REPORT OF THE WSCUC VISITING TEAM

SEEKING ACCREDITATION VISIT 3 (VIRTUAL)

Lincoln University

May 8, 2020

Team Roster

Chair: Margaret Bailey, Executive Director, Higher Education Board and Strategy Development; Former President, Pacific Educational Resources; Former Vice Provost, Program Development and Accreditation, Point Loma Nazarene University

Assistant Chair: Cecilia Minalga, Interim Financial Consultant, Minalga & Mariella

Staff Liaison: Tamela Hawley, WSCUC Vice President

The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. The formal action concerning the institution’s status is taken by the Commission and is described in a letter from the Commission to the institution. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be made available to the public by publication on the WSCUC website.
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SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Visit

Description of Institution

Lincoln University (LU) celebrated its centennial on November 16, 2019. It was founded in 1919 by Dr. Benjamin Franklin Lickey and his wife Susan as a law study program. It was established in San Francisco to serve returning World War I veterans with evening courses. By 1927 LU was offering both day and evening college courses in law, commerce, foreign trade, business administration, and special courses and coaching in bar examination preparation, advertising, journalism, and public speaking.

LU became a non-profit tax-exempt institution in 1950. In 1961, under the leadership of E. Barbara Jorss and Dean Jerome Sack, a second campus was opened in San Jose. By 1987, LU’s entire law school program was concentrated in San Jose. In 1993, the San Jose campus formally separated from LU changing its name to Lincoln Law School of San Jose. The remaining school moved to Oakland from San Francisco in December 1999.

The LU campus in Oakland is a physical facility consisting of three buildings; a four-story main classroom and administrative building owned by LU, a leased one-story office space housing the diagnostic imaging labs and faculty, and a two-story leased facility for the LU library. All three buildings are in proximity and located in downtown Oakland near public transportation.

According to the audited financials for fiscal year 2019 ending July 31, 2019, LU had total assets of $5,614,119 and no long-term liabilities. For FY 2019 the total revenue was $5,079,733 and total expenses of $5,420,146 for a deficit of $340,413. According to the most current preliminary (April 30, 2020) financial position the total assets increased to $5,775,251 and the statement of activities report net revenue of $287,590. LU recorded a U.S. Department
of Education financial responsibility composite score of 2.27 for fiscal year 2019 and is projected to end this fiscal year on July 31, 2020 with a composite score between 2.60 to 3.00.

The *Institutional Research Report 2019* states, “Lincoln University has a very diverse student population from a gender, ethnic, and cultural perspective. In the year 2019, Lincoln University enrolled over 400 students, representing over 40 different countries.” The report provides the following student profile for fall 2019 semester (*n* = 476):

- LU students by gender: males 58% and females 42%
- The average age for LU students was Mean 28.4, with a range from 20 to 45 years old.
- LU students by enrollment: 94% fulltime and 6% part-time
- Ethnic profile: African and African-American 24%; Asian 36%; Caucasian 29%; Hispanic/Latino 7%, and other 4%.
- LU retention rates for 2017 = 84%, 2018 = 88% and 2019 = 89%

The university offers six degrees: Bachelor of Arts (BA) in Business Administration, Bachelor of Science (BS) in Diagnostic Imaging, Master of Business Administration (MBA), Master of Science (MS) in International Business, Master of Science (MS) in Finance Management, and Doctor of Business Administration (DBA). LU does not have any off-campus sites or offer any distance education programs except for the spring of 2020 all courses were offered online in compliance with the state of California COVID-19 order.

LU serves a unique international mission “to provide traditional educational programs in diverse fields of study, delivered by experienced educators, and leading to outstanding employment opportunities for American and international students. Graduate and undergraduate programs utilize practical experience of the instructors and are geared to give its students tools for successful professional careers.” It was noted by the review team that many of the faculty and staff are foreign born and relate well to the students’ experience.

