

## **REPORT OF THE WSCUC TEAM**

Accreditation Visit for Reaffirmation

To Ashford University

April 3-5, 2019

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

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

### **A. Description of the Institution and its Accreditation History, as Relevant**

Ashford University is a private, for-profit university owned by Zovio (formerly known as Bridgepoint Education). Its mission is to serve traditionally underserved and at-risk student populations through online distance learning programs. Its approximately 40,000 students are distributed across 69 undergraduate and graduate programs. Eighty-five percent of Ashford students are classified as undergraduate and 15% are graduate. Most are working adults.

Ashford has approximately 210 full-time faculty and about 2,400 associate faculty; at most other institutions, associate faculty are called part-time or contingent faculty. The full-time faculty-to-student ratio is 1:177. Ashford's main office is in San Diego, CA with operations service centers in Phoenix, AZ and Denver, CO as well as a small campus in Clinton, IA. At the time of this reaffirmation process, Ashford is also undergoing a structural change process with WSCUC, having applied for approval to separate from Zovio, convert from for-profit status to non-profit status, and become a freestanding private institution.

Ashford University was created in 2005 when Bridgepoint Education, Inc. (now Zovio) purchased The Franciscan University of the Prairies, located in Clinton, Iowa. Franciscan University of the Prairies was founded as Mount St. Clare College in 1918 as a junior college for women sponsored by the Sisters of St. Francis. The institution was accredited in 1950 by North Central Association, the precursor to the Higher Learning Commission (HLC) and began to offer baccalaureate programs in 1979. It introduced graduate degree programs in 2003, and changed its name in 2004 to The Franciscan University of the Prairies. In 2005, the Sisters of St. Francis ended their sponsorship of the school leading to Bridgepoint's purchase and

subsequent renaming of the school as Ashford University. Ashford expanded its online offerings while maintaining a campus in Clinton, Iowa. In 2010, Ashford decided to move its headquarters from Clinton, IA, to San Diego, CA. At the time of this writing, Ashford maintains a small campus in Clinton offering a Bachelor of Arts in Business.

Anticipating moving its operations center to San Diego, Ashford applied for accreditation with WSCUC in 2010 while it was still accredited by HLC. In 2011, eligibility for accreditation under the Pathway B process was granted. In 2012, following a Pathway B site visit, accreditation was denied. The Commission permitted Ashford to reapply for accreditation with a Special Visit scheduled for 2013. In October, 2012 Ashford reapplied for initial accreditation. In June 2013, following an Offsite Review and a Special Visit, initial accreditation was granted with a planned Special Visit in 2015 to *“monitor progress... with regard to student achievement and degree completion; adequacy and alignment of resources with educational purposes; faculty model and roles; program review; assessment; and independence of the governing board.”* The 2015 Special Visit was conducted, the Commission received the report, and scheduled the current reaffirmation process. In 2017, Ashford applied for two structural changes – a merger with University of the Rockies and conversion from for-profit to non-profit status, including separation from Zovio. In June 2018, Ashford received approval to merge with University of the Rockies. As of this writing, the WSCUC Commission has deferred a decision related to the Ashford petition for separation from Zovio and conversion from for-profit to non-profit status.

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

The WSCUC commission constituted the Review Team in spring 2017. Ashford uploaded its Institutional Report on schedule in January, 2018. An Offsite Review (OSR) was conducted in March, 2018. The Team reviewed the institutional report and related appendixes as well as materials submitted for previous reviews. The Team identified five lines of inquiry for the planned September, 2018 site visit:

1. educational effectiveness,
2. faculty participation in academic decision making,
3. institutional governance,
4. resource allocation, and
5. Ashford's complicated legal/regulatory environment.

In addition, the Team requested additional information about student outcomes, student practical training, student work, use of rubrics, faculty development and performance evaluation, minutes of various stakeholder group meetings, and Board involvement in strategic planning. In June, 2018, due to pending structural change reviews related to the merger with University of the Rockies and the proposed conversion from for-profit to non-profit, the site visit was postponed and rescheduled for April, 2019.

The Team reviewed the material uploaded in January 2019 and held a conference call in March, 2019 to discuss the Ashford materials, establish visit priorities, assign Team member responsibilities, and refine lines of inquiry. Additional questions were developed and institutional documents requested. Ashford responded accordingly prior to the site visit.

During the site visit, the Team conducted 30 meetings with more than 140 students, faculty, staff, and administrative leaders (38 faculty, 17 program chairs, 12 deans or associate

deans, 38 other administrators and professional staff, 17 board members, and about 25 students). Some were interviewed two or more times. The Team also reviewed student, faculty, staff, and alumni responses to an email inviting comments about their Ashford experience. These responses were submitted to a confidential email account provided by WSCUC. In addition, during the site visit, the Team requested additional materials related to questions arising during the visit. Ashford provided and the Team reviewed all requested materials prior to the end of the visit.

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

Ashford provided an Institutional Report, necessary attachments, and all requested additional reports and related information in a timely manner. These materials were well organized, clearly written, and presented with sufficient documentation for the Team to conduct its work. Based on the Team's work during the visit, Ashford's report accurately portrayed the condition of the institution. The institution's preparation process appeared rigorous and complete, drawing on information provided by administrative leaders, faculty, staff, the Board, and an external advisory group.

A Reaffirmation Steering Committee (RSC) composed of leaders from across various units of the university was formed in 2015 to begin the self-study process. The members of the RSC chaired the subcommittees tasked with the research and writing for the report. These subcommittees included faculty and leadership from across all areas of the university as well as shared service departments at Zovio. They worked through 2017 researching, discussing, and writing multiple drafts of their sections of the report. The completed full draft was reviewed by

internal constituents, by the Board of Trustees, and by the institution's National Advisory Council. Ashford conducted a comprehensive inquiry, examined and evaluated the quality of data, and developed an evidence-informed understanding of its strengths and concerns, which were subsequently conveyed in the report.

In addition to providing additional information as requested following the Offsite Review, Ashford provided written text and data responding to the lines of inquiry. This response included detailed material that addressed the Team's issues and questions. Because of the postponed site visit, the Team made additional requests for updated information to which Ashford also responded in a timely fashion. All Ashford materials were uploaded to the Box site provided by WSCUC.

During the site visit, the Team workroom provided a productive space for Team meetings. The site visit schedule made it possible for the Team to meet with a diverse group of Ashford leaders, faculty, staff, and students. The Team thanks Ashford's administration, faculty, and staff for their support and for creating a hospitable working environment.

In all, the Team examined about 400 reports, documents, recordings, and related materials.

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

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

The Commission's 2015 action letter identified six areas for attention, specifically noting: *"The team found evidence of progress in data-driven interventions supporting student success. However, there appears to be limited alignment between the specific initiatives and their effectiveness. By the time of the next accreditation visit, significant improvement in these*

*metrics is expected along with the evidence that links the university's interventions to student success. In addition, we expect the university to report their retention/graduation rates on their website in a more accessible format."* The Commission emphasized the following for attention and development, *"Trend Data to Evaluate Initiatives. By the time of the next Comprehensive Review, the university will have accumulated sufficient longitudinal data to make appraisals of its various strategies around student retention and completion."* Furthermore, the Commission urged Ashford to *"ensure that proportional expenditures are invested toward support of the academic functions, regardless of changing enrollments, and to have cycles of data in support of this priority by the time of the next review."*

Ashford's response to the six recommendations is discussed below.

**1. Attrition, Support for Student Achievement, and Adequate Levels of Degree Completion.**

*"The team found evidence of progress in data-driven interventions supporting student success. However, there appears to be limited alignment between the specific initiatives and their effectiveness. By the time of the next accreditation visit, significant improvement in these metrics is expected along with the evidence that links the university's interventions to student success. In addition, we expect the university to report their retention/graduation rates on their website in a more accessible format."* (WSCUC Action Letter, 2015)

Ashford's report describes its efforts to improve persistence and completion rates.

Ashford posts persistence and completion data on its website that can be easily located from a student consumer information link on the home page. Ashford's efforts to improve persistence and completion take the form of a number of intervention initiatives aimed at reducing attrition and supporting progress by implementing, testing, and evaluating numerous initiatives.

According to its report, these efforts have not yet resulted in demonstrable improvements to persistence and completion. Ashford discontinues initiatives that do not demonstrate benefits, continues those that show promise, and adds new programs to pilot test. The effects of some efforts intended to improve persistence may be muted by educationally purposeful changes in policy and practice. For example, Ashford undergraduate students who do not earn passing grades in three consecutive courses are withdrawn, and graduate students are withdrawn following two or more unsuccessful course grades, whether consecutive or not. This has the laudable effect of limiting debt incurred by students whose performance indicates they are not presently able to meet Ashford's standards.

Ashford created a Retention Intervention Matrix to represent its range of ongoing efforts supporting student success by showing interventions that have a positive impact, emerging interventions, and best practices implemented. In another approach to addressing these issues, Ashford conducts studies of students who withdraw as well as additional studies of what students consider to be a positive Ashford experience. The institution also has implemented an ongoing student satisfaction assessment process that allows leadership to gauge dissatisfaction on a monthly basis, identify issues with which students are grappling, and act on them. These studies guide the development of subsequent intervention programs.

**2. Adequacy and Alignment of Resources with Educational Purposes.** *"The team found evidence of the prioritizing of resource allocations to academics and of budgets informed by program review action plans. The university is urged to continue to ensure that proportional expenditures are invested toward support of the academic functions, regardless of changing*

*enrollments, and to have cycles of data in support of this priority by the time of the next review.” (WSCUC Action Letter, 2015)*

The report shows evidence of Ashford’s continued commitment to aligning adequate resources with educational purposes. At the time the report was prepared, Ashford had an Adequacy and Alignment of Resources Committee, the function of which is now incorporated into the Retention and Graduation Committee (RGC), that focuses on the needs of diverse students and monitors a number of data points to ensure Ashford meets its goals for resource allocation and alignment. These data points include student-to-faculty ratios, instructional cost per student, and metrics relating to average class size and the percentage of courses taught by full-time faculty. The student-full-time faculty ratio is under Ashford’s target of 1:200. The student-advisor ratio is within 10% of the 200:1 target for six of the eight most recent reporting periods. Average class sizes have stabilized at 21-23 for undergraduates and 14-17 for graduate students. Ashford has exceeded its goal of having 10% of classes taught by full-time faculty. Ashford has met these targets even as enrollment has declined. In addition, the RGC collaborates with stakeholders to develop improvements, interventions, and alignment with strategic priorities.

