REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To the Keck Graduate Institute of Applied Life Sciences

March 7 – 9, 2018

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The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution’s status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.
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SECTION I: OVERVIEW AND CONTEXT

IA. Description of Institution and Accreditation History

The Keck Graduate Institute of Applied Life Sciences (KGI) was founded in 1997 with a mission to enrich society with breakthrough approaches to education and translational research in the life sciences. The first member of KGI’s faculty was hired in 1998 and the inaugural class was enrolled in 2000. Over the last twenty-plus years, the institution has expanded its educational offerings from a single graduate program to a portfolio of 14\(^1\) degree programs and five certificate programs offered across three schools: the School of Applied Life Sciences (SALS), the School of Pharmacy (SoP), and the Minerva Schools at KGI (MSKGI). SALS and SoP, which are physically located at the main campus in Claremont, offer graduate degrees exclusively, including one research doctorate, one professional doctorate (PharmD), four professional master’s degrees,\(^2\) and one academic master’s degree. Through its branch campus located in San Francisco, MSKGI offers five baccalaureate degrees and two master’s degrees. As of spring 2018, KGI has a total enrollment of 1059, with 298, 292, and 469 students enrolled in programs associated with SALS, SoP, and MSKGI, respectively.

Most of KGI’s growth has occurred since the institution’s accreditation was last reaffirmed in 2011. Over the last seven years, KGI has added 11 new degree programs,\(^3\) three new certificate programs, and two new schools, SoP and MSKGI. Nine of the new programs – five undergraduate degrees and two master’s degrees offered through MSKGI, and two certificate programs by SALS – are offered via distance education technologies. The two new schools, and all new degree programs, have undergone review for substantive change; the former for structural change. Approved by WSCUC in 2013, the SoP opened in fall 2014, and will graduate its first class in spring 2018. The SoP was granted candidacy status in June 2015 by the Accreditation Council for Pharmacy Education (ACPE) and will be eligible for full accreditation in 2018.

Perhaps the most significant change to the institution was the structural change in mission, approved by the WSCUC Commission in 2014, which formalized the relationship between KGI and the Minerva Project, established MSKGI, and authorized KGI via MSKGI to offer the first of its five undergraduate degrees. The partnership between KGI and the Minerva Project is grounded in a shared commitment to

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\(^1\) The MA Human Genetics and Genetic Counseling (HGGC) was approved by the Commission in February 2018.
\(^2\) Including the newly approved HGGC degree.
\(^3\) Including the newly approved HGGC degree.
innovation, active learning, practical knowledge, globalism, and student-centeredness. Many of these values are reflected in the Minerva Project’s proprietary Active Learning Forum (ALF), a technology that facilitates live, synchronous, face-to-face, interactions among teachers and students. The ALF is central to the educational programs offered by MSKGI; all programs are taught on it. Graduate-only students in MSKGI programs study exclusively on the platform. In contrast, all MSKGI undergraduates have a residential educational experience; they live together in residential housing, taking courses via the ALF, and engage in in-person learning outside of class as they participate in a global rotation through six countries following their first year in San Francisco. All SALS and SoP programs have access to the ALF should they elect to use it.

The partnership between the KGI and the Minerva Project is formally outlined in the KGI-Minerva Project Alliance Agreement. As per the agreement, the Minerva Project funds all MSKGI programs for KGI, and provides services, outreach, and residential housing for MSKGI students. In 2015, the Minerva Schools location in San Francisco was designated a branch campus of KGI. As part of this reaffirmation review, two team members visited the MSKGI branch campus on February 26, 2018 to conduct distance education and off-campus location reviews. The respective reports are appended.

KGI is a member of the Claremont Consortium, a group of seven independent colleges, which share a range of central services and resources for students and faculty. These include the Honnold-Mudd library, health services, counseling and psychological services, student disability resources, campus safety, and resource centers for affinity groups. MSKGI students have remote access to the consortium’s library.

In conducting its review, the team carefully read, analyzed, and discussed the institutional report and supporting exhibits, as well as KGI’s accreditation history as described by the institution and summarized in documents provided by WSCUC. The team’s review of the materials gave rise to lines of inquiry that formed the basis for interviews and meetings conducted during the two and one-half day Accreditation Visit of March 7-9, 2018. During the visit, the team furthered its understanding of the university through meetings with faculty, staff, students, and administrative leadership, including the Accreditation Steering Committee, and via comments received through the confidential email account. Prior to the visit, team members reviewed materials necessary to complete the four federal compliance forms: Credit Hour and Program Length Review, Marketing and Recruitment Review, Student Complaints
Review, and Transfer Credit Policy Review. These documents are appended. No special follow-up related to substantive change was conducted in connection with this visit.

**IB. Description of Team’s Review Process**

The team’s contribution to KGI’s review for reaffirmation of accreditation was executed in three stages: an Offsite Review (OSR) held October 5-6, 2017 at the Hilton Oakland Airport Hotel in Oakland, California; a visit on February 26, 2018 by two team members to the MSKGI branch campus in San Francisco, California to conduct the off-campus location and distance education reviews; and the Accreditation Visit of March 7 – 9, 2018 at the KGI main campus in Claremont, California.