LU was accredited by the Accrediting Council for Independent Colleges and Schools (ACICS) in 1990. In 2012, the Bureau for Private Post-secondary Education (BPPE) granted LU
exempt status which was held through December 31, 2016 when it was removed due to
decertification of ACICS. ACICS was recognized again in 2018. Currently ACICS and BPPE
approve the 6 existing LU degree programs. As a result of ACICS decertification, LU decided to
pursue regional accreditation through WSCUC and was granted Eligibility in April 2017. The
WSCUC SAV 1 team visited LU in spring 2018, and because of this visit, LU became a
Candidate for Accreditation by WSCUC in June 2018. The WSCUC SAV 2 team conducted a
visit in October 2019. There have been no other WSCUC accreditation applications including
new program Substantive Change reviews. In 2019 the International Accreditation Council for
Business Education (IACBE), a programmatic national accredits, accredited LU’s graduate
business programs.

Description of the Team’s Review Process

The WSCUC SAV 3 virtual site visit team conducted the pre-visit teleconference on
Tuesday, April 21, 2020, to review the team’s consolidated worksheet based on the institutional
report and evidence provided by LU. The team reviewed the proposed interview schedule and
identified additional documents needed prior to the virtual visit. In addition, the team members
confirmed writing assignments and key issues arising in the consolidated worksheet based on the
information provided by LU.

The scheduled visit was to take place during the Coronavirus pandemic at a time when
the State of California was under a “shelter at home” order. The WSCUC staff liaison, WSCUC
visiting team and LU personnel agreed to conduct the visit virtually. The assistant chair worked
with LU’s ALO in preparation for the virtual visit and the development of the schedule. Prior to
the visit, LU provided the additional information requested in a timely manner. The WSCUC
team members reviewed the institutional report submission and attachments, along with all
relevant correspondence, reports, and documents, in preparation for the virtual visit scheduled
for Friday, May 8, 2020. The planning meeting of the team was scheduled for Thursday, April 21, 2020.

The reviewers prepared for the SAV 3 visit according to a standard visit protocol. The reviewers did extensive preparation in advance of the virtual visit, including analysis of the evidence made available electronically. The virtual visit was hosted by LU and was well organized and presented a full assessment of the progress made by the university in addressing the issues identified in the SAV 2 visit. LU leadership, administration, and staff grasp the importance of the WSCUC Standards, and successfully addressed the issues of the WSCUC reviewers with an in-depth and transparent analysis, particularly those issues related to Standard 3 specifically CFR 3.4. The WSCUC reviewers concluded that the discussions were wide ranging, transparent, and thorough. (CFRs 1.5, 1.6, and 1.7)

B. The Institution’s Seeking Accreditation Visit Report: Quality and Rigor of the Review and Report

LU’s institutional report was well-written and organized. The institution should be commended for taking seriously the SAV 2 report and CAL February 26, 2020. While the LU steering committee was responsible for writing much of the institutional report, the committee members sought wide institutional involvement. It is clear, that the institution is working on each of the standards and is making progress towards improvement based on previous recommendations.

LU has done significant work in responding to the issues raised in the Commission Action Letter (CAL) of February 26, 2020. Amid a global pandemic the university continued to make substantial progress in the past seven months, and the documents and virtual visit suggest that more improvements are forthcoming. The institution takes seriously WSCUC's mission and
standards. It has made investments in its faculty and staff to take advantage of the numerous development opportunities provided by WSCUC.

C. Response to Issues Raised in Past Commission Letters

The February 26, 2020 Commission Action Letter to Lincoln University articulated 6 discrete recommendations spanning twelve CFRs. The SAV 3 team found the university in substantial compliance with all twelve of the CFRs.

**ISSUE 1 – CFR 3.7, 3.8, 4.3**
Further professionalize the university’s business office aligned with the best practices and standards of higher education. This includes improvements in technology, staffing, risk management and controls, procedures, and operations, with a focus on building a foundation for future growth in enrollment.

