REPORT OF THE WSCUC VISITING TEAM

SEEKING ACCREDITATION VISIT 1

For Institutions Seeking Initial Accreditation

SUM Bible College and Theological Seminary

January 30-February 2, 2017

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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 the Institution and Visit

Founded in 1992 by George Neau, the School of Urban Missions, now known as SUM Bible College and Theological Seminary (SUM) is a Christian Bible College currently headquartered in Oakland, California. The focus of the college is the education of individuals who are called into Christian ministry. SUM was created to provide an affordable education to individuals who desire to start churches or ministries in urban areas. The founders believed that to transform urban communities, future leaders needed Bible college training, but lacked this training, in part, because of limited financial resources.

Originally started in New Orleans, SUM moved its corporate offices to Oakland following the devastating impacts of Hurricane Katrina in August 2005. SUM had purchased four acres near the Oakland International Airport and Coliseum Complex in 1999. This site includes two warehouse buildings, an athletic field and a seven unit, two-bedroom apartment complex. The educational and administrative facilities were renovated in 2002-2003. The buildings contain dormitories, classrooms, library, student center, chapel and offices. Currently, SUM is in the process of selling the Oakland property and investigating several larger facilities in the Sacramento area, which would allow the college to increase enrollment and provide additional space for faculty, students, staff and administration. If the sale is successful, SUM anticipates moving in the summer of 2017.

In 1998, SUM received applicant status from the Accrediting Association of Bible Colleges, now the Association of Biblical Education (ABHE). In 2003, ABHE granted SUM Candidacy and Initial Full Accreditation in 2006. Following a review conducted in 2013, the ABHE Commission reaffirmed SUM’s accreditation until 2021. In 2005, ABHE granted SUM permission to provide online education. Cohorts were started in 2008 by partnering with local
churches. Cohorts and extension sites currently exist at 39 locations in the United States as well as seven other countries.

In 2014, SUM applied for Eligibility status with the Western Association of Schools and Colleges (WSCUC). Following a review by a panel of the Eligibility Review Committee, WSCUC granted SUM Eligibility status in September 2015 and the institution was given five years until August 12, 2020 to achieve Candidacy. SUM submitted a request to go through the Seeking Accreditation process in December 2015 and its institutional self-study was submitted in December 2016 with an evaluation team visit scheduled for late January 2017.

Degrees Offered

In 2006, SUM began the creation of a Bachelor of Arts degree. The institution only offers one major, biblical studies, along with minors and concentrations. SUM also offers an Associates of Arts in biblical studies. Four years later, SUM launched two graduate programs--a Master of Arts in Biblical Studies and a Master of Arts in Organizational Leadership now called the Master of Arts in Christian Leadership. In 2013, a Masters of Divinity was started and a faculty committee is currently investigating the possibility of starting a Doctor of Ministry degree in the future. From its first class of four students in 1993, SUM currently has 584 full time equivalent students and over 400 alumni. Of its students in fall 2016, over 10 percent are graduate students.

Educational Approach.

As a Bible college and seminary, SUM’s educational philosophy is built upon four major pillars: academic excellence (cognitive), practical hands-on training (praxis), mentoring for student discipleship (affective) and financial affordability. SUM partners with ministries across the United States and around the world to offer its academic programs. Offsite locations are
entitled “cohorts,” with each cohort assigned an advisor and managed by a leader, generally the senior pastor of a church.

Online instruction is conducted via real-time, synchronous virtual interactive classrooms using very sophisticated technology and learning management systems, Canvas and Zoom. Online students meet in the virtual classroom for 34.5 hours over an eleven-week trimester. SUM’s online, cohort program falls under WSCUC’s definition of distance education.

**Evaluation Team Visit**

In anticipation of the Seeking Accreditation Visit 1, the visiting team read the materials—report, evidence and appendices—supplied by SUM. Also, the chair of the team participated in a conference call with the chancellor of SUM prior to the visit.

The entire team visited the Oakland campus of SUM between January 31-February 2, 2017. The team enjoyed outstanding hospitality, with convenient and comfortable meeting rooms along with excellent technical support for the team’s technology needs. The team’s requests for additional information during the visit were met with responsiveness. During the visit the team received access to additional documents and to campus facilities, met with and interviewed campus leaders and groups, and heard from faculty, students, and staff at separate open meetings. Using SUM’s Zoom technology, the team spoke with students in cohorts around the United States. It was noteworthy and appreciated that SUM arranged for certain cohort advisors, board members and faculty who live outside California to fly into Oakland for meetings with the team.
B. The Institution’s Seeking Accreditation Visit 1 Report: Alignment with the Letter of Intent and Quality and Rigor of the Review and Report

Letter of Intent

In its Letter of Intent, SUM indicated that through the SAV process it expected to continue an evaluation of policies and procedures, improve its documentation, increase data collection, study its systems and processes, improve the quality of services to students and further solidify its position as a singularly-focused educational institution (Letter of Intent, page 10).

Several examples of CFRs that needed further attention by the institution’s faculty and administration were discussed in the Letter of Intent. The first CFR, 1.6, requires institutions to treat students fairly and equitably through established policies and procedures addressing student conduct, grievances, human subjects in research, disability and financial matters. The aspect of CFR 1.6 that caused concern to SUM administration was having policies in place around student conduct. Considering its religious model and innovative cohort model wherein most students are off site and in some cases, outside of the US, SUM grappled with how to create a fair conduct system. The decision was made to have the Dean of Student Life and the US Cohort Director clarify the discipline process and procedures and offer increased staff training.

The second CFR that the institution believed needed further attention was 2.8, which requires institutions to clearly define expectations for research, scholarship and creative activity for its students and faculty. SUM recognized that because most of the faculty is part time and dispersed across the country, knowledge of faculty scholarship is limited. The institution also acknowledged the need to develop a more systematic approach to encouraging faculty scholarship. The responsibility for this has been assigned to a new assistant academic dean.

Another area that the institution noted as a concern related to CFR 3.4 that expects an institution to be financially stable and have resources sufficient to ensure long-term viability.
This is a challenge for SUM given its commitment to keeping tuition low. It also is a challenge for the institution to allocate funds to reserves. The outcome that SUM intends to undertake is work to increase reserves and improve planning.

The final CFR discussed was 4.5 that requires appropriate stakeholders, alumni, practitioners, etc., be involved in the assessment and alignment of educational programs. The institution believes that it has done a good job involving students, faculty and participating ministers in the assessment of educational programs. The group that needs more involvement in the alignment of educational program is alumni. To that end, the institution has created a more accurate alumni database, approved an alum to lead the alumni association, reached out to alums, conducted a survey of alumni to determine involvement in ministry and planned a project to survey alumni on the quality of SUM’s educational programs.

**Overall Quality and Rigor of the Review and the Report**

The campus ALO and Chief Academic Officer (CAO) led the accreditation effort as the compiler of information and chief writer of the document. The discussion of the report and the accreditation process began in 2015 with an Executive retreat. Student feedback was obtained through surveys. Faculty input was received through program chairs and surveys. The Board of Directors created an Accreditation Committee and was involved in the process. From the report itself and from interviews conducted during the evaluation visit, the self-study was developed with the involvement and collaboration of faculty and administration.

