



Western Association of Schools and Colleges
Accrediting Commission for Senior Colleges and Universities

**REPORT OF THE WASC VISITING TEAM
EDUCATIONAL EFFECTIVENESS REVIEW**

To HUMPHREYS COLLEGE

MARCH 5-8, 2013

**In Partial Fulfillment of the Requirements for
Reaffirmation of Accreditation**

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

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SECTION I. OVERVIEW AND CONTEXT

A. Description of the Institution and Visit

Humphreys College is an independent college that offers undergraduate degree programs in eight majors, two specialized certificate programs, a J.D. degree program through its law school, and a Master of Arts (M.A.) in Education. The college operates two campuses within 25 miles of one another, in Stockton and in Modesto. Enrollment grew to a peak of 1,200 in fall 2011 and has since dropped down to 1,050 in fall 2012 and 1,004 in winter 2013 and is expected to level off to around 900 in coming years, based on the institution's own projections.

Accreditation History

Humphreys College obtained Accrediting Commission for Senior Schools and Colleges/Western Association of Schools and Colleges (ACSCU/WASC) accreditation effective June 26, 1992 after a multi-year application and candidacy period while still accredited by the Accrediting Commission for Community and Junior Colleges (ACCJC). Recommendations along the way included planning beyond the departmental level, breadth of general education offerings to support degree programs, formal plans for addressing diversity issues, maintaining sufficient and adequate full-time faculty, and plans for more effective connections to the higher education community. Accreditation was reaffirmed in 1997. In 2004 the Commission issued a formal Notice of Concern, which was removed in 2006 after the report of a Special Visit team. At that time, the Commission also confirmed the schedule for the next comprehensive institutional review, that is, the Capacity and Preparatory Review (CPR) for spring 2011 and the subsequent Educational Effectiveness Review (EER) for fall 2012, with a Special Visit in 2007 to verify ongoing progress on action items. The Commission requested that the institution include in its institutional review proposal its response to the issues raised and recommendations

made in the Commission action letter, namely: (a) institutional self-assessment of educational effectiveness; (b) law school educational effectiveness; shared governance – Board of Trustees; and (c) strategic planning and financial projections.

In 2008 Humphreys College sought and obtained approval to proceed with new programs. The Commission approved the proposal from Humphreys College to offer a Master of Arts in Education with emphases in Early Childhood Education and in Educational Administration. In 2009, the Commission approved a B.S. in Criminal Justice.

The Commission did require that the college address the recommendations for the Master of Arts in Education program contained in the October 31, 2008 Substantive Change Visit report in the college's spring 2011 CPR report. Specifically, the college was required to address: (a) an up to date financial report on the status of resource allocation for the Master of Arts in Education program, including actual and projected budget and enrollment figures and developments in increasing facilities and other resource needs as planned; (b) the current status of the program's actions to prepare Master of Arts in Educational Administration students for the credential in administrative services; and (c) the qualifications and experience of faculty to meet the intentions and goals in each concentration of the Master of Arts in Education program.

Based on the report from the 2011 CPR visit, the Commission endorsed the team recommendations, rescheduled the EER to spring 2013 to allow the institution more time for its C-DATA¹ and Critical Mass² processes to be fully implemented, and highlighted several issues of concern including the need for:

- a comprehensive and systematic plan for educational effectiveness at the law school

¹ C-DATA (Community, Development, Advising, Teaching and Assessment) refers to the college's model used to organize all academic efforts, including annual faculty reviews and program reviews.

² Critical MASS (Mission, Academic, and Student Services) is the college's planning structure for assessing and assuring institutional effectiveness.

- policies, systems and staffing to ensure data integrity and continued development of a culture of evidence in support of effective decision making
- adequate staffing level to support technology, institutional research, retention and assessment, academic support services, and faculty (with respect to teaching and advising loads)

The March 5-8, 2013 EER included visits to both campuses and interviews with the President, the Accreditation Liaison Officer (ALO), the EER Steering Committee, Law School Assessment Committee, Dean of Instruction, Dean of the Law School, Dean of Institutional Research and Effectiveness, Dean of Administration, Academic Department Chairs, Undergraduate Academic Council, Graduate Council, faculty, students, and the Board of Trustees. The four team members were all returning members from the 2011 CPR visit and were able to recognize patterns and evaluate progress vis-à-vis recommendations. The team appreciated the college's hospitality and preparation for the visit.

B. The Institution's Educational Effectiveness Review Report

The December 2012 Humphreys College Educational Effectiveness Report is thorough and addresses programs, initiatives, and data related to the themes and to the recommendations of the CPR visiting team. It is organized around the two themes of the proposal:

- 1) *Assuring Educational Effectiveness*
- 2) *Planning for Growth*

While the report focuses heavily on the assuring effectiveness theme, the team was able to learn more about the growth theme during face to face interviews.

C. Institutional Response to Issues Raised in the Capacity and Preparatory Review

The 2011 CPR team report made seven recommendations relating to the following areas:

- 1) the institutional research (IR) function, data integrity and adequate staffing; 2) administrative

staffing, including Information Technology (IT) support; 3) a comprehensive and systematic plan for educational effectiveness at the law school; 4) academic support; 5) faculty teaching and advising loads; 6) faculty diversity; and 7) the chief financial officer (CFO) function.

1) IR Function: Data Integrity and Adequate Staffing. The college reports that as part of its migration to a new enterprise software system the Dean of Institutional Research and Effectiveness has been mapping and extracting data from the legacy system for conversion to the new system. A committee on data integrity has been tasked with examining all the data elements in the new system to assure that data elements are defined clearly and appropriately. All employees involved in data entry will be trained on the new system and manuals are being created to document processes and definitions to assure continuity as new employees take on data entry tasks in the future.

2) Administrative Staffing including Information Technology (IT) Support. The college reports that it hired an additional full time IT employee to process Level I requests and projects, freeing up time for the IT Director for higher level planning and infrastructure development activities.

