

REPORT OF THE WASC VISITING TEAM

SPECIAL VISIT

To PHILLIPS GRADUATE INSTITUTE

November 12-14, 2012

Team Roster

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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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Western Association of Schools and Colleges

Special Visit Team Report

Phillips Graduate Institute

Nov 11 - 14, 2012

I. OVERVIEW AND CONTEXT

A. Description of the Institution and Visit

Phillips Graduate Institute is a not-for-profit graduate school in Chatsworth, California that prepares students for human service-related professions. Founded in 1972 in Encino, California as the California Family Study Center under the accreditation aegis of Azusa Pacific University, the institution obtained independent accreditation in 1983. In 1995, the Center changed its name to the Phillips Graduate Institute (the Institute). In August of 2011, the Institute moved from Encino to Chatsworth, California.

From its founding to 1997, the Institute offered a single degree program: a 48-unit Master of Arts degree in Marriage and Family Therapy (later changed to Masters in Psychology with a major in Marriage and Family Therapy). In 1997 the Institute identified diversifying its degree programs as one of its primary initiatives, and it began Master's degree programs in Organizational Behavior, School Counseling, and Art Therapy. From 1999 to 2009 the Institute added the following programs: credential in School Counseling / Pupil Personnel Services, Psy.D. in Clinical Psychology (2000), credential in Child Welfare and Attendance (2004), Psy.D. in Organizational Consulting (2005) (name changed to Organizational Management and Consulting in 2010), Master's in School Psychology with credential for Pupil Personnel Services (2007), and Internship Credential for School Counseling (2007). In 2010 with the declining economy, budgetary pressures and its decision to withdraw its application for

American Psychological Association accreditation, the Institute suspended admissions to the Psy.D. program in Clinical Psychology. In 2011 it suspended admissions to the School Psychology Master's program.

Presently, the Institute offers admissions in four academic programs: Master's in Psychology, Marriage and Family Therapy; Master's in Psychology, Marriage and Family Therapy / Art Therapy; Master's in Psychology, School Counseling / Pupil and Personnel Services; and Psy.D. in Organizational Management and Consulting. It also offers two post-graduate credentials in Pupil Personnel Services (PPS) and Child Welfare and Attendance (CWA). In addition, it maintains a Counseling Center for intern training and community mental health services, and it offers Continuing Education seminars through its Center for Applied Learning.

B. Recent Visits

The Institute was placed on probation following its fall 2008 Education Effectiveness Review visit. In its February 27, 2009 letter to then-President Lisa Porche-Burke, the WASC Commission noted that "Phillips Graduate Institute fails to meet several key elements of Standards One, Two, Three, and Four, and that a sanction needs to be issued to assure that meaningful, lasting, and swift actions are taken to address the areas of concern set forth...." The Commission found that the Institute was not in compliance with WASC standards in the following areas: Financial Sustainability, Planning and Management; Presidential and Board Leadership; Fair and Equitable Faculty Policies; Institutional Planning and Use of Data; Assessment of Student Learning and Student Success; and Understanding and Promoting Diversity and Student Success. The Commission placed the Institute on probation and scheduled Special visits for summer 2009 and 2010.

The first Special Visit was conducted in June of 2009. The team found that the Institute had developed plans to address the six areas of non-compliance, and that progress had been made in some of the areas. The Institute provided a written update to the WASC Commission in October 2009.

In its November 2009 letter to President Yolanda Nunn (now Gorman), the WASC Commission found that the Institute had made considerable progress in responding to the Commission's areas of concern, particularly in the areas of presidential leadership and campus climate. The Commission noted that the single most critical element to the Institute was the creation and implementation of a concrete, realistic plan for financial viability and sustainability. The Commission noted that significant work needed to be done in all areas for the Institute to demonstrate "substantial and meaningful progress" by the time of the 2010 special visit. The Commission moved the summer 2010 Special Visit to fall 2010.

The second Special Visit was conducted in November of 2010. The team found that while the Institute had begun to address issues of concern in all areas, particularly in student assessment of learning, the critical area of financial viability and sustainability was not yet stabilized. In its March 2011 letter to President Yolanda Nunn (now Gorman), the Commission reported that the Institute had made meaningful progress in most of the areas of concern but that it was not yet in compliance with WASC standards. The Commission removed the Institute from Probation and imposed a Warning. The Commission noted three critical areas of focus for the third Special Visit: financial sustainability, planning and management; growth, development, and accountability of the governing board; and fair and equitable faculty policies.

The third Special Visit was in November of 2011. The team found that while progress was made in the three areas of concern, the area of financial viability was not yet stabilized. The Institute responded in a February 2012 report.

In its March 6, 2012 letter to President Yolanda Gorman, the Commission continued the Warning “for a maximum of one year,” stating that the Institute was not yet in compliance with WASC Standard 3 of developing and applying resources and organizational structures to ensure sustainability. It stated that “if full compliance is not demonstrated by the time of the February 2013 Commission meeting, the Commission will have to take action to terminate Phillip’s accreditation.” This extension of the sanction beyond the federally mandated limit of two years was based on the Commission’s recognition that the Institute had made substantial progress but was not yet in compliance with the Standards.

The Commission required the Institute to submit by no later than June 1, 2012 “a progress report to WASC concerning the requirements that Phillips must meet to continue participation in Title IV financial aid programs, including how Phillips will secure any necessary letter of credit.”

Prior to its fall 2012 Special Visit, the Commission asked the Institute to provide “an evidence-based analysis of the institution’s financial viability for the next five years.” The Commission emphasized as items of concern the Institute’s dependence on tuition coupled with decreasing enrollments; its relatively poor fundraising; and its low Department of Education composite score. The Commission emphasized the necessity of increasing enrollment recruitment and retention, increasing revenue from other sources, and developing the Board’s “leadership role in building a viable business model,” emphasizing that the Institute realize “ongoing monitoring of expenses and increased revenues from other sources.”