Various stages of the report were reviewed and edited by SUM’s Executive Committee and the Board of Director’s Accreditation Committee. The report is organized byWSCUC Standards and each CFR is discussed and evidence presented to demonstrate compliance with the CFR. SUM provided a great deal of useful data to the team, but the team found the presentation
of some data, especially enrollment data, to be insufficient and before and during the visit made additional requests for this data, which the college attempted to make available.

The report text, its exhibits and its appendices do, however, demonstrate a genuine attempt to address the Standards with supporting evidence and to analyze both the accomplishments of SUM and its issues and challenges in the coming years. From the review of documents and conversations during the team visit, it was apparent that the WSCUC process allowed SUM administrators, faculty and staff to address a range of academic and administrative issues, create some additional needed policies and put into place a range of assessments to better understand student learning.

Response to Issues Raised in the Eligibility Review Committee Letter.

SUM was asked to address 13 recommendations resulting from the Eligibility review conducted in 2015. The recommendations and SUM’s response are as follows.

Criterion 5: Recommendation: Develop specific credit hour policy in line with federal policies and WSCUC’s Credit Hour Policy.

Response: Policy revised in fall 2016 and available widely to campus community.

Criterion 7: Recommendation: Complete by-laws revision making sure that all requirements of WSCUC’s Independent Governing Policy are met.

Response: By-laws completed and included as attachment to Self-Study.

Criterion 8: Recommendation: Present a viable financial model demonstrating positive financial gains and a realistic three-year budget projected forward.

Response: As part of the SAV process, institution submitted a three-year projection based upon an enrollment growth rate of 10% each year.

Criterion 9: Recommendation: Develop metrics for strategic plan goals tied to projected financial resources necessary to accomplish goals.
Response: This was undertaken in summer 2015 during an Executive retreat before the ERC panel review. Specific metrics were submitted by each department head and tied to the strategic plan goals.

**Criterion 9:** Recommendation: Continue plans to hire an institutional research specialist.
Response: The position was filled and then incumbent became Registrar. As of the evaluation team visit, this position was not yet filled. SUM administration indicated that the institutional research specialist would be hired following the institution’s move to Sacramento.

**Criterion 10:** Recommendation: Develop enrollment projections for each program.
Response: Institution created projections and they are included in the self-study on pages 12-13.

**Criterion 10:** Recommendation: Prepare disaggregated data on retention, persistence and numbers of disciplines of graduates.
Response: Data collected and available in attachments.

**Criterion 11:** Recommendation: Engage in further development of educational effectiveness measures such as learning outcomes, assessment and program review.
Response: Examples of progress include: discussion at summer 2015 retreat, learning outcomes modified, learning management system changed which enhances ability to collect and analyze data and annual reports created.

**Criterion 12:** Recommendation: Ensure compliance with GE outcomes as required byWSCUC.
Response: GE reviewed during 2014-15 and review will be completed by 2016. Courses realigned and a new learning outcome for information literacy was created and
quantitative reasoning assessments being developed accompanied by faculty development training to ensure its integration into courses.

**Criterion 14:** Recommendation: Present in greater specificity the scope of student services offered on campus.

Response: A Dean of Student Life was hired in 2015. Students have mentors, attend devotions every morning, go to chapel four days a week and have personal counseling and academic counseling services available. Student government provides social gatherings and representation.

**Criterion 14:** Recommendation: Develop plans for reducing any gaps in retention and graduation rates among ethnic groups.

Response: No gaps have been noted in data.

**Criterion 15:** Recommendation: Develop clear admissions procedures for graduate programs.

Response: Plan in place since 2011 and can be found in Course Catalog.

**Criterion 16:** Continue to develop and implement plan for information literacy.

Response: Plan developed to facilitate a three-step information literacy process and is being integrated into the curriculum. A learning outcome was added to allow for assessment of this area across appropriate courses.

The team finds that SUM must address Criterion 9 in the recommendations from the Eligibility review.
SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS

STANDARD 1: DEFINING INSTITUTIONAL PURPOSES AND ENSURING EDUCATIONAL OBJECTIVES

SUM has developed a mission statement and values (known as the five foundational principles), which are well aligned with institutional purposes. The mission and principles are widely published in the catalog, website and various handbooks. The team discovered a broad and comprehensive understanding of the mission and principles by administration, Board of Directors members, faculty, staff, and students, and the curriculum both supports and is informed by the mission and principles (CFR 1.1).

The institutional mission specifically connects with vocational ministry preparation only. The team suggests that the strategic plan (Strategic Metrics document), continue to build upon SUM’s mission and principles, actively documenting a broad inclusive group of institutional stakeholders, especially including the board. Evidence of the board participating actively in the process of developing and monitoring the new strategic plan is crucial. The team notes a passion and commitment to the mission of Biblical higher education permeating the community starting with the chancellor and the board and through the faculty, staff and students. We further recognize the institution’s unity of purpose in pursuing the process of regional accreditation.

Clearly, SUM is making a concerted effort to increase the measurement of student learning in various ways, such as: 1) evaluating cohort performance, 2) completion of ministry formation hours and 3) the use of a nationally normed Bible knowledge test (CFR 1.2). The team, however, discovered much work remains as the institution seeks to better understand and improve student-learning outcomes consistently. A critical missing component of the overall assessment process is the lack of a formal program review process and calendar.
Recently, the college undertook to align each of its five guiding principles with specific institutional goals and objectives. The team appreciates this intentional effort to “bring alignment between the values of the institution, each academic program, and student learning outcomes” (Institutional Report, page 20). Although some of the institutional goals as currently written appear to be not easily measurable, the team found evidence of faculty governance employing the goals and objectives to improve learning outcomes. The team suggests that SUM consider developing specific policies and procedures outlining how institutional goals and outcomes may be best measured and connected with a formal program evaluation process and calendar.

Better alignment with program learning outcomes (PLOs) and course learning outcomes (CLOs) is needed in the syllabi to assure valid measurement of student learning outcomes. SUM displays outdated graduation and placement information (from 2011) on its public website, along with Bible Test norms and data. The team did not find publicly available and easily accessible retention and graduation rates displayed, and strongly suggests the institution consider adding additional data and disclosures in the fact sheet or other easily accessed appropriate published locations to include enrollment, financial aid performance, student engagement and updated alumni outcomes (CFR 1.2).

The institution publishes an academic freedom policy for faculty in the respective handbook. The policy, though minimalistic, was developed by a faculty committee. The faculty policy is not comprehensive, nor does it clearly reflect SUM’s expectations and culture. The team suggests this policy undergo a readability study and be reviewed again by faculty governance and administration for its reflection of the institution’s values, culture and expectations. The academic freedom policy, as currently written, seems to emphasize what instructors should avoid saying or teaching in the classroom, rather than celebrating and outlining an appropriate academic freedom culture for an institution of Biblical higher education.
Moreover, the team was unable to find any academic freedom policies that apply to students or other members of the campus community. Noteworthy, however, was the team’s finding of evidence of an overall faculty perception that SUM instructors enjoy an appropriate degree of academic freedom.

