjunct/Core Faculty
- March 12 9:00 Open Session: Undergraduate learners
- March 12 10:15 Advisory Boards (Business & Management, Behavioral Sciences, Library, Law, Criminology, and Criminal Justice)
- March 12 1:00 International Student Operations / Directors of Clinical Training
  - PSYD - Martiniez
  - MA - Moua
  - MA Program Coordinator Hawks
  - Dean of Nursing - Ngati
- March 12 2:00 Open Sessions: Undergraduate Learners
- March 12 2:45 Team Meeting with Board of Directors
- March 12 4:00 Team meeting with President Finestone

## Observations and Findings

Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)	Observations and Findings	Follow-up Required (identify the issues)
<i>Fit with Mission.</i> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?	The institution is a global online university and fulfills its mission by delivering instruction through online education by monitoring, evaluating and reporting the learner's academic progress through a faculty mentoring relationship in each course (CFR 1.1).	
<i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?	<p>The institution uses a Faculty Mentor Model, that allows learners to receive instruction through monitoring, evaluating and reporting learner's academic progress and success based on "outcomes" not "time." (institutional report, page 60).</p> <p>Academic advisors are available to help guide learners through their degree program from beginning to end by assisting with:</p> <ul style="list-style-type: none"> <li>· Degree plan orientations</li> <li>· Frequent course check-ins</li> <li>· Ongoing and regular advising sessions</li> <li>· Course selection</li> <li>· Degree program inquiries</li> <li>· Learner advocate</li> </ul>	

	<ul style="list-style-type: none"> <li>· Course pairing and sequencing</li> <li>· Advising on semester course load</li> <li>· Making sound academic decisions</li> <li>· Resolving learner issues (institutional report, page 38)</li> </ul> <p>Co-curricular activities are available to support learning engagement in the life and culture of the institution. (institutional report, Component 6)</p>	
<p><i>Quality of the DE Infrastructure. Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?</i></p>	<p>The current LMS is Compass. This legacy system is outdated and has technical limitations that impede learning and interactions between faculty mentors and learner to learner interactions.</p> <p>Learners are able to access the course syllabus, and post entries and replies in a text-based discussion forum.</p> <p>Canvas has been selected to replace Compass as the LMS, with the transition fully implemented in fall 2021.</p> <p>Using an active self-learning model, faculty mentors are required to contact learners during the first week of the course. Thereafter, learners engage in self-learning by following a suggested outline of course activities for the 8 week course such as reading assigned chapters of a textbook, posting responses to discussion questions, written assignments, or oral assignments submitted as a video recording.</p> <p>Faculty mentors monitor learners' activity in the courses. However,</p>	<p>Redesign the educational model to assure faculty-initiated, regular, and substantive interactions with learners (CFRs 2.5, 4.4)</p>

	<p>substantive interactions in the LMS are primarily learner initiated, including responding to questions in the discussion forum, posing questions triggering the faculty mentor's responses, or uploading assignments.</p> <p>Faculty mentor initiated interactions were reported and observed to be procedural in nature rather than substantive. For example, reminding a learner to begin their discussion posts, or contacting a learner and/or the learner's academic advisor if assignment submissions are not uploaded in accordance with the suggested course timeline.</p> <p>The statutory and regulatory definitions of distance education state, in part, that it must "support regular and substantive interaction between the students and the instructor, synchronously or asynchronously" (Higher Education Opportunity Act, Pub.L. 110-315, 122 Stat. 3078, codified as amended at 34 C.F.R. §600.2).</p> <p>Faculty mentors evaluate learners by grading discussion posts and provide feedback to learners on submitted assignments.</p> <p>Common rubrics are used at the graduate level and undergraduate level across all schools and all courses.</p> <p>Learners are penalized up to 10% of the assignment grade for "bulk uploading" which means uploading more than 3 weeks of assignments at one time. The intent of this policy is to</p>	
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	<p>encourage learners to await feedback on their assignment before submitting subsequent assignments for a course. Aside from this policy, learners submit assignments at their own pace during the 8-week term.</p> <p>Learners have flexible start dates for enrollment in courses. The January and February 2020 Course Enrollment Report indicated 323 instances where one (1) learner was enrolled in a course for a particular start date. Consequently, opportunity for peer-to-peer engagement in such instances is not available. As a result of the rolling start dates, discussion forums remain open in a course continually, with no clear start or end to discussion threads.</p>	
<p><i>Student Support Services: What is the institution's capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</i></p>	<p>Academic Advisors are responsible for the following areas:</p> <ul style="list-style-type: none"> <li>· Retention, academic progression, graduation and time to degree</li> <li>· Course scheduling for academic progression and monitor course progression while enrolled</li> <li>· Course offerings and grade requirements that may inhibit graduation</li> <li>· Monitor through academic advising to ensure time to degree (institutional report, page 34).</li> </ul> <p>The library website was moved to WordPress and Library links and pages were reorganized for ease of use (C4-B page 3).</p> <p>Co-Curricular activities are available to learners. There is</p>	<p>Implement a functional, valid and reliable data collection, analysis, and reporting system that supports a culture of evidence and improvement. (CFR 4.1, 4.2, 4.3)</p>