3) A Comprehensive and Systematic Plan for Educational Effectiveness at the Law School. The law school appointed an assessment committee which has rewritten its program learning outcomes, looking at examples from other law schools and scholarship on law school outcomes assessment work. The new program learning outcomes were discussed at length at a law school faculty retreat (for full time and part time faculty). Feedback from the retreat was incorporated into a finalized draft of the learning outcomes. The law school assessment committee has begun work on assessment of these learning outcomes, and at the time of the EER visit completed work assessing two of the eight learning outcomes.

4) *Academic Support.* The college has made creative use of graduate students in the new M.A. in Education program to begin to assess the effectiveness of academic support services. In addition, a new registration system has been developed for signing up for tutoring and workshops to facilitate the collection of more robust data to use in further assessment efforts. In addition, the college announced at the time of the EER visit that it was about to hire a second part-time tutor at the Stockton campus to help assure broader access to tutoring services.

5) *Faculty Teaching and Advising Loads.* The CPR team report expressed some concern about heavy faculty advising loads and the lack of any breaks from teaching for professional development and intellectual renewal other than short breaks between quarters.

The college discovered in taking a closer look at advising loads that part of the problem was an imbalance in the distribution of advising loads among faculty members. The college pursued a multifaceted strategy to address advising load concerns, including the following: (a) increasing the number of faculty members; (b) reducing overall advising loads with some shrinkage in enrollments; (c) reduced teaching loads for court reporting faculty (where apparently advising loads were higher) and for three deans with advising responsibilities; and (d) redistributing advising loads to even out some of the imbalance.

The college also noted that four faculty members in the past three years have taken one-quarter paid sabbaticals and every faculty member has a professional development budget to assist faculty members in pursuing professional development activities.

6) *Faculty Diversity.* The Capacity and Preparatory Review found that the Humphreys College faculty was not very diverse, particularly compared to the student body and the community served by the college, and that the strategic plan, while identifying the need to increase faculty size to match enrollment growth, did not address the opportunity presented by planned faculty growth to add to the diversity of the faculty. The college's EER report notes that

in addressing an unrelated concern about data integrity through a data audit the college discovered that two existing full time faculty members who were thought to be White were actually Hispanic. In addition, one of the new faculty members hired since the CPR visit is also Hispanic. Over the period of the current strategic plan (2009-2014) eight new faculty members have been hired and four of the eight have added to the racial and ethnic diversity of the faculty.

7) *The Chief Financial Officer Function.* As was the case at the time of the CPR visit, the Chief Executive Officer (CEO) and the Chief Financial Officer at Humphreys College continue to be the same person, the President.

SECTION II. EVALUATION OF INSTITUTIONAL EDUCATIONAL EFFECTIVENESS

The team commends the institution for its deeply embedded sense of mission as a college of opportunity, and the caring student focus and loyalty engendered among all constituents. The team observed a real sense of fit between mission, staffing, and students at both campuses.

Theme 1: Assuring Educational Effectiveness

Assuring Educational Effectiveness and the IR Function (CFR 2.4, 2.6, 2.7, 2.10, 2.11, 3.6, 3.8, 4.4, 4.5, 4.7)

The institutional research function, also identified in 2007 and 2011 as an area that needed focus, is still in development. However, important progress has been made. There is now awareness of several issues including data integrity, definition, and accuracy that need to be addressed in order for the function to be effective. As noted earlier, the college is implementing a new enterprise system that will address these challenges. The implementation team has put these challenges in the forefront and is keenly aware of the importance of resolving them.

The institutional research office is better organized and supported in a manner that will enable it to fulfill its critical role in the gathering, analysis, interpretation, and dissemination of

data and information as the institution continues to develop a culture of evidence in support of effective planning and decision-making. Although attention to this area has also led to improved understanding, tracking, and use of data, more work remains in the area of data and cohort definitions particularly for the analysis of retention and graduation rates. Of some concern is the very tight timeline under which the college hopes to complete this project. If the new enterprise software system is not ready for use by May 2013, use will have to be delayed an entire year to avoid the difficult prospect of having two systems active during the same academic year. As important as the deadline is, it cannot compromise the effort to establish sound processes and definitions. The team recommends continued focus and training on the new data system including the degree audit function and use of common definitions and coding of student types for external reporting and internal program review.

The Associate Dean of Undergraduate Retention and Assessment is a member of the new database implementation team. Her involvement in this project is critical, and it is recommended that she work closely with the Dean of Institutional Research and Effectiveness in defining data and cohorts that drive the analyses of retention and graduation rates. In order to better manage and track retention and graduation efforts campus-wide, it is recommended that an Enrollment Management Committee be created. This was recommended in the Strategic Plan, but has not been instituted. Such a committee would help expand the responsibility for retention and graduation efforts to larger groups on campus. An Enrollment Management Committee will also help facilitate the implementation of the new enterprise system.

Program Review (CFR 4.4)

Program review structures are well developed at and given high importance by the college. The college's program review calendar schedules each program for review every five years. Assessment plan calendars are also in place for each program. One program learning

outcome (PLO) is assessed each year and assessment reports are produced. Generally, the college has been consistent in following these calendars.

Since 2004 every academic program, including the online program (complete with its first comprehensive review of online courses) and law school, has been reviewed at least once. PLO assessment reports are examined as part of the program review. Recommendations for improvement are offered following the framework of the C-DATA model. The C-DATA and Critical MASS models have also been assessed. Since 2012, program review efforts have been explored for student services departments, but this is still in development.

In 2010, the program review policy was revised to include an external reviewer. The college was inspired to adopt this practice after one of their administrators attended the WASC Academic Resource Conference (ARC) and learned about best practices for reviewing academic programs. The use of an external reviewer was first implemented for the 2012 M.A. in Education review and, recently, for the review of the Liberal Studies program. The college's program review committee has committed to applying this practice to each and every program review in the future.

The college has strategies in place to encourage the use of program review recommendations to improve programs and close the program review loop. The Dean of Instruction receives a yearly update on the use of program review recommendations. Following through on program review recommendations is also a part of the performance review of academic chairs. It is recommended that a copy of each performance review be made available to the Associate Dean of Undergraduate Retention and Assessment to keep her informed of progress made in implementing program review recommendations and enable the Associate Dean to ensure that the final step in closing the loop is achieved. The college is also exploring ways to tie program review work to faculty development. For instance, the Associate Dean is

exploring conferences on critical thinking that faculty can attend to help them think through program review processes and the use of recommendations for program enhancement.