The team noted a careful tracking of student ethnic diversity by cohort and at the main campus, along with corresponding retention and completion data. The disaggregated retention and completion data is used for planning, however, despite SUM’s claim to employ “a concerted effort is (to) continuously … interview people of diverse backgrounds (either based on ethnicity or gender),” the team was unable to find evidence of specific documented policies or processes to increase the number of faculty of color (CFR 1.4). The institution correctly asserts that it faces challenges, as the American Bible college movement historically has been confronted with difficulties finding academically qualified faculty of color, especially so among the Pentecostal and charismatic community. There are clear policies related to discrimination and handling harassment, and the team found that employment practices are devoid of discrimination. The team was pleased to note a highly diverse on-campus student population, and an increasingly diverse staff and faculty. The team recommends SUM continue to explore its diversity practices and policies considering alignment with all aspects of WSCUC’s diversity policy: representation, community on campus and co-curricular development of cultural acceptance.

SUM is a non-profit organization incorporated in the State of California and operating in compliance with the Bureau of Private Postsecondary Education (BPPE). There are no affiliations that appear to neither threaten the independence of SUM nor undermine the institution from fulfilling its purposes and mission. The Board of Directors, though somewhat small in membership for a WSCUC non-profit, private institution, are nonetheless independent and clearly articulated to the team their governance role and responsibilities (CFR 1.5).
The undergraduate and graduate curriculum is mostly well presented and has been accredited by the Association of Biblical Higher Education (ABHE), which also accredits SUM institutionally. The team learned that ABHE is recognized by CHEA for all levels, but only at the undergraduate level by the United States Department of Education. Therefore, graduate students are not eligible for Title IV funds as they would be underWSCUC candidacy or accreditation.

An annual catalog displays the courses, the hours, units and a description and is easily accessible on the institution’s website (CFR 1.6). The retention and completion rates are somewhat troubling, with graduation rates nearing the 35% threshold required by WSCUC to avoid additional monitoring.

Certain data presented to the team by the institution do not align with data published by the United States Department of Education in its College Scorecard. The team suggests that SUM investigate the misalignment and either correct their published statements or request the Department of Education to do so. Tuition and fees are clearly presented, along with financial aid information, for prospective students.

As mentioned above, the institution is approved for participation in federal financial aid programs for undergraduates only with a cohort default rate of 13.9 (FY 2013). A tuition refund policy is clearly outlined in the catalog.

The team learned that SUM claims the “type of research done at the institution is excluded from Human Subject reviews because it is either survey research or anonymous interviews (Institutional Report, page 52). The institution later clarified that all research performed by faculty and students must be excludable from Intuitional Research Board (IRB) review. Currently, the institution does not permit research that would include sensitive survey or interview questions or vulnerable populations. Considering the growing number of students studying at the graduate level, the team suggests the institution consider a review of its policies
for human subjects research. Though an institution of Biblical higher education, even anonymous surveys and certainly research interviews may in the future need to involve a vulnerable population, or sensitive topics, which are subject to IRB oversight.

SUM reviews and regularly updates policies, procedures and manuals to maintain the currency of laws, regulations and personal welfare as they pertain to its operations. Examples are the policies and procedures included in the Employee Handbook, Faculty Policy Manual, Catalog and Student Handbook (CFR 1.7). The team received a copy of a well-developed Board of Directors Policy Manual. Evidence during the visit indicated grievance procedures for students and faculty are published and appear appropriate for due process. The annual budgeting process appears to be well distributed across the institution and independent audits of financial statements and a financial aid audit occur annually. Executive leadership is provided an opportunity to participate in resource allocation and expense discussions.

The Board of Directors heartily and enthusiastically supports the WSCUC accreditation effort and has approved a resolution supporting the meeting of WSCUC policies and standards. The Board has received information concerning the Seeking WSCUC Accreditation Visit 1, and is involved with the institution’s journey toward initial accreditation by WSCUC (CFR 1.8).

The WSCUC team finds that SUM meets Standard 1 at a level sufficient for Candidacy, understanding that only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 1 at the Initial Accreditation level: CFRs 1.1, 1.5, 1.6, 1.7, 1.8.
- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 1 at the Candidacy level: CFRs 1.2, 1.3, 1.4.
STANDARD 2: ACHIEVING EDUCATIONAL OBJECTIVES THROUGH CORE FUNCTIONS

The institution has built a foundation of learning outcomes upon which it can create its structure of ongoing learning outcomes assessment and program review. Detailed assessment plans and a comprehensive program review policy need to be developed and implemented.

Teaching and Learning

SUM clearly presents its admission requirements, degree plans and requirements for graduation. These elements reflect standard designs and expectations while at the same time conveying the uniqueness of the institution and its mission (CFRs 2.1, 2.2b, 2.3).

SUM has made improvements to its general education component. The formal statement of general education philosophy and purpose needs to reflect deeper engagement with the value, purpose and institutional commitment to general education (CFR 2.2a). The team learned that some cohort students receive their entire baccalaureate program in a language other than English. In such instances, programs must conform to the WSCUC Instruction in Languages other than English Policy (CFR 2.2).

The faculty has taken collective responsibility for developing student learning outcomes and weaving them through the curriculum and linking the various levels (course, program, institutional) to form an authentic fabric of learning directives (CFR 2.4). Knowing the degree to which graduates wear this fabric is the next step in assuring educational effectiveness.

SUM students are active learners. Through synchronous instruction, they can participate in class discussions with other students around the country and, in some cases, around the world. Additionally, the cohort model allows students at remote sites to engage with each other and apply what they have learned under the tutelage of a local church leader, often the lead pastor (CFR 2.5).
Assessment of student learning, especially at the program level, must be further developed (CFR 2.6). For each set of program learning outcomes, the faculty should identify, typically with an assessment calendar, when each program learning outcome will be assessed and with what kinds of evidence, including direct evidence, such as student papers or other work products from courses linked to the PLOs. The best example of an assessment structure was found for the institutional learning outcome for Information Literacy. A similar structure needs to be built for each program learning outcome, each institutional learning outcome, and each core competency.

The methodology, findings, results, and conclusions of the assessing committee should be presented in the form of a written report and presented to the faculty for discussion and generation of recommendations for improvement of student learning. The report for each assessment of each PLO should indicate what data were collected, how the data were collected and analyzed and how the data were used to develop recommendation for improvement of student learning. Examples were provided of data related to assessment of program learning outcomes, but the context of the data needs to be articulated in the form of a comprehensive report, similar to the 2014 SUM study on retention.

Some data are being collected that are used to assess PLOs. The next step in the development of the assessment processes is to formalize the collection and analysis of direct evidence of student attainment of program learning outcomes. The use of calibrated rubrics with a scale used across the institution can help to standardize assessment processes. SUM provided a document showing the linkages between specific CLOs and PLOs. These links are vital, and the faculty clearly worked long and hard to establish the links. At the same time, the team learned that CLOs are not static so that, for example, two instructors teaching different sections of the same course may have their own tailored sets of CLOs. Because of the importance of the
linkages between CLOs and PLOs to provide the mechanism for PLO assessment, each course should have a static set or subset (those linked to PLOs) of CLOs that are not changeable without faculty review and dean approval. Moving forward, the assessment of a program’s learning outcomes should be completed in a timely manner so that a complete set of PLO assessment reports are available for the commencement of program review.