	<p>a Student Advisory Council that holds monthly meetings. (institutional report, page 40). A Co-Curricular Assessment Committee was formed and charged with monitoring and assessing the effectiveness of Student Affairs co-curricular activities. (institutional report, page 44)</p> <p>Career Café (bi-weekly webinar series) provide topics that benefit the learning experience as well as career preparation. Learners can attend sessions live and pose questions or watch recordings of previous sessions. (institutional report, page 39)</p> <p>The Student Affairs department initiated, "The Learner Connect" newsletter. Volume 1, Issue 1 was published in July 2019. At the time of the site visit, the most recent issue was Volume 1, Issue 3 published in November 2019.</p> <p>Disability services and veteran services are provided to qualified learners. The most common disability accommodation provided to learners with documented disabilities is up to two 30-day extensions to extend time to complete course activities.</p> <p>Effectiveness of learner support services was anecdotal. Limited assessment of the effectiveness of advising and co-curricular activities was provided.</p>	
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<p><i>Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</i></p>	<p>The institution classifies faculty as full-time, core and adjunct. The institution utilizes a majority of adjunct faculty with contracts with an open-ended timeframe. These employment agreements are issued as at-will agreements. Faculty mentors are compensated per successful learner completion per course. Deans determine the maximum number of learners assigned to each faculty mentor.</p> <p>The Seniority Faculty Update 2019 for AY 2015-2019 (SFU19) indicated 207 mentors with only two active full-time faculty mentors, both in the School of Behavioral Sciences. Oral statements at the visit were that there were five full-time faculty in School of Behavioral Sciences, five full-time faculty in the School of Business, and one full-time faculty in the School of Education, but no full-time faculty in the Nursing, Criminal Justice, or Law programs (CFR 2.1).</p> <p>Upon hire, faculty mentors participate in faculty orientation and online training. New faculty mentors are paired with a more experienced faculty mentor for coaching through the first few courses.</p> <p>The Faculty Training Calendar lists 25 one-hour workshops offered in 2019 by the institution and 8 externally offered workshops.</p> <p>Faculty Mentors set annual and quarterly goals and submit progress reports</p>	<p>Ensure that all programs have at least one full-time faculty member.</p>
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	<p>through the faculty portal that are reviewed by the Dean.</p> <p>Deans hold monthly meetings via WebX with Faculty Mentors. (institutional report, page 32)</p>	
<p><i>Curriculum and Delivery. Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</i></p>	<p>Courses are offered online asynchronous in 8-week or 16-week terms.</p> <p>Faculty can submit Syllabus Revision Recommendations to the Dean. A faculty governance process has been established. Bylaws of the Faculty Senate were approved in February 2018.</p> <p>The Standard Operating Procedure states that the institutional Curriculum Committee is responsible for the development, review, renewal, and recommendation of curriculum. However, the team is unclear if the Faculty Senate or its Curriculum Committee is represented on it. Further, the team saw little or no evidence that the Faculty Senate itself had representation on university committees and is unsure of the role and authority of the Senate.</p> <p>Credit hour policy is defined in the Faculty Mentor Handbook (page 29). Guidelines are provided that correlate reading for study to time expectations. A sample of the Credit Hour Validation Form is provided in the Faculty Mentor Guidebook (pages 30-31).</p> <p>At the time of the site visit, three curriculum developers were responsible for design of the syllabus, course materials and course</p>	<p>Strengthen the Faculty Senate by continuing to develop a more engaged role in university decision making. This includes expanding the functions of Senate committees and representation on university committees. (CFRs 2.4, 3.10)</p>