The Commission required that the Institute “include an evidence-based analysis of the institution’s financial viability for the next five years” with material and analyses in the following areas:

- a) the FY 2012 audited financial statement; (CFR 3.5)
- b) a detailed report on recruitment, enrollment and retention, including enrollment data by program and other subpopulations of students for the last 2 years, and projections through 2013-14; (CFR 3.5)
- c) a financial analysis of the recently adopted strategy of offering unfunded scholarships and plans for institution-financed financial aid as a means to recruit students and increase enrollment; (CFR 3.5)
- d) an updated strategic plan with reports on achievement of goals, including fund-raising plans and results to date, and board leadership in financial viability; (CFR 1.3, 3.5, 4.1, 4.2)
- e) updated plans for establishment of a separate foundation for fundraising; (CFR 3.5)
- f) updated information concerning participation in Title IV financial aid programs; (CFR 3.5)
- g) an updated budget, with budget actuals to date for 2012-13 and projected budgets for 2013-14 through 2015-16; (CFR 3.5)
- h) any changes in size and composition of the governing board; and
- i) updates on the implementation of technology to support the use of data for planning and decision-making. (CFR 3.1, 3.5, 3.7, 3.8, 4.2-4)

The completed audited financial statement for the fiscal year ending in 2011 provided the Commission with updated information on the Institute's progress toward meeting the areas of concern.

For ease of analysis, the team divided the report into five areas related to financial sustainability: (1) budget, (2) recruitment, enrollment and retention, (3) financial aid, (4) strategic plan, fundraising, non-tuition revenue streams, and Board leadership, and (5) technology use for institutional planning and decision-making.

C. Quality of the Special Visit Report and Supporting Evidence

The institutional report was prepared by the Institute's president and chief financial officer after consultation with faculty, administration, staff and students, and in consultation with outside business, legal and financial consultants. It was reviewed and vetted by institutional constituents as well as by its outside consultants. In the team's judgment, the report reflects adequate involvement on the part of the Institution.

While the report addresses the principal issues of financial viability and sustainability, the team found the Institute's evidence, analyses, conclusions, and self-assessments of its action steps of limited utility and persuasiveness. The team found the report more promotional than reflective as few, if any, comments were critical of the institution's progress. Overall, the report lacked the depth that only comes from sufficient critical inquiry and community engagement in which an institution asks itself probing and difficult questions. For example, the decline in student headcount enrollment in fall 2012 (from 242 to 205) is a significant factor in understanding financial situation of the Institute; yet, it is overlooked in a dominant and overstated narrative of an institution on a "turn-around" course. On several occasions before and during the visit, the team asked for and received information more specific than that included in the report; nonetheless, the selective use of data and often aggregated data (such as in average

retention and time to graduation rates) in the report is symptomatic of an overriding issue that the team observed throughout the visit: a considerable lack of consistent evidence and an understanding of its relevance to effective decision making.

Specifically, the team found that two practices decreased the efficacy of the institution's report in responding to the Commission's issues. 1) The Institution reported much of its data in visual or percentage trends—for example, in revenue and expenses, Department of Education ratio, funds raised, enrollment, applications—rather than in data tables. Moreover, admission and enrollment raw data were inconsistent and differed depending on department. The reporting strategy made it impossible for the team to easily assess and evaluate the Institute's status in specific areas, and forced the team to consistently request detailed relevant data. Moreover, the inconsistency of the data decreased the team's confidence in the Institute's capacities to collect and analyze data for planning and decision-making. 2) The Institute presented information without detailed or searching explanations and analyses. This strategy made it extremely difficult for the team to assess and evaluate the Institute's awareness of its strategic response to the Commission's issues. For example, the report showed a projected 2013 budget without analyses or explanations of line items, as is customary in higher education.

The report did not evaluate the sources of funds raised, nor the Board's leadership role in fundraising. Rather, the institution stated without analysis that “traditional models of institutional growth (fundraising and advancement) will not work to significantly build the resources necessary for accelerated recovery and for growth in the future.” The Institute identified marketing, new certificate programs, summer programs, international students, and professional training and development through the Center for Applied Learning as appropriate strategies to increase institutional growth and establish financial viability. Board leadership focused on developing online partnerships, articulation agreements

with local schools, and a possible merger with another institution as their contributions to financial viability and sustainability.

However, not all of these areas were adequately explored in the report. The marketing strategy described in the report emphasized “strategic lead generation” to increase application rates through email, mail and internet “touches,” but did not address typical funnel admissions data such as prior conversion, admit, and yield rates. While enrollment headcount data were reported for the prior five years, with best, worst, and most likely scenarios in the next three years, the best and worst case projections were statistical projections without strategic thinking evaluating them. More significantly, there was no funnel analysis of prior and current marketing and admissions strategies in order to determine the most appropriate strategies to improve current admissions. In addition, the strategic planning documents described objectives but did not include specific goals and behavioral strategies to achieve them. Information on Board development was confined to descriptions of Board members and their areas of expertise, without dates of membership. And there were no cost-benefit analyses of the effects of the new unfunded scholarships on financial sustainability. Finally, the report contained almost no discussion or analyses of implementation of the Jenzabar system to improve institutional data-gathering, data use, and data analyses to improve institutional evaluating, planning and decision-making.

During the visit, the team scheduled additional meetings with the President and the Chair of the Board’s Finance Committee in order to understand the Institute’s strategic financial planning and decision-making in the prior fiscal year. In these meetings, the team was impressed by the willingness of these officers to respond candidly and quickly provide the team with supporting material. The team found that the data were present but not always in clear sight. In the end, the team concluded that the institution planned more effectively than it represented in the report and that it made substantial financial progress during the past year

D. Description of the Team Review Process

The 2012 Special Visit team studied the Institute's report, and based on the evidence and the narrative conducted a preliminary analysis of the Institute's areas of good practice, areas needing improvement, and areas needing further inquiry. Rather than the team being able to take the report as a productive starting point and build on it prior to the visit, the team needed to ask for extensive data prior to arrival on campus as well as during the visit. This hampered the team's own evaluation of the data, as time during the visit was often spent in trying to obtain evidence.

The team requested the following information prior to the visit: evaluations and analyses of actual and projected budgets and budget assumptions; latest Department of Education projection ratio for FY 2012; cost-benefit analysis and budget for strategic plan implementation, with rank order of priorities, and fiscal and technological resources to fulfill strategic plan; costs and revenues for each program; enrollment data and projections (headcount and FTE) for each program; retention and graduation rates for each program for prior five years; data and percentages disaggregated by program using funnel criteria including conversion, admit, yield, and melt rates; assessment and cost-benefit analysis of objectives in the technology strategic plan, including how it aligned with financial resources and how data is collected and used for institutional planning; and finally, cost analyses of the international study program and certificate program.

While the Institute provided much of this information prior to the visit, not all of it was provided; and the team found itself during the visit clarifying the information it was given, pointing out inconsistencies in data, and requesting clarifying analyses and explanations. Eventually, the team received enough supporting data to render a valid conclusion; but far too

much of its time was spent in discovery. It became apparent to the team that the Institute faces challenging capacity issues, and that it critically needs collaborative dialogue and discussion among administrative areas.