The team strongly urges that a series of formal program reviews must begin as soon as possible. Each set of PLOs belongs to its own program. Each program must undergo its own program review. Academic personnel should develop a comprehensive program review policy, perhaps starting with WSCUC’s Resource Guide for ‘Good Practices’ in Academic Program Review. (CFR 2.7)

SUM does not have a formal program review process, though as in the case with assessment of program learning outcomes, efforts have been made to assess the bachelor’s program, demonstrating awareness of the need to conduct program review. Again, formalization of processes is what needs to occur. While data about graduates was provided, a consistent presentation of graduation and retention rates was not. SUM should continue to look at retention and graduation rate data in forms that are useful internally. Additionally, the institution should gather and report retention and graduation rate data in ways that conform with WSCUC standards so that comparisons can be made. Graduation and retention rate data are often viewed as key indicators of institutional performance and should be reported regularly and consistently. The planned hiring of an institutional researcher should address this issue.

**Scholarship and Creative Activity**

Clearly, faculty members understand the value of research in education and have taken concrete steps to include research assignments in the curriculum, especially at the graduate level (CFR 2.8). Good examples of graduate program research exist in the form of theses.
It is not clear how scholarship, teaching, student learning, and service are used in performance evaluation of faculty. The institutional response to CFR 2.9 did not address this issue. Evaluation of faculty does occur, but needs to be regular and systematized and account for scholarship, teaching, student learning, and service as guided by the expectations of faculty members outlined in contracts.

**Student Learning and Success**

Mechanisms are apparent to gather information from students about their needs, achievement, satisfaction, and campus climate (CFR 2.10). Some co-curricular programs (CFR 2.11) and student support services are formally developed to include goals and assessments. These efforts must continue to develop through formalization, consistency and standardization that can be achieved through the planned hiring of an institutional researcher.

While some co-curricular programs and student services are formally developed and assessed, others are not. Some, such as the chapel activity could not be found to be linked to a specific goal, while the highly-developed Servant of All program does not yet appear to be a target for assessment. Each co-curricular program also should undergo a program review similar to an academic program review (CFR 2.11).

SUM has developed a comprehensive cohort site assessment model in which multiple types of data are collected, including interviews conducted face-to-face at the cohort site. The data are contextualized and presented in a written report. A calendar of cohort site visits was provided.

The institution provides timely and accurate academic advising and planning information to students through a variety of methods, including for distance students (2.13). Academic advising and planning information extends to transfer students through articulation policies for accepting credits from other institutions (2.12, 2.14).
The WSCUC team finds that SUM meets Standard 2 at a level sufficient for Candidacy, understanding that only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 2 at the Initial Accreditation level: CFRs 2.1, 2.2b, 2.3, 2.4, 2.5, 2.8, 2.12, 2.13, 2.14.

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 2 at the Candidacy level: CFRs 2.2, 2.2a, 2.6, 2.10, 2.11.

- The team identified that SUM has demonstrated it currently does not meet the following CFR from Standard 2: CFR 2.7.

- The team identified that SUM provided insufficient information to determine compliance with the following CFR from Standard 2: CFR 2.9.
STANDARD 3: DEVELOPING AND APPLYING RESOURCES AND ORGANIZATIONAL STRUCTURES TO ENSURE QUALITY AND SUSTAINABILITY

From the institutional self-study, it appears there are an adequate number of faculty members. There needs, however, to be clarity as to whether these are truly full-time faculty as compared to adjunct faculty who teach a larger number of courses each trimester. The institution designates some faculty as administrative full-time faculty, but it was not clear how much time is devoted to administration and how much to teaching. The faculty who do teach, administrative or not, are all qualified, from diverse backgrounds and with appropriate disciplinary degrees and professional experiences to support programs and academic operations.

Currently, there are seven administrative faculty, four of whom hold terminal degrees and two pursuing terminal degrees. SUM also employs 45 adjunct professors. All professors hold a minimum of a master’s degree. Of the 45, 36.5% of the faculty hold terminal degrees, 11.5% are working toward terminal degrees and 51.9% hold only master’s degrees. “Full-time faculty equivalency” is defined as a nine-credit teaching load for a trimester. As of the last trimester, the student-to-teacher ratio in terms of full-time equivalent professors was approximately 15:1. The team recommends that SUM develop and document a clear policy defining and designating the specific roles and responsibilities of full-time faculty. Likewise, adequate compensation, benefits, and institutional support should be more clearly codified for both adjunct and full-time faculty (CFR 3.1). The team suggests that SUM’s current practice of designating all non-administrative faculty, full-time or not, as “independent contractors,” be carefully studied with HR and legal counsel. The team’s concern is that faculty with independent contractor status may not be adequately under the proper control of the institution’s faculty governance and administrative governance systems to meetWSCUC Standard 3. Moreover, redefining faculty roles and responsibilities under the faculty handbook may create a situation where the independent contractor status is not in alignment with state and federal regulations.
The faculty is assessed using faculty evaluation forms, peer review, self-evaluation and student course evaluations. All need to be part of the evaluation. There is limited or no evidence of the results of these evaluations and what steps are taken if there are negative results (CFR 3.2). The faculty meets and reviews academic policies, curricula and initiatives and they also have a retreat in the summer during which much of SUM’s faculty governance activities take place.

In 2014 an evaluation was conducted and it was determined that the faculty needed additional training on methods for engaging students. During 2015 and 2016, training was provided on the newly purchased technology software. The Professor Partner Program matches new professors with more experienced faculty members who can give advice, answer questions and basically be a mentor. The team was pleased to learn that evaluations of faculty members by students have shown good results with only three of the 30 instructors scoring less than 4.0 on a 1-5 scale (CFR 3.3, 3.3.1).

Financial sustainability and stability will be increasingly important as the institution moves toward WSCUC initial accreditation. In the fiscal year ending June 30, 2014, there was an overall loss of $182,600 with $50,800 resulting from the operating costs of the Oakland facilities. It is important that the institution develop a five-year budget to prevent operating losses in the future. Creating long-term budget scenarios will better inform institutional decision-making for maintaining and creating programs, operations, hiring, and maturing diverse revenue stream planning. The team understands that the value of the Oakland property has increased dramatically with several possible buyers. As the institution plans to use the sale proceeds to either buy or lease another location in the Sacramento area, careful plans on how to use the proceeds will need to be developed to enable the institution to reduce any budget deficits.
The most recent (2015-2016) audit found no material deficiency in financials, student aid or reporting. Most revenue is generated by tuition paid by students/parents and financial aid (loans and grants). Other income comes from donations from churches and individuals along with a yearly grant from a foundation in the amount of $150,000. SUM has an investment of $120,000 which does not currently produce income with prevailing low interest rates yielding less than the offset from low inflation over the past several years. SUM also received a restricted donation to provide scholarships. The initial donation was $100,000. Under the terms specified by the donor, SUM is to use all earnings from the funds and up to $5,000 per year from the corpus to provide scholarships to students who excel academically. At June 30, 2016, the balance of the fund was $124,441 (CFR 3.4). The team highly encourages SUM to consider creating a development unit to work with alumni and friends of the institution to better diversify its revenue sources. Now 25 years old, the institution is now positioned to begin a formal fellowship or alliance of alumni and friends, which could be used as a base to begin a more intentional annual fund and other fundraising strategies.