	<p>activities. The curriculum developers rely on faculty mentors as subject matter experts when designing curriculum. In the School of Behavioral Sciences, the curriculum developer works collaboratively with all faculty mentors assigned to teach a particular course to elicit feedback on course assignments and course materials.</p>	
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions' online offerings? If any concerns exist, how are these being addressed?</p>	<p>The IRAD publicly displays retention and graduation data on the Institutional Effectiveness page of the website.</p> <p>CalSouthern has graduation rates that have trended lower over the last 4 years and historically has struggled to find a methodology to measure undergraduate graduation rates with its monthly course starts and bachelor completion programs.</p> <p>During the visit, the institutional research team described a new process for measuring graduation and is applying this methodology.</p> <p>Learner first year retention in 2018 appeared to be improving in a range of 78 to 100% depending on the program.</p>	
<p><i>Student Learning.</i> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses?</p> <p>What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings?</p>	<p>Institutional Learning Outcomes (ILOs) were revised in 2014. Curricular maps by degree program demonstrate alignment of ILOs and Program Learning Outcomes (PLOs). Faculty develop Student Learning Outcomes that align to Course Learning Outcomes. Signature assignments in courses are uploaded to LiveText for evaluation of PLOs and ILOs.</p>	<p>Fully execute all three phases of the assessment plan and act upon results to make informed decisions to improve student learning. (CFRs 2.6, 2.7, 2.11)</p>

	<p>A revised Academic Program Review (APR) Guide explains the policies and procedures for program review. The schedule of APRs is unclear to the team. A three-phase assessment process has recently been developed as a process for phasing through yearly assessment activities. Data collection began in Q3 2019 for phase one for the new assessment plan. At the time of the site visit in March 2020, sufficient data were not available to determine if the new collection process is resulting in meaningful data to assess learning outcomes.</p>	
<p><i>Contracts with Vendors.</i> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on <i>Contracts with Unaccredited Organizations?</i></p>	<p>Turnitin - Faculty mentors are required to upload a minimum of one assignment per learner per course to Turnitin for “Quick Review” (Mentor Handbook, page 25)</p> <p>ProctorU – All learners are required to have an account with ProctorU, an online proctoring service for exams.</p>	
<p><i>Quality Assurance Processes:</i> How are the institution’s quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?</p>	<p>The 2018 Academic Annual Plans, the 2016 MBA Program Review, and the 2018 Summary Assessment Report of the Library provides examples of how program assessment has been conducted. A new Assessment Plan and Academic Program Review have resulted from a renewed focus on assessment (institutional report, pages 29-30)</p>	