While the team's visit concentrated on WASC Standard 3, financial viability and sustainability, the team reviewed all WASC standards and followed the compliance audit process in evaluating the Institute's substantial compliance with the standards.

II. EVALUATION OF ISSUES UNDER THE STANDARDS

A. Budget and Financial Matters

The Commission in its March 2012 letter requested that the Institute provide: (1) the FY 2012 audited financial statements; (2) updated budget, with budget actuals to date for 2012-13 and projected budgets for 2013-14 through 2015-16. (CFR 3.5)

At the time of the team's visit, the audited financial statements for FY 2012 were not complete. The team interviewed the independent audit firm conducting the institution's audit, Vavrinek, Trine, Day & Co., LLP. The firm indicated that it had completed the financial aid portion of the audit related to compliance with requirements that could have a direct and material effect on each major program and on internal control over compliance in accordance with OMB Circular A-133 (federal financial aid programs). The auditors reported that there were no significant findings from this compliance review. Regarding the audited financial statements, the auditors reported that they had received the ledger and financial statements from the Institute for FY 2012, but had not yet completed the annual financial report. The firm indicated that it was targeting December 15, 2012 to complete the audit of the FY 2012 financial statements. During the team's discussion with the audit firm, the firm did indicate ongoing concern about Phillips' cash flow situation, but not at the level of concern that existed in the previous year when the audit firm was evaluating whether there was substantial doubt about the entity's ability to

continue as a “going concern.” Ultimately, the audit firm did conclude that there was no justification for including a “going concern” disclosure in the institution’s audit financial report for FY 2011. (CFR 3.5) Overall, the auditors commented that although Phillips was showing improvement in its financial position, it was not yet “out of the woods.” (CFR 3.5)

The DOE Composite Financial Index (Score) for the Institute for FY 2011 was 0.26. The institution’s composite score for FY 2011 falls below the 1.5 composite score required by the Department of Education (DOE). The DOE Composite Financial Index (Score) profile for the Institution for recent years is as follows:

FY 2007	0.4
FY 2008	1.5
FY 2009	1.0
FY 2010	0.46
FY 2011	0.26

For fiscal years 2009, 2010 and 2011, the Department of Education adjusted the Institute’s index scores to .70, -0.40 and .10, respectively.

The Institute is expecting that its composite score for FY 2012 will be approximately 1.230 (as revised). Given that the independent auditors have not completed the audit process for FY 2012, the actual score is not yet known. The Institute’s preliminary projection of the composite score for FY 2013 is approximately 1.541.

In June 2011, the Department of Education advised the Institute that it had determined that the institution had failed to meet the standards of financial responsibility. In compliance with the requirements of the Department of Education, the Institute posted two Letters of Credit (LOC) totaling \$732,621. In November 2011, the Institute requested that the Department release

one of the LOC's in the amount of \$200,000, in order to cover a financial shortfall due to a delay in expected funding from the State of California. In December 2011, the Department agreed to release one of the LOC's in the amount of \$200,000 provided that the Institute entered into an agreement to limit its annual Title IV funds to a level where the LOC represented not less than 10% of the institution's annual Title IV funding. The Institute agreed to the Department's limitation. The Institute and the Department agreed that the Institute could make one increase to the LOC during the FY 2012 fiscal year to correspondingly increase the amount of Title IV funds it could obtain during the period, provided that the LOC was increased prior to the institution exceeding that funding restriction. Following Phillips' resolution of its cash flow challenges in late 2011, the institution did reinstate the LOC of \$200,000. As indicated, the total amount of the DOE required LOC at the time of the team's visit was \$732,621. It should be noted that if Phillips can obtain a composite score of 1.541 in FY 2013 as it is currently forecasting, then this achievement could result in the elimination of the Line of Credit (LOC) requirement by the Department of Education. (CFR 3.5)

The Institute indicated to the team that the institution experienced a net surplus from operations for FY 2012 of \$547,000. It also reported to the team that the institution was currently projecting a net surplus (excess) from operations at the end of fiscal year 2013 of \$306,000.

The team spent considerable time attempting to fully understand and validate the assumptions used by the institution in developing its multi-year budget projections (FY 2013 through FY 2016). It was a frustrating and time consuming exercise for all involved. Ultimately, the team was able to better understand the budget assumptions being used by Phillips and to achieve a reasonable comfort level in regard to the validity of the assumptions. The institution has developed various budget scenarios for each of the fiscal years ("Most Likely Case," "Worst

Case,” “Projected Case,” and “Best Case”). There was some confusion among officers as to whether the institution was managing to the “Most Likely Case” or “Projected Case” (“Expected Case”) scenario. Based on “Most Likely Case,” the institution is projecting operating surpluses in each of the following fiscal years as follows:

<u>Year</u>	<u>Projected Surplus</u>	<u>Percentage of Total Annual Revenues</u>
FY 2013	\$306,000	4.5%
FY 2014	\$480,476	6.8%
FY 2015	\$426,839	6.1%
FY 2016	\$400,530	5.7%

(CFR 3.5)

The Institute continues to make modest progress in stabilizing its financial position and enhancing its overall financial capacity. Nonetheless, the financial condition of the institution remains relatively fragile. A summary of the institution’s financial vulnerability is as follows:

- The Institute remains a tuition-dependent institution which is highly impacted by even small changes in enrollments. About eighty-seven percent (87%) of the Institute’s revenue is generated from tuition and fees. Based on the institution’s multi-year projections, this level of tuition and fee dependency is not likely to change significantly in the next four years.
- Fundraising currently represents a very small fraction of the institution’s overall revenue (approximately 1.0% of total annual revenue), and the Institute’s projections indicate it will be several years before donations and contributions represent a significant source of revenue for the Institute.
- As reported earlier, the Institute appears to be showing improvement, but continues to

operate with a DOE Composite Financial Index Score below the minimum standard for financial responsibility of 1.5. This situation represents a significant restriction relative to the institution's financial flexibility.