SUM is projecting undergraduate student population increases of 10% each year over the next three years. This would increase revenue, but it would also increase expenses. The team was concerned if these are realistic and attainable enrollment targets. While SUM has been growing by approximately 10% a year over the past 10 years, the institution must secure its financial future by not completely relying on such aggressive growth. The team was pleased to learn that later this spring SUM will undertake a national marketing campaign, certainly appropriate for an institution with distributed learning cohorts across the nation. In meetings with the team, staff explained how the institution was increasing personnel to respond to inquiries generated by the marketing campaign and what steps vis-à-vis the budget would be taken if the enrollment did not materialize (CFR 3.4).
To better support the growing cohort model, the institution made a major investment in leading-edge technology with the purchase of Canvas and Zoom. The information technology resources are very sufficient and aligned with a variety of needs of the college. Some examples of the use of the technology are for student records, academic records and course scheduling. Some forms of technology assist greatly with communication between the main campus and the many cohorts and between the faculty and students. SUM has made extraordinary advances in the use of these communication methods, particularly for a small school (CFR 3.5).

In 2012-2013 students completed a satisfaction survey regarding the performance of the Office of the Registrar, with a 44% response rate. More than half of the respondents positively indicated that office staff answered their questions and solved their problems “quite well” or “extremely well”. The survey further indicated that Registrar office staff were quite helpful in processing their requests, understood the students’ academic needs, got things done in a timely manner, was accessible and the services were simple and easy to use. Some negative responses included not being advised of all requirements needed for graduation, not being advised of credits needed to finish the degree and not enough communication or timeliness in responding to questions/requests.

In response to the students’ feedback, the institution hired an Assistant to the Cohort Director to support the Office of the Registrar in providing advisement to Cohort students. A new practice on processing requests, particularly evaluation of transcripts for credit transfer was implemented. Upon completion of evaluation of transfer credits, Registrar staff e-mail the student as to which previously taken courses are transferrable towards the student’s degree at SUM. The Executive Committee approved these changes during its Strategic Meeting in July 2013 (CFRs 3.6, 3.6.7).
The institution has been reconsidering its organizational chart to create a structure that will help the college move forward as it grows. The assignment of roles and responsibilities is more complicated because of its cohort model with faculty and staff located across the United States and around the world. SUM has cohort advisors at each location, which has been beneficial.

The president/chancellor (CEO) reports to the board, which can replace him if found necessary. The team noted the board, along with senior leadership, is fully committed to pursuing regional accreditation with WSCUC.

The Organization Chart shows the chain of command. The president evaluates all executives on planning, policies and procedures, qualitative and quantitative work. The performance evaluation tool measures the following variables: planning, policies and procedures, performance factors such as communication, decision making, creativity, interface/teamwork, ability to work under pressure, quality of work, quantity of work and customer satisfaction.

As it pertains to adequate staff, the Institutional report mentioned that the plan was to hire a full-time Chief Financial Officer (CFO). Given limited resources, aggressive enrollment goals, a cohort/dispersed model and a possible move, the team believes it is critical for SUM to fulfill WSCUC expectations by hiring a full-time CFO as soon as practicable. The team was pleased to learn that SUM intends to proceed in this direction after it relocates to the Sacramento area (CFR 3.8).

The institution has an independent governing board with appropriate oversight, including hiring and evaluating the CEO, however, the CEO evaluation process and history was not evident. This is a necessary responsibility of the board. The team was also concerned that the board is quite small, with only seven members. The team recommends that the board consider adding additional members and committees. The small board makes it more difficult to have
enough members to staff needed committees, one of which would be an audit committee, which does not exist at present. The team further recommends the board also needs to not simply approve, but regularly monitor the institution’s strategic plan (CFR 3.9).

The faculty is supervised by the Chief Academic Officer (CAO). Since the CAO is an executive committee member, the faculty is represented in decision-making, albeit indirectly. The Faculty Handbook outlines the roles, rights and responsibilities of the faculty. The executive administration, along with others, work together to ensure consistency in the implementation of policies and in collaborative decision-making. This is especially important considering that they are managing a small yet complex organization with cohort students, faculty and staff at numerous locations across the United States and around the world. The team noted, however, that technologies in place greatly support overall communication and collaboration, and seemed to be widely embraced by the entire SUM community worldwide (CFR 3.10).

The WSCUC team finds that SUM meets Standard 3 at a level sufficient for Candidacy, understanding that only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 3 at the Initial Accreditation level: CFRs 3.5, 3.6
- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 2 at the Candidacy level: CFRs 3.3, 3.4, 3.7, 3.9, 3.10
- The team identified that SUM has demonstrated it currently does not meet the following CFR from Standard 3: CFR 3.2, 3.8
STANDARD 4: CREATING AN ORGANIZATION COMMITTED TO QUALITY ASSURANCE, INSTITUTIONAL LEARNING AND IMPROVEMENT

Quality Assurance Processes

The evaluation team finds that SUM has a commitment to preparing their students for academic and professional success. The team found the institution to be a positive learning environment with the staff demonstrating a sincere care for its students. This is manifested in part by their qualified leaders, administrators and faculty. SUM has begun the process of putting in place structures and processes necessary to enhance quality assurance processes.

Quality improvement systems, including institutional research, are undergoing development and the use of data to inform planning and decision-making also is in the early stages. The self-study states: “data concerning both academic and non-academic effectiveness are regularly collected and analyzed” (Institutional Report, page 89). The visiting team, however, was unable to find evidence of a formalized evaluation process where data is collected and analyzed. While current efforts in assessment are focused on course evaluation scores, Bible Knowledge exam scores and GPA, the team notes that moving forward it will be helpful for SUM to develop and implement assessment plans that entail multiple mechanisms for assessing student performance that involve both direct and indirect measurement methods. This approach will allow SUM to recognize opportunities for improvement in both academic programs and student support services (CFRs 4.1, 4.3, 4.4).

As noted in the institutional self-study, the role of a full-time institutional researcher is relatively new to SUM, and the college will soon be recruiting to fill the position. The hiring of a qualified person in this position will play an increasingly important role in the quality assurance processes. Due to its not being fully developed, the team was unable to review the functions of the IR office. It is important for the IR role to be fully developed and structured beyond compiling survey data for the decision-making (CFRs 4.2, 4.5, 4.6, 4.7). This approach will
allow the IR office to introduce data into the program review process and that can be incorporated into the planning and decision-making process. Data driven decisions about teaching and learning should inform the institution of academic strategic planning such as curriculum initiatives, faculty and staff recruitment goals, enrollment forecasting and quality assurance processes (CFRs 4.1, 4.2, 4.3, 4.6, 4.7).