During the OSR, the team engaged in a structured discussion of KGI’s institutional report, evaluating each component of the report individually, and the report as a whole, to identify strengths of the institution’s work (commendations) and to develop lines of inquiry to guide the Accreditation Visit. This included a discussion of the institution’s compliance with the WSCUC standards, and consideration of the institution’s accreditation history. The OSR concluded with a videoconference between the team and leadership from KGI, during which the team orally communicated its commendations and lines of inquiry. A formal, written summary of the commendations and lines of inquiry was provided to KGI eight business days after the videoconference.

The visit to the MSKGI branch campus addressed the lines of inquiry outlined in the off-campus location and distance education review appendices. These two reviews were conducted concurrently and in–person because the distance education and off-campus location aspects of MSKGI are linked inextricably; courses are conducted using the ALF, Minerva’s technology-mediated educational platform, while students are in residence at the San Francisco branch campus or at other international locations. The exception are students in MSKGI’s two masters programs, which are conducted entirely via the ALF and lack a residential component. During the visit, team members met in person or via videoconference with the MSKGI senior leadership, academic team leaders/deans and associate deans, faculty, the technology team that develops and supports the ALF, student affairs and student services staff, and groups of students and student experience personnel living in both San Francisco and Hyderabad, India. Team members also had access to videos of seven, archived class sessions taught on the ALF, together with associated lesson plans. Additional details are provided in the off-campus location and distance education review appendices.
The Accreditation Visit involved two days of meetings with select campus constituents, including faculty, staff, administrative leadership, and graduate students. Meetings were structured to gather information and insights bearing directly on the lines of inquiry. Members also had access to stakeholder comments submitted via the confidential email account. Preparation for the visit included reviewing and discussing a preliminary draft of the team’s report, and examining additional documents requested from the institution. The Accreditation Visit concluded with the exit interview, open to all campus constituents, in which the team communicated its commendations and recommendations.

For all three visits, the team prepared carefully and systematically. To guide its analysis of institutional materials, team members completed worksheets designed by WSCUC and discussed the completed worksheets as a group, identifying institutional strengths and areas for further inquiry. To ensure all aspects of the institutional report—and related review requirements—were carefully considered, pairs of team members assumed specific responsibility for particular elements of the review, leading the team through the analysis, soliciting input and reflection from all, and then summarizing the group’s conclusions in draft sections of the team’s report. To put their own responsibilities in context, all team members read KGI’s institutional report in its entirety. All team members also read and edited the final team report. As such, this report represents the team’s collective understanding and evaluation of KGI.

**IC. Institution’s Reaccreditation Report and Update: Quality and rigor of the report and supporting evidence**

Following the organizational structure outlined in the 2013 *Handbook of Accreditation*, KGI’s institutional report consisted of eight components, each with supporting documentation and evidence. The university did not complete the optional essay on an institution-specific theme.

The team found the institutional report to clearly and concisely convey the institution’s understanding of, and commitment to, its mission. Each required component responded to the expectations outlined in the *Handbook* and relevant evidence was provided to support assertions. The institutional report included the two required exhibits, the Review under the WSCUC Standards and the Inventory of Educational Effectiveness Indicators, each of which was thoughtfully completed. The report also included much evidence of KGI’s genuine engagement with the self-study nature of the review process. For example, when the Review under the WSCUC Standards revealed areas needing attention, KGI used follow-up surveys to clarify concerns, and then acted on those concerns. Steps taken included integrating into the institution’s 2017-2022 Strategic Plan topics requiring sustained attention. Each
component of the institutional report also closed with a “Reflection and Plans” section, which included recommendations for future actions.

The institutional report was developed under the guidance of both a steering committee and an associated advisory committee formed to broaden participation and engagement in the reaffirmation process. Collectively, these committees included representatives from all segments of KGI operations, including administrators, faculty, and students from all three schools as well as administrative representatives from KGI's student affairs and financial affairs units. Members of the steering committee conducted research and drafted sections of the institutional report, which were then reviewed by the steering committee, the steering committee advisory committee, and the deans and faculty of each school. Ultimately, and prior to its submission, the report was approved by the Executive Committee of the Board of Trustees.

In sum, the institutional report, as well as the additional materials submitted in response to the team's request, provided a candid description and self-reflective analysis of the institution. The team found the report to accurately portray the condition of the institution, as understood by its constituents, and confirmed through discussions during both the visit to MSKGI and the Accreditation Visit conducted at the main campus in Claremont. It is clear that KGI undertook the accreditation review process with seriousness and candor, and that it is committed to honest and open communication with the Accrediting Commission. (CFR 1.8)

SECTION II: EVALUATION OF INSTITUTIONAL ESSAYS

IIA. Component 1: Response to previous Commission actions (CFRs 1.1, 1.8)

In its 2011 action letter reaffirming accreditation, the WSCUC Commission identified three areas for institutional attention: financial stability and enrollment growth; program review and assessment; and strategic planning. These focal areas formed the basis for an Interim Report submitted in 2014 and a follow-up Progress Report accepted by WSCUC staff in 2015. Since 2011, KGI has also undergone two structural changes, one in 2013 to add the School of Pharmacy and Doctor of Pharmacy (PharmD) degree and a second in 2014 to expand its mission to offer undergraduate programs through the Minerva Schools at KGI. Since 2011, eleven new degrees have also been approved through substantive change, including the PharmD degree, the five new undergraduate and two master’s degree programs offered through MSKGI, and three new master’s degrees in SALS. Recommendations have followed from
all reviews, and in-depth descriptions of KGI’s response to these recommendations are provided in exhibits associated with the institutional report. As demonstrated through its institutional report and through the Accreditation Visit, KGI has responded seriously, thoughtfully, and purposefully to all Commission recommendations, with good progress generally made in all areas. An overview of the institution’s response is provided here beginning with the Commission’s three recommendations from 2011 and concluding with the recommendations stemming from the 11 substantive change reviews.