- The Institute's Line of Credit (LOC) for operations is at its maximum level and the institution has little, if any, ability to secure additional financing for operations. The total outstanding liability on the Line of Credit (LOC) as of June 30, 2012 was \$500,000. This line of credit is partially secured by \$300,000 cash collateral.
- The Institute's cash flow situation appears to have stabilized since the previous fiscal year, but remains a significant challenge for the institution.
- The Institute has experienced deterioration in net assets on its balance sheet over recent years. The institution is expected to show improvement in net assets for the FY 2012 bring it closer to the levels it experienced in FY 2008 and FY 2009:

<u>Year</u>	<u>Net Assets</u>
FY 2008	\$694,823
FY 2009	\$647,130
FY 2010	\$330,002
FY 2011	\$118,778
FY 2012*	\$666,483

* *Unaudited*

- Due primarily to enrollment challenges, total annual institutional revenue has experienced a decline in recent years. The Institute showed marginal improvement in revenues in FY 2012 and its revenue situation may have stabilized somewhat.

<u>Year</u>	<u>Total Revenue</u>
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FY 2008	\$9,210,603
FY 2009	\$8,423,044
FY 2010	\$7,693,754
FY 2011	\$6,793,844
FY 2012*	\$7,068,281

* *Unaudited*

The institution is projecting revenues for FY 2013 of \$6,861,466, a decline of approximately 3% from the previous year (“Most Likely Case”). For the fiscal years of 2014 through 2016, average total annual revenue for Phillips is forecasted to be between \$7,068,901 and \$7,271,360 (“Most Likely Case” and “Projected/Expected Case”). This represents little to no revenue growth when compared to the average total annual revenue over the past three fiscal years (FY 2010 - FY 2012) which was \$7,185,263. With little to no growth in revenues expected, it makes the assumptions for and projections of expenditures for multi-year budget planning purposes even more relevant. (CFR 3.5)

B. Recruitment, Enrollment and Retention

The Commission in its March 2012 letter requested that the Institute provide a “detailed report on enrollment and retention, including enrollment data by program and other subpopulations of students for the last 2 years, and projections through 2013-14,” in addition to recruitment efforts. (CFR 3.5)

1. Recruitment

Institutional resources directed to recruitment, marketing and enrollment increased in the six months prior to the visit, when a Director of Admissions and Enrollment, a Coordinator of

Marketing and Admissions, and an Enrollment Advisor were hired. (CFR 3.1) This recently appointed staff has introduced marketing ventures new to the Institute such as email blasts, non-targeted and targeted mass mailings, and ads in newspapers, radio, websites and social media.

At the time of the November team visit, these efforts had resulted in a spring 2013 application rate near to the prior year's rate. However, there was a 40% decrease in paper applications and a 158% increase in online applications compared to one year ago. This is significant because the addition of online applications yielded more incomplete applications in the prior semester, resulting in a lower 47% yield over all applications (Noel-Levitz reports a 66% median yield rate for private Master's programs in a national 2012 survey). Online applications tend thus to increase the total number of applications needed to yield higher enrollments. The team did not hear the admissions team factoring this in to its application projections. The team requested a breakdown of online and paper application, and it asked for prior admit and yield rates. The data show that prior to online applications, there was an overall application to matriculation yield of 70% in spring 2012 and 59% in fall 2011, generally consistent with median yield rates of private master's institutions.

It was not evident to the team that the Institute's marketing and admissions team fully realized what was needed to achieve a desired yield, nor that the team had adequately researched the efficacy of marketing strategies needed to produce this yield. Different versions of the funnel data were given to the team during the visit. However, the data were used and analyzed piecemeal in response to team requests, but not analyzed and evaluated holistically in light of an overall admissions or marketing strategy. For example, even though data showed that newspaper advertising yielded no responses, the admissions team continued its use, stating that they wanted to "see the cycle through." (CFR 4.1, 4.3)

The Institute invested in rebranding in 2010 and a new website in March 2012. The institution chose to pursue a lead management marketing strategy that involves saturating a broad market in order to garner five per-person contacts that might lead to an inquiry to the Institute. A mass mailing and emailing was sent in September 2012 to 9,000 Graduate Record Examination names, yielding an 8% response rate. With an increase in the marketing budget for the FY2012, the Institute chose to increase its advertising in local business and general newspapers, emails sent to newspaper readers, and web-based ads. The Institute tracks its LinkedIn, YouTube, and Facebook pages, with no data yet on its efficacy. The Institute is encouraging its alumni to refer potential applicants, and is involving its faculty in generating names of potential applicants, writing blogs, and calling applicants with incomplete applications.

Because enrollment revenues are critical to the Institute's financial viability, and because the marketing budget is limited, the admissions team's ability to set goals, acquire knowledge about marketing efficacy strategies, and nimbly make decisions based on its analyses of the data, is critical. The visiting team did not observe that the admissions team has critically examined its admissions data, which has prevented it from learning from the data and engaging in a learning feedback loop. At the same time, the new admissions approaches to gathering and studying data are promising and may lead to improved student recruiting in 2013.

2. Enrollment

It was extremely difficult for the team to acquire consistent data on headcount and FTES enrollment both across programs and within programs from departments within the institution. Significant inconsistencies were pointed out and while finalized headcount and FTES enrollment data were not provided to the team by the end of the visit, they were provided afterwards via email. (CFR 4.2, 4.3)

The Institute shows a decline in headcount enrollment from 2009 to fall 2012 in the Master's in Family Therapy, School Counseling, School Psychology, Organizational Management and Consulting and Clinical Psychology programs. The Art Therapy program shows steady enrollment from 2009 to spring 2011, with a decline in fall 2012 enrollment. It was puzzling to the team that many of the faculty and administrators spoke of enrollments trending upwards even though the enrollment data showed the opposite.

The Institute did not provide the team with cost analysis data of certificate programs. The team was somewhat dismayed that it did not receive program budget revenues/costs in order to determine which programs were in the black and which in the red. The team could only conclude that the data did not exist, and this lack of data substantially jeopardizes the institution's ability to analyze its financial performance. (CFR 1.8, 3.5, 3.8, 4.1, 4.2). During the campus interviews, the team found there was a genuine willingness on the part of the Institute to develop such data and recognition that such data it would be useful in its planning enrollment growth.