Graduate Programs (CFR 2.2b, 2.3, 2.5, 2.6, 2.7)

At the time of the CPR visit, the college had recently launched its new Master of Arts in Education program. That program has developed in the ensuing years. In addition to the two original tracks in Early Childhood Education and Educational Administration, the college added a state-approved program for the multi-subject California teacher credential that provides for further curricular development as well as increases employment opportunities for graduates. This addition was the result of the successful completion of a rigorous application process.

The credential program, which will be subject to external monitoring by the California Teacher Credentialing Commission, is too new to have been through the program review process. However, the recently completed program review of the original two tracks is thoughtful and thorough and provides evidence of educational effectiveness. It includes a strong set of program learning outcomes that are well aligned to the skills taught in the program's courses, a review of assessment projects, a positive evaluation by an external reviewer, and a series of meaningful recommendations. The team learned during the visit that these recommendations were already being implemented. For instance, a recommendation to increase attention on the skills of incoming students resulted in a more selective admissions process. And, a recommendation that students be given earlier direction on the development of their thesis topics and increased instruction on research skills needed for the thesis resulted in changes at the curricular and course level. Faculty supervising these theses report improvements in the student work product as a result of these changes. This feedback demonstrates that in a relatively short period of time, the graduate faculty "closed the loop" effectively.

The graduate faculty, both full time and part time, impressed the team with their breadth of experience, expertise and commitment to the program. A strong spirit of collaboration was evident. Students in the program report a high degree of satisfaction with their education and appreciation for the faculty's close attention to their academic success. The degree of rigor in the program is high, with student expectations well-articulated.

Law School (CFR 2.2b, 2.3, 2.4, 2.5, 2.10, 2.13)

In the CPR Action Letter of July 5, 2011, the Commission wrote that it was “particularly concerned that the law school has not made more substantial progress on assessment of student learning” in light of concerns raised in previous action letters, and the need for the college to demonstrate by the time of the EER “that student learning in all programs and at all levels is assured.” The Commission drew attention to the “nascent stage” of development in the assessment program that the team had found, and the need to further refine the learning outcomes “so that they are ‘aligned with the skills graduates need to acquire’”(quoting the team report).

The law school has made good progress in developing its program of assessment in student learning since the CPR visit. Some of that progress had been delayed by the sudden passing of the law school faculty member who was the key driver of the process. However, the work that he had begun and that was taken up by a committed and enthusiastic assessment committee reveals several positive developments. The law school took to heart the suggestions made by the CPR team that the faculty rethink the program learning outcomes that had previously been established, so that they would be more fully aligned with the skills that the students in the law school were actually learning and should by all accounts be learning in their classes. Accordingly, the process began with the creation anew of a set of program learning outcomes. The new set of learning outcomes were developed through a process of faculty involvement and attention to outside resources. As a result, they are much more representative of

the teaching and learning that actually occurs in the law school classes than were the previous set of learning outcomes, and they are better informed by the research and current thinking in the legal education community. The learning outcomes are:

- 1) Knowing correct principles of California and Federal substantive law, legal procedure, and process;
- 2) Developing cogent legal analysis by the application of critical thinking and problem solving skills;
- 3) Communicating effectively in a legal context in objective or persuasive style, whether written or oral;
- 4) Applying professional responsibility, including recognition of the attorney's dual role of zealous representation of a client's interests while acting as an officer of the court;
- 5) Demonstrating proficiency in legal research and factual investigation, including the appropriate use of technology;
- 6) Understanding the concepts of effective and responsible practice management;
- 7) Exercising professional judgment in identifying a client's legal needs and counseling on the benefits and limitations of a proposed course of action including negotiation, litigation and alternate dispute resolution strategies; and
- 8) Appreciating the role of law as a social institution that supports a just and civil society, including the need for attorneys to perform pro bono legal services and to be active participants in the community at large.

The faculty have been well educated about the outcomes and accept them as representative of their goals. The process of mapping the curriculum to these outcomes has also begun. In contrast to the previous set, this set of learning outcomes is comprehensive and well aligned with the curriculum and individual course goals.

At the time of the submission of the EER Report, one assessment project had been undertaken to demonstrate student learning under this set of learning outcomes. This project addressed learning outcome #2 on the above list. As part of that project, a faculty team developed a rubric for the learning outcome, evaluated ten randomly selected papers from

courses that were mapped to this outcome and applied the rubric to them. In order to stay on track the assessment committee immediately began assessment of a second learning outcome (learning outcome #1), and that report was available for the team's review by the time of the visit. For that project, a faculty team developed an additional rubric and again evaluated a random selection of papers. The development of the new rubric as well as the recommendations flowing from this assessment project showed an increasing sophistication on the part of the assessment committee, which was clearly using its first assessment experience as a basis for further refinement and improvement of subsequent assessment efforts. Further, its members received constructive suggestions from the visiting team for additional improvements with enthusiasm, and appeared further motivated to continue and refine their work. The suggestions they embraced include:

- revising how the first rubric's standards are articulated so that they better match the result that was intended;
- assessing beginning students separately from more advanced students in order to measure progress in learning and formally acknowledge rising expectations for depth of learning as students move through the four-year program; and
- sharing their analysis with the faculty as a whole, not just their recommendations, to give context to their recommendations.

The committee also demonstrated a commitment to continue their work on a systematic basis, working through the learning outcomes and developing a regular schedule of assessment leading to program review. They indicated that the project as defined was manageable and the methodology sustainable.

Finally, the results of the assessments indicate that appropriate learning is occurring in the law school; discussions with faculty members further indicate the use of appropriate and innovative methodologies to encourage active learning and provide students with meaningful feedback.