**Financial stability and enrollment growth:** In its 2011 letter, the Commission urged careful attention to persistent financial and enrollment stressors. In 2014, the Interim Report Committee reiterated this emphasis recommending that KGI continue to pay close attention to meeting enrollment projections and pursue strategies to enhance the institution’s long-term financial stability. The committee also raised concerns of institutional risk stemming from its $40 million debt.

In keeping with these recommendations, over the last seven years, KGI has grown enrollment through the addition of new, mission-aligned programs and enrollment management in existing programs. As of fall 2017, SALS and SoP programs accounted for 572.5 full-time-equivalent students (FTES), up from 153.75 in fall 2011. MSKGI FTES has also grown to 484 as of fall 2017. The team commends KGI for its remarkable progress in this regard. KGI’s successful growth, however, has come at the cost of a significant increase in indebtedness. So while the institution’s financial circumstances have stabilized, KGI remains in a weak financial position. (It should be noted that MSKGI’s enrollment does not contribute to overall improvement of KGI’s financial position, as the relationship with MSKGI is designed to be revenue-neutral.) These and other concerns about the long-term financial stability and sustainability of the institution are discussed in Section II.G of this report.

**Assessment and program review:** In its 2011 letter, the Commission recommended the institution develop foundational elements in support of effective data gathering and program review, establish a centralized research function, and implement program review. In 2014, the Interim Report Committee endorsed KGI’s plans to add an institutional research position as it grows. It also recommended clarifying the distinctions between student learning assessment and program review and that the institution “close the loop,” using assessment and program review results to inform decisions about program improvements.

Since 2011, the institution’s assessment infrastructure in support of effective data gathering and program review has been strengthened. Student learning outcomes exist for all programs, and all
courses have been mapped to them. For all programs, assessment plans and rubrics have been developed that reflect formative and summative assessment of student learning. Programs are also conducting assessment, and results have led to improvements to curriculum and pedagogy. The institution has also developed a robust program review policy and process and has conducted reviews of three programs, two Ph.D. and the Master of Bioscience degrees. Substantive recommendations for strengthening the programs emerged from these reviews, and, in one instance, a decision was made to sunset a degree. All programs have also been scheduled for program review, with SALS and MSKGI programs on a seven-year cycle, and SOP on an eight-year cycle in connection with ACPE accreditation. Finally, following an evaluation of the need for an institutional researcher, and with the support of a consultant, KGI has developed a position description and is currently advertising for a Director of Institutional Research and Effectiveness to serve the main campus. The intention is to fill this position by July 1, 2018. An institutional researcher/assessment professional is in place at MSKGI.

**Strategic planning:** In 2011, the Commission recommended KGI develop and execute a strategic plan that addressed the following: achieving financial sustainability; expanding academic programs and increasing enrollments; establishing a critical mass of research faculty; offering more student services; providing faculty and staff with development funds and programs; and supporting assessment and program review. The expectation was that execution of such a plan would lead to new academic programs, re-invigorated Ph.D. programs, increased capacity for research, a culture of evidence, increased cultural competency, and increased diversity of the student body and faculty. In 2014, the Interim Report Committee commended KGI for developing and launching a strategic plan, and recommended KGI continue to monitor the plan’s effectiveness in support of program success. The committee also noted that with respect to faculty and staff development, no information was provided regarding plans for faculty growth or to foster faculty diversity.

Since 2011, KGI has completed its 2012-17 Strategic Plan, which, consistent with recommendations from the Commission, has resulted in a diversified portfolio of programs and enrollment growth. KGI has also increased student services offerings, and adopted a diversity statement to support ongoing diversification of the faculty. KGI also undertook efforts to address faculty and staff development. However, the survey conducted in conjunction with the institution’s Review under theWSCUC Standards revealed a need for further attention to professional development. As a result, this topic has been integrated in to the institution’s 2017-2022 Strategic Plan.
In spring 2017, the campus adopted a strategic plan for the 2017-22 period that focuses on the following: continuing growth with impact through mission-aligned, distinctive market-driven programs; strengthening applied research in health care and bioscience industries; expanding active learning; maximizing relationships and outreach in support of growth; enhancing student and alumni success; and enriching institutional culture. In Academic Year (AY) 2017-18, the institution identified for each strategic goal metrics, milestones, associated numerical goals, and the individuals responsible for data collection. While the document helps to further operationalize the institution’s objectives for 2022, the team concluded it could benefit from additional attention as milestones are not established for all goals, and it is not entirely clear whether metrics are to be met annually or represent longer-term targets.

Finally, KGI has attended carefully to the approximately 23 recommendations stemming from the 11 reviews for substantive change since 2011. The institution’s response to each of these recommendations is detailed in Exhibit 1.08 of the institutional report. A brief overview of the recommendations and the institution’s response follows.