3. Enrollment Projections

The Institute developed a series of future enrollment projections based on *most likely*, *best*, and *worst case* scenarios. The *most likely* scenarios were based not on institutional targets or strategized goals, but rather on anticipated no-change from the prior year. Similarly, *best* and *worst case* scenarios were based on statistical averages of prior enrollment increases and decreases. The team did not understand the Institute's decision not to engage in strategic goal-setting in enrollments, as this reluctance hampers the Institute's ability to increase enrollments—no goals means no strategies, no timelines, no evaluations of strategies. The team strongly recommends that the Institute initiate goal-setting in all areas with appropriate specific strategies

needed to achieve the goals, along with the means to evaluate strategies and change them when needed. (CFR 4.1, 4.2, 4.3)

The team examined the Institute's past enrollment projections in order to assess its track record in predicting enrollment trends. The Institute's projections for overall enrollment in both spring and fall 2012 were higher than the actual enrollments. This suggests that the Institute has not yet learned how to accurately use data, analyze it, and gauge future enrollments. (CFR 4.3) The team strongly recommends that the Institute intensify its data collection in marketing and admissions, and track in program-specific ways the marketing techniques that lead to adequate yields. The team considers this tracking to be essential to the Institute's financial sustainability.

The Institute plans for two MFT cohorts to enroll in summer 2013 as the result of the increase to 60 units in the MFT program. Three MFT cohorts will enroll each summer beginning in 2014, resulting in a continuing income stream throughout the year. In making its summer projections, the Institute again used a statistical formula predicting a decrease in headcount relative to current enrollments. The team recommends that the Institute find ways to base its projections on its own strategic goal-setting and strategic marketing initiatives, rather than only on statistical decreases.

4. Retention and Graduation

Retention rates across programs are excellent and do not vary significantly by ethnicity. The one-year retention rate for first year students across programs averages 93% in the past four years, and the overall retention rate across programs is higher. (CFR 1.2, 2.10)

The average time-to-graduation rate for each program is consistent with program expectations. Eighty-eight percent of students finish early, on time, or within one semester of the average graduation time. (CFR 1.2) The Institute determined that Taiwanese students in the

Organizational Management and Consulting program took longer to graduate than other students due to issues arising from their international status, such as visa issues.

In its meetings with students and faculty, the team was impressed by the commitment of the campus community to high academic quality in teaching and learning. The team concluded that the Institute has maintained its high standards despite its limited resources. Unquestionably, this bodes well for the future of the Institute as “word of mouth” is among the most effective approaches to student recruiting.

C. Financial Aid

The Commission in its March 2012 letter requested the Institute to provide two reports on financial aid: (1) updated information concerning participation in Title IV financial aid programs; and (2) financial analysis of the recently adopted strategy of offering unfunded scholarships and plans for institution-financed financial aid as a means to recruit students and increase enrollment. (CFR 3.5)

During the visit, the Institute provided information describing its new discounted scholarships and financial aid, including the amount of the tuition discount and the selection criteria. Depending on the budget scenario used (*most likely, best, worst*), approximately 4% to 5% of tuition revenue is used to discount these scholarships. The team did not receive specific data on the total discounts for each scholarship. While the scholarships are a cost to the Institute, their use in attracting students and maintaining retention may positively impact the institution’s marketing and application rates. (CFR 3.5) The team recommends that the institution gather data on scholarship applications related to recruitment, as well as on the retention and time-to-graduation rates of scholarship recipients. (CFR 1.7, 1.8)

D. Strategic Plan, Fundraising, Non-Tuition Revenue Streams, Board Leadership

1. Strategic Plan

In its March 2012 letter, the Commission requested the Institute to provide reports in the areas of Board leadership in strategic planning and fundraising, specifically: (1) describe any changes in size and composition of the governing board; (2) provide an updated strategic plan with reports on achievement of goals, including fund-raising plans and results to date; and (3) provide updated plans for the establishment of a separate foundation for fundraising.

The Institute recently completed a new strategic plan for the years 2011-2014 (CFR 4.2). During the visit, the team was assured that many constituents contributed to the strategic plan. Campus community members spoke with each other and with campus leaders, providing their thoughts and ideas through formal and informal channels. Members of the Board of Trustees and senior members of the administration along with faculty, staff, and student representatives, devoted many hours in group meetings where they applied their knowledge, experience, and other skills to consider institutional planning. (CFR 4.1) The resulting strategic plan which details many institutional goals and objectives in the areas of financial sustainability; Board governance and effectiveness; educational experiences for students; professional development for faculty; professional development and training for staff; alumni engagement; and community service. The team commends the Institute for implementing an inclusive planning process informed by review and analysis of internal and external data (CFR 4.3) and thoughtful discussions about the forces that shape the Institute's mission, opportunities, and challenges.

While the Strategic Plan—and the accompanying Operation Plan— identify the objectives, strategies and persons responsible to carry out the plan, the team was less clear about how the plan is aligned with the resources of the Institute, as such data were not provided to the team. The Board of

Trustees, together with the administration, faculty, and staff are encouraged to delineate priorities in this plan, as well as the fiscal, physical, technological and personnel resources required to fulfill the plan (CFR 4.2). Furthermore, it is not clear to the team if the Board has developed a mechanism to review progress and revisit the plan on a periodic basis. The visiting team also recommends that the Institute examine how strategic planning, financial planning, and assessment can be better integrated.

During the visit, many administrators and trustees described the Strategic Plan as a first step in a process in which the Institute's community could be educated on the principles of planning in higher education. After considerable conversation with the team, administrators and trustees agreed that the next phase of planning should include a business plan with clear quantifiable targets and specific strategies to reach these targets. The team was concerned that planned growth was substantially missing from the Strategic Plan, and the team as well as many constituents agreed that staying flat was not an option for the institution. (CFR 3.5)

2. Fundraising

An issue raised in the March 6, 2012 WASC action letter requires the development of fundraising plans and reporting of fundraising results to date (CFR 3.5). Philips Development Plan 2011-2014 provides the framework for institutional advancement and fundraising. It builds on past fundraising efforts, attempts to rebrand the institution, and identifies strategies to grow the annual giving program, including major gifts, planned giving, and foundation and corporate support. The plan identifies targeted fundraising goals necessary to support the institution's operating budget and the institutional structures necessary to meet these goals.

The data provided to the visiting team failed to clearly identify fundraising goals for 2009-2010, 2010-2011, 2011-2012, and the total amount raised for these years. Furthermore, while a Coordinator for Development and Alumni Affairs was hired, there is no evidence that the

Institute has developed a fundraising structure to support the implementation of the Development Plan. (CFR 3.8) The team commends the Board for its philanthropic commitment in fundraising activities. However, the team did not receive reliable information regarding Board giving. For example, the team was told that there was 100% board giving but the data requested by the team during the visit showed that this was not the case. In addition, the data provided to the team regarding Board giving need to be disaggregated by year before a determination could be made if the funds contributed by the Board are sufficient in meeting fundraising goals. (CFR 3.5)

During the visit, the team often heard that the Institute thought that the WASC sanctions have hurt the ability of the Institute to raise money. The team was sympathetic to this argument because the new Board members, President, and development staff seem prepared and eager to move forward in fund raising once the sanctions are removed.