Another important measure for law school learning is the ability of the school's graduates to pass the California Bar Exam. While a certain number of graduates do not intend to practice law, the ability of the law school to prepare its students to enter the legal profession is an important component of educational effectiveness. During the CPR visit, the Dean of the law school presented information to the team demonstrating that he and a team of faculty members had engaged in an analysis of those factors that best predicted the success of graduates on the bar, concluding that law school GPA was the strongest factor. Accordingly, the law school had adopted a set of new good standing policies that were hoped to improve success on the bar by motivating students to improve performance and by excluding those students who were not able to perform at an adequate level. In the CPR report the team praised these efforts, stating, "The use of academic and bar data to drive academic policy shows a commitment to increasing educational effectiveness through assessment, and based on evidence."

The EER team was pleased to see that these efforts had been maintained, with data continuing to support similar conclusions. In addition, the Dean had begun to assess the effectiveness of time spent on online learning modules for bar preparation, providing evidence that time spent on these modules positively correlated with bar pass.

Unfortunately, the bar pass results for the law school's most recent graduates have been disappointing. The July 2012 test takers represent the largest cohort in the law school's history. They also entered law school and advanced through the program just prior to the institution of the good standing policies that the school recently adopted, and their pass rate does not, therefore, reflect the impact of these new policies. The overall 2012 first-time pass rate was 15.8% (6 of 38), with all but four of these first-time takers taking the July bar, producing a July 2012 first-time pass rate of 11.8% (4 of 34). The previous four years had seen pass rates in the upper 20's, down from 50% and 57% in 2007 and 2006 (with smaller classes). In addition to

analyzing the factors that contribute to bar passage, the law school has reacted to the declining bar pass rates by instituting new courses to help students develop their writing skills for the bar exam, a student mentor program and a longer orientation for incoming students. The Dean and faculty are also reviewing other potential measures, including arrangements with bar review companies to provide more uniform bar preparation.

The urgency to improve bar pass rates has increased with recent developments. On January 1, 2013, new guidelines from the California State Bar's Committee of Bar Examiners (CBE), which accredits the college's law school, became effective. These guidelines require California-accredited law schools to maintain a five-year cumulative bar examination passage rate of at least 40 percent. Law schools must provide an initial compliance report to the State Bar in November 2013. Under the new guidelines, law schools' bar passage rates will be tabulated yearly as a percentage based on the number of students who have graduated within the past five years and have taken and passed a bar exam in California, regardless of the number of attempts. That figure will then be divided by the number of graduates during that five-year period who have taken any of those exams.

Based on bar pass data supplied by the law school, the current figure under this formula for the law school, looking at graduates from 2008 through 2012, is 33.9%, short of the required standard. This low cumulative pass rate results in large part from an unfortunate confluence of events, including the fact that the July 2012 cohort of first-time test takers was the largest in the history of the law school, that this cohort had the lowest first-time pass rate of any cohort in recent history, and that because this cohort just graduated, it has only had one opportunity to take and pass the exam. There is reason to anticipate that this number will improve as the large group that posted the recent low first-time pass rate retakes the exam, and as subsequent cohorts, who will have benefited from the new programming and good standing policies, take the exam in the

coming years. Nevertheless, continued vigilance, assessment and programming will be necessary to ensure cumulative bar pass rates that will maintain the law school in good standing with its programmatic accreditor.

In the CPR report, the team also recommended that given the open admissions standards of the law school, the educational effectiveness of the program could be enhanced by the development of a comprehensive academic support program. This seems a particularly urgent need in light of the bar pass results. During the EER visit, the faculty told the team that academic support at the law school remained “sporadic.”

Career development and support may be seen as a further indication of educational effectiveness. The law school has done an impressive job of providing this support to its graduates who pass the bar, taking advantage of the large alumni network to connect students with appropriate opportunities, and by developing a new incubator program to help graduates who wish to develop solo practices. This program provides graduates with office space to meet clients, other overhead support, and client referrals to help graduates develop and launch their own practices.

Faculty Workload (CFR 2.1, 3.3)

The CPR report expressed some concern over heavy faculty advising loads and the lack of any breaks from teaching for professional development and intellectual renewal other than short breaks between quarters. While the teaching load each quarter seemed manageable, the fact that this teaching load carried through all four quarters in the year, coupled with heavy advising loads, meant there was no built in time for renewal and professional growth.

The college’s EER report noted that part of the problem was an imbalance in the distribution of advising loads among faculty members. As noted in Section I above, the college pursued a multifaceted strategy to attack advising load imbalances. However, during the visit, the

team learned that advising loads remained quite high despite the measures that had been taken to improve them. Because several departments have only one or two full time faculty members including the department chair, redistribution of loads was either not available or left two people with still very heavy loads. Faculty members are very committed to the advising function, and see course of study approval as only the start of a very valuable individual communication process between students and their advisors. Faculty members impressed the team as being extremely devoted to their students, ardent about the mission of the college, and extremely hard working. However, the visiting team noticed heightened stress loads during the EER visit, compared to the CPR visit, evidenced by the number of comments and expressions of concerns from faculty members during the visit (often not about their own workloads, but about workloads of their colleagues around them). The combination of advising loads and year round teaching loads leave the faculty and the department chairs with little time to pause and reflect on program review recommendations, or develop new courses and curricula, despite their eagerness to devote themselves to these additional projects. While the faculty has shown remarkable commitment to completing program reviews and addressing program review recommendations, the visiting team could not help but question the sustainability of the excellent program review and assessment process that the college has implemented, absent some attention to the faculty workload issue.

At the same time, the team sympathized with concerns from the college's administrative leadership that adding a significant number of full time faculty members, while it might relieve workload issues in the short run, could put the college in severe financial stress in the future should enrollments drop. However, the visiting team noted that certain small changes with low budgetary impact could create the necessary space for assessment, review and development activity that is being impinged by the current workload policies. For example, release time in the form of a reduction in teaching load, so that a faculty member might teach two courses one

quarter rather than three, could be achieved by hiring existing adjunct faculty to fill in for a course that would normally be taught by a full time faculty member. In addition, the current academic calendar provides for two 11 week quarters and two 12 week quarters. By converting the calendar to four 11-week quarters, the college would provide full time faculty with two additional weeks during which the extra work could be addressed, while simultaneously eliminating the burden of producing both 11-week and 12-week versions of the same course syllabi. Because versions of most if not all courses are taught effectively during 11-week quarters, the implementation of quarters of uniform length is unlikely to impact educational effectiveness.