**3. Adequacy of the Ashford Faculty Model and the Role of Faculty.** *“The team found evidence of investment in full-time faculty as well as evidence of faculty leadership, faculty control of curriculum, and well-functioning faculty governance and development. The university is urged to continue that investment in full-time faculty and to avoid any degradation in the full-time faculty/student ratio. The Commission also urges continued faculty participation in the current curriculum review and revision.” (WSCUC Action Letter, 2015)*

Ashford's 2019 reaffirmation report describes its continuing commitment to deploying full-time faculty as evidenced by exceeding its target of 12% of its faculty being full-time and maintaining a full-time faculty to student ratio of approximately 1:177 (plus or minus 10 depending on the year). Ashford full-time faculty are expected to engage in activities comparable to counterparts at other similar types of institutions, including teaching assignments, mentoring students and faculty colleagues, developing and reviewing courses and programs, and assessing student learning. The Ashford mixed model of full-time and associate faculty appears to be effective as evidenced by a study demonstrating that faculty status had a limited impact on course outcomes, with courses taught by full-time faculty and those taught by associate faculty being comparable.

**4. Effectiveness of Program Review.** *"The team found evidence of substantial progress in the volume of program reviews, their high quality, and resulting actions taken based on these reviews."* (WSCUC Action Letter, 2015)

The report described continued strengthening of the program review process in a number of ways. One indicator is the completion of program reviews on a five-year cycle. By the end of 2016, all eligible programs had completed their review. In 2017, the next review cycle had begun, and 15% of all eligible programs were reviewed by the end of that year. In 2018, three additional programs began their reviews. A second piece of evidence is the evaluation of the efficacy of the program review process conducted in 2017 in a collaborative effort between the Office of Learning Assessment and the Program Review Subcommittee of the Faculty Senate. This evaluation led to several improvements, including ensuring that important content and metrics are included, shortening the program review process,

incorporating objective analyses from external reviewers and faculty leadership, and providing templates and exemplars of effective program review components to assist faculty in implementing the program review process. A third piece of evidence is the ongoing program review cycle for non-academic service departments.

**5. Assessing Student Learning and Ensuring Academic Rigor.** *“The team found evidence of progress in the development and assessment of learning outcomes at both the undergraduate and graduate degree level together with a culture of evidence supporting continuous strengthening of student learning and rigor. The Commission recommended continued focus in these important areas and also recommended the development and implementation of a plan to assess learning outcomes at the institutional level beyond what occurs at the program level.”* (WSCUC Action Letter, 2015)

The report prepared for the 2019 visit provided evidence of continued progress in the articulation and assessment of learning outcomes. Ashford developed and implemented a plan for assessing Institutional Learning Outcomes (ILOs). In addition, it undertook three initiatives to ensure/improve academic rigor:

(1) a rubric norming process for the General Education Capstone;

(2) a partnership between the Forbes School of Business & Technology and Peregrine Academic Services to use their Common Professional Component online examinations, resulting in determining that Ashford students were above national averages for undergraduate and traditional-age students; and

(3) a faculty task force dedicated to enhancing the quality of discussion in online forums resulting in the development a universal discussion forum rubric, with the task force continuing to provide training and support.

**6. Independence of Ashford Board.** *“[T]he team saw evidence of appropriate governance at Ashford: oversight by a strong Ashford board exercising appropriate responsibilities with autonomy, and a collegial relationship with Bridgepoint [now Zovio] that clearly prioritizes student success.”* (WSCUC Action Letter, 2015)

The 2019 reaffirmation report describes Ashford University’s Board structure, committees, and policies, demonstrating they are consistent with those common to other university governing boards. The Ashford Board was substantively involved in the development of the institutional report submitted to WSCUC. More specifically in response to the 2015 recommendations, the Board revised its policies and operations to ensure the continued focus on student success as well as an equitable, collegial relationship with Zovio. At the time of the report, the Board had 14 members and contained a majority of independent members, that is, more than half of Board members is neither appointed by nor affiliated with Zovio, as prescribed by the Board’s revised Operating Agreement. Their roles and responsibilities are described in the Board’s Policies Manual. Ashford Board members have broad and deep experience in areas relevant to Ashford’s operations, including higher education leadership, finance, military experience, and other areas relevant to Ashford’s mission. The range of Board members’ relevant expertise and the quarterly reports the Board reviews related to their respective areas of responsibility (e.g., financial reports prepared by the CFO) enables the Board to exercise appropriate oversight of the Shared Services Agreement with Zovio.

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

**Standard 1:** *The institution defines its purposes and establishes educational objectives aligned with those purposes. The institution has a clear and explicit sense of its essential values and character, its distinctive elements, its place in both the higher education community and society, and its contribution to the public good. It functions with integrity, transparency, and autonomy.*

The Team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to determine it complies with the Standard.

**Institutional Purposes.** Ashford has clearly defined statements of mission and purpose that articulate its commitment to providing quality education for its students (CFRs 1.1, 1.5). These statements appear on the institution's public website and in the school catalog. The mission is "... to provide high-quality, accessible, affordable, innovative educational programs that meet the diverse needs of individuals pursuing advancement in their lives, professions, and communities."

Ashford University has clearly defined outcomes at the institutional, program, and course levels, which are published on its website. All course syllabi reviewed also clearly delineate intended outcomes. Systematic assessment practices are used to measure achievement at all levels (CFR 1.6). Ashford publishes and reports to IPEDs program learning outcomes as well as indicators of student achievement such as persistence and graduation rates. Data are disaggregated by gender and ethnicity.

However, student satisfaction is based only on one item from the National Survey of Student Engagement (NSSE) about the overall educational experience. No data on career

placement are published; Ashford explanation for this is that because most of their students are employed when they begin their studies, such data would not be especially meaningful. Given Ashford's mission of serving "individuals pursuing advancement in their lives, professions, and communities," information about career *advancement* would be an appropriate performance indicator (CFR 1.2). During the site visit, the Team asked about regularly collecting career advancement data and was told that information is very difficult to gather. Ashford is advised to develop ways to gather this information to further measure student attainment consistent with its mission (CFR 1.2). Ashford might also consider obtaining and making publicly available additional information about student satisfaction and course completion on its website.

**Integrity and Transparency.** Ashford provides information for prospective students and other interested parties on its website, for enrolled students in its academic catalog, for faculty in the academic catalog and faculty handbook, and for all employees in its written institutional policies and procedures (CFR 1.6). The Ashford *Full-time Faculty Handbook* sets forth an academic freedom policy that is consistent with the principles set forth in the American Association of University Professors (AAUP) statement on academic freedom. If faculty wish to have a concern about academic freedom addressed, they are instructed to follow the general Grievance Procedure published in the Employee Handbook, Section 2.26 (CFRs 1.3, 1.7). For students, Ashford publishes a Freedom of Inquiry and Expression statement as well as a complaint process in the University Academic Catalog (CFR 1.3).

Evidence of Ashford's commitment to diversity is set forth in its Diversity and Inclusion Policy as well as the *Institutional Equity Strategic Plan*, the Equity Council's policies and

processes, and by the Intercultural and Global Awareness competency requirement, which is part of the General Education curriculum (CFR 1.4).

Ashford appears to operate with integrity in pursuit of enacting its educational mission. Its faculty, staff, and leadership exhibit a zealous affinity for that mission. At the same time, and as discussed in various places in this document, the combination of its continuous enhancement of the institution's technological infrastructure, overlapping institutional research and evaluation functions, extraction of substantial resources by its parent corporation, and numerous improvement initiatives being implemented concurrently places Ashford University at risk of trying to do too much at once. During the site visit, the Team learned about more than 30 strategic initiatives aimed at institutional improvement of student success indicators. Full-time faculty also reported at least 17 initiatives with which they are currently involved. Ashford has allocated substantial resources to institutional research, which allows staff to do as much as possible to determine if anything "sticks," or stands out as promising related to fostering student success. Thus, the Team advises Ashford's leadership to exercise due diligence to ensure that all this activity does not result in initiative fatigue and distract from Ashford's efforts to maintain the quality of academic programs and the student experience (CFRs 1.1, 1.5).

**Standard 2:** *The institution achieves its purposes and attains its educational objectives at the institutional and program level through the core functions of teaching and learning, scholarship, and creative activity, and support for student learning and success. The institution demonstrates that these core functions are performed effectively by evaluating valid and reliable evidence of learning and by supporting the success of every student.*

The Team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to determine compliance with the Standard.

**Teaching and Learning.** The content and coverage of Ashford's academic programs are appropriate, as are its standards of performance, rigor, and nomenclature for the degrees awarded. Faculty resources are sufficient for its curricular offerings (e.g., the BAE program faculty as described in the BAE Self-Study, p. 50 (CFR 2.1)). Examinations of Ashford syllabi, the academic catalog, and program reviews indicate degree programs are clearly defined and guided by well-defined principles (CFRs 2.2, 2.2a, 2.2b). Syllabi and curriculum maps show Ashford has well-articulated aligned institutional, program, and course learning outcomes along with student assignments and activities that support students toward achieving these outcomes. All outcomes, developed by faculty, are available in the catalog and in course syllabi (CFR 2.3 and CFR 2.4). Ashford uses the assessments of learning outcomes to document student learning and develop plans for improving course and program offerings as demonstrated in program review documents (e.g., MATLT Program Review Self-Study.pdf, p. 31 (CFR 2.5 and CFR 2.6)). As noted earlier, the institution employs a robust program review process that includes participation of external reviewers and informs action plans for program improvement (CFR 2.7).

**Scholarship and Creative Activity.** Ashford uses a carefully designed faculty evaluation model based on the Boyer Model of Scholarship, as described in the Full-Time Faculty Handbook (CFR 2.8 and CFR 2.9). Ashford supports scholarship and creative activity through the recently added institutional conferences at which faculty and students present their work (CFR 2.8). The first of these was the 2018 Teaching and Learning Conference: Transformation in

Practice, open to the Ashford community, with 120 sessions involving faculty, student, and external presenters. The conference was recorded and made available to non-attending Ashford faculty, staff, and the public on YouTube.