The approvals of the M.S. in Applied Life Sciences in 2012, the structural change establishing the PharmD degree in 2013, and the Master of Engineering in Biopharmaceutical Processing in 2015 were accompanied by recommendations to include in syllabi assignments to assess course learning outcomes and implement assessment and program review processes; report SoP enrollment projections and faculty hires in the subsequent comprehensive review; and ensure that formative evaluation of learning outcomes is integrated into the curriculum. As verified by the team, syllabi contain assignments linked to course outcomes, assessment and program review processes have been implemented, SoP enrollment history and projections together with faculty numbers were included in the institutional report, and formative assessments have been integrated into the 2017 implementation of the Master of Engineering curriculum.

Seventeen recommendations accompanied the structural change to expand KGI’s mission to offer undergraduate programs through Minerva Schools at KGI, as well as the related substantive change reviews for five undergraduate degrees and two master’s degrees. For MSKGI, these focused on scaling as enrollment grows and ensuring students are tracked as they move among program locations; faculty hiring, turnover, contracts, and professional development; technology costs, technology support and library access outside of the U.S.; continued development of assessment and rubrics; faculty effectiveness and the impact on students of video-taping classes; the inclusion of MSKGI in the KGI
strategic plan; cultural and economic diversity in relation to recruitment and admissions; faculty rights, roles, and responsibilities and participation in governance; and development of a plan to evaluate the Student Affairs programs, operations, and experience infrastructure. Recommendations stemming from the review of four new baccalaureate degrees and the two master’s degrees urged focus on program revisions; refinements to the curriculum approval process; careful screening of applicants to the master’s degree program; ensuring marketing materials clearly communicate the degree to students and employers; attending especially to the aggregated assessment of course outcomes and employer feedback; and monitoring to ensure sustained student engagement and development of a graduate culture. Commendably, KGI has responded thoughtfully to these recommendations as documented in the institutional report and verified during the Accreditation Visit and the visit to the MSKGI branch campus. As relevant, data have or are being been collected to enable decision-making in relation to the recommendations. Assessment plans and processes are in place to assess student learning and evaluate the student support operations, and support for faculty development and success is being modified in response to experience.

In summary, the team concludes that KGI has provided evidence that it has addressed, or continues to address, the recommendations stemming from all prior interactions with WSCUC since 2011. As noted above, and discussed in Component 7, the institution has responded to prior recommendations to address enrollment growth and financial success, but continued focus on financial sustainability is warranted.

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

Consistent with the Handbook of Accreditation, KGI completed and submitted all three required elements of Component 2 of the institutional report: the Inventory of Educational Effectiveness Indicators (IEEI), the Review under the WSCUC Standards (RUWS), and drafts of the federal requirement reporting forms. For each program, the IEEI describes program and/or school specific assessment-related practices, and illustrates that all programs have formal learning outcomes that are, at a minimum, published on the KGI website. Although the IEEI does not indicate this, KGI’s new institutional outcomes are also published on KGI’s website. The inventory also shows that all programs have identified evidence of student achievement, other than grade point average (GPA), which is used to determine whether graduates have achieved the stated outcomes for the degree. Likewise, each program has in place processes for interpreting evidence of student outcomes and plans for how
findings will be used. Finally, the IEEI provides for each program the date of the most recent, or first planned, program review.

The RUWS was equally well executed. To complete the review, KGI’s Steering Committee translated the RUWS document into a survey instrument that was distributed to trustees, faculty, and staff members across all three schools. To gain a deeper understanding of some of the initial results, a follow-up survey was conducted on select Criteria for Review (CFR). Collectively, the results were used to identify strengths and areas in need of attention and, as appropriate, information was shared for action with the Board of Trustees or schools. The institutional report included a summative narrative outlining the institution’s compliance with each standard as supported by the results of the survey, together with any changes already made or anticipated in response to the findings. In the sections that follow, KGI’s compliance with the standards is analyzed and summarized drawing on evidence provided in the institutional report and information gathered during the Accreditation Visit.

**Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives**

KGI has a well-defined and prominently displayed mission to serve the health sector’s workforce needs and offers educational programs focused on delivering on that mission. The institution’s faculty and staff are aware and supportive of the mission and recognize KGI’s commitment and focus. KGI’s strategic plan is consistent with its mission and vision of future achievement. SALS and SoP each have mission statements that align closely with that of KGI, while focusing on their respective area of the life sciences industry. MSKGI, on the other hand, has a much broader mission with only partial potential overlap with the KGI overall mission and focus. Standard 1 does not require a sharp and close alignment of all of an institution’s programs, only a clear articulation of institutional purpose and educational objectives, both of which are in evidence in the institutional report and on KGI’s web site. However, KGI may benefit from a more explicit articulation of the link between the overall mission and MSKGI’s objectives, and how the latter advance the institution’s larger strategic goals. (CFRs 1.1, 1.2)