Finally, limited and strategic additional hiring may be necessary to ensure the educational effectiveness of the college's programs for its students. The combined Criminal Justice and Legal Studies departments under a single full time faculty member who serves as the joint chair to the departments and the advisor to all students in the two departments is not a sustainable model for student success, despite the enthusiasm, high level of energy, and resourcefulness of the one hardworking individual. Another example is the tutoring function. Students report a high level of satisfaction with the assistance they receive from the one individual who provides Math and English tutoring at the Stockton campus. However, they express frustration at the difficulty they sometimes have in scheduling appointments because he is in such high and continuous demand. The team learned that a plan was in place to hire an additional tutor; perhaps even additional hires might be appropriate for this important function, particularly if the Modesto campus is also to have access to tutoring resources. The team heard from Modesto faculty and students that the satellite campus makes use of peer tutors but is having difficulty finding a Writing tutor, despite a uniformly recognized need.

Ultimately, the workload does not seem to have changed substantially since the time of the CPR Review. However, the degree to which the faculty are stretched beyond capacity in the work that is both expected of them and that they are eager to complete has produced over time a level of stress that was palpable to the team. For that reason, the team deems the current workload not sustainable.

Modesto Campus (CFR 2.13, 3.6)

See Appendix A

Theme 2: Planning Growth

Humphreys College's strategic plan and institutional proposal are organized around growth: programmatic, enrollment, and facilities.

Programmatic (CFR 2.2, 4.1, 4.4)

The college added academic programs based on projected regional demand. These include a teacher credentialing program to meet anticipated regional need for multiple subjects K-8 teachers, and programs that recombine elements of the Criminal Justice curriculum to serve the needs of the local law enforcement community. A career orientation is evident in new program development, and aligns with the college's focus on meeting regional needs. The team recognizes regular engagement with program development through the Academic Council, the Dean of Instruction, and the Dean of Institutional Research and Effectiveness. The team also notes meaningful research engagement from students in the Master of Arts in Education program.

Enrollment (Standard 3; CFR 3.5, 3.7)

Institutional leadership expresses comfort at what they described as "steady-state" enrollment of around 900-1,000, a target they describe as "hitting from above rather than from

below” since the peak of 1,200 in 2011 (which was well above the targets the college set for itself in its strategic plan). The peak years of 2011 and 2012 yielded operating surpluses that gave the leadership a measure of comfort as they faced facilities and technology investments and uncertainty regarding Cal Grant funding. The college’s enrollment model remains heavily grant-dependent, with 80% of the student body Pell-eligible and annual tuition carefully set to allow Pell + Cal Grant recipients’ loan funds to cover cost of attendance including some living expenses. During the EER visit the team learned that the college had lost Cal Grant eligibility for 2013-14 based on its students’ default rate of 15.6% relative to the newly set state cutoff of 15.5%. This unexpected turn affects about 150 current Humphreys College students. The President and Board of Trustees responded to this challenge with a multifaceted approach including several possible financial scenarios. First, the college is working closely with legislative representatives to address several key issues in the legislation, including providing some level of protection to returning students, and a more flexible approach to handling institutions that narrowly miss the loan default benchmark, particularly when they are very small institutions with low tuition and very low loan amounts in default. In the college’s case, the 0.1 amount by which the college missed the benchmark represents less than one student, and data show that the largest number of defaulters had attended Humphreys College for less than four quarters and defaulted on loan amounts of less than \$10,000. Second, the college is working with its graduates to help get them into loan repayment plans to lower the default rate. Third, the college developed a scholarship program so that, if it is not able to regain Cal Grant eligibility for the 2013-14 academic year, its students will not bear the full brunt of that financial burden. The program provides each student who was otherwise Cal Grant eligible with a scholarship that represents 50% of the Cal Grant value. While this program will come at a financial cost, the college believes that revenue loss if these students are not able to continue their education at

Humphreys College will be significantly greater than the “cost” of retaining them through the award of scholarships designed to decrease the students’ out-of-pocket loss from the unavailability of Cal Grants. The Board shared with the team that the President is handling the situation wisely and that the institution can absorb what is viewed as a one-time hit. The team acknowledges that the leadership is fiscally conservative and can financially manage this setback. However, the team also expressed some concern that the current Cal Grant situation not be used as a rationale for cutting actual or proposed staffing in fragile core areas, including tutoring and faculty hiring.

Facilities (CFR 3.6)

The college community is pleased with the new instructional and meeting facilities, which have been completed as planned. The team noted that both the Stockton campus and the Modesto campus now have surplus seating capacity that could allow for future enrollment growth in both day and evening programs.

Strategic Planning (CFR 2.10, 2.12, 2.13, 3.1, 3.5, 3.8, 4.1, 4.2, 4.3)

Humphreys College is slated to begin work on its next five year strategic plan this summer (2014-2019). The team heard from several individuals that the theme going forward may shift from “growth” to “sustainability” or “dealing with change.” The team recommends that the next round of strategic planning include consideration of ways to diversify revenues and counter balance the heavy institutional dependence on two government funding sources. The team also recommends that the academic department chairs’ input be included in the process, as lessons learned from program review and student learning can help inform consideration of priorities.

The CPR team expressed concern in 2011 over the sustainability of the staffing model. Faculty workload is addressed under Theme 1 in this report. For example, the faculty advising load has in part been reduced through hires and declining enrollments since the CPR visit, and

may be further alleviated through online advising tools within the new student information data system set to launch in 2013. The team remains concerned about thin staffing in some areas, and left with the impression that faculty and staff are loyal but tired. The team wants to underscore that much has been accomplished since the CPR visit two years ago, both among faculty with program reviews and among staff with the planned migration to a new student information system and the associated systemic review of data definitions and operational procedures.