**Institutional Learning and Improvement**

As mentioned earlier in this report, while SUM has assessment practices in place, it lacks a formalized structure. The institution must immediately develop a program review process. While not required, the already existentWSCUC Program Review Rubric provides excellent guidance in developing a program review process and structure. Programs should undergo a cyclical review process that allows the institution to evaluate the program’s outcomes, assessment plan and provide feedback to improve student learning. This quality assurance process is completed through collecting, analyzing and interpreting data to track results over time to make program improvements. The assessment plan should be further developed to include multiple tools for assessing student work, direct and indirect measures, alumni feedback, as well as multiple assessment methods (CFRs 4.1, 4.5).

Articulated PLOs for all its programs are in place. However, efforts to assess these outcomes is needed. The assessment of learning outcomes is an important tool to use in the program review process to effectively incorporate the results into curricula improvements. The institution’s self-study stated that 26 cohort locations were visited in 2015-2016 and 34 locations will be visited in 2016-2017. Though this is an effective process, there should be an assessment plan to identify the details of this process. It is also suggested that the institution develop a structure to formalize learning outcomes as well as signature assignments for learning outcomes.
in institution-wide. Introducing the use of assessment rubrics would also validate curriculum rigor and continuity.

The program review process should be tied to the planning and budgeting processes. The team found that further development in this area is needed. The leadership for assessment and evaluation processes appears to be driven by administration. While faculty is clearly a part of the curriculum development process, faculty ownership and leadership of program review and assessment processes needs to be more fully developed as SUM moves forward. The faculty should analyze direct and indirect evidence of student learning in the program review and offer evaluative feedback and suggestions for improvement. An external reviewer (usually disciplinary experts) should also analyze these areas and offer feedback with suggestions for improvement. SUM is encouraged to determine other performance indicators appropriate to the institution that provide additional information to stakeholders and the planning decision-making process. It will be important in building a culture of assessment and evidence-based assessment to instill this culture college-wide (CFRs 4.3, 4.4, 4.5, 4.6).

While SUM demonstrated evidence of a strategic plan, further development is needed in building an awareness of this plan with the Board of Directors and other groups across the institution. The strategic plan must be aligned with the institution’s budget and address key priorities with future directions and these plans should be monitored and revised as required (CFR 4.6).

The team found the faculty to be highly dedicated to the institution’s mission and to its students. With the use of distance education and adjunct faculty, it is vital for academic leadership to ensure that these faculty members are integrated into the culture of assessment. Organizing opportunities for more individuals across both academic and non-academic areas of the college to come together will be critical as SUM continues to work on developing a culture
of assessment and evidence (CFRs 4.5, 4.6, 4.7). The review of co-curricular and non-academic areas is based on student survey data. While it is important to collect data on student satisfaction, an assessment plan that includes evidence collected from both direct and indirect assessment methods would be beneficial to the non-academic review areas (CFRs 4.6, 4.7). This focus would allow SUM to analyze how effectively the programs and services are helping students succeed and what knowledge the students gain from these service areas (CFRs 4.4, 4.6).

Faculty participates in professional development for ongoing teaching and learning through the annual faculty retreats and cohort advisor meetings. These annual meetings are to be commended and demonstrate institution-wide communication and development training with successful outcomes (CFR 4.4). The team further suggests that SUM consider how key staff members would benefit greatly from participating in professional development activities provided from well-known higher education associations, including Christian higher education, organizations.

The WSCUC team finds that SUM meets Standard 4 at a level sufficient for Candidacy, understanding that only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 4 at the Initial Accreditation level: CFRs 4.3, 4.5, 4.7.
- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 4 at the Candidacy level: CFRs 4.4.
- The team identified that SUM has demonstrated it currently does not yet fully meet the following CFR from Standard 4: CFRs 4.1, 4.2, 4.6.
SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION

While the institution has given some attention to WSCUC core competencies and actively increased the assessment of learning outcomes, it has not yet developed a coherent program evaluation process nor does it yet intentionally evaluate the meaning, quality and integrity of the four-degree programs currently offered. The team suggests the core faculty consider using tools such as LEAP or the Degree Qualifications Profile (DQP), or developing their own strategy and template for meeting the requirements of WSCUC policy for this area. The institution must move quickly to establish a formalized program review process, and initiate program reviews in academic and non-academic areas.

SUM recognizes and reports there is much work to do concerning the assurance and measurement of educational quality. The relatively new cohort model based in various local churches is somewhat unique in higher education, and provides the institution an innovative opportunity to grow enrollment while rooting students in an active ministry environment. A great deal of data is collected from the cohort advisors, which can provide an excellent basis for analysis and decision-making concerning quality. The team urges SUM to hire an institutional researcher as soon as possible to undertake further analysis of cohort students.

As a small institution with very low tuition rates, a highly-focused mission and an innovative distance education delivery system, SUM will need to focus great attention on long-term financial sustainability. The pending move of the campus to a much lower-cost area will be helpful. The team, however, suggests the institution seek to diversify revenue streams, increase its use of financial metrics such as the Composite Financial Index (CFI), and develop five-year budget models, which may be revisited annually. The changing environment of higher education
in the United States, will likely continue to place pressure on small emerging institutions with limited resources such as SUM. The institution must continue to build a stable financial foundation to better ensure its future success.
SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS

The team received and reviewed the Inventory of Educational Effectiveness Indicators (IEEI) and suggests SUM expand on the depth of educational effectiveness indicators through further expansion in the areas of evidence collected, interpreted and used. In the next interaction with WASC, this document should be completed thoroughly to reflect a comprehensive system of program review and assessment of learning outcomes at all levels.
SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

Findings

The institution reports two “major challenges that will result in changes in operation” (Institutional Report, page 104). First, SUM believes its current location in Oakland is not sustainable for attracting and retaining high quality staff and faculty. With the high cost of housing in the area, personnel find themselves commuting an hour or more each way to campus. Following a rigorous search for a new campus home, the college has decided to relocate to Sacramento, and is currently exploring three possible locations. The CEO reported that each of these locations allows for greater capacity for staff and students at a much lower cost per square foot. SUM does not anticipate substantial disruption to its operations as they will move during the summer break, also noting that the largest percentage of students reside and study in off-site cohorts nationally and internationally. With the increased real estate worth of the Oakland campus, and a low debt service, the team observed this development will likely be a positive move for the institution, resulting in cost savings, and possibly some increased cash inflows. The Oakland campus is currently in the due diligence phase of escrow with a buyer.

Recently, the institution decided to restructure its executive team to better serve the growing cohort model. Student life and student ministry departments were reorganized under the leadership of a vice president of cohort development. In addition, SUM is seeking a full-time CFO who will work on campus and replace the part-time vice president of finance located in Louisiana. SUM senior administrators also acknowledged the need for a full time institutional researcher who can assist with assessment and program review. The search for this position will begin after the campus has relocated to Sacramento.
Commendations

1. The team commends the Board, administration, faculty, staff and students for their warm and gracious welcome and assistance throughout our visit. We also want to say a special thank you to the Executive Team for their patience and responsiveness to our frequent requests for new data and information.

2. The team commends the faculty for their commitment to SUM's students. The team spoke to students studying in Oakland and in cohorts around the country and from their many comments, it was clear that the students feel supported by a caring, knowledgeable and responsive faculty.