KGI shares evidence of student achievement of learning outcomes, retention, and graduation rates. The structure and methods of assessment are consistent within each school; they do vary significantly between schools, however, and KGI may benefit from cross-pollination between their distinct school-based assessment programs. (CFR 1.2)
KGI has established policies on academic freedom and diversity. The RUWS survey results highlighted diversity as a priority and, in 2017, the board adopted a statement on diversity to reinforce the institution’s commitment. Diversity is also a focus of Strategic Goal 6 in the 2017-2022 Strategic Plan. The institution’s statement on diversity espouses diversity of backgrounds, cultures, identities, and thought as a catalyst for collaboration and excellence, a commitment the team admired. These commitments, however, are slightly less transparent in the strategic plan, including in the metrics used to assess institutional progress and achievement. The Accreditation Visit indicated that the institution is in the earliest stages of determining how to implement its diversity statement in a systematic and sustained way. No new discussions, nor strategies for translating the statement into practice, appeared to be underway. Looking forward, the team recommends that the institution determine how best to translate its diversity statement into action in a way that reflects the value KGI places on diversity in backgrounds, disciplines, and thought. This may include considering how the institution’s focus on these diversity-related values is reflected in the metrics used to assess achievement of its strategic plan. (CFRs 1.3, 1.4)

KGI is clearly organized to deliver degree- and certificate-granting educational programs as its primary activity, as well as complying with the remaining aspects of Standard 1 integrity and transparency criteria. Evidence of compliance is discussed elsewhere in this report. (CFRs 1.5-1.8)

**Standard 2: Achieving Educational Objectives Through Core Functions**

All three schools at KGI take Standard 2 seriously. As indicated by the RUWS survey results, KGI excels at meeting many of the CFRs associated with this Standard. Without exception, the “Teaching and Learning” CFRs are addressed by the institution, and each school, in a committed, careful, and, indeed, exemplary fashion. Learning outcomes exist at the course, program, and institutional levels and, as illustrated by the IEEI, each program has in place program-level assessment processes. Notably, each program’s assessment practices carefully couple formative assessment of individual student learning to program-level consideration of aggregated learning results. Faculty-developed rubrics are used to perform both formative and summative assessments of student learning, and rubrics are shared with students to cultivate shared expectations for performance. Externally benchmarked instruments, such as the Collegiate Learning Assessment Plus (CLA+) and professional exams, provide the institution with an externally referenced perspective on student learning achievement. (CFRs 2.1-2.5)
Discussions with campus stakeholders confirmed that assessment results lead to revisions to program operations intended to improve student learning and success, and evidence provided in the institutional report demonstrates that students are achieving the faculty’s goals for student learning often at high levels. The institution also has in place a robust program review process for which student learning achievement is an important focus, and in which retention and graduation rates are evaluated. As appropriate, program review also considers results of student placement and input from external constituencies, including those providing internships and supporting student capstone projects. The team commends the institution for having student learning outcomes that are clearly stated, linked to core competencies, aligned to institutional outcomes, and that are a part of program review (CFRs 2.6, 2.7).

In keeping with the CFRs associated with “Scholarship and Creative Activity”, the institution has in place a faculty handbook, which articulates school-specific expectations for teaching, research, and scholarship. Although these guidelines for appointment and promotion are in place, the RUWS survey results suggested there is some concern by faculty regarding the institution’s expectations in the areas of research, teaching, and service, and especially a sense that research activity is not valued enough and that there is insufficient support for research and creative activity. Concerns also emerged during the Accreditation Visit around issues of shared governance, and specifically the extent to which the faculty has a say in important matters that affect their work lives in the institution. To its credit, the institution has moved to address these various concerns by making it part of the 2017-2022 Strategic Plan (and specifically Strategic Goals 2 and 6), by conducting follow-up surveys on both issues, by issuing two reports generated by teams composed of faculty and administrators, and ultimately by the president embracing the need for reforms and appointing several committees to make specific recommendations toward that end. The team is optimistic that true, mutually-agreed upon institutional change will emerge from this process. (CFRs 2.8, 2.9)

Finally, the CFRs associated with “Student Learning and Success” represent another area of institutional strength. The faculty and staff of KGI are deeply committed to student success as exhibited by very strong graduation rates and learning results, and the work faculty and staff undertake to identify quickly and support students in academic difficulty. Student success data are gathered and disaggregated, and reveal no real disparities in retention and graduation rates by gender or racial/ethnic groups. Student satisfaction is assessed through surveys. The institution offers a full set of student services, either on campus or through the Claremont consortium for those students on the main campus. MSKGI provides
its own services to students both in San Francisco and other host cities. Feedback from MSKGI students suggest that mental and physical health services may require further enhancement at this school. All three schools offer co-curricular programs – such as internships, study abroad, and academic support services – that are directly aligned to larger program goals. Results from the RUWS survey indicated some need for greater academic support within SoP and MSKGI. This has led to new initiatives, including peer-based tutoring and at MSKGI summer preparation programs. KGI’s programs accept few transfer students, and each school has its own policies noted in student handbooks. (CFRs 2.10-2.14)

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

KGI employs faculty and staff who are well qualified and express a commitment to the shared purpose of caring for and helping students to succeed. The number of faculty and staff has grown along with enrollment, however, more than half of the respondents to the RUWS survey indicated they are carrying an overly heavy workload. While there is no formal policy for faculty or staff development, it is a component of all annual evaluations and self-evaluations for faculty and staff. In response to the RUWS survey results, the institution developed a revised workload policy for its SALS’s faculty. However, no such policy exists in the SoP. Gender diversity among faculty shows 46.1% female and 53.9% male. For staff, it is 61.4% and 37.3% respectively. Ethnic diversity skews heavily toward white and Asian at 61.7% and 23.5% of faculty respectively and staff at 55.6% and 19.6% respectively. The ethnic diversity of the student body could also use attention. The student body on the main campus is about 23% white and 38% Asian. It does not reflect the diversity of the city of Los Angeles or the United States. Enhancing faculty, staff, and student diversity is a component of KGI’s 2017-2022 Strategic Plan. (CFRs 3.1 –3.3)