SECTION III. FINDINGS AND RECOMMENDATIONS FROM THE CAPACITY AND PREPARATORY REVIEW AND THE EDUCATIONAL EFFECTIVENESS REVIEW

A. Follow up on CPR Action Letter Recommendations

IR Function (CFR 2.10, 4.5)

The Institutional Research function at Humphreys College is still developing, but now has achieved traction. The migration to a new enterprise software system poses challenges, but will lead to more reliable data entry and easier access to important data, helping to move the college from an emerging to a developed culture of inquiry and evidence.

Administrative Staffing (CFR 2.13, 3.1, 3.7)

IT staffing at the time of the CPR visit consisted of one very capable full-time staff person. That person is now assisted by an additional full-time staffer. The Dean of Institutional Research and Effectiveness and the Associate Dean of Undergraduate Retention and Assessment have been given a reduction in teaching load to free up some of their time for administrative responsibilities. There are still areas of stress due to thinness of staffing, but some of this is caused by the enterprise software migration project, and some of that stress will be alleviated both by the end of that project and the efficiency benefits that flow from the new software system.

Educational Effectiveness at the Law School (CFR 2.2b, 2.3, 2.4, 2.5, 2.10)

As noted earlier in this report, good progress has been made at the law school in building a comprehensive and systematic plan for educational effectiveness. While the law school's track record of assessment activity is still short, their activities and plans can no longer be fairly described as "nascent."

Academic Support (CFR 2.13)

While the college has begun to build an effective plan for assessing the effectiveness of its academic support programs, staffing remains a concern as noted in Section II, above.

Faculty Workloads (CFR 2.1, 3.3)

Some adjustments to heavy advising loads have been made through more even distribution of advising loads or reduced teaching loads in a few key areas. However, in some other areas advising loads remain heavy. Furthermore, four quarter full teaching loads and the limited down time between quarters, as discussed in more detail in Section II and in the visiting team recommendations below, create a sense of a relentless rising tide that never subsides.

Faculty Diversity (CFR 1.5)

Between the inadvertent discovery that two full time faculty members classified as White in the old enterprise software system were actually Hispanic, and the hiring of four faculty members of diverse race or ethnicity among the eight new full-time faculty hires under the 2009-2014 strategic plan, the college has made significant progress in improving faculty diversity.

CFO Function (CFR 3.10)

As noted in Section I above, the CFO function at Humphreys College is still fulfilled by the President of the college. Two years ago, the visiting team reported the satisfaction of the Board of Trustees that the President was serving effectively in both roles, and the team's satisfaction that the President has been an effective leader in both roles. There was no evidence

at the EER visit of any change regarding this issue. As noted below, the visiting team suggests, as it did two years ago, that the college continue to evaluate this question as it plans for and moves into the future.

B. Commendations

Humphreys College has a well-defined cycle of program reviews. It is learning from the process and applying that learning to new cycles of reviews. It pays attention to recommendations flowing from reviews, and due to its small size is sometimes able to respond to recommendations for improvement with remarkable agility. It has used external reviewers in the two most recent program reviews and intends to incorporate external review in all future program reviews.

The law school was at a troublesome stage of development two years ago, having failed to develop an adequate assessment plan in spite of particular attention being given to this point in the Commission's February 2008 action letter. While a set of program learning outcomes was in place prior to the CPR visit, they were defined at such a high level of generality as to not be very useful in measuring effectiveness. The early assessment efforts seemed ill-designed to measure effectiveness in achievement of the defined learning outcomes. The EER team found that new and more appropriate program learning outcomes have been established. Two of the eight program learning outcomes have now been assessed. The assessment process is appropriate. There is enthusiasm to continue the assessment work and an eagerness to learn from the process that is evident even in the changes and adjustments made between the first and second assessment effort.

In addition, the law school is pursuing some creative ideas including an impressive incubator project designed to help graduates who have not found employment to either grow their own practices or gain experience that will be useful in finding job placements.

The Master of Arts in Education program, which was just getting under way at the time of the CPR visit is a well-conceived, well-executed, and carefully assessed program that is helping the college to diversify its revenue stream. The teacher credentialing program is very new, but appears to be off to a healthy start.

Two years ago, the Modesto campus seemed to present a challenge to the institution. Communication between the main campus in Stockton and Modesto was lacking. Too often Modesto seemed to be an afterthought. The EER team found that the Modesto campus is well managed, well supported, and well integrated with the Stockton campus.

Two years ago, discussions were underway concerning a looming migration from one enterprise software system to another. That migration is now underway. It has involved a huge commitment of time and resources, but the migration is now far enough along that the committee coordinating the effort has begun to see in concrete terms the benefits that will flow from full implementation of the new system.

Humphreys College is blessed with a dedicated faculty and staff who are, at all levels, committed to student success. This is evident not only in discussions with faculty and staff, but more significantly in discussions with students, who feel a tremendous sense of loyalty to the institution.

At the time of the CPR visit, the college had just completed construction of several new buildings adding much needed state-of-the art classroom and meeting space. Two years later, the new spaces still feel fresh. The campus is attractive and well maintained, and helps contribute to a real sense of comfort and support for students.

In the past few months, a large challenge presented to the college has been new standards set by the state for institutional eligibility for Cal Grants. The new standards require meeting designated benchmarks for graduation rates and federal loan default rates. Humphreys College

exceeds the graduation rate benchmark by a large margin. However, as noted in Section II, above, the college's loan default rate of 15.6% exceeded the benchmark by 0.1, causing the college to lose eligibility for Cal Grants next year for all of its students, new and returning. The EER team commends the college for responding to this important challenge in a manner that is appropriately thoughtful, creative, speedy and aggressive. The team's assessment of the college's plan of action is that the college will meet this challenge and overcome it.

C. Recommendations

1. The Law School should continue to build on its assessment efforts and focus renewed attention on its low bar pass rates (CFR 2.2b, 2.3, 2.4, 2.5, 2.10, 2.13) (See pp. 10-15, above).

Although much progress has been made at the law school in creating a culture of assessment, the assessment efforts are still relatively new. The EER team encourages the law school to continue those efforts and to take steps to assure that assessment becomes built into the institution's norms.