**Student Learning and Success.** To support student learning and success, Ashford employs tracking systems to identify need areas and to devise appropriate responses. One example is the detailed study of grading practices by faculty across Ashford (i.e., III.a.iii Faculty Performance Analytical Summary.pdf) (CFR 2.10)). The institution's somewhat limited co-curricular programming is aligned with academic programs, illustrating Ashford's commitment to student engagement. One well-regarded co-curricular program is the Psychology Club described enthusiastically by its student club president (CFR 2.11). Nonetheless, co-curricular programming is an area warranting additional attention.

Advising appears to be well organized and responsive to student needs in a timely manner. Groups of advisors are specifically trained to work with students in specific program areas and with students with certain background characteristics (e.g., military students). This approach facilitates ready access to a knowledgeable advisor (CFR 2.12). Ashford's student support systems continue to evolve to respond to documented emerging student needs (CFR 2.13).

The institution collects appropriate information and provides services for transfer students that are described on its public website. Ashford's undergraduate transfer credit policy is delineated in the Ashford University Academic Catalog (<https://www.ashford.edu/general-academic-information-policies.htm#undergraduate-general-transfer-credit-provisions-and-limitations>) and its graduate transfer credit policy is detailed in

the Ashford University Academic Catalog, <https://www.ashford.edu/general-academic-information-policies.htm#graduate-transfer-credit-policy>. Ashford’s website provides prospective students information about transferring credits to Ashford University degree programs, <https://www.ashford.edu/online-admissions/transferring> (CFR 2.14).

**Standard 3:** *The institution sustains its operations and supports the achievement of its educational objectives through investments in human, physical, fiscal, technological, and information resources and through an appropriate and effective set of organizational and decision-making structures. These key resources and organizational structures promote the achievement of institutional purposes and educational objectives and create a high-quality environment for learning.*

The Team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to comply with the Standard.

**Faculty and Staff.** Taken together, Ashford’s *Faculty Qualification Profiles* (CFR 3.1) and the individual handbooks for full-time faculty, associate faculty, and all other employees describing policies and practices (CFR 3.2) constitute evidence of a qualified faculty. About 10% to 12% of courses are taught by full-time faculty and 88% to 90% by associate faculty. As noted previously, the student-to-faculty ratio currently stands at 177:1, a decrease from 195:1 in 2014 and from the 196:1 at the time of the Institutional Report. Full-time faculty currently stands at

Fiscal Year	Full-Time Faculty	Student-to-Faculty Ratio
2014	340	195-to-1
2018	215	177-to-1

215, substantially fewer compared with 340 in 2014. The decrease in full-time faculty is commensurate with the enrollment decrease experienced by Ashford in recent years.

All new full-time and associate faculty members are required to participate in the *New Faculty Experience* course, a comprehensive three-week onboarding faculty development program. The program utilizes feedback from constituents to revise its structure and content, and supports efforts for iterative improvement. Included among the offerings are faculty collaborations, attendance at discipline-specific workshops, conferences, or professional association meetings along with an annual Ashford teaching and learning conference. In addition, the University is currently reviewing the onboarding course to address issues identified in program reviews. These resources and events provide a foundation to guide and strengthen continuous faculty development, which the Team views as particularly important given the pace of online delivery innovation and changing external circumstances (CFR 3.3).

**Fiscal, Physical, and Information Resources.** Ashford University has experienced enrollment declines over the last several years. However, the Institution appears to be financially stable, with enviable scale and healthy net income (CFR 3.4). While net tuition revenue has declined by about \$77 million from 2016 to 2018, total costs and expenses have followed suit, declining by about \$74 million during the same period. University management has done a commendable job in reducing expenses while maintaining stable key indicator ratios, such as student/faculty ratio, in a declining revenue environment, a difficult feat to say the least in today's volatile higher education environment. Worthy of note is that while enrollment and tuition revenues have declined between 2016 and 2018, the amount of

scholarship dollars have increased by about 36% during the same timeframe. On a related point, Ashford has developed 187 corporate partnerships that provide full tuition grants to Ashford students, making the institution more affordable to a non-trivial number of students and by most measures, these students complete degrees at a higher rate compared with other students (I\_Graduation Rates by Type of Corporate Partnership.pdf).

Key financial results are listed below:

	(\$ in thousands)		
	Fiscal Year Ending		
	2016	2017	2018*
Gross Tuition & Fees	\$609,928	\$566,208	\$568,516
Less: Scholarships	(101,877)	(105,198)	(138,379)
Net Tuition & Fees	\$508,051	\$461,010	\$430,137
Instructional Costs & Services	\$243,829	\$218,031	\$199,886
Admissions Advisory & Marketing	186,593	158,955	154,276
Other Costs	14,840	14,688	17,061
Total Costs & Expenses	\$445,262	\$391,674	\$371,223
Operating Income	\$62,789	\$69,336	\$58,914

*\*2018 figures reflect unaudited financial results.*

The Institution demonstrates robust audits and disclosures, given the public stock market listing of its parent (requirements set by the SEC and FINRA) (CFR 3.4).

As part of its cost structure, Ashford University utilizes key services from parent Zovio. In 2018, these shared services represented \$194.0 million, or roughly half of Ashford's direct costs. The other half of remaining direct costs Ashford handles internally, through its own employees or outsourced to other third-party providers. As part of its plan to become a non-profit (and therefore a stand-alone) entity, some of the shared services are expected to be

brought under Ashford's direct control. Some of this will likely be through the transition of certain Zovio employees, others through hiring of additional staff, and others through direct purchase of third-party services. A new shared services agreement, contingent on a structural change approval by WSCUC, is currently being negotiated between Ashford and Zovio; some services will likely continue to be provided by Zovio under this structure.

Separating services to be provided by Ashford and those by Zovio makes it difficult to evaluate the economic fairness of the shared services agreement. Using Ashford's profitability as a proxy to estimate whether the shared services agreement is within a range of fairness, it seems that at this point in time the Shared Services Agreement is economically reasonable.

The Team identified one significant area of concern associated with the Ashford-Zovio relationship: Zovio is able to pull cash from Ashford at any time for any reason. The Team recognizes this practice is common for parent-subsidary entities, but that practice can affect institutional compliance with multiple CFRs (1.6, 2.13, 2.8, 3.1, 3.4, 3.5, 4.1, 4.2). While the Team acknowledges that Zovio ultimately controls financial matters, the Team recommends Ashford implement a policy to balance economic transfers to equity stakeholders (i.e., Zovio) with comparable reinvestment in the university and its students. This reinvestment could take the form of infrastructure, technology, faculty, administration, or other resources geared towards current or future students. The objective of such a policy is to balance economic transfers to equity stakeholders while at the same time investing at an appropriate, sustainable level in current and future students.

Ashford University's investments in technology and online course development (CFR 3.5) -- necessities for an online institution -- are areas of strength. Ashford utilizes state-of-the-

art platforms including Canvas learning management system, Zoom web conferencing platform, and Constellation suite of online course learning materials to facilitate faculty-student and student-to-student interactions and support learning (*CFR 3.5*). The University has a deep bench of course designers, responsible for continual course evaluation and implementation of incremental improvements. Courses are evaluated independently by Quality Matters, a non-profit organization that reviews and certifies on-line course quality. Furthermore, the University Services within Ashford assists students with managing their academic responsibilities with other life challenges, such as natural disasters, illness, and so on. With the frequent introduction of new technology, faculty members must be updated periodically with regard to technology upgrades to ensure optimal understanding and teaching. During the required New Faculty Experience course, new full-time and associate faculty learn how to use online learning tools such as Canvas, Waypoint learning outcome assessment and tracking system, and other digital tools as well as about the distinctive aspects of teaching adult learners (*CFR 3.2*).

Pending approval of the structural change by WSCUC, if and when the University transitions from a subsidiary to standalone entity, the addition of significant internal administrative, technical, and operational resources will be required, such as human resources, legal, facility and facility operations, and finance. If the change is approved, it will be important to examine these functions in future reviews.

**Organizational Structures and Decision-Making Processes.** Ashford's organizational charts clearly depict its structure and chain-of-command, documenting and communicating designated roles and responsibilities. The CEO and CFO roles are full-time positions. Both the

CEO and CFO have substantial relevant experience. Based on extensive conversations, the Team is confident both individuals have deep institutional knowledge and are competent to discharge their respective responsibilities (CFRs 3.6, 3.7, 3.8) so that the University is able to execute effectively its strategic plans.

Ashford employs a robust budgeting process. Its annual “bottom-up” budgeting process serves to identify and provide adequate resources to address needs in line with enrollment and staffing expectations at the program, division, and institutional levels (CFR 3.4) as well as to support and integrate administrative, facilities, and technology needs (CFR 3.5).

The 17 members of the Ashford Board of Trustees include current and former faculty, provosts, and presidents, retired and active duty military personnel, former students and educational administrators. Ashford’s CEO is an ex-officio member. Two official corporate documents explicate the institution’s governance structure and process: (1) Corporate Governance Guidelines and (2) Code of Ethics. Further, four Board subcommittees insure independence and appropriate oversight of core institutional functions and obligations: (1) Executive Committee; (2) Academic and Student Affairs Committee; (3) Finance Committee; and (4) Audit Committee (CFR 3.7 and CFR 3.9). The CEO presents an annual report to the Board at the start of each fiscal year outlining institutional goals and the metrics to be used to determine the degree to which those goals are attained. The Team considers the Ashford Board of Trustees to be diverse and highly experienced.

However, the Team determined that a subset of the Board of Trustees was unaware of certain financial arrangements and money flows between Ashford and Zovio. Despite Ashford’s limited control over the economic transfer to its parent, as fiduciaries of the institution, the

Board of Trustees should have knowledge of these practices. In this regard, the Team recommends that the entire Board of Trustees have a more thorough understanding of the financial relationship between the University and Zovio and review the arrangement at least once annually in a full Board meeting.