The university has made meaningful progress in aligning with the best practices and standards of higher education. As part of the university organization, a new Chief Financial Officer was hired starting January 1, 2020. The CFO is actively involved in the restructuring of the university’s organizational structure, accounting and budgeting system and processes. The new budgeting process is transitioning to each of the departments for FY 2021 budget preparation, with completion projected by the end of May 2020.

There continues to be a need for the CFO to have more active engagement and strong relationship with university leadership and the board of trustees. As noted in SAV2, the CFO should work closely with board committees, including the Financial Audit Committee and Finance Budget and Planning Committee to address such issues as budget, forecasting and strategic planning. At the time of the visit, the CAO was serving on the finance related committees of the board as the staff representative rather than transitioning this role to the highly qualified CFO.
Further, throughout the COVID-19 pandemic the board had individual and informal conversations with the President and did not have a virtual meeting or receive official updates on the financial and operational health of the university. When the board and president were asked about this the president stated that he did not feel there was a need because the COVID-19 pandemic did not threaten the solvency of the university. This lack of communication between the board and the president during the current public health crisis was concerning for the visiting team who expected the board to be fully engaged in supporting the president through this national crisis.

In summary, the visiting team was encouraged by the strong technical and managerial skills the new chief financial officer brings to the university. However, for the board to fulfill its fiduciary responsibility, the CFO should build strong relationships with the board of trustees’ budget and finance committees. The president is encouraged to involve the CFO in more direct participation with the board. The CFO should work in close collaboration and act as a trusted resource for the board of trustees. When called upon by the board, particularly in times of economic instability, he should provide the board a full and transparent financial assessment of the university’s performance and challenges.

**ISSUE 2 – CFR 3.4, 3.7, 4.5, 4.7**

Accelerate the establishment of a donor development office to lead the university’s diversification of revenue and financial stabilization efforts.

The university has taken several steps to address the need for a more formal donor development function to better serve the university. The initial efforts in formalizing a donor development function began with the 100th anniversary celebration of the university in November 2019. A member of the board of trustees, who also is an alumna of the university, and with expertise in fundraising is leading the initiative to create donor development staff and operations. The board has allocated a budget to support the work of the staff and volunteers.
The university appointed fundraising team which includes administrators, faculty, alumni, and staff.

The LU fundraising team has established fundraising goals including a goal to raise $2,000,000 over the next five years. The team set an initial goal of $250,000 for this fiscal year 2019-2020 and have received $200,000 to date with another $50,000 expected before the end of the fiscal year July 31, 2020. The goal for the upcoming fiscal year is $400,000 (in cash and gifts in kind).

In addition, the team has been working with Foundation Search to identify grant opportunities. They have engaged the board, administrators, faculty, and alumni in the effort to pursue grant and gift opportunities with philanthropic organizations and corporations within the community. They have been using online alumni management software for building the alumni data base and network. The development software will eventually be integrated with the LU information system. The team has also presented to the board other innovative approaches to fundraising that are now under consideration. Plans include alumni chapters, capital fundraising for specific projects (e.g. computer lab upgrades, library enhancements, etc.), endowed chairs, real estate projects, as well as pursuing other innovative opportunities.

The university is laying the foundation for an Office of Development that will be fully staffed as the fundraising success grows. They have made excellent progress during these first few months in operation which has greatly benefited the university.

ISSUE 3 – CFR 3.4
Develop the admissions and enrollment management functions to prioritize the university’s strategy to meet domestic enrollment goals.

The university has identified that growing the domestic student enrollment as the “most important strategic priority.” The executive leadership developed, and the board approved the
creation of a Domestic Marketing and Recruitment team assigned to take the lead role in
growing domestic enrollment.

The Domestic Marketing and Recruitment team has developed an action plan for growing
enrollment that initially focuses on two target markets: 1) local community colleges and
international students already in the US (such as those in language schools), and 2) professional
certificate programs for graduate students. Just as the domestic recruitment program was gaining
traction for the fall 2020 enrollment period the COVID-19 order to “shelter at home” was issued
by the Governor of California, which forced the recruitment operations to pivot to social media,
digital marketing, and virtual tours. The team successfully made the transition and LU is
experiencing success in the digital marketing space.