A looming concern for the law school is its recent low bar pass rates. The state bar has also recently implemented a new "cumulative bar pass" standard for its California-accredited law schools. Under this new standard Humphreys College must demonstrate that graduates who graduated during the past five years and took the bar exam eventually passed (no matter how many attempts were required) at a 40% rate. The team calculated the cumulative pass rate for graduates of the law school from 2008 through 2012 at 33.9%.

Assuming as appears likely that the law school will be found out of compliance with this new state bar requirement, it will have a period of three years to bring its cumulative pass rate into compliance or face possible loss of state accreditation. It will be important to the law school and the college that steps be taken immediately to begin to address this concern.

2. *The College should take further steps to alleviate heavy faculty teaching and advising loads* (CFR 2.1, 3.3) (See pp. 15-18, above). Two years ago the CPR team was concerned with several issues related to limited staffing, including IT, IR, AR, and faculty. While a number of these concerns were addressed in the intervening two years, as identified above, some workload concerns remain, and in some ways seem to have become more pressing.

For the EER team, observing the climate and culture of the institution two years ago and today, there is a real positive sense of increased dedication to assessment and review, and an institution in transition from an emerging to a developed culture of inquiry and evidence-based decision-making. But there is also a strong sense from meetings with students, faculty and staff, of increased stress levels and accompanying frustration and concern. It is unclear how much of this stress comes from increased workloads and how much of this stress is the result of the length of time individuals have been grappling with heavy workloads with no respite in sight. Yet, in spite of this stress there is an amazing sense of dedication to students and to the institution, a willingness to continue sacrificing for the greater good of the institution and its important mission.

Humphreys College has always operated on a limited staffing model. For a small institution heavily dependent on enrollment, the reality of enrollment fluctuations means that adding full time faculty and staff must always be approached with caution. Therefore, it is not reasonable to expect that the college can add full time faculty or staff every time workloads increase, even when the increase is caused by enrollment growth, which is not always the case. However, the college has a long history of creativity in problem solving to maximize efficiency and minimize cost. Humphreys College also has a long history of careful attention to fiscal responsibility – an attention that may be one of the primary reasons the college has been able to survive and prosper, even in lean times that have caused other institutions to fail. But as

Humphreys College grows into a more sophisticated institution of higher learning it needs to make sure that its human resources are as well cared for as its physical and fiscal resources. To be clear, Humphreys College has always treated its employees as members of a close-knit Humphreys family. However, as Humphreys College grows intellectually, the demands on key members of its family grow too, as do their needs for support.

3. *The College should continue to push for timely completion of the migration to a new enterprise software system while taking care to implement sound data-entry policies and protocols to assure future data integrity* (CFR 3.6, 3.8, 4.5) (See pp. 6-7, above). The visiting team noted, at the time of the CPR visit, some issues with data integrity. As the college migrates to its new enterprise software system, it is making every effort to clean up existing data where possible, and to assure through training and control features in its new database that data entry moving forward has integrity. The college is, however, on a very tight timeline for completion of this migration. Meeting that timeline will be important for the college. However, doing it right will be equally important. The college still has a number of important decisions to make about how key terms are defined to assure consistency in data entry in the future. It is important that the college take the time to make sure everything in the new enterprise software system is set up optimally to maximize efficiency and accuracy.

4. *In the next round of strategic planning Humphreys College should look closely at alternative funding models that do not rely so heavily on government grant funding as a source for students to fund tuition* (CFR 4.1, 4.2, 4.3) (See pp. 20-21, above). Humphreys College will soon be undertaking a new round of strategic planning as its current strategic plan comes to an end in 2014. As that new planning process begins, there will be many issues under discussion concerning the future of Humphreys College. The college has a mission of access to needy students who might not otherwise be able to afford a college education, built on the framework

of low tuition, Pell Grants and Cal Grants. These federal and state grant programs are under attack in the political arena for a variety of reasons, but perhaps most importantly because of deficit pressures on both the state and federal government. The long-term threat to Humphreys College is not the kind of legislative glitch that resulted in the college losing its Cal Grant eligibility for the next academic year. The long-term threat is the piecemeal reductions in grant levels that at some point will make them insufficient to continue to support the financial framework on which the college's mission is built.

So as Humphreys College approaches its next strategic plan, it should ask this question, among the many other important questions that will be under consideration: How can Humphreys College evolve in ways that retain the best of what it is while preparing for a future where state and federal grant funding might play a much diminished role in supporting students?

As the college examines this question, it may find that the role of the President evolves and expands as the needs of the institution change. For example, in visiting team discussions with the Board of Trustees during the EER visit, the Board brought up the possibility that fund raising could become more important as the college looks to diversify its sources of revenue in the future and reduce its reliance on government grant funding to support its students. As the visiting team noted in its CPR report two years ago, such an expansion of responsibilities could have implications for the ability of the President to effectively serve both as the college's CEO and CFO. Therefore, the EER team encourages the college to continue to examine how these roles are filled as institutional needs and leadership responsibilities evolve.

APPENDICES

- A. Report on Off-Campus Sites: Modesto Campus
- B. Credit Hour Policy
- C. Student Complaint Policy

Appendix A: Modesto Campus

Team Report Appendix OFF-CAMPUS SITE

Institution: Humphreys College
Kind of Visit: EER
Date: March 5-8, 2013

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address: Modesto Campus, 3600 Sisk Road, Suite 5A, *Modesto, CA* 95356 (209) 543-9411
2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a regional center or off-campus site by WASC):

Humphreys College offers the following certificate and undergraduate programs at its Modesto campus:

Accounting: AS, AA

Business Administration: AS, AA, BS

Criminal Justice: AA, BS

Early Childhood Education: AA, BA

Liberal Studies: AA, BA

Legal Studies: AA, BA

Paralegal: Certificate

Modesto Students FTE = 221 (Fall 2012)

Modesto Faculty FTE = 16 (Fall 2012)

The Modesto campus is designated as an off-campus site. It is within 25 miles of the Stockton campus.