The Institute is not pursuing the establishment of a separate foundation.

3. Non-Tuition Revenue Streams

In its report, the Institute targeted two initiatives for diversifying its revenue stream so that it is less dependent on tuition and fundraising: 1) establishing professional development and training programs in its Center for Applied Learning, and 2) developing new certificate programs. Board leadership focused on the following contributions to financial viability and sustainability: 1) developing online partnerships; 2) articulating agreements with local schools; and 3) and possibly merging with another institution as their contributions to financial viability and sustainability.

The Center for Applied Learning has made a promising start. It is developing a community partnership program, an Organizational Management and Consulting internship program, and a professional development program in Art Therapy, all to begin in spring of 2013.

(CFR 3.5, 4.1) The Institute is funding staff salaries (at 33%-40% total salary) and has a modest budget for resources, memberships, supplies, and equipment. (CFR 4.2)

Additionally, the Institute is evaluating the Counseling Center's intern and community mental health services. (CFR 3.5) It has begun a private practice model for interns by motivating intern practice by dollars billed. Invoiced hours, or money brought in, in the first quarter of 2012-2013 shows an increase in weekly revenues of 44% compared to the first quarter of 2011-2012.

The Institute is not pursuing new certificate programs at this time.

While the Board indicated during the visit that it was pursuing several options to insure financial viability, no specific information was given to the team regarding online programs, articulation agreements, or possible mergers. (CFR 1.8, 3.5) This may become available prior the Commission meeting in February 2013. (CFR 1.9)

4. Board Leadership

An important asset of the Institute is its Board of Trustees (CFR 3.9). Since the November 2011 Special Visit, the institution lost one and added two new members of the Board for a total of twelve (including the President), which represents a net gain of one. The visiting team applauds the Institute's efforts to increase the size and quality of the Board and for developing a careful vetting process. However, the team is concerned that these efforts have not yielded significant financial results. It is imperative that the Institute increase the number of members on its Board of Trustees, and that the Institute ensure that new members contribute considerable philanthropic gifts and leadership in fundraising. Furthermore, the visiting team commends the Institute for providing Board member training and development, and it

recommends that a self-assessment protocol be developed to gauge and enhance Board effectiveness.

E. Technology Use Planning and Decision Making

The Commission asked that the Institute provide updates on its implementation of technology to support the use of data for planning and decision-making. (CFR 3.1, 3.5, 3.7, 3.8, 4.2-4) Prior to 2009 there were no systematic collection and analyses of data for decision-making in admissions and enrollment. Following leadership changes in 2009, the Institute analyzed their technological needs and existing resources and developed a technology strategic plan. Since then the Institute has established a technology communication infrastructure, updated classroom audio and Blu-ray DVD equipment, conducted regular evaluations of the technology network, consolidated printing resources, and improved web and social media presence.

The staff of the Institute's business office received training on the Jenzebar system for use in accounting, and the system is being used by the business and registrar's office for student billing, invoicing and accounting. The strategic plan lists as objective 8.3 the establishment of an institutional governance process for the re-implementation of Jenzabar, and indicates as progress toward this goal that a Jenzabar re-implementation group has been formed. The Director of IT confirmed that this group was meeting to plan implementation for Jenzabar use, as many of the Jenzabar modules were not used and training had not been provided to relevant offices and administrators. A Jenzabar training was conducted in September 2012 prior to the team visit, and, for example, for the first time the Office of Institutional Research was able to conduct data analyses with Jenzabar. According to the IT report, training was provided in student billing, and retrieving and analyzing data. Additionally, personnel learned how to input and use admissions and enrollment data, some of it for the first time for the Institution.

The team requested an assessment and cost-benefit analysis of objectives and implementation and an update on the use of the Jenzabar system—what applications are being used, who is trained to use them, what resources are allocated for their use, and how data are being collected and used in admissions, enrollment, marketing, and budgeting. A cost accounting of the IT strategic plan objectives was given to team members at the end of the visit, and no time remained to inquire about plan details. Many of the cost analyses appear unrealistic to the team, as many of the technology initiatives were described as bringing no cost to the institution. For example, the cost of goals such as “enhancing technology support throughout the institution,” “develop data input best practice procedures and standards,” “develop an institutional advancement plan that appropriately utilizes technology for marketing, outreach and fundraising,” “continue evaluation and training of staff resources on new and emerging technologies,” “create an assessment program to measure the effectiveness of technology employed by Phillips Graduate Institute,” and most importantly, “provide training for staff and faculty on capabilities and use of new and updated technology” was set at “none” or “no costs incurred.” The team finds such absence of cost projections overly optimistic and unrealistic. Likewise, under *Goal 5: Ensure that technology is meeting the institutional needs for which it was deployed*, costs were described as “no costs to develop budget needs or plan,” or “under development,” an assessment which does not realistically cost-evaluate the technology needs of the Institute. For example, it does not include registration in Jenzabar implementation, a need expressed by students, nor the establishment and maintenance of “smart” classrooms equipped with digital projectors and computers.

The team recommends that the institution devote itself to more focused training in data entry, data analyses, data evaluation, and data use in planning and decision-making, in the

important areas of budgeting, registration, billing, admissions, marketing, and enrollment. Jenzebar training costs were budgeted at \$8,000, though a description of the type and extent of training provided was not included in the report. The alignment of information management systems and technology systems with administrative, enrollment, academic, advising, and financial planning areas is critically needed.

III. FINDINGS AND RECOMMENDATIONS

The Special Visit team was tasked with examining the Institute's evidence for compliance with WASC standards, particularly that of Standard 3 regarding financial viability, sustainability, planning and management. The team examined evidence relating to financial sustainability for the next five years, including projected budgets, the Department of Education composite score, enrollments, recruitment and retention, Board leadership, fundraising, non-tuition revenue streams, strategic planning, and the use of technology in data collection, use, and analyses to improve institutional planning and decision-making. While the team concentrated on WASC Standard 3, financial viability and sustainability, the team reviewed all standards and followed the compliance audit process. The Compliance Audit Checklist is attached.

A. Budget

The team found that the Institute, through drastically reducing its costs, is reported a surplus of \$660,000 in the fiscal year of 2011-12, improved its Department of Education composite financial index score (unaudited), and projected a balanced budget for the fiscal year 2012-2013. (CFR 1.8, 3.5) These are essential steps toward institutional financial viability.