The university is currently on track to meet fall domestic student enrollment goals.
Currently the greatest impediment to domestic enrollment continues to be a lack of regional
accreditation which restricts most of the university’s recruitment activity and transfer agreements
with regional community colleges. In addition, the travel restrictions and uncertainty around
international students in the US has presented challenges for this applicant population.

The university has made considerable progress in developing the capacity to recruit and
market to the domestic applicants. They have developed a domestic enrollment plan and
recruiting goals, committed resources including technology to track applications electronically,
trained staff, and successfully moved marketing to online. Once the COVID-19 restrictions are
lifted it is expected the domestic marketing and recruitment activities will continue to meet or
exceed the enrollment targets.

**ISSUE 4 – CFR 3.1, 3.10**
Prioritize, continue, and demonstrate progress on gender diversity in faculty hiring practices.
LU continues to prioritize and make progress on the gender diversity of the faculty. In the spring of 2020, there were 21 male faculty and 7 female faculty teaching. The female faculty taught psychology, English and business communications, and there are five female faculty teaching in the Diagnostic Imaging program. However, there are not any fulltime female faculty assigned to the business department which comprise the largest programs at the university.

In the spring 2020 the university made offers to two female professors for a fulltime position with the business faculty. Both offers were declined but the university is pursuing three other female candidates for potential positions and two of these positions are with the business programs.

While the university has not been as successful as they had hoped in achieving their gender diversity goals, they continue to have this as a top priority.

ISSUE 5 – CFR 3.1, 3.2
Move toward the creation of a centralized human resource function with clear lines of responsibility for developing hiring practices, salary and benefits packages, performance evaluations, and state and federal regulatory compliance. The university should create a plan that shifts responsibility from faculty and administrative staff to human resource professionals.

The centralization of the human resources functions, that were previously dispersed, is an area where the university has made exceptional progress in bringing the university's operations in alignment with best practices. On January 1, 2020, the university hired a fulltime Director of Human Resources, who is a lawyer with decades of experience in the field of human resources. The new director reports directly to the president.

Over the past five months the new director has: created an Office of Human Resources by pulling all personnel functions into his department and creating a job description, updated all personnel related policies and procedures as well as identifying those that the university did not
have; created a new hire packet; purchased updated posters, notices and pamphlets; standardized faculty contracts; and created a process for coordinating employee benefits.

The university is to be commended for hiring a human resource professional to establish the office, centralizing all the personnel related functions into a new Office of Human Resources and updating documents, processes, notices, and procedures for this critical function of the university. In a short period of time the university has brought the decentralized personnel functions up to best practice standards for higher education.

**ISSUE 6 – CFR 3.5**
Create an information technology plan and budget that addresses the technology needs for a student information system, learning management system, integrated financial systems, personnel management systems, course and catalog management systems, etc.

The university has proceeded quickly to create an information technology committee and an action plan to update the current decentralized databases and outdated software. In the SAV 2 visit in fall 2019 the team was informed that a major issue with the information technology was the individual systems were not integrated and information had to be manually transferred from one data base to another. This labor-intensive process resulted in numerous errors and the staff not being able to generate accurate reports needed for decision-making.

The university completed the review of technology solutions and has begun work on converting to Salesforce Education Data Architecture. During the virtual visit the WSCUC visiting team was provided a demonstration of the academic and admissions functionality of the Salesforce information system. The LU personnel overseeing the transition to the new system explained the process of cleaning the data pulled from the three independent systems and challenges of moving this data to the new system.

Despite these obstacles, the information technology team is targeting the start of the fall 2020 academic year to bring the academic and registrar functionality online with the business
office software integrated with the system shortly afterward. In less than nine months since the SAV 2 visit the university has made exceptional progress in planning, resourcing, selecting, and implementing a technology solution that will enhance the technology infrastructure for the students and institution.

SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS

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

WSCUC Standard 3’s emphasis on fiscal and organizational structure as connected to institutional decision-making and short- and long-range planning form the foundation for this section of team’s discussion of LU’s SAV 3.

CFR 3.4
The institution is financially stable and has unqualified independent financial audits and resources sufficient to ensure long-term viability. Resource planning and development include realistic budgeting, enrollment management, and diversification of revenue sources. Resource planning is integrated with all other institutional planning. Resources are aligned with educational purposes and objectives.

SAV 2 Team Recommendation:
Given the institution’s dependence on international student enrollment, LU must diversify its revenue sources. LU must provide evidence that they are prepared to support an increased number of domestic students, including recruitment, admissions, student support and the increased capacity to process financial aid. In addition, the institution must provide evidence that it is not on U.S. Department of Education HCM2 monitoring.

The university has made meaningful progress to ensure financial stability, with resources sufficient to ensure longer-term viability. In response to SAV2, improvements were made to the university’s HCM2 status, diversification of revenue and ability to support a growth in domestic student enrollment. LU recorded a U.S. Department of Education financial responsibility
composite score of 2.27 for fiscal year 2019 and is projected to end this fiscal year on July 31, 2020 with a composite score between 2.60 to 3.00.

Following the SAV 3 visit, on May 14, 2020 the university was notified by the U.S. Department of Education, "Lincoln University has been changed from HCM2 to HCM1 method of payment, and you should be getting a letter with the new status shortly." The U.S. Department of Education required LU to go on Heightened Cash Monitoring (HCM2) due to irregularities in the disbursement of student Title IV financial aid. Since being placed on HCM2 status, LU has successfully complied with all the U.S. Department of Education requirements to move back into good standing for distribution of financial aid and has posted a Letter of Credit with the Department of Education in the amount of $580,132 which represents the high end of the amount of the fine yet to be determined.

As explained in the SAV3 institutional report, "Lincoln University was approved and started to receive funds from Federal Student Financial Aid (FA) in 2002. During 15 years... an independent contractor, administered LU’s FA office. Due to a small number of students (10 – 40 in different years), LU had no need to have a full-time employee for the office... In March 2017, USED conducted their first review of LU operations and found that students were overfunded during several years, then as a result of the findings placed LU on HCM2 monitoring status. Later in 2017 for a comprehensive review of FA operations LU hired a consulting company, Solutions4Less, specializing in FA audits. In June 2018, LU established Financial Aid office with 2 full time employees... Since the office began its operations, we provided 8 clean reports to the USED; the reports were accepted without corrections and our FA participation is approved through 2021 with only condition - continuous accreditation... To remove this status, we had to provide 6 clean reports (done and financed) and pay the fine." It is expected that Lincoln will not appear on the June 1, 2020, list of universities in HCM2 status.
The university has continued with clean external audits for the year ended July 31, 2019. The university provided internally prepared and unaudited financial results as of April 30, 2020, with unrestricted net assets of $5.2 million, and year-to-date surplus of $0.3 million. The university’s balance sheet continues to be solid with cash and cash equivalents of $3.1 million, with no long-term liabilities. The Finance Audit Committee issued a request for proposal (RFP) and is reviewing the current auditor’s performance and considering a proposal from a new potential external auditor.

LU has relied heavily on recruiting international students from a wide range of countries. The SAV2 team emphasized the need to diversify revenue particularly considering the increasing restrictions on foreign students studying in the United States. To achieve revenue diversification, the university has created a donor development function that has achieved initial success and a separate domestic marketing and recruit team focused on the domestic regional market.

The COVID-19 pandemic required the enrollment and marketing team to quickly pivot to a virtual platform for recruitment. The SAV3 visiting team was advised that LU expects to meet enrollment targets for Fall 2020. However, there is still considerable uncertainty around international student travel and domestic enrollment in the fall 2020 semester. Even if both applicant populations miss the enrollment targets it will not threaten the financial viability of the institution.