Academic leadership roles are well defined, and responsibilities are clearly delineated, with accountability laced throughout the organizational structure (CFR 3.10). As evidenced in the *Faculty Senate Constitution*, Meeting Minutes, and conversations with faculty, voice is given to faculty via the nascent faculty senate which includes seven standing faculty senate committees comprised of faculty senate members and other faculty that are responsible for curriculum, assessment, promotion, professional development, student success, communication, and faculty welfare. All University faculty members elect representatives to serve their interests. The senate has 26 voting members; each of the six schools receives four seats (twenty-four total school seats) and associate faculty receive two seats. Although associate faculty compose about 90% of the instructional staff, they are allotted less than eight percent of senate seats. Consequently, the Team recommends Ashford review the merits of achieving more balanced representation of full-time and associate faculty on the faculty senate to facilitate greater participation of associate faculty.

**Standard 4:** *The institution engages in sustained, evidence-based, and participatory self-reflection about how effectively it is accomplishing its purposes and achieving its educational objectives. The institution considers the changing environment of higher education in envisioning its future. These activities inform both institutional planning and systematic*

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

The Team's finding, subject to Commission review, is that the institution provided sufficient evidence to demonstrate it complies with the Standard.

**Quality Assurance Processes.** As reported in the institutional review and confirmed during the site visit, Ashford is committed to robust quality assurance processes and procedures, and continuous improvement, demonstrated in a number of ways (CFRs 4.1, 4.3). The institution tracks systematically persistence and graduation rates, periodically evaluates a large number of academic initiatives, analyzes information from program reviews, and undertakes and utilizes the results from surveys including but not limited to alumni, National Survey of Student Engagement (NSSE), Noel-Levitz Adult Learner Inventory and Priorities Survey for Online Learners. There are clear lines of accountability and decision making from the Board of Trustees, President's Executive Committee through the Senior Leadership Group to the Retention and Graduation Committee. Data-based reports are provided by the Office of Institutional Effectiveness, Institutional Research Services, the Office of Learning Assessment and Program Review, and the Center for Excellence in Teaching and Learning (CFR 4.2). All operational, strategic, and academic initiatives are tracked and monitored by the University Services and Policy unit. For example, as part of the assessment strategy, the institution uses key data sets including results from program reviews, student surveys, learning outcomes assessments, faculty evaluations, and local and national (e.g., NSSE) tools collected and managed through such systems as Taskstream assessment management platform, Waypoint, Tableau Dashboards analysis and reporting platform, and Canvas. Together these

complementary tools provide a rich dataset for faculty and administration to use to assess quality and identify paths to improvement (CFR 4.4).

Reports of the investigations about the effectiveness of teaching, learning, and student success are available to faculty and key stakeholders, as are a number of tools (Waypoint Outcomes, Learning Outcomes Dashboard) for reviewing and reporting on key metrics. Faculty and other stakeholder groups expressed appreciation for the just in time and readily available data, and indicated that they find the data useful in supporting students. They further indicated a need and desire for more training related to analyzing and using data to inform and guide improvement efforts (CFRs 4.3, 4.4, 4.5).

Findings are reviewed at multiple levels within the colleges and divisions, by governance bodies such as the Faculty Senate assessment committee, and by external reviewers (CFR 4.5). Action plans are developed and subsequently executed, then monitored by the collaborative efforts of the Office of Learning Assessment and Program Review and the Strategy and Planning Management Teams. This process allows for strategic alignment across colleges and divisions as well as the university writ large. The Board of Trustees via the Academic Affairs Committee (CFRs 4.6, 4.7) also monitors Ashford's plethora of assessment initiatives and the outcomes of action plans. As noted earlier, there are a multiplicity of studies and initiatives underway. However, it was not evident to the Team that a strategy or coherent framework exists to guide these activities even though the question was raised several times during this visit as well as during the previous WSCUC visit.

Ashford's Institutional Effectiveness (IE) and Institutional Research Services (IR) offices collectively provide information for institutional internal and external reporting, data

management, assessment of the effectiveness of university initiatives, and behavioral modeling to discern the factors related to student success at Ashford. The IR function recently moved from Zovio to Ashford. The IR and IE groups appear to work collaboratively; each office is able to articulate its distinct and complementary functions within the university (CFR 4.2). Specifically, the IE group is responsible for reporting internally consistent and accurate information; conducting analysis to facilitate strategic planning, accreditation, and reporting the results of persistence and graduation initiatives; and engaging in assessment and continuous improvement of academic programs, student learning initiatives, and behavioral and predictive modeling. The IR unit generates all externally reported data to meet federal and state requirements.

Given the high demand for their services, there is a protocol in place for research study requests as well as evaluating change management activities. The combined efforts of IR and IE are needed to support institutional strategic planning and operational effectiveness along with meeting reporting compliance requirements required for strategic planning and decision making (CFRs 4.2, 4.4, 4.5, 4.6). However, as noted earlier, Ashford does not appear to have established a framework to prioritize and use effectively the data generated by these units. Such a framework is critical for efficacious decision making in today's dynamic higher education environment (CFR 4.7)

Intended student outcomes for all new and existing baccalaureate and master's programs are aligned with the Lumina Degree Qualifications Profile (DQP). As noted earlier, courses are submitted for review to Quality Matters. The Team examined two courses submitted to Quality Matters for full review by three reviewers and one submitted to Quality

Matters for recertification by one reviewer. Results of those kinds of reviews are used as part of decision making related to course improvements.

Academic programs are formally reviewed on a 5-year cycle and these reviews are instrumental in curricular improvement and oversight by faculty. Program review includes a self-study conducted by chairs and full-time faculty members; associate faculty members provide input based on their teaching assignments in a program. The program review process also employs benchmarking with professional standards and programs at other institutions and document review and on-site visits conducted by external reviewers (e.g., AAECCE Exit Interview Minutes.pdf). A comprehensive action plan is then developed based on results from the self-study and external review. Subsequently these are reviewed and approved by the executive dean of the appropriate college, associate vice president of academic services, and the associate vice president of learning assessment (CFRs 4.3, 4.4). Improvements resulting from program reviews frequently take substantial time to implement. The team noted periods as long as 18 months between completion of a program review and implementation of course revisions. This time gap is problematic. In addition to the time gap following program review completion, the process for changes in courses while they are being delivered often involve a delay from instructor request to completion. This presents a challenge inasmuch as courses are delivered in five-week terms. These are areas deserving attention to further educationally effective learning and teaching (CFRs 2.1, 4.3, 4.4).

The majority of reviews conducted to date are specific to academic programs, with more attention now paid to service and co-curricular program reviews. An approach and schedule for service and co-curricular program review has been established (CFR 2.11). Such

reviews may further inform strategic planning as well as inform the effects of the broad array of initiatives associated with retention and graduation.

Ashford is in the midst of a transformative process as it builds its systems and processes for understanding itself and the students it serves, for using data to inform change, and to plan for an ever-changing higher education landscape (CFR 4.7). This has made it difficult for Ashford to craft evidence based, audience-specific narratives about quality assurance and improvement. The Team recommends Ashford create a deliberate, focused strategy to determine which initiatives to pursue that have the greatest likelihood of enhancing student success.

### **Compliance with Federal Requirements**

**Credit Hour and Program Length Review.** As shown in the appendix, Ashford has paid close attention to compliance with credit hour and program length requirements. It has detailed policies and procedures in place to ensure courses and programs are designed and reviewed so they meet Ashford's established standards.

**Marketing and Recruitment Review.** The Appendix shows that Ashford meets federal requirements for recruiting students and provides required information regarding degree completion, cost, careers, and employment.

**Student Complaints Review.** The Appendix has information about Ashford's student complaint policy and process that is described in its academic catalog. Ashford maintains records of all student complaints (prior to 2011 in securely stored hard copy, from 2011 forward in securely stored electronic form).

**Transfer Policy Review.** As the appended form shows, Ashford's policies about transfer credit are publicly available and readily accessible from its website.

**Inventory of Educational Effectiveness Indicators (IEEI).** Ashford's IEEI employs systematic approaches to assess student learning that can inform, guide, and evaluate institutional improvement efforts. All programs offered by Ashford University undergo systematic program review, which includes analyses of student achievement of the program's learning outcomes; persistence and graduation rates; and, where appropriate, evidence from external constituencies (CFR 2.7). Both direct and indirect evidence of student learning are considered and evaluated as part of the assessment process.

Final determination of compliance with the Standards rests with the Commission.

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

Ashford defines the meaning of its degrees through its implementation of sets of institutional learning outcomes (ILOs), for graduate and undergraduate programs, which serve as measurable expectations for all students (CFRs 2.2 a, 2.2b). The undergraduate and graduate level institutional learning outcomes aligned with the institutional mission provide an overarching framework within which to consider the scope and quality of its degree programs.

Each graduate and undergraduate level ILO is further delineated by several sub-outcomes. This level of precision is enviable; however, it further complicates the assessment process. In light of current changes facing Ashford, it may be wise to ask full time and associate faculty from a range of disciplines to review these ILOs to determine if the ILOs adequately define and represent the meaning of their degrees in relation to the population Ashford intends to serve. For instance, should Ashford shift focus toward attracting more students who are

predicted to succeed based on behavioral analytics, the current ILOs may not be appropriate. The review might also consider whether reducing the complexity in assessing the ILOs is possible. (CFRs 1.2, 2.3).

The current process for assessing ILOs includes annual assessment of all ILOs, including sub-outcomes, by the Office of Learning Assessment and Program Review. Ashford is urged to consider involving full-time and associate faculty in these assessments and perhaps revise the schedule of assessment to allow for more focused analysis on each outcome (CFRs 2.9, 4.5).

Ashford's individual programs have differentiated purposes as reflected in their program learning outcomes, and all strive to align with one or more institutional learning outcomes described above. Course learning outcomes also are aligned with both the ILOs and PLOs through curriculum mapping completed by each program (CFRs 2.2, 2.3).

The university assessment processes have helped to guide quality improvement efforts across the university. ILOs, PLOs and CLOs are reviewed across all levels and programs. The Team examined 12 PLO reports (6 undergraduate, 6 graduate) with the lowest and highest PLO achievements. Across all programs the reported average PLO achievement fell in the range of 2.85 to 3.73 on a 0-4 point scale (2=basic; 3=proficient; 4=distinguished). These types of data are then used as part of program review and program improvement (CFRs 4.1, 4.4 4.6).