Commendations

1. The team commends the Institute for achieving a surplus of \$660,000 in the past fiscal year 2011-12.

2. The team commends the Institute for projecting a balanced budget for the current fiscal year 2012-2013.
3. The team commends the Institute for improving the Department of Education Composite Financial Index Score.

Recommendations

1. **The team recommends that the Institute stay focused on its efforts to bring its financial position and health to a level where it can achieve and sustain the minimum standard (score) for the DOE Composite Financial Index of 1.5.**
2. **The team recommends that the Institute communicate and integrate among its departments the data and assumptions used in developing its annual operations budget and multi-year budget/ financial forecasts, including enrollment data used for tuition revenue projections. The Institute needs to be more transparent regarding the development and status of the operations budget.**
3. **The team recommends that the Institute develop a policy for completing annual financial audits within 6 months of the end of the fiscal year. The financial audit for FY 2011 was completed on February 17, 2012, and the audit for FY 2010 was completed on March 28, 2011.**
4. **The team recommends that the Institute shift the budget/ financial planning approach from a model of "survivability" to one of "sustainability."**

B. Recruitment, Enrollment and Retention

The Institute's overall enrollments continue to decline, and while marketing efforts have increased, the team did not receive evidence for future increased enrollments or new programs. (CFR 3.5) Thus the Institute remains financially vulnerable and dependent on tuition. The areas

of recruitment, marketing, and enrollment require the Institute's utmost focus and strategic planning, as it cannot maintain financial viability if enrollments continue to decline. The Institute's new discounted tuition plans may generate slight increases in applications, and this data should be monitored and analyzed to inform future decision-making.

Commendations

1. The team commends the Institute for its move to an attractive building that not only saves the Institute money and positively affects the budget, but also provides an attractive learning environment, with spacious classrooms, meeting rooms and offices. It is a welcoming facility.

Recommendations

1. **The Team recommends that the Institute develop institutional decision-making processes for the use and evaluation of data in enrollment planning and marketing.**
2. **The team recommends that Phillips develop program-specific and targeted marketing strategies that are informed by current research on marketing efficacy in order to increase enrollments.**

C. Strategic Plan, Fundraising, Non-Tuition Revenue Streams, Board Leadership

The team found that the Board's leadership in financial viability and sustainability is limited. Fundraising results are currently inadequate in significantly increasing institutional revenues and decreasing tuition reliance. While the team requested evidence for the Board's substantial financial leadership and support of the Institute through the generation of non-tuition income-generating proposals, this was not available at the time of the visit. However, new information being reviewed by the Board and its consultants may be available in the interim period prior to the Commission meeting in February of 2013. The Board's strategic plan did not

include specific operational targets and timelines specifically directed toward increasing revenue streams, nor was it informed by cost / benefit analyses. The team finds that such detailed strategic planning is imperative for the Board to provide sound financial leadership to the Institute. (CFR 3.5, 3.8, 3.9, 4.1, 4.2)

Commendations

1. The team commends the Institute for the revenue-generating plans of the Center for Applied Learning.

Recommendations

1. **The team recommends that Phillips immediately commit itself to substantially grow and diversify revenues in all areas to ensure its long-term financial sustainability. The Institute needs to consider exponentially increasing enrollments in existing academic programs as well as developing new programs that align with the Institute's mission and that are the outcome of a thoughtful and strategic decision-making process. In addition, the Institute needs to substantially increase its fundraising revenue, continue to develop public programs and community partnerships, and expand the services provided by the counseling center.**
2. **The team recommends that the Board of Trustees develop a viable business plan with clear quantifiable targets and specific strategies to reach these targets.**
3. **The team recommends that the Institute invest in developing a fundraising structure to support the implementation of the Development (Fundraising) Plan.**
4. **The team recommends that the Board of Trustees develop a gift policy.**
5. **The team recommends that the Institute continue to increase the size of its Board by recruiting qualified board members with considerable philanthropic capacity.**

6. **The team recommends that the Institute develop a self-assessment protocol to gauge and assess Board effectiveness.**
7. **The team recommends that the Board of Trustees, together with the administration, faculty and staff, identify the fiscal, physical, personnel, and technological resources needed to fulfill the Strategic Plan.**
8. **The team recommends that the Board of Trustees and the administration align strategic planning, financial planning, and assessment.**

D. Technology Use in Planning and Decision-Making

The team found that while the Institute is beginning structured training of selected personnel in Jenzabar use, data collection and analyses, the institution's use and analyses of data in institutional planning and decision-making is limited. In addition, the team concluded that collaboration across administrative areas to enhance institutional planning and decision-making is also limited. (CFR 4.3, 4.4) Likewise, the information technology strategic plan, while making the best use of its limited funds in setting up a new communications infrastructure in the Institute's new location, does not yet provide the leadership, specific targets, timelines, and realistic cost / benefit analyses of full technology use in the institution. (CFR 3.7, 4.1, 4.2)

Recommendations

1. **The team recommends that the Institute implement training in Jenzabar as soon as possible so that admissions, enrollment, and institutional research personnel can access data for planning, analysis and decision making.**
2. **The team recommends that the Institute make the use of data for institutional planning and decision a high priority, and that it establish mechanisms for collecting, analyzing, and using data across institutional areas.**

- 3. The team recommends that the Institute put in place mechanisms for evaluating the institution's use of data for planning and decision making.**
- 4. In order to strengthen its commitment to a culture of evidence, the team recommends that the Institute reevaluate its organizational structures and activities to ensure that they are well coordinated and integrated as well as transparent to constituents.**

IV. Summary Statement

In sum, the team found that the Institute has made significant progress toward achieving long term financial sustainability, but it remains in a precarious financial situation. The team strongly believes that the Institute needs to plan growth that aligns with its institutional mission and is based on data analyses of relevant educational needs in the local area and beyond. The team also encourages the Institute to assess the capacities of its personnel and its ability to effectively collaborate through meaningful communication among all academic and administrative areas. Lastly, while the team recognizes that there has been significant improvement in institutional leadership, it urges the Institute to continue to develop its staff members to assume informed and collegial leadership in their respective areas.

The team believes that the Institute can build on its notable financial success of the past year – moving from deficit to surplus budget. The Institute's strategic success in achieving a financial surplus suggests to the team that the Institute is poised to move forward with greater self-confidence and realistic financial aspirations. The Institute's many educational strengths—a student-centered learning environment, commitment to diversity, effective program reviews, successful program accreditations and certificate programs, the training and community services

provided by its mental health clinic, its exceptionally high student satisfaction—provide the academic foundation for the Institute’s new initiatives and new strategic financial planning.