The institution is financially stable and has shown recent improvement in financial performance following several years of operational deficits. However, it remains somewhat financially weak as described in further detail in Section II.G of this report. Support for faculty members using technology in instruction is sufficient and resources are adequate to maintain compliance with the Standard. (CFRs 3.4, 3.5)

Leadership of the institution demonstrates high performance, competency, and responsibility. Indeed, the RUWS survey results highlighted this as an institutional strength, and the team applauds KGI for the high level of confidence the KGI community has in the institution’s leadership. The Board of Trustees is active and engaged in the life of the institution, providing appropriate oversight and holding
management accountable for good operational performance. The chief executive and financial officers hold full-time positions with the institution. Responsibilities and workload for administrative staff have increased as enrollment has grown often stretching their ability to perform at optimal levels. The institution is encouraged to assess current workload and provide adequate levels of staff to support the mission and academic programs. The institution has embarked on a process of ensuring participation of faculty in matters of leadership and governance. It is encouraged to continue this work ensuring an influential voice for faculty. (CFRs 3.6 – 3.10)

**Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement**

KGI is fully committed to quality assurance, institutional learning, and improvement, as demonstrated in the regular evaluation of the curricular, co-curricular, and student support services at all three schools. The institution’s quality-assurance processes are well developed, and include for academic programs a coupled annual assessment and periodic program review process. Student development and assessment of intended outcomes are well supported by rubrics, capstones, and externally benchmarked instruments, and assessment results inform revisions to curriculum and, as appropriate, assessment methodologies. In SALS and SoP, advisory boards of professionals in relevant fields offer guidance on programmatic curriculum and direction. (CFRs 4.1, 4.3-4.5)

Evidence indicates that students are achieving the standards established by faculty. Like academic programs, co-curricular programs and student support services are expected to assess service goals and outcomes annually. At this time, academic and support services units do not engage in a periodic review process akin to academic program review. The team encourages the institution to consider the potential value in adopting a process as the institution continues to grow. As part of its 2017-2022 Strategic Plan, the institution has recently developed a process for proposing and approving new programs. (CFRs 4.1, 4.3-4.5)

The team was pleased to learn that the institution is moving forward with plans to hire an institutional researcher on the Claremont campus, as this had been a need identified in prior interactions with WSCUC. (MSKGI has its own institutional researcher in place.) As the Director of Institutional Research and Effectiveness, this individual will help the institution strengthen its systems for data tracking, reporting, and dissemination in support of decision-making, and will bring more coherence to processes that are currently localized at the school level. The decision to establish this position was informed by a
review of how institutional research (IR) is supported on other similar-sized institutions. The position description was developed through an equally thoughtful process, which involved a knowledgeable consultant compiling the IR needs of institutional stakeholders. Institutional stakeholders are excited about this hire and the capacity and potential for advanced analytical support it will bring. The team applauds this development as a centralized IR function will become increasingly important as the institution continues to grow. (CFRs 4.1, 4.2)

The institution has structures in place to establish and reflect on its achievements relative to its goals. Given its small size, the institution can be nimble and responsive to issues that are identified through evaluation and assessment. This was particularly evident in the institution’s response to the faculty concerns identified through RUWS survey, which led to a series of steps to further clarify needs and the development of faculty-administrative work groups to recommend solutions. The institution’s commitment to reflection and planning is also evident in its 2017-2022 Strategic Plan, which is strongly aligned to the KGI’s mission and was developed through a broadly inclusive process involving the governing board, faculty, and staff. At all levels of the institution, there is keen awareness of, and support for, the institution’s particular niche in higher education. (CFRs 4.6, 4.7)

Conclusion

In summary, the team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to determine compliance with all four Standards. The team notes that final determination of compliance with the Standards rests with the Commission.

IIC. Component 3: Degree Programs: Meaning, quality and integrity of the degrees

The team understands component 3 of KGI’s institutional report to be an important piece of intellectual work. In a particularly well-structured and thoroughly documented essay, KGI establishes institutional definitions of the meaning, quality, and integrity of the degree, elaborates criteria for each of these three elements, and provides, for each school, evidence those criteria are met. As noted in the closing “Reflection and Plans” section of the essay, the benchmarks for quality and integrity established in this component constitute a framework for accountability and improvement that should be integrated systematically into institutional quality assurances practices. The team strongly encourages the institution to pursue this.
For KGI, the meaning of the degree is defined ultimately by the five newly-adopted institutional outcomes that describe the values and learning goals common to all of its schools and programs. For each school, the meaning of the degree is further defined by attributes distinctive to the school, its programs, and associated curricula. For example, all programs in SALS emphasize the importance of science in society and have a strong experimental component with a culminating project. In SoP, the degree reflects four programmatic pillars and an educational environment characterized by a distinctive curriculum implemented through team-based learning and active learning pedagogies. Finally, the MSKGI degree is designed to prepare leaders, entrepreneurs, and innovators for the 21st century through a distinctive undergraduate curriculum that facilitates mastery of 115 Habits of Mind and Foundational Concepts and that is developed through active learning pedagogies and immersive co-curricular experiences. In sum, it is clear that the meaning of the degree is well articulated at institutional, school, and programmatic levels, including via learning outcomes specific to each program, although the latter is not considered in detail in this component. Looking forward, KGI may find it useful to assess the extent to which students recognize the distinctive nature of the KGI degree, as graduates are important ambassadors for further developing brand identity and institutional profile. Conversations during the Accreditation Visit suggest that some students are indeed aware, but cultivating broad awareness may be productive. (CFRs 2.2, 2.3)