Ashford adopted Lumina Foundation's Degree Qualifications Profile (DQP) to align its undergraduate and master's level institutional learning outcomes, DQP intellectual skills, other DQP proficiencies and the WSCUC core competencies. This demonstrates the university's commitment to defining and articulating the meaning of its degrees (CFR 2.2). Furthermore, Ashford continues this mapping to the program and course level, which was confirmed during

the site visit in interviews with staff and Team review of voluminous assessment and mapping exhibits (CFR 2.3). The VALUE rubrics promulgated by the American Association of Colleges and Universities (AAC&U) in concert with Ashford faculty developed rubrics are used to assess the achievement of learning outcomes at all levels (CFR 2.4).

The quality of Ashford degree programs is overseen by highly qualified faculty and staff and innovative efforts to foster student engagement presented at the Teaching and Learning Conference for students and faculty as well as numerous professional development activities designed for faculty, such as departmental webinars and web-based conferences (CFRs 2.1, 3.1). At the doctoral level, student residencies are designed to meet learning outcomes and the doctoral faculty are in the process of providing virtual residency options. Additionally, many Ashford degree programs are externally validated through programmatic accreditors such as the Commission on Collegiate Nursing Education (CCNE), the International Accreditation Council for Business Education (IACBE) and the Commission on Accreditation for Health Informatics and Information Management Education (CAHIIM) (CFRs 2.1, 2.6).

All degrees awarded by the institution are described in the catalog and on the institutional website in terms of entry-level requirements and levels of student achievement necessary for graduation (CFR 2.2). As noted earlier, Ashford has established processes and procedures to ensure the quality and integrity of its degrees including a comprehensive program review process, course reviews through Quality Matters, faculty mentoring and shadowing, and widespread assessment of student outcomes using the Waypoint system (CFRs 2.4, 2.7).

With regard to curricular integrity, degree programs adhere to a common framework that emphasizes skill and knowledge acquisition often culminating in a final integrative capstone course, thesis, or dissertation. Curricular rigor is appropriate for the degree level and standardized using faculty developed rubrics that are shared with students (CFRs 2.1, 2.4). Interviews with students and faculty confirmed that Ashford's culture is to make academic policies and procedures transparent, further ensuring integrity (CFR 1.2, 1.6).

Another example of Ashford's efforts to ensure institutional integrity is deterring students from submitting assignments that do not contain a student's own original work. To do this, Ashford has integrated Waypoint with Turnitin, an Internet-based originality checking software which provides students and instructors with the tools to identify plagiarism. Students can submit drafts of their work into Waypoint and use Turnitin reports to further develop responsible scholarship and avoid the negative ramifications of academic dishonesty. Faculty are able to use Turnitin as part of the assignment grading and evaluation process to determine the originality of all submitted written work.

In summary, Ashford has commendable practices for defining and ensuring the meaning, quality, and integrity of its degrees.

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

A review of Ashford's learning outcome definition and assessment documents indicates the university has a sophisticated system for collecting, analyzing, and applying data regarding student achievement of learning outcomes. This system seems to be widely understood and

used throughout the university by faculty and staff. Institutional programs and courses are mapped carefully and aligned with institutional performance outcomes.

Ashford has made great progress in the assessment of learning outcomes at the course and program level. Ashford's assessment plan is well detailed from course level outcomes (CLOs) through program learning outcomes (PLOs) to institutional level outcomes (ILOs), even though ILOs are not required under WSCUC Standards. However, assessment of institutional learning outcomes is nascent in comparison to assessment of PLOs and CLOs (CFR 2.3). Ashford refined its ILOs at the graduate and undergraduate level in the 2016-2017 academic year. The current process for assessment of ILOs includes the collection of assessment data using the Waypoint system; all ILOs are assessed using student performance in capstone courses. Ashford's plan calls for assessment of all ILOs annually by the Office of Learning Assessment.

Core competencies are represented in the undergraduate ILOs with the exception of oral communication. Interviews with staff and evaluation of program reviews revealed a challenge with teaching the oral communication competency in an online environment (CFR 2.2a). The Team encourages Ashford to include faculty from all disciplines to review these ILOs with an eye towards simplicity and measurability (CFR 2.4). Further attention should be given to aligning the core competencies, especially oral communication, with other ILOs throughout the curriculum. This is especially important for transfer students who may not have achieved these outcomes at their previous institutions (CFR 2.2a).

As with other institutions with a large number of part-time faculty (associate faculty at Ashford), Ashford is challenged to ensure consistency in grading and course delivery. The University did a study of grading, the results of which were useful in designing additional

professional development (CFR 3.3, III.a.iii Faculty Performance Analytical Summary.pdf). To its credit, Ashford provides many professional development options for all faculty including extensive training in the use of assessment systems, tracking the performance of those who participate in professional development modules, and following up with faculty whose performance needs a boost. As described earlier, assessment of associate faculty teaching effectiveness suggests they perform on par with full-time faculty. In addition, the associate faculty with whom the Team met reported excellent communication from and access to their program chairs.

The intended benefits of Ashford's program review process appear to be limited in two ways. First, because of Ashford's policy to standardize course content and requirements, faculty are only able to make minor changes in course delivery; other units must approve substantial substantive changes. Second, as noted earlier, there often is a long lag period between the beginning of a regularly scheduled program review and its completion, and the implementation of a revised program. As a result, some courses and programs can and have become outdated to the detriment of students.

Students with whom the Team met were generally positive; most were enthusiastic about their educational experiences at Ashford. The university recognizes the value of fostering student engagement inside and outside the classroom, and offers student clubs as well as virtual teaching and learning conference forums for faculty and student research sharing (CFRs 2.8, 2.10). In recent years, Ashford has attempted to develop additional co-curricular activities for students and assess the effects of student participation (CFR 2.11). A recent on-site gathering of students, faculty and alumni was held in Atlanta with more such gatherings

planned. Plans to assess such programs aligned with academic reviews are scheduled (CFR 2.11). A recent new program is the Honors College to recognize and enrich high-performing students and support persistence and completion efforts. Ashford would do well to continue its efforts of co-curricular alignment with academic goals and systematic assessment of these activities with an eye toward identifying practices that help students form affinity groups and foster a sense of belonging.

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

Ashford seems to have made considerable progress toward reinventing itself since its last accreditation visit. This is especially evident in the institution-wide commitment to enhancing student learning, persistence, and graduation. According to the institutional review report and substantiated in multiple sessions throughout the visit, student success is defined as students' ability to demonstrate their learning as evidenced by measurable learning outcomes. The cross-functional Retention and Graduation Committee (RGC), which has incorporated the former Adequacy and Alignment of Resources Committee, is leading this endeavor.

The RGC operates from a conceptual framework drawn from a synthesis of literature reviews of promising practices related to equity imperatives, student engagement and high-impact activities, internal performance data, and peer institutional benchmarking. Its efforts are further informed and guided by Ashford's mission and strategic plan while addressing the challenges associated with balancing open access, student equity, and accountability for student outcomes. This metrics-driven group is now focusing on disaggregating data to better understand the experience of student sub-groups.

As reported in the institutional review and confirmed during meetings with stakeholders, Ashford's interventions have demonstrated varying degrees of the effects of Student Success Orientation (CFRs 1.2, 2.13), Ashford Promise (CFRs 1.2, 2.13), Tutoring on Demand (CFRs 2.10, 2.13), 24/7 Access to the Library and Writing Center(CFR 2.10), Finish Line Outreach to Students (CFR 2.10), SMART Track Program (CFR 2.10), Collaborative Holistic and Academic Mentoring for Peer Success (CHAMPS) (CFRs 1.2, 2.5, 2.10, 2.11, 2.13), Full Tuition Grant (CFRs 1.2, 2.10, 2.13), Top 50 Retention Intervention (CFR 1.2.), and Tutoring on Demand (CFRs 2.10, 2.13). The Finish Line Outreach project for "near course completers" is a coordinated outreach activity whereby faculty members propose options to students to facilitate their course and program completion. Initial results in general education courses demonstrated a 69% success rate (CFRs 2.10, 2.13). The Finish Line program is in the process of being implemented university-wide.

With the implementation of the CIVITAS Learning platform, faculty and advisors are able to proactively reach out to students to offer "just-in-time" and more personalized interventions (CFRs 2.4, 2.10, 2.12). As of August 2017, the Faculty Senate Student Success Committee is more deeply engaged in these efforts as it reports on student success, recommends improvements, and seeks to understand the impact of faculty on retention and graduation. (CFRs 3.10, 4.2)

Ashford's use of behavioral and predictive analytics has helped identify the factors related to student success. Subsequently, a viable population model for student segmentation has been developed. A study employing this model discovered three dominant student behavioral profiles: Achievers (36%) Strivers (32%) and Early Dropouts (32%). The goal is to use

this information to tailor different interventions specifically designed for each of these groups (CFRs 4.1, 4.2, 4.3).

Despite these numerous, well-intentioned efforts, persistence and graduation rates have not improved. Indeed, as shown in the table below provided by Ashford, the rates have decreased slightly in the past few years. Ashford defines full-time undergraduate students as those who attempt four or more courses in the first 20 weeks of their academic year. Full-time graduate students are defined as those who attempt three or more courses in the first 20 weeks.

**Ashford One-Year Retention Rates for Entering Cohorts (Calendar Year: Jan to Dec)**

Entering calendar year	Associate's			Bachelor's Online			Master's		
	All students	4 or more attempted courses first 20 weeks	< 4 attempted courses first 20 weeks	All students	4 or more attempted courses first 20 weeks	< 4 attempted courses first 20 weeks	All students	3 or more attempted courses first 18 weeks	< 3 attempted courses first 18 weeks
2013	32.6%	47.8%	7.1%	41.2%	57.6%	14.4%	65.6%	77.1%	17.5%
2014	27.0%	39.0%	6.5%	38.4%	53.1%	13.1%	60.4%	72.2%	12.7%
2015	28.2%	39.3%	7.6%	35.3%	49.9%	12.2%	60.4%	71.5%	13.1%

**Ashford Six-Year Graduation Rates (Calendar Year: Jan to Dec)**

Entering calendar year	Bachelor's Online		
	All students	4 or more attempted courses first 20 weeks	< 4 Attempted courses first 20 weeks
2008	31.8%	50.1%	8.0%
2009	29.1%	46.2%	7.5%
2010	25.7%	40.7%	7.3%

**Ashford Associate and Master's Three-Year Graduation Rates (Calendar Year: Jan to Dec)**

Entering calendar year	Associate's			Master's		
	All students	4 or more attempted courses first 20 weeks	< 4 attempted courses first 20 weeks	All students	3 or more attempted courses first 18 weeks	< 3 attempted courses first 18 weeks
2011	10.7%	20.5%	0.7%	59.3%	74.0%	11.9%
2012	9.4%	17.6%	0.7%	55.6%	68.2%	9.5%
2013	14.2%	22.2%	0.9%	56.5%	67.9%	9.7%

Recognizing the challenges associated with these disappointing trends, Ashford's Institutional Research team undertook benchmarking comparisons to determine whether Ashford student persistence and completion was substantially different compared with peer institutions (open admissions, offering a master's degree as the highest degree level offering) and those with similar student characteristics (e.g., percentage of Pell eligible). One of its benchmarking efforts employed methodology used in a US Department of Education study. Benchmarking findings show that persistence rates for full-time (four plus courses in 20 weeks) are above the 50<sup>th</sup> percentile for similar schools. Nevertheless, Ashford's declining rates are worrisome, even though these decreases are at a lower rate than peer institutions. Similarly, graduation rate comparisons found that in 2010, 41% of Ashford full-time students completed their degrees compared with 24% at peer institutions. Thus, this benchmarking analysis indicates a comparative advantage for Ashford (CFR 2.10).