**B Off-Campus Locations Review**, not applicable

**C Federal Compliance Forms**

**Overview**

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

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

## 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 Where is the policy located? Catalog (generally), page 119-190; syllabi specifically Comments:		
	Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Does the institution adhere to this procedure? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Comments: There was a wide number of activities per 3 cr.hr. course and no mechanism to correct	
		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 checked="" type="checkbox"/> NO X NA Comments:
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>			How many syllabi were reviewed? 2 Per Degree Level What kind of courses (online or hybrid or both)? online What degree level(s)? 0 AA/AS X BA/BS XMA X Doctoral What discipline(s)? Business, Law, Psychology, Nursing 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: The information in the syllabus does not clearly state how the credit hour is determined. Some calculation tables were submitted for review and these seem to follow 135 hours, but it is unclear how that was validated in any review process
	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? 8 What kinds of courses? online and one practicum course for nursing What degree level(s)? 0 AA/AS X BA/BS <input type="checkbox"/> X MA X Doctoral What discipline(s)? Business 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: It appears that business courses have too many activities for 3 credits in 8 week	
		Sample program information (catalog, website, or other program materials)	How many programs were reviewed? four What kinds of programs were reviewed? Catalog Review and All Distance Ed Programs. What degree level(s)? AA/AS X BA/BS XMA X Doctoral What discipline(s)? Business Administration Comments: BS Business Administration demonstrates 120 credit hour requirement to fulfill graduation requirements, and expected length is published at 4 years. MA in Psychology: 62 credit hour requirement to fulfill graduation and expected length published at 4 years. Doctor of Psychology: 66 credit hour requirement, published length of program is four years.

Review Completed By: Emmanuel Folowosele; Date: June 25,2019 Updated by W. Nitsch, WSCUC team  
chair 3/31/2020

## 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 <input type="checkbox"/> NA Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Comments: CalSouthern demonstrating employment information through their Career Cafe Webinars and institutional effectiveness website.

\*§602.16(a){l}{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: Emmanuel Folowosele;  
Date: June 25, 2019

Updated by J. Keith, WSCUC team member 03/31/2020

### 3 - STUDENT COMPLAINTS REVIEW FORM

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

<b>Material Reviewed</b>	<b>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</b>
Policy on student complaints	<p>Does the institution have a policy or formal procedure for student complaints?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, is the policy or procedure easily accessible? Is so, where?  Yes, a grievance procedure exists in the catalog, PG-210</p> <p>Comments:  A grievance procedure exists in the catalog, page 210, which includes a multi-step process.</p>
Process(es)/ procedure	<p>Does the institution have a procedure for addressing student complaints?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly: In the event that a learner has a complaint, grievance or dispute with California Southern University regarding university procedures, decisions or judgements, the learner has a right to seek a satisfactory resolution through the formal avenues of appeal and redress as follows: Notification, Appeal and Final Decision by the Academic Committee.</p> <p>If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:</p>
Records	<p>Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO  If so, where? Office of VP Student services</p> <p>Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO  If so, please describe briefly:</p> <p>Comments: The University legal counsel was able to produce a copy of the formal complaints and the related complaints log which had been compiled dating back to September of 2008. Each entry into the log included the following information: <ul style="list-style-type: none"> <li>• Learner/Student name</li> <li>• Date of complaint/grievance.</li> <li>• Description of complaint</li> <li>• Type (complaint, grievance, appeal)</li> <li>• Resolution</li> <li>• Resolution date</li> <li>• Individual who resolved the issue</li> </ul> </p>

\* §602-16(1)(I)(ix)

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

Review Completed By: Emmanuel Folowosele;  
Date: June 25, 2019

Updated by J. Keith, WSCUC team member 3/31/2020

#### **4-TRANSFER CREDIT POLICY REVIEW FORM**

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

Material Reviewed	Questions/Comments {Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	<p>Does the institution have a policy or formal procedure for receiving transfer credit? X YES <input type="checkbox"/> NO</p> <p>If so, is the policy publicly available? X YES <input type="checkbox"/> NO If so, where? CalSouthern 2019 Catalog Pg13-16.</p> <p>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? X YES <input type="checkbox"/> NO</p> <p>Comments: The team chair reviewed several transcripts of students admitted within 6 months of the visit. The number of credits awarded appears to follow the institution's policy for master and doctorate students, but not for bachelor students. The maximum allowed credits is 90, yet there were four students with over 90 credit hours, one with 103 credits. The individual who does the transfer credit evaluations was not available for the visit to confirm this data.</p>

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

- (1) Are publicly disclosed in accordance with 668.43(a)(II); and
- (2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

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

Review Completed By: **Emmanuel Folowosele;**  
Date: **June 25, 2019**

Updated by **W. Nitsch, WSCUC team chair, 03/31/2020**