3. The team commends SUM for its passion and commitment to the mission of Biblical higher education that permeates your community starting with the chancellor and the board and through the faculty, staff and students. We also commend your unity of purpose in pursuing the process of regional accreditation.

4. The team commends SUM for having created a highly innovative delivery system, cohort model and use of technology that allow the institution to provide quality educational programs and experiences across the United States and internationally. The team is impressed by the way the cohorts are initiated, grown and maintained and with the team of people and the administrative structure that you have put into place to help the cohorts flourish.

5. The team commends SUM's faculty and administration for creating a foundation to begin to assess student learning upon which you can build.

6. The team commends SUM for creating a culture of communication and collaboration among and between administration, faculty, staff and students who are dispersed across the United States and around the world. Your Student Ministry program, Mardis Gras Program and retreats bring people together and allow them to contribute to the growth and development of the college and to your mission.
Recommendations

The WSCUC team finds that SUM meets all of the Standards at a level sufficient for Candidacy, understanding that only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

**Standard 1**

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 1 at the Initial Accreditation level: CFRs 1.1, 1.5, 1.6, 1.7, 1.8
- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 1 at the Candidacy level: CFRs 1.2, 1.3, 1.4

**Standard 2**

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 2 at the Initial Accreditation level: CFRs 2.1, 2.2b, 2.3, 2.4, 2.5, 2.8, 2.12, 2.13, 2.14.
- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 2 at the Candidacy level: CFRs 2.2, 2.2a, 2.6, 2.10, 2.11.
- The team identified that SUM has demonstrated it currently does not meet the following CFR from Standard 2: CFR 2.7.
- The team identified that SUM provided insufficient information to determine compliance with the following CFR from Standard 2: CFR 2.9.

**Standard 3**

- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 3 at the Initial Accreditation level: CFRs 3.5, 3.6
- The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 2 at the Candidacy level: CFRs 3.3, 3.4, 3.7, 3.9, 3.10
• The team identified that SUM has demonstrated it currently does not meet the following CFRs from Standard 3: CFR 3.2, 3.8

Standard 4

• The team identified that SUM has demonstrated it currently meets the following CFRs from Standard 4 at the Initial Accreditation level: CFRs 4.3, 4.5, 4.7.

• The team identified that SUM has demonstrated it currently meets the following CFR from Standard 4 at the Candidacy level: CFRs. 4.4

• The team identified that SUM has demonstrated it currently does not meet the following CFRs from Standard 4: CFRs 4.1, 4.2, 4.6.
APPENDICES

- Four federal compliance forms
- Report of distance education programs
FEDERAL COMPLIANCE FORMS

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

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

During the visit, teams complete these four forms and add them as an appendix to the Team Report. Teams are not required to include a narrative about any of these matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM
Under federal regulations, WSCUC is required to demonstrate that it monitors the institution’s credit hour policy and processes as well as the lengths of its programs.

Credit Hour - §602.24(f)
The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the Institution’s assignment of credit hours.

(1) The accrediting agency meets this requirement if-
   (i) it reviews the Institution’s-
       (A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the Institution awards for courses and programs; and
       (B) The application of the Institution’s policies and procedures to its programs and coursework; and
   (ii) Makes a reasonable determination of whether the Institution’s assignment of credit hours conforms to commonly accepted practice in higher education.

(2) In reviewing and evaluating an Institution’s policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

Credit hour is defined by the Department of Education as follows:
A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

See also WASC Senior Colleges and University Commission’s Credit Hour Policy.

Program Length - §602.16(a)(1)(viii)
Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor’s degree, and 30 semester credit hours for a master’s degree; there is greater variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.

Rev 09/2015
## 1. Credit Hour and Program Length Review Form

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible?  ☑ YES ☐ NO &lt;br&gt; If so, where is the policy located? Sum.edu, Catalog p. 93&lt;br&gt; Comments:</td>
</tr>
<tr>
<td>Process(es)/periodic review of credit hour</td>
<td>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  &lt;br&gt; If so, does the institution adhere to this procedure?  ☑ YES ☐ NO &lt;br&gt; Comments:</td>
</tr>
<tr>
<td>Schedule of on-ground courses showing when they meet</td>
<td>Does this schedule show that on-ground courses meet for the prescribed number of hours?  ☑ YES ☐ NO &lt;br&gt; Comments:</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed? &lt;br&gt; What kind of courses (online or hybrid or both)? &lt;br&gt; What degree level(s)?  ☑ AA/AS ☐ BA/BS ☐ MA ☐ Doctoral &lt;br&gt; What discipline(s)? &lt;br&gt; Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  ☐ YES ☑ NO &lt;br&gt; Comments:</td>
</tr>
<tr>
<td>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)</td>
<td>How many syllabi were reviewed? &lt;br&gt; What kinds of courses? &lt;br&gt; What degree level(s)?  ☑ AA/AS ☐ BA/BS ☐ MA ☐ Doctoral &lt;br&gt; What discipline(s)? &lt;br&gt; Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  ☑ YES ☐ NO &lt;br&gt; Comments:</td>
</tr>
<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? &lt;br&gt; What kinds of programs were reviewed? &lt;br&gt; What degree level(s)?  ☑ AA/AS ☐ BA/BS ☐ MA ☐ Doctoral &lt;br&gt; What discipline(s)? &lt;br&gt; Does this material show that the programs offered at the institution are of a generally acceptable length?  ☑ YES ☐ NO &lt;br&gt; Comments:</td>
</tr>
</tbody>
</table>

Review Completed By:  
Date:
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>
</table>
| **Federal regulations** | Does the institution follow federal regulations on recruiting students?  
☑️ YES ☐ NO  
Comments:                                                      |
| Degree completion and cost | Does the institution provide information about the typical length of time to degree?  
☑️ YES ☐ NO sum.edu/undergraduate; sum.edu/graduate  
Comments: |
| Career services and employment | Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable?  ☑️ YES ☐ NO  
Does the institution provide information about the employment of its graduates, as applicable?  ☑️ YES ☐ NO sum.edu/publications  
Comments: |
### 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?  
Sum.edu/catalog p.182-183; sum.edu/forms  
Comments: |
| Process(es)/procedure | Does the institution have a procedure for addressing student complaints?  
☑ YES ☐ NO  
If so, please describe briefly:  
Sum.edu/catalog p.182-183  
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? Wufoo  
Does the institution have an effective way of tracking and monitoring student complaints over time?  
☑ YES ☐ NO  
If so, please describe briefly:  
Complaint forms are sent to Wufoo, where it can be tracked  
Comments: |

*§602-16(1)(j)(x)

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

Review Completed By:  
Date:
4 – TRANSFER CREDIT POLICY REVIEW FORM

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

<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>
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit?  
\( □ YES ☐ NO \)  
If so, is the policy publicly available?  
\( □ YES ☐ NO \)  
If so, where? Sum.edu/catalog p. 93-97  
Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education?  
\( □ YES ☐ NO \)  
Comments: |

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

1. Are publicly disclosed in accordance with 668.43(a)(11); and

2. Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

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

Review Completed By:  
Date:
Distance Education Review-Team Report Appendix

Institution: SUM Bible College and Theological Seminary
Type of Visit: Initial Accreditation SAV1
Name of reviewer/s: Jess Bonds
Date/s of review: 1/31/17 - 2/2/17

A completed copy of this form should be appended to the team report for all comprehensive visits to institutions that offer distance education programs and for other visits as applicable. Teams can use the institutional report to begin their investigation, then, use the visit to confirm claims and further surface possible concerns. Teams are not required to include a narrative about this in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report. (If the institution offers only online courses, the team may use this form for reference but need not submit it as the team report is expected to cover distance education in depth in the body of the report.)