Ashford evinces an almost palpable desire to foster higher levels of student success as demonstrated by the broad array of initiatives it has implemented. Despite the current, ongoing efforts and the amount of energy invested in these initiatives, Ashford has yet to

discover --in its own words -- the “secret sauce” or effective approaches to enhance student accomplishment.

There is a heavy reliance on quantitative data to populate student success metrics. Ashford is considering the potential value of incorporating qualitative information to understand its students and their college experiences from multiple perspectives. As noted earlier, the absence of a coherent, comprehensive strategy and related criteria for prioritizing and implementing improvement initiatives may be hindering to some degree realizing the desired results.

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

**Institutional Research and Use of Data and Evidence.** As noted earlier, two separate offices conduct institutional research: (a) Institutional Effectiveness and (b) Institutional Research. These entities work together to support decision-making at Ashford. The Team reviewed comprehensive reports prepared by the Office of Institutional Effectiveness such as *Critical Factors for Retention, Faculty Status Impact on Course Outcomes, and Graduation and Course Progression Analysis*. The Office of Institutional Research also produces many reports based on external data such as the *Student Success Benchmarking Comparison* providing a context for comparing retention and graduation rates with peer institutions based on Ashford students’ characteristics.

The Team noted the quality of available institutional research and Ashford’s dedication to using data to improve programs and practices (CFR 4.1). Nevertheless, the Team found little evidence of expected improvement in student performance metrics (CFR 4.3). Furthermore,

the Team identified as a Line of Inquiry Ashford's focus on additional information about the process by which decisions are made as to which interventions to implement (such as for increasing student persistence or as a result of program review), how their impact is determined, and next steps to improve the innovation or to discontinue the effort. Ashford would do well to further examine and refine its approaches to framing evidence-based stories about how the institution is student outcomes data for improvement.

**Program Review.** Ashford routinely conducts program reviews using a variety of internal and external data that result in action plans for program and course revisions (e.g., AAECE Exit Interview Minutes.pdf). The Team examined 19 reviews of Ashford degree programs and Action Plans for improvement. Program reviews demonstrated high quality effort to gain insights into programs and activities and their impact on students. However, many of the reports relied heavily on descriptive information about programs in contrast with an analysis of factors related to student performance and improving teaching.

Well-qualified internal and external reviewers periodically evaluate program learning outcomes, assessment plans, evidence, benchmarking results, and use of assessment results. They also provide evaluative feedback and suggestions for improvement. Faculty report that they use the feedback to improve student learning and teaching. The University is encouraged to expand the use of student participation in program reviews.

Another line of inquiry identified by the Team was "additional information about how full-time and associate faculty are involved in the program review process." Participation of associate faculty in the program review process continues to be a concern (CFR 2.7). As noted earlier, associate faculty members teach approximately 90% of Ashford courses. Given

Ashford's heavy reliance on associate faculty, their input in assessment and program review is critical.

**Assessment.** Ashford has a systematic process for learning assessment at the course, program, and institutional level. The University uses Waypoint Outcomes to support faculty assessment of learning. The Waypoint system allows Ashford to collect student learning outcomes data from every assignment from every course. This approach allows for assessment work at an unusually large scale. The courses reviewed by the Team included rubrics aligned with intended outcomes. According to students, faculty are inconsistent in their use of grading rubrics to evaluate the quality of student work, an issue that warrants Ashford's attention.

Assessment is supported by the Office of Learning Assessment which helps guide assessment at every level, allowing faculty to focus their efforts on assessing student learning. Review of meeting minutes and interviews with staff demonstrated a true passion and commitment for assessment and quality improvement. The Team was impressed with Ashford's comprehensive assessment practices and culture of evidence. Assessment efforts should be continued with increasing faculty (associate and full-time) ownership and engagement.

**Quality Assurance.** In the 2015 Ashford team report, the University was "urged to continue to invest proportionately in support of academic functions" (2015 WSCUC team Report). Ashford demonstrates a commitment to academic quality by submitting its courses to Quality Matters for review. Indeed, more than 95% of Ashford's courses have been certified through Quality Matters. Certification is based on three individual faculty reviewing the curriculum using a set of eight general standards and 42 specific review standards. However, as

noted earlier, Team interviews and evaluation of program reviews indicated course revision beyond minor edits is not always timely and often insufficient. While the Team found evidence of some programs reviewing all curriculum, this was not consistent across the disciplines. Granted, managing the assessment system linking course learning outcomes and assignments is complex, which can influence the university's ability to be agile in this regard. Nevertheless, timely course reviews and revisions should be a priority for the university. Ashford is urged to continue to invest in support of academic functions such as regular course reviews and revisions to make these more timely and efficient (CFR 3.5).

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

As mentioned previously, Ashford University has demonstrated an ability to generate positive net income, which appears to be primarily due to cost controls and fiscal discipline in the

Fiscal Year Ending, (\$ in thousands)						
	2013	2014	2015	2016	2017	Unaudited 2018
<b>Net tuition &amp; fees</b>	\$723,989	\$611,677	\$538,368	\$508,051	\$461,010	\$430,137
<i>% Change</i>		-15.5%	-12.0%	-5.6%	-9.3%	-6.7%
<b>Instructional costs &amp; services</b>	\$339,601	\$291,273	\$261,504	\$243,829	\$218,031	\$199,886
<i>% Change</i>		-14.2%	-10.2%	-6.8%	-10.6%	-8.3%
<b>Admissions advisory &amp; marketing</b>	\$213,272	\$212,757	\$187,164	\$186,593	\$158,955	\$154,276
<i>% Change</i>		-0.2%	-12.0%	-0.3%	-14.8%	-2.9%
<b>General &amp; administrative</b>	\$17,860	\$13,677	\$14,837	\$12,377	\$13,792	\$17,335
<i>% Change</i>		-23.4%	8.5%	-16.6%	11.4%	25.7%
<b>Other (income) / expense</b>	(\$1,137)	(\$1,735)	\$14,117	\$992	\$1,147	\$1,231
<b>Net income / (loss)</b>	\$154,393	\$95,705	\$60,746	\$64,260	\$70,483	\$60,145
<i>% Change</i>		-38.0%	-36.5%	5.8%	9.7%	-14.7%
<b>Average enrollment</b>	70,508	59,485	50,824	46,355	42,496	

context of a declining enrollment environment. Ashford has been able to reduce costs commensurate with enrollment declines while stabilizing important key metrics such as student- faculty ratio. Partially due to enrollment declines, per student instruction costs have increased annually since 2013. This is likely due to a decrease in enrollment; regardless, the Team views higher resource allocation per student instruction as a net positive.

From a balance sheet and cash generation perspective, the University has substantial liquidity, with current ratios well above 1.0x over the past three fiscal years. Barring unforeseen circumstances, it appears that Ashford will be able to meet its cash needs and remain financially viable in the near-term.

<b>Fiscal Year</b>	<b>Current Ratio</b>
2016	3.5x
2017	2.2x
2018	2.1x

Ashford’s business model allows flexibility and a demonstrated ability to transform revenue into free cash flow. However, as noted previously, the ability of parent Zovio to remove cash at its discretion injects uncertainty into whether Ashford’s cash balances will remain robust. As depicted in the chart below, Ashford generates substantial free cash flow annually. However, the large distributions to parent, Zovio, result in negative free cash flow generation in fiscal years 2017 and 2018 (2018 results reflect unaudited financial results). Thus, Ashford is advised to closely monitor its cash reserves going forward.

<i>(\$ in thousands)</i>			
<b>Fiscal Year</b>	<b>Free Cash Flow Before Distribution to Parent</b>	<b>Distributions to Parent</b>	<b>Free Cash Flow After Distribution to Parent</b>
2016	\$54,900	\$17,015	\$37,885
2017	\$96,196	\$187,022	(\$90,826)
2018*	\$52,489	\$66,156	(\$13,667)

\*2018 results reflect unaudited financial results.

The Team acknowledges Ashford’s robust strategic planning and budgeting processes, which allows rapid adaptation to changing environmental forces (CFRs 3.4, 4.7). Ashford’s six-steps: (1) development; (2) translation; (3) alignment; (4) plan operations; (5) monitor and learn; and (6) test and adopt, are designed to be cyclical. Historical financial results demonstrate the institution’s ability to adjust to changing market forces and the effectiveness of its budgeting process.

Additionally, as an online university, Ashford continually tests and implements new digital tools to foster online learning, such as “one-to-one” tutoring, chatbots, “cohort of one model” and tutoring on demand. This area is a strength of Ashford. Furthermore, Ashford’s Civitas platform allows faculty to quickly view and assess all students via data driven analysis (CFR 3.3).

The University has maintained unqualified independent financial audits and complies with the U.S. Department of Education (“USDE”) 90/10 and Cohort Default Rate rules (CFR 3.4). For the year ended December 31, 2018 (unaudited financial results), the University derived 78.6% of its revenue from Title IV funds, below the 90% federal ceiling. As noted in the chart below, Title IV dependency has fallen slightly in each of the last three years. Additionally, cohort default rates for the latest three-year periods (2013, 2014 and 2015) are well below the

30% threshold. Consequently, the Team sees evidence that Ashford appears to comply with these specific federally-mandated regulations related to for-profit institutions.