To consider the quality of its degrees, KGI adopted the definition provided in the American Council of Education’s 2017 paper *Instructional Quality, Student Outcomes, and Institutional Finances* and provided, for each school, evidence of the quality of its programs in relation to eight indicators. Among these indicators are student learning results demonstrating that students are achieving what faculty intend them to learn, and retention and degree completion rates that exceed national benchmarks or are on target to do so. Other indicators of quality examined include evidence that employers and sponsors recognize the quality of a KGI education through their robust support for student participation in clinical rotations and internships; the highly qualified nature of the faculty; the research productivity of faculty in SALS and SoP, which is judged to be high and increasing, and which leads to educational opportunities for KGI students; small class sizes, low student to faculty ratios, and the use of pedagogies of engagement; and high rates of post-graduate employment and employer satisfaction. Collectively, these indicators of program quality align closely with the goals outlined in KGI’s 2017-2022 Strategic Plan, thereby providing program-level measures in support of institutional success. The team commends
KGI for developing a robust, multi-dimensional set of mission-aligned indicators of broad use to the institution and its programs. (CFRs 2.1, 2.3, 2.6, 2.10)

Finally, KGI considered the integrity of the degree in relation to three criteria: the structural integrity of the curriculum; the high level of rigor and standards of performance expected of students; and the student-centered, highly ethical, and transparent culture of KGI. Evidence provided during the review showed that, in all three schools, structural integrity was reflected in curricula that are carefully sequenced to facilitate successful completion of a culminating project, and that educational rigor is promoted through active learning pedagogies and faculty-developed rubrics and, in SoP, by the standards of its professional accreditor ACPE. KGI also provided evidence that policies, practice, and educational offerings are in place to support a transparent, highly ethical, student-centered institutional culture. Examples include the inclusion of conduct policies in student handbooks, the existence of policies that ensure the integrity of grades, and requirements for coursework in ethics. During the visit, however, the team learned there are, among some students, perceptions that violations of academic integrity are not uncommon and that, when they occur, they are insufficiently addressed. Having seen clear evidence of the institution’s commitment to fostering a highly ethical culture, including as relates to academic integrity, the team suggests that KGI may want to assess more directly the extent to which the desired culture of integrity has been achieved and, as relevant, take steps to strengthen it. The team notes the resources of the International Center for Academic Integrity maybe useful in this regard. (CFRs 2.4, 2.6)

In summary, the framework KGI developed for examining the meaning, quality and integrity of the degree is commendable. The team anticipates it will be immensely useful for developing new programs and for considering the efficacy of existing programs through program review. Looking forward, the team encourages KGI to pursue its intentions to integrate the criteria and benchmarks outlined in this component into its quality assurance processes, and to ensure the systematic collection of data that will allow programs and the institution to easily track progress and adjust course as necessary.

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

KGI has established, for all its programs, program learning outcomes and associated standards of student performance. It has also provided convincing evidence of student learning attainment. Across all three schools, there is clear commitment to enhancing the quality of graduate and undergraduate
education. As part of this commitment, and in preparation for this review, KGI developed institutional learning outcomes (ILOs) that specify the knowledge and skills all KGI graduates are expected to demonstrate at the time of graduation. Articulated in broad terms, the ILOs function as a unifying framework while simultaneously affording schools and programs the flexibility to address them in ways consistent with their purposes and characters. Notably, the ILOs also align with the five WSCUC Core Competencies, thereby ensuring all programs, both graduate and undergraduate, are addressing these fundamental skills. (CFRs 2.2, 2.2a, 2.3)

At the school level, faculty have also defined a set of core competencies specific to the school, that are aligned to the ILOs, and the development of which is supported by each program’s learning outcomes and associated curriculum. In MSKGI, these competencies take the form of the 115 “habits of mind” and “foundational concepts” (HCs) that constitute the foundation of the Minerva degree. The HCs are introduced during the first-year general education courses. Mastery of these outcomes is then cultivated throughout each degree program, with each major emphasizing a different subset of HCs depending upon the expectations of the field. Students develop these outcomes through self-reflective activities that are transparently tied to the HCs, and each student’s skill level is assessed, using specifically-designed rubrics, formatively over the course of his or her education and summatively at graduation. Informed by the science of learning, these 115 outcomes are aligned to and supportive of the development of the five WSCUC Core Competencies. However, they constitute much more detailed action statements than the WSCUC Core Competencies themselves. In an effort to validate the pedagogy, core competencies, and first-year curriculum, MSKGI administers the CLA+ to its students at the beginning and end of their first year. Results show high levels of student attainment, as well as significant gains from the beginning to the end of the academic year. (CFRs 2.2-2.4)