There are four sources of revenue in addition to normal operating funds that have brought stability to the university during this time of uncertainty. First, LU successfully secured $660,000 from the Payroll Protection Program (PPP) to support employees this is potentially a forgivable loan. In addition, LU is currently waiting for a decision on their application with the US Department of Education for Commercial and Government Entity (CAGE) funds in the amount of $310,000 to support students. Third, in January 2020, LU received repayment of two
real estate loans of $850,000 and of $600,000 for a total of $1,450,000 with an additional $135,000 of interest income in 2019. Fourth, the success of the donor development activities is expected to yield $250,000 in new donations. These four sources of revenue provide LU the financial resources for stability through fall 2020.

However, the SAV3 team believes it is of paramount importance for the board of trustees and president to work closely to monitor all aspects of the university’s operational, social, and fiscal health while navigating through the current Coronavirus pandemic. The board should be provided frequent updates and offer support to the president as he leads the university. It should be noted that in recent years Lincoln University has faced several significant external threats, such as changes in immigration policy, decertification of ACICS and the pandemic. In all cases LU has successfully overcome the threat but it is expected that this has been at a personal cost. During the current crisis, the board and executive leadership should be working together to envision alternative scenarios resulting from the economic and health crisis and how it might impact the future of Lincoln University.

The visiting team also met with LU staff to ensure the university’s capacity to support domestic students. The team met with the librarian, financial aid, admissions, student affairs, and information technology staffs. In addition, the team questioned staff who were previously domestic students at Lincoln University. The team concluded that LU understands and can meet the needs of the domestic student population. The team noted that the staff has been particularly resourceful and creative during the COVID-19 in keeping students engaged. For example, the student affairs staff created the “Three Ideas” newsletter offering students advice on mental and physical health during the pandemic. Students have also been provided support in the areas of tutoring, career services, personal counseling, health insurance, scholarship applications, and the Writing and Speaking Center has been actively supporting students. All other services have been
actively engaged in providing student support in the online environment. The professionalism of the staff and demonstrated care for the domestic and international student populations has been commendable.

The visiting team determined that Lincoln University demonstrated compliance with Standard 3 sufficient for initial accreditation with the understanding that the Commission makes the final determination regarding compliance.

SECTION III. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

The SAV 3 team finds that LU has responded appropriately and thoroughly to each of the SAV 2 issues raised in the Commission Action Letter on February 26, 2020.

The WSCUC SAV 3 team determined that LU demonstrated compliance with the WSCUC Standard 3 sufficient for initial accreditation with the understanding that the Commission makes the final determination regarding compliance.

Findings

In the SAV 2 report, the WSCUC Team raised issues where LU was required to demonstrate more progress for substantial compliance with Standard 3 (CFR 3.4). The university has shown significant progress in meeting the CFR and addressing all issues raised in the SAV 2 review.

Standard 3

All CFRs are compliant at a substantial level. The team finds that LU meets this Standard at a level sufficient for initial accreditation. Only the Commission is authorized to make the final determination as to whether an institution is in compliance with the Standards.
Commendations

1. Information technology plans to fully integrate the technology infrastructure to better support the technology needs of the students and the institution through the implementation of the Salesforce student information system and future incorporation of the registrar and financial systems.

2. The university’s immediate action in securing COVID-19 financial support in the amount of $660,000 from the Payroll Protection Program (PPP) to support employees. In addition, the application and pending approval with the US Department of Education for Commercial and Government Entity (CAGE) funds in the amount of $310,000 to support students.

3. The institution’s commitment to diversify revenue sources through the establishment of the Donor Fund Development Committee with their innovative approach to fund development, pursuing domestic student enrollments, and the success of the real estate investment strategies.

4. The progress made to date to centralize functions related to human resources and to update policies and procedures consistent with best practices in higher education.

5. The professionalism, knowledge, and capacity of the financial aid operation with the transition of the institution from HCM2 to HCM1.