1. Programs and courses reviewed (please list)
   - B.A. Biblical Studies
   - M.A. Biblical Studies
   - M.A. Christian Leadership
   - Master of Divinity

2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)

   SUM offers all four programs by distance education. At this time, all graduate degrees are offered exclusively at a distance. There are some on-campus bachelor students in Oakland; however, the vast majority of undergraduate students are taught at a distance.

   The number of distance education students has nearly doubled since 2011. Approximately 90% of distance education students are undergraduate students. The institution reports that nearly all students are full time.

   2011 Fall Distance Education Students: 301
   2012 Fall Distance Education Students: 380
   2013 Fall Distance Education Students: 408
   2014 Fall Distance Education Students: 548
   2015 Fall Distance Education Students: NA
   2016 Fall Distance Education Students: 584

   In fall 2016, SUM changed its online platforms to web-based products: LMS is Canvas. Video-conferencing is Zoom. All distance education courses are synchronous. Typically, students meet together in a church-supplied classroom and watch 3.5 hour live-lectures by professors who are at locations across the country. In many instances, the professors are in Oakland teaching an on-ground class that is simultaneously broadcast through the interactive Zoom platform, allowing remote students to participate in class discussions.

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

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1 See Protocol for Review of Distance Education to determine whether programs are subject to this process. In general only programs that are more than 50% online require review and reporting.
This distance education review is part of an SAV1 visit. The data for this report were gleaned from the institutional report for the SAV1 visit, including attachments. During the site visit, additional data were gathered through interviews of the academic dean and members of the Distance Education Committee.

### Observations and Findings

<table>
<thead>
<tr>
<th>Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)</th>
<th>Observations and Findings</th>
<th>Follow-up Required (identify the issues)</th>
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<tbody>
<tr>
<td><strong>Fit with Mission.</strong> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?</td>
<td>Distance education is the primary method of delivering education. As such, nearly all planning, funding, and operations are geared toward implementing, supporting, assessing, and improving distance education.</td>
<td>None</td>
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<td><strong>Connection to the Institution.</strong> How are distance education students integrated into the life and culture of the institution?</td>
<td>At each location where students gather to attend live video-conferenced courses, there is an institution-funded church employee who is the liaison between the remote location and the main campus in Oakland. The position is called the Cohort Advisor (CA). The CA oversees required internships and spiritual and social development activities. The CAs hold video-conference meetings weekly and meet twice a year at face-to-face events for training. Significantly, all students for each of their first two years are required to attend Mardi Gras for ministry training and practice. The annual gathering of some 800+ students, faculty, staff, cohort advisors, and pastors is an impactful manifestation of the vision, mission, and culture of SUM.</td>
<td>None</td>
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<td><strong>Quality of the DE Infrastructure.</strong> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?</td>
<td>SUM has invested significantly in its technology. Rigorous testing of competing platforms was conducted. LMS and SIS platforms are web-based, and data are backed up at remote sites.</td>
<td>None</td>
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<td><strong>Student Support Services:</strong> What is the institution’s capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</td>
<td>The Cohort Advisors provide and/or facilitate a wide variety of student services directly to students. The CA identifies qualified church attendees for tutoring in a variety of general</td>
<td>None</td>
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<td><strong>SUM Bible College and Theological Seminary – SAV1 Report</strong></td>
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<td><strong>Faculty.</strong> Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance-learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</td>
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<td>Most distance education courses are taught by part-time faculty who teach mostly online, though some also teach face-to-face in Oakland. The academic dean has organized an impressive network of well-qualified professors and has effectively identified some adjuncts as leaders to function as chairs on a variety of committees, such as a hiring committee. Faculty meets regularly via video-conferencing to develop the curriculum and meeting at least once a year face-to-face for additional training and curriculum development. Faculty assesses student-learning outcomes at the course level. Program level assessment is still being developed.</td>
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<td>Include faculty in program learning outcomes assessment projects. Develop PLO assessment processes to include a final written assessment report that identifies what data are collected by what methods, how data are analyzed, and how data are used to develop recommendations for improvement of student learning. Additionally, calendars need to be developed and maintained that show when each program learning outcome will be formally assessed and what types of data are anticipated to be collected, including direct evidence.</td>
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<td><strong>Curriculum and Delivery.</strong> Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</td>
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<td>The faculty design the courses and programs. Some assessment of programs occurs but needs more formalization (see note above). Each faculty member must complete a form for each course that calculates the number of hours a student will devote to reading, writing, presenting, discussing, and participating in class. This calculation is done specifically to ensure online course are comparable to on-ground courses and that course requirements meet credit-hour standards.</td>
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<td>None.</td>
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<td>Retention and Graduation.</td>
<td>SUM examines term-to-term retention. Levels of attrition acceptability have been identified. Cohort sites that fall below the acceptable standard are targeted for deeper evaluation and correction. No data could be found of traditional examination of year-to-year retention. While data about graduates was available, graduation rate data were difficult to acquire. Some graduation rate data showed wild swings, due to changes in delivery approaches and refinement of the cohort approach and the Cohort Advisor position. Comparison of rates was difficult because of the non-standard reporting of retention and graduation rate data.</td>
<td>While SUM should continue to look at retention and graduation rate data in forms that are useful internally, the institution needs to gather and report retention and graduation rate data in ways that conform withWSCUC standards so that comparisons can be made.</td>
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<td>Student Learning.</td>
<td>Course and course-level learning occur regularly. Because of the comparatively small number of on-ground students, data for courses are combined. Additionally, it should be noted that on-ground courses are attended by distance students via video-conferencing; thus, the on-ground courses are the same as the distance courses. Distance students are able to participate in discussions. Data have been collected to assess the online programs, however, as noted in the Faculty section above, the process, including a written report, needs to be formalized.</td>
<td>See note in Faculty section.</td>
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<td>Contracts with Vendors.</td>
<td>No such contracts were identified. SUM develops, delivers, and teaches all courses.</td>
<td>None</td>
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<td>Quality Assurance Processes.</td>
<td>SUM’s primary method of instructional delivery is online; thus, all quality assurance processes are designed with distance education in mind. SUM’s program review process needs development and formalization, including the use of an outside expert and</td>
<td>Develop a comprehensive program review process that complies withWSCUC standards. Develop a comprehensive faculty evaluation system that examines faculty effectiveness in the areas of expectations listed in contracts.</td>
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including an comprehensive written report, as well as a calendar of when each its program will be reviewed. Evaluation of faculty occurs regularly but is not as formal or comprehensive at it should be, given the heavy reliance on part-time faculty who are located in numerous cities across the country.