In order for the Commission to be current on the Institute’s financial status in 2013, the team recommends that the Institute submit an interim report prior to the February Commission meeting with data on 1) actual spring 2013 enrollment by headcount, FTES and units, with overall total and disaggregated by program, accompanied by strategic institutional analyses of the financial implications of these data for financial sustainability, and 2) the Board’s progress in providing evidence for additional non-tuition revenue streams, accompanied by strategic institutional analyses of the financial implications of these plans for financial sustainability.

Compliance Audit Checklist for Special Visits and Pathway B Visits

NOTE: BLANK OR IRRELEVANT (APPLICABLE TO UNDERGRAD ONLY) ROWS ALREADY DELETED

Name of Institution: Phillips Graduate Institute

Date of Visit: November 12-14, 2012

CFR	Documents Required	
Standard 1		
1.1	Mission statement	X
1.2	Educational objectives at the institutional and program levels	X
1.2.1	Public statement on student achievement (retention, graduation, student learning	X
1.3	Organization chart (X 3.8, 3.9, 3.10)	X
1.4	Academic freedom policy	X
1.5	Diversity policies and procedures; Procedures for Special Accommodations	X
1.7	Catalog (online ____, hard copy ____) with complete program descriptions, graduation requirements, grading policies (X 2.10.1)	X
1.7.2	Student complaint and grievance policies	X
1.7.2.1	Policy for grade appeals	X
1.7.2.2	Records of student complaints	X
1.7.3	Faculty grievance policies	X
1.7.3.1	Record of faculty grievances	X
1.7.4	Staff grievance policies	X
1.7.4.1	Record of staff grievances and complaints	X
1.7.5	Employee handbook	X
1.7.6.1	Up-to-date student transcripts with key that explains credit hours, grades, levels, etc.	
1.7.6.2	Admissions records that match stated requirements; complete files	
1.7.6.3	Policies and procedures to protect the integrity of grades	
1.7.6.4	Tuition and fee schedule	X
1.7.6.5	Policies on tuition refunds	X
1.7.6.6	Policy on credit hour/award of credit Processes for review of assignment of credit Review of syllabi/equivalent for all kinds of courses	X
1.8	Regular independent audits of finances (X 3.5)	X
1.9	WASC-related policies to ensure sub change policies	N/A
1.7- 1.9	Documents relating to investigations of the institution by any governmental entity and an update on the status of such investigation A list of pending legal actions by or against the institution, including a full explanation of the nature of the actions, parties involved, and status of the litigation	X
Standard 2		
2.1	List of degree programs, showing curriculum and units for each (X 1.7)	X
2.2	Complete set of course syllabi for all courses offered	X
2.3	SLOs for every program	X
2.7	Program review process with clear criteria, which include assessment of program retention/graduation and achievement of learning outcomes	X
2.7.1	Regular schedule of program review (including for non-academic units)	X
2.8	Policies re faculty scholarship and creative activity	X

CFR	Documents Required	
2.10	Data on student demographics	X
2.10.1	Data on retention and graduation, disaggregated by demographic categories and programs	X
2.10.2	Collection and analysis of grades at the course or program level, as appropriate	NA
2.10.3	Policies on student evaluation of faculty	X
2.10.4	Forms for evaluation of faculty by students	X
2.11	List of student services and co-curricular activities	X
2.11.1	Policies on financial aid	X
2.12	Academic calendar (X 1.7 catalog)	X
2.13	Recruitment and advertising material for the last year	X
2.13.1	Registration procedures	X
2.14	Policy on Transfer of Credit	X
Standard 3		
3.1	Policies on staff development	X
3.2	List of faculty with classifications, e.g., core, full-time, part-time, adjunct, tenure track, by program	X
3.3	Faculty hiring policies	X
3.3.1	Faculty evaluation policies and procedures (X 2.10)	X
3.3.2	Faculty Handbook if available	X
3.4	Faculty development policies	X
3.4.1	Faculty orientation policies and procedures	X
3.4.2	Policies on rights and responsibilities of non-full-time faculty	X
3.4.3	Statements concerning faculty role in assessment of student learning	X
3.5	Audited financial statements (X 1.8)	X
3.5.1	Appropriate financial records	X
3.5.2	Appropriate policies and procedures for handling of financial aid (X 2.11)	X
3.5.3	Campus maps	N/A
3.6	Inventory of technology resources for students and faculty	X
3.6.1	If online or hybrid, information on delivery method	N/A
3.6.2	Library data/holdings, size	X
3.7	Inventory of technology resources and services for staff	X
3.8	Organization chart (X 1.3 and 3.1)	X
3.9	Board list	X
3.9.1	Board member bios	X
3.9.2	List of Board committees	X
3.9.2.1	Minutes of Board meetings for last two years	X
3.9.2.2	Governing board bylaws and operations manual	X
3.10	CEO bio	X
3.10.1	CFO bio	X
3.10.2	Other top administrators' bios (e.g., cabinet, VPs, Provost)	X
3.10.3	Policy and procedure for the evaluation of president/CEO	X
3.11	Faculty governing body charges, bylaws and authority	X
3.11.1	Faculty organization chart (if applicable)	NA
3.11.2	Minutes of last year's faculty meetings	X
Standard 4		
4.1	Strategic plan	X
4.1.1	Operations plan	X
4.1.2	Academic plan	X
4.2	Description of planning process	X

CFR	Documents Required	
4.2.1	Process for review of implementation of strategic plan	
4.4	New program approval process	X
4.4.1	Program review process (X 2.7)	X
4.5	Description of IR function and staffing	X
4.6	Process for review and analysis of key data, such as retention, graduation (X1.2)	X

Related to Substantive Change		
1	Locations of all off-campus sites and programs offered at such sites (more than 50% of program)	N/A
1a	Number of students enrolled at such sites	“
1b	Date of first offerings	“
2	Names of all programs for which 50% of the program is offered through distance education	“
2a	Number of students enrolled in each	“
2b	Date each was first offered	“
3	Names of all hybrid programs	“
3a	Number of students enrolled in each	“
3b	Date each was first offered	“
Accuracy and Availability of Records		
	Policies and procedures for students, faculty and staff are stated consistently in all media	X
	Policies, procedures, and information are readily available to relevant constituents	X
	Records are accurate and up to date	X