Recommendations

1. The institution should ensure that the chief financial officer establishes direct communication with the board to provide the trustees with institutional data and regular reports on the financial status of the institution in order for the board of trustees to fulfill their fiduciary responsibilities. (CFR 3.8)
2. The chief executive officer should be in frequent communication with institutional leadership and the board members with financial, operational, and budgetary updates during periods of crisis, such as the COVID-19. This is critical to provide oversight to the institution during this period where there is uncertainty and high risk. (CFR 3.8, 3.9)

3. The institution needs to immediately develop processes for creating risk-mitigating operational plans and budgets under different scenarios which will allow LU to be flexible and agile, particularly during times of uncertainty. (CFR 3.4, 3.6)

4. Lincoln University should continue to work with the Department of Education to meet all requirements to remove heightened cash monitoring status. CFR 3.4)

APPENDICES

- Inventory of Educational Effectiveness Indicators
- Four Federal Compliance Forms
<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on credit hour                                 | Is this policy easily accessible?  ☑ YES  ☐ NO  
Where is the policy located?  Website, Catalog  
Comments:                                                                                               |
| Process(es)/ periodic review of credit hour           | Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)?  ☑ YES  ☐ NO  
Does the institution adhere to this procedure?  ☑ YES  ☐ NO  
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  ☐ NO  
Comments:                                                                                               |
| Sample syllabi or equivalent for online and hybrid courses  
Please review at least 1 - 2 from each degree level. | How many syllabi were reviewed?  N/A  
What kind of courses (online or hybrid or both)?  
What degree level(s)?  
What discipline(s)?  
Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  ☑ YES  ☐ NO  
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)  
Please review at least 1 - 2 from each degree level. | How many syllabi were reviewed?  N/A  
What kinds of courses?  
What degree level(s)?  
What discipline(s)?  
Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  ☑ YES  ☐ NO  
Comments:                                                                                               |
| Sample program information (catalog, website, or other program materials)  
Please review at least 1 - 2 from each degree level. | How many programs were reviewed?  3  
What kinds of programs were reviewed?  On-Ground  
What degree level(s)?  Gen Ed, BS, MBA  
What discipline(s)?  Gen Ed, Diagnostic Imaging, MBA  
Does this material show that the programs offered at the institution are of a generally acceptable length?  ☑ YES  ☐ NO  
Comments:                                                                                               |

Review Completed By:  Eunhwi Cho  
Date:  10/4/19
2 - MARKETING AND RECRUITMENT REVIEW FORM

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

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal regulations</strong></td>
<td>Does the institution follow federal regulations on recruiting students? (YES □ NO) Comments:</td>
</tr>
<tr>
<td>Degree completion</td>
<td>Does the institution provide information about the typical length of time to degree? (YES □ NO) Comments:</td>
</tr>
<tr>
<td>and cost</td>
<td>Does the institution provide information about the overall cost of the degree? (YES □ NO) Comments:</td>
</tr>
<tr>
<td>Careers and employment</td>
<td>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? (YES □ NO)</td>
</tr>
<tr>
<td></td>
<td>Does the institution provide information about the employment of its graduates, as applicable? (YES □ NO) Comments:</td>
</tr>
</tbody>
</table>

*§602.16(a)(1)(vii)

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

Review Completed By:  
Date: 4/20/2019
3 - STUDENT COMPLAINTS REVIEW FORM

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

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints?  
☑ YES ☐ NO  
If so, is the policy or procedure easily accessible? Is so, where?  
Comments: |
| Process(es)/ procedure | Does the institution have a procedure for addressing student complaints?  
☑ YES ☐ NO  
If so, please describe briefly:  
If so, does the institution adhere to this procedure?  ☑ YES ☐ NO  
Comments: |
| Records | Does the institution maintain records of student complaints?  ☑ YES ☐ NO  
If so, where?  
Does the institution have an effective way of tracking and monitoring student complaints over time?  ☑ YES ☐ NO  
If so, please describe briefly:  
Comments: |

*§602-16(1)(1)(ix)
See also WASC Senior College and University Commission’s Complaints and Third Party Comment Policy.

Review Completed By: [Signature]
Date: 10-4-19