<b>Fiscal Year</b>	<b>90/10 Rule</b>	<b>Fiscal Year</b>	<b>Cohort Default Rate</b>
2016	81.2%	2013	14.5%
2017	80.8%	2014	14.9%
2018	78.6%	2015	13.5%

With regard to the Gainful Employment rule, none of Ashford’s programs was classified as “failing” any of the accountability measures (i.e., graduates have annual loan payments greater than 12% of total earnings and greater than 30% of discretionary earnings). Two of Ashford’s programs, Associate of Arts in Early Childhood Education and Bachelor of Arts in Early Childhood Education/Administration, fell within the “zone,” meaning that graduates have annual loan payments between 8% and 12% of total earnings and between 20% and 30% of discretionary earnings. Programs that fail in two out of any three consecutive years or are in the “zone” for four consecutive years are disqualified from receiving Title IV funds.

In sum, Ashford’s financial sustainability going forward depends on balancing two sets of factors. First, Ashford has been able to generate positive net income year over year even as distributions to Zovio resulted in negative free cash flow the past two years. Second, Ashford has stabilized some quality metrics and even improved others such as student-to-faculty ratio, instruction costs, USDE 90/10 and Cohort Default Rate rules in the face of declining enrollment over the past five years. These factors are in tension, and if they become unbalanced, Ashford’s ability to carry out its ambitious agenda and maintain the quality of its work will be significantly challenged. Ashford would do well to monitor these conditions through enhanced financial

oversight and prioritizing improvement plans consistent with a guiding framework developed for this purpose.

**F. Component 8: Optional essay on institution-specific themes**

Not Applicable.

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

During the self-study process, Ashford engaged senior institutional leaders, full-time faculty, and the subcommittees of the Reaffirmation Steering Committee in workshops and discussion groups to reflect on the results of its self-study, identify areas of strength and concern, and develop focal points for improvement. In its institutional report to WSCUC, Ashford articulates five areas of concern with twelve specific focal points. Since completing the report, it has begun to address some of these issues.

**Metrics and Data**

- 1. Further, refine data collection and analytics processes in ways that enable the fullest use of the large volume of data the university gathers, with a goal of increasing its use at the predictive level.*
- 2. Conduct further data-driven research to determine how faculty selection, training, mentorships, and professional development may be combined to achieve even stronger learning outcomes while improving retention and completion.*
- 3. Improve and expand access to student data for college leaders and faculty members in order to aid in strategic planning and resource allocation.*

Ashford's data-based metrics are produced by robust assessment and evaluation processes that span the whole institution. At the same time, the actionable value of this work

has not yet produced the desired result as Ashford's persistence and completion rates have not improved. As mentioned earlier, Ashford has launched many initiatives, terminated those that were non-productive, continued those that show promise, and pursued new initiatives. As demonstrated during the site visit, the institution has already developed predictive models for student progress and success with the goal of further developing these and using them to develop new initiatives. These focal points of using metrics and data to develop predictive student success models, strengthen faculty development offerings, and support strategic planning and resource allocation could serve as the basis for developing a systematic, comprehensive improvement strategy (CFRs 2.10, 3.3, 4.3). Progress realizing higher rates of student persistence and completion is critical for Ashford's future success, especially as the needs and demands of students in higher education evolve (CFR 4.7).

### **Technology**

4. *Increase efficiencies by modernizing or replacing the few remaining legacy applications that challenge effective and efficient operations.*
5. *Continue to innovate and simplify the user experience for students, faculty, and staff.*

During the site visit, Ashford demonstrated it has continued to upgrade its technologies to improve both the user experience and operational capacity. Two examples are its technology-assisted analysis of enrollment personnel phone calls to further ensure operational integrity (CFR 1.6, 4.1) and the recently installed second generation portal interface for students and faculty to meet student information needs and engagement (CFRs 2.5, 2.10). The Team encourages continuing these efforts as the institution is able, consistent with its strategic and budget priorities.

## **Students and Programs**

6. *Continue to assess students' preparation, needs, and experiences in order to improve student achievement and retention through new approaches (e.g., individualized learning needs and pathways).*
7. *Continue to strengthen the graduate culture by creating expectations and enhancements that more fully distinguish the graduate experience from an undergraduate experience.*
8. *In addition to providing clearly outlined transfer credit policies, expand practices that honor students' prior learning (e.g., adaptive learning models, student-led course pacing, increase in partnerships with feeder schools).*

Ashford's desire to expand recognition of prior learning is commendable, especially given its mission of serving an adult population. Many students come to Ashford with college credits and/or significant work experience and/or skills that could translate into partial or full credit. The institution continues to develop partnerships with feeder schools that allow credit transfer. Ashford is currently piloting technology-assisted approaches such as adaptive learning. Continued testing and/or widespread rollout will likely require significant investment of human and financial resources and will need to be balanced with other priorities and integrated into Ashford's year-over-year budgeting as well as strategic planning (CFRs 2.10, 2.14, 3.4, 3.7, 4.6).

## **Diversity**

9. *Strengthen staffing processes in order to better promote the diversity that exists in the student population.*

*10. Explore additional approaches to infusing content regarding diversity and inclusion across the curriculum. Examine Ashford's current diversity and inclusion policy to ensure it supports these improvements.*

Ashford reported it has been exploring best practices for diversity, inclusion, and equity in support of both these areas. As the university has noted, its diverse student population makes it imperative that Ashford expand these efforts to serve well its students (CFRs 2.10, 2.13). Improving staffing processes should be straightforward while further infusion of content across the curriculum may be more challenging since it requires faculty leadership, time, and possibly financial resources (CFRs 2.1, 2.4, 2.8, 3.1). The rate at which either of these can be accomplished will depend on the institution's priorities as well as the outcomes of Ashford's ongoing strategic and budget planning process (CFR 3.4, 4.6).

### **Assessment**

*11. Expand the use of discipline-related, national assessments that use external, comparative data.*

*12. Implement reviews that further validate summative evaluation rubrics designed to assess learning outcomes.*

Ashford has developed a strong assessment culture and the two foci listed above need to be addressed to demonstrate quality and meaning of the degree. Improvement in each of these areas will provide additional indicators of the quality and integrity of Ashford's degree programs (CFR 2.1).

## **SECTION III – OTHER TOPICS, AS APPROPRIATE**

### **A. Letters and Concerns Regarding Ashford Practices**

Prior to the site visit, the Team was provided with copies of several letters sent to WSCUC questioning among other things Ashford's integrity (e.g., unethical recruiting practices), mission fulfillment, truthful representation, student support, and commitment to student success. Because the Team had not reviewed any materials related to recruiting practices, it asked Ashford for access to its recruiting operations and compliance division. Ashford made recordings of randomly selected calls available to Team members and provided two separate onsite visits to its call center, which included presentations of its recruiting and compliance processes, data, and results.

A review of randomly selected recruiting calls demonstrated congenial calls providing accurate information (CFR 1.6). Ashford selected the last 2,000 recorded calls from its system, counted calls 1,11,21... until it had identified 200 calls, then loaded them in a WSCUC Box.com file. Three WSCUC staff then listened to 50 of these calls, selected randomly. Of the 50, only one was deemed problematic, wherein an enrollment advisor might have been better served to refer a question to a Financial Aid advisor rather than answering it himself. The Team's review of practices and evaluative data provided by the Ethics and Compliance Office showed that Ashford sets standards of behavior in recruitment calls and maintains staff policies, practices, training, evaluation, and development that are uniformly applied (CFR 3.2). It regularly reviews recruiting calls using speech analytic technology to identify whether an Enrollment Services Advisor has made statements that violate standard policy or practice (CFR 3.5). For example, in March 2019, Ashford reviewed over 500,000 calls and identified 137 calls with potential issues.

Those 137 call recordings were listened to by trained individuals who determined that five of the calls violated policy. In each case the Enrollment Services Advisor was provided with developmental feedback, further training, or was terminated depending on the individual's circumstances (e.g., whether they had any other violations) (CFR 3.3).

The Team's review of Ashford's performance in this area cannot address Ashford's history; however, current practices and procedures are evidence of Ashford's commitment to operate with integrity (CFR 1.7). The Team determined that Ashford is using state of the art methods and technologies to ensure open, honest communication with prospective and current students about material matters, thus providing demonstrable evidence that the University is adhering to WSCUC policies (CFR 1.8).

Based on the institutional report, the massive amount of additional information provided, and the Team's site visit interviews, observations, and study of additional documents, it appears that Ashford is operating with integrity and dedication to its mission. Our review of student support and efforts to improve student outcomes including faculty development, attention to student services and co-curricular programming, and upgrading technology platforms support this observation.

## SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS FROM THE TEAM

### REVIEW

#### Commendations

1. **Mission** – The Team commends Ashford for the authentic, enthusiastic, and passionate commitment of its Board of Trustees, administration, faculty, and staff to enacting the University’s mission of serving students from underserved groups.
2. **Data Informed Actions to Foster Student Success** – The Team commends Ashford for its efforts to collect actionable data to develop and implement policies and programs intended to guide institutional improvement and promote higher levels of student accomplishment.
3. **Assessment** – The Team commends Ashford for its systematic efforts to assess student achievement aimed at providing a high quality student experience.
4. **Faculty** - The Team commends Ashford for its ongoing faculty development activities, both for full-time and associate faculty, that feature promising practices in learning and teaching.
5. **Financial management** – The Team commends Ashford for its robust, holistic budgeting process and effective financial leadership.

#### Recommendations

1. **New Initiatives** – The Team recommends Ashford consider developing and explicating a coherent strategy for determining which improvement initiatives to prioritize, evaluate, and enact (CFRs 3.4, 3.5, 4.6, 4.7).