History of Humphreys College Modesto campus:

In 1987, the college was approached by Modesto Junior College (MJC) and was offered the opportunity to conduct its paralegal program on the MJC campus. There was significant and growing demand for such a program in Modesto at the time, and MJC did not have such a program. Humphreys College agreed and began offering paralegal courses there in the fall of 1987.

After several years, and after further analysis of the Modesto educational market, the college determined that there was a large enough market in Modesto, not only in paralegal, but in several other programs offered at that time including, administrative management, office assistant, office administration, accounting, computer science, and others. Based on that analysis, the decision was made to move Humphreys College to its own, rented facilities in downtown Modesto in 1990.

The college offered these selected programs in that location for approximately seven years, at which time it had outgrown the 8,000 square feet it was then renting. The college moved to a new location in north Modesto, which had approximately 12,000 square feet and was closer to the Stockton campus. The college has been in that location since that time, expanding its space to approximately 24,000 square feet in 2010.

During this time, programs offered in Modesto grew from the certificate programs, to include associate degrees, and then within the last ten years, bachelor degrees. The move to the new location in north Modesto brought the campus within 25 miles of the Stockton campus, and thus did not require a substantive change as defined by WASC policy. The law school also uses the Modesto campus for a limited number of classes to serve the large number of students from that area.

3. Nature of the Review (material examined and persons/committees interviewed): EER. Reviewed WASC Data Exhibits and EER report. Interviewed Director of Academic Administration, faculty, and students.

Observations and Findings

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<p><i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</p>	<p>The site is well planned and operationalized. Humphreys College has an overarching mission for its main and off site campus. The administrative structure at Modesto is an extension of the main campus and managers at Modesto report to senior managers at main campus. The Director of Academic Administration feels that communication has improved between the campuses. The Dean of instruction and other administrators at Stockton have been very good at updating Modesto about changes in policies and programs.</p>	
<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>As noted above, Modesto Campus is an integral part of the main campus at Stockton. The Director of Academic Administration at Modesto is a member of the Academic Council and was a member of the EER team. Modesto uses the same student information management system as Stockton and key staff report to directors at the Stockton campus. Chairs of academic programs at Stockton visit and meet with Modesto students and faculty each quarter and faculty at Modesto attend department meetings at Stockton. Modesto staff have been included in the new database implementation. Staff feel that Modesto now has a broader access to the database.</p>	
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>Students and faculty at Modesto reported that security is more visible now and improved on campus and that they feel safe even at night. There are more maintenance staff patrolling the campus- there are now 4 such staff. Security was a concern during the CPR visit. Faculty indicated that more lighting is needed.</p>	<p>Lighting around campus.</p>

<p><i>Student Support Services. CPR:</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? <i>EER:</i> What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>As at the Stockton campus, student and academic support services are very lean at the Modesto campus (This was the case during the CPR as well as the EER visit). Each full time faculty at Modesto advises students. Faculty reported that students need better writing communications and mechanics skills. One faculty in Criminal Justice plans to conduct weekly workshops on writing skills. There is no writing tutor. However, a Math and Accounting tutor is available. No data exists about the effectiveness of student support services at Modesto.</p>	<p>Whatever follow up is applicable to Stockton should be extended to the Modesto campus. Stockton plans to hire an additional tutor. It is recommended that the same should be applicable at Modesto, especially for writing. Data should be collected and analyzed on the effectiveness of student support services.</p>
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty are involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</p>	<p>The faculty at Modesto are mainly adjuncts. They are required to attend departmental meetings both at Stockton and at Modesto. These meetings are quarterly.</p>	
<p><i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6) [Also submit credit hour report.]</p>	<p>The programs and courses at the Modesto Campus are the same as those at Stockton campus in terms of outcomes and quality. The faculty at Modesto participate in the curriculum development and evaluation of academic programs.</p>	
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</p>	<p>The Dean of Institutional Research and Effectiveness analyzes data on retention and graduation for both the Modesto and Stockton campus. At 79%, the one-year retention rate at Modesto for the cohort of 2011 was the highest ever for both campuses.</p>	
<p><i>Student Learning. CPR:</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? <i>EER:</i> What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>	<p>As noted above the academic programs are the same at both campuses. Data on Modesto campus students are included in the program assessments. PLOs are assessed and program reviews are conducted for academic programs. These are well documented on the Humphreys College web portal. The recommendations of program reviews are used by faculty to revise and improve programs.</p>	
<p><i>Quality Assurance Processes: CPR:</i> How are the institution's quality assurance processes designed or modified to cover off-campus sites? <i>EER:</i> What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>	<p>See above (Student learning)</p>	

Appendix B: Credit Hour Policy

Institution: Humphreys College

Type of Visit: EER visit

Date: March 5-8, 2013

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)	Verified Yes/No
Policy on credit hour	Does this policy adhere to WASC policy and federal regulations?	Yes
	Comments:	
Process(es)/ periodic review	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)?	Yes – through program reviews
	Does the institution adhere to this procedure?	Yes
	Comments:	
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours?	Yes
	Comments:	
Sample syllabi or equivalent for online and hybrid courses	What kind of courses (online or hybrid or both)? How many syllabi were reviewed? What degree level(s)? What discipline(s)?	Online and hybrid courses 6 syllabi BA level Business; Paralegal; Crim Justice; History; English
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?	Yes
	Comments:	
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated)	What kinds of courses? How many syllabi were reviewed? What degree level(s)? What discipline(s)?	Internships 2 syllabi BA and JD Community Studies & Law
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?	Yes
	Comments:	

Appendix C: Student Complaint Policy

Institution: Humphreys College

Type of Visit: EER visit

Date: March 5-8, 2013

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)	Verified Yes/No
Policy on student complaints	Does the institution have a formal policy on student complaints?	YES
	Comments: The policy covers complaints about administration, instruction, and the satellite campus. It includes an appeals process.	
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints?	YES
	Does the institution adhere to this procedure?	YES
	Comments: The form is available in offices across the college. The Dean of Administration follows up and routes as needed.	
Records	Does the institution maintain records of student complaints?	YES
	Comments: Records are maintained through the Dean of Administration's office.	