2. **Faculty Workload** – The Team recommends Ashford consider reviewing its current workload and compensation practices for full-time and associate faculty to determine whether they are appropriate and equitable (CFRs 2.1, 3.1, 3.2, 3.3).
3. **Faculty Governance** -- The Team recommends Ashford examine whether associate faculty representation and participation in faculty governance and efforts to evaluate educational effectiveness are appropriate and adequate (CFRs 2.4, 3.1. 3.10).
4. **Student Learning Assessment** – The Team recommends Ashford consider examining its process for ILO development and assessment to determine that it is satisfactory and meeting student and institutional needs (CFRs 1.2, 2.3, 2.4. 2.6).
5. **Student Success** – The Team recommends Ashford continue to analyze and interpret quantitative and qualitative institutional data from curricular and co-curricular programs in order to implement effective efforts aimed at ameliorating potential obstacles to student persistence and completion and documenting its graduates’ career paths (CFRs 4.1, 4.2, 4.3).
6. **Balancing Resource Allocation.** The Team recommends Ashford consider developing a policy to balance return to institution and return to shareholder/parent (CFRs 3.4, 3.6, 3.7).
7. **Financial Governance.** The Team recommends Ashford consider involving the entire Board of Trustees in examining annual financial reports to support a comprehensive understanding of the financial standing and practices of the University (CFRs 3.4, 3.6, 3.7, 3.9).

## **APPENDIX A**

### Federal Compliance Forms

## 1. Credit Hour and Program Length Review

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, where is the policy located?  Ashford’s Credit Hour Policy is posted on the university website, <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/catalog.htm#credit-hour-">https://www.ashford.edu/catalog.htm#credit-hour-</a></li> </ul>
	Comments:  The <i>Ashford University Academic Catalog</i> states the following: <ul style="list-style-type: none"> <li>• “Academic credit at Ashford University is granted using the semester credit hour system.”</li> </ul>
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:  When designing a new course, faculty complete a Credit Hour Equivalency Form (see sample credit hour analysis for IDT601: Instructional Analysis I provided as <a href="#">Appendix A</a> ) using Credit Hour Equivalency Definitions ( <a href="#">Appendix B</a> ).  Revisiting the credit hour calculations for assignments in a course is part of the university’s program review process. An excerpt from the <i>Program Review Self-Study Guide</i> is provided as <a href="#">Appendix C</a> .
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Two on-ground programs are offered at the Clinton Campus in Iowa: <ul style="list-style-type: none"> <li>• The <a href="#">Bachelor of Arts in Business Administration</a> is a 120-credit on-ground program taught over five weeks.</li> <li>• The <a href="#">Master of Business Administration</a> is a 42-credit hybrid graduate program delivered partly online and partly on-ground over six weeks.</li> </ul>

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections as appropriate.)
<p>Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i></p>	How many syllabi were reviewed? 15
	Type of courses reviewed: <input checked="" type="checkbox"/> online <input type="checkbox"/> hybrid
	What degree level(s)? <input checked="" type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? Education, HHS, Liberal Arts, Gen Ed,
	Are students doing the amount of work per the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	<p>Comments:</p> <p>Sample course guides, three from each of Ashford’s four colleges and the Division of General Education, are provided.</p> <ul style="list-style-type: none"> <li>• College of Education: <a href="#">Appendix D</a>   <a href="#">Appendix E</a>   <a href="#">Appendix F</a></li> <li>• College of Health, Human Services, and Science: <a href="#">Appendix G</a>   <a href="#">Appendix H</a>   <a href="#">Appendix I</a></li> <li>• College of Liberal Arts: <a href="#">Appendix J</a>   <a href="#">Appendix K</a>   <a href="#">Appendix L</a></li> <li>• Division of General Education: <a href="#">Appendix M</a>   <a href="#">Appendix N</a>   <a href="#">Appendix O</a></li> <li>• Forbes School of Business and Technology: <a href="#">Appendix P</a>   <a href="#">Appendix Q</a>   <a href="#">Appendix R</a></li> </ul>
<p>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></p>	How many syllabi were reviewed? 2
	What kinds of courses? labs
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? ECE 355, Environmental Studies, (Ecology and Evolution ENV 326)
	Are students doing the amount of work per the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
<p>Sample program information (catalog, website, or other program materials)</p>	How many programs were reviewed? 4
	What kinds of programs were reviewed? Assoc of Arts in Military Studies, B.A. Accounting, Master’s in Health Care Adm., PhD in Education
	What degree level(s)? <input checked="" type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? see above
	Does this material show that the programs offered at the institution are of an acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

## 2. Marketing and Recruitment Review

Material Reviewed	Questions and Comments: (Enter findings and recommendations in the Comments sections of this table as appropriate.)
**Federal Requirements	Does the institution follow federal requirements 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:  The typical length of time to degree and the overall cost of a degree are provided for all programs in the Program Disclosure section of the Ashford University website, <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/online-degrees/program-disclosures">https://www.ashford.edu/online-degrees/program-disclosures</a></li> </ul>
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution provide information about the employment of its graduates, as applicable? <input type="checkbox"/> YES <input type="checkbox"/> NO – Not Applicable, see comment below
	Comments:  The Program Disclosure section of the Ashford University website provides information about the fields, by keyword or O*NET-SOC Codes, in which program graduates could be employed. <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/online-degrees/program-disclosures">https://www.ashford.edu/online-degrees/program-disclosures</a></li> </ul> The university is not currently required to calculate a job placement rate for program completers.

### 3. Student Complaints Review

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO. Yes
	If so, is the policy or procedure easily accessible? Yes If so, where?  See Student Complaints and Other Complaints at <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#dispute-resolution-procedure-for-student-complaints">https://www.ashford.edu/student-rights-and-responsibilities.htm#dispute-resolution-procedure-for-student-complaints</a></li> </ul>
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: See below in comments
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:  Section Two: Student Rights and Responsibilities of the Ashford University Academic Catalog details the procedures for different types of student complaints:  The Student Dispute Resolution Center (SDRC) has standard operating procedures for addressing student complaints related to financial aid, loan balances, claims of misleading statements regarding admissions and costs, and discrimination that is not related to sexual misconduct or harassment. <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#reportingfiling-a-complaint-for-discrimination-not-sexual-misconductharassment">https://www.ashford.edu/student-rights-and-responsibilities.htm#reportingfiling-a-complaint-for-discrimination-not-sexual-misconductharassment</a></li> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#dispute-resolution-procedure-for-student-complaints">https://www.ashford.edu/student-rights-and-responsibilities.htm#dispute-resolution-procedure-for-student-complaints</a></li> </ul>

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
	<p>Title IX sexual misconduct/harassment complaints are reported to a university Title IX/SaVE coordinator and then referred to the Office of Student Grievance Resolution. An investigation follows.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#reportingfiling-a-complaint-for-title-ix-sexual-misconductharassment">https://www.ashford.edu/student-rights-and-responsibilities.htm#reportingfiling-a-complaint-for-title-ix-sexual-misconductharassment</a></li> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#referral-to-office-of-student-grievance-resolution">https://www.ashford.edu/student-rights-and-responsibilities.htm#referral-to-office-of-student-grievance-resolution</a></li> </ul> <p>The university has established procedures for student concerns with instructors and for grade appeals.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#student-concerns-with-instructors">https://www.ashford.edu/student-rights-and-responsibilities.htm#student-concerns-with-instructors</a></li> <li>• <a href="https://www.ashford.edu/student-rights-and-responsibilities.htm#grade-appeals">https://www.ashford.edu/student-rights-and-responsibilities.htm#grade-appeals</a></li> </ul> <p>The Ashford University website also publishes information on the procedures for handling student complaints under its Student Dispute Resolution Center section.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/online-learning-experience/student-support/student-dispute-resolution-center">https://www.ashford.edu/online-learning-experience/student-support/student-dispute-resolution-center</a></li> </ul>
Records	<p>Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? Yes, see comments below.</p> <hr/> <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 yes If so, please describe briefly: Yes, see comments below.</p> <hr/> <p>Comments:</p> <ul style="list-style-type: none"> <li>• Records prior to 2011 are hard copies maintained in a secure storage room.</li> <li>• Since 2011, student complaints and the resulting communications and actions have been filed electronically in data-management systems (Microsoft Access, Talisma).</li> <li>• Specifically, student dispute data from 2011 to present are stored electronically, with records from 2011 to mid-2016 in Microsoft Access and those from mid-2016 to present in Talisma.</li> <li>• Student dispute files are maintained on Talisma and the university's shared drive. Access to student complaint data and student complaint files is restricted to SDRC staff.</li> </ul>

#### 4. Transfer Credit Review

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)
Transfer Credit Policy(s)	<p>Does the institution have a policy or formal procedure for reviewing and receiving transfer credit?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
	<p>If so, is the policy publicly available? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO            If so, where?            Ashford’s undergraduate transfer credit policy is detailed in the <i>Ashford University Academic Catalog</i>,  <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/general-academic-information-policies.htm#undergraduate-general-transfer-credit-provisions-and-limitations">https://www.ashford.edu/general-academic-information-policies.htm#undergraduate-general-transfer-credit-provisions-and-limitations</a></li> </ul>           Ashford’s graduate transfer credit policy is detailed in the <i>Ashford University Academic Catalog</i>,  <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/general-academic-information-policies.htm#graduate-transfer-credit-policy">https://www.ashford.edu/general-academic-information-policies.htm#graduate-transfer-credit-policy</a></li> </ul>           Ashford’s website provides prospective students information on the traditional and non-traditional credits that may be transferred to Ashford University degree programs,  <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/online-admissions/transferring">https://www.ashford.edu/online-admissions/transferring</a></li> </ul> </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?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Ashford University’s website states the following:</p> <ul style="list-style-type: none"> <li>• “The transferability of credits is subject to Ashford University's transfer credit policies, and requires the submission of official transcripts. The official transcripts will be evaluated to determine the credits that will officially apply toward an Ashford University degree program.”</li> </ul> <p>Over 170 community colleges throughout the United States have signed articulation agreements with Ashford University. Specifics are provided on the Ashford University website,  <ul style="list-style-type: none"> <li>• <a href="https://www.ashford.edu/online-admissions/transferring/traditional-college-credit">https://www.ashford.edu/online-admissions/transferring/traditional-college-credit</a></li> </ul>           Ashford’s policy states the following about credits earned outside the United States:</p>

	<ul style="list-style-type: none"><li>• “Credits earned outside the United States must be evaluated by an approved Foreign Evaluation Agency for equivalency to both content and degree level of the Ashford University course.”</li></ul>
	Comments:

Appendix B. Off-Campus Locations Review, as appropriate

Not Applicable.

Appendix C. Distance Education Review, as appropriate

Not Applicable.