The core competencies in SALS reflect the school’s focus on communication, teamwork, ethics, and interdisciplinary degree programs that prepare students in science and business. For all students, development of the competencies is linked to achievement of specific program learning outcomes. Assessment of student preparation in these areas begins upon matriculation, and student development is cultivated and assessed through a variety of methods, including in-class projects, exams, presentations, and papers. All students complete a culminating project, which is assessed using faculty-developed rubrics. Standards of performance in the school also reflect the expectations of employers in the life sciences industry. Evidence provided in the report, and on the KGI website
(http://www.kgi.edu/about-kgi/student-achievement), indicates that, at the time of graduation, students are meeting the faculty’s expectations for performance. (CFRs 2.2-2.4, 2.7, 4.5)

SoP is relatively new, and has the benefit of a highly regulated industry, to help establish its identity, and a national accredditor (ACPE), to help define intended outcomes and standards for student performance. Consistent with this context, SoP has defined as its core competencies a set of global program learning outcomes (GPLOs) that reflect national professional standards. Student development of the GPLOs is supported through their achievement of the Professional Student Outcomes (PSOs) - the knowledge skills and attitudes a pharmacy graduate should possess. PSOs are mapped to all course syllabi, and are assessed in courses via specifically designed, course embedded assessments, which are scored using faculty-developed rubrics (as appropriate). Annually, the school also administers the Pharmacy Curriculum Outcomes Assessment (PCOA) exam, a nationally benchmarked instrument that provides evidence of student achievement in support of formative development of the program. Evidence provided in the report, and during discussions with the team, indicated that curriculum is being refined in response to the results of assessment, particularly in anticipation of SoP’s upcoming accreditation visit and its first graduating class. Examples include revisions to course sequencing and augmentation of course content. (CFRs 2.2-2.4, 2.7)

In summary, the five core competencies have been thoughtfully addressed in all programs. Most notable is the use of capstone projects, which allow students to synthesize their learning in relation to the program learning outcomes and, in turn, the core competencies, at the time of graduation. Evidence provided in the report demonstrates that SALS students are meeting program expectations, including core competencies, at the time of graduation, and that MSKGI and SoP students are on track to do so as well.

IIE. Component 5: Student Success: Student learning, retention, and graduation

KGI is committed to student success. In a comprehensive essay, KGI establishes an institutional definition of student success, and an associated suite of measures, and subsequently examines, on a school by school basis, the resources in place to support student success and the evidence that KGI’s school and programs are achieving success as defined. At KGI, students are successful when they attain intended program learning outcomes; complete their degrees in a timely fashion; exhibit the values and attitudes KGI seeks to imbue; grow personally and professionally; and transition successfully to the next stage of their education or career. The associated measures of success emerge naturally from these
intended outcomes, and include assessments of learning, individual growth, retention and graduation rates, and post-graduate placement. Critical to the attainment of these outcomes are the array of student and academic support services, and the academic curriculum and internship experiences offered in support of intended program outcomes. By and large, the institution and each program should be commended for possessing well-defined metrics for student success and for assessing the degree to which student success is achieved.

Adequate student services appear to exist for both SALS and SoP. For example, Financial Aid, International Student Services, Career Services, and Mental Health and Wellness Services are broadly available. In keeping with the focus on continuous improvement at KGI, these departments have defined goals and/or learning outcomes for their services and identified metrics for assessing their achievement. Not atypically, surveys are the most commonly used assessment instrument and the team encourages services to adopt more direct measures where possible. Academic support is also generally plentiful at these two schools. For example, SALS has peer tutors and an early warning system, and SoP has a writing center. The degree to which these particular services possess well-defined goals and an assessment framework that extends beyond student surveys remains unclear. At MSKGI, there is evidence suggestive of the need for greater attention to student academic support as well as mental and physical health services. The school is aware of these concerns, however, and has the leadership capacity to strengthen its support for student academic success. (CFRs 2.10, 2.11, 2.13, 4.1)

The academic missions of all three schools are impressive. Clear learning outcomes exist at the course, program, and institutional levels. Both formative and summative assessment of student learning is integrated into the curriculum. Intended learning outcomes are further defined through rubrics, and assessment of assignments throughout the curriculum, and capstones at the conclusion, provide programs with useful data on student learning. There are also well-developed processes for “closing the loop” thereby granting feedback to academic actors to make adjustments to academic programs to ensure that outcomes are ultimately achieved. (CFRs 2.3-2.5)

There is good evidence suggesting that the students are meeting program goals for professional growth, and are prepared for the next stage of their careers. SALS, for example, prepares students in résumé writing and interviewing skills, and works hard to provide students with summer internships (almost half coming from KGI connections and through the Career Services Center), from which roughly one-quarter of students get their first job. MSKGI encourages internship experiences for all students, and works hard
to prepare students for, and to provide, them. Moreover, MSKGI makes an effort to discern whether the intended learning outcomes of these experiences are achieved by polling internship sponsors regarding students’ critical thinking skills, written and oral communication, and interpersonal skills, with results that are impressive. (CFR 2.11)

The commitment to high academic standards coupled with ample student services and academic support services, many of which are engaged in an evidence-based approach to assessment, allows the schools to meet their respective measures of student success, perhaps the most visible being in the areas of retention and graduation rates. Only one of the schools (SALS) has been in operation long enough to have a graduating class, but all have tracked retention rates from year to year. SALS has a graduation rate of 93%, better than comparable programs across the country which average 66% according to 2013 data from the Council of Graduate Schools. Obviously, its yearly retention rates are also extremely high, and academic dismissals are virtually non-existent. Statistics reveal little disparity across race/ethnicity/gender categories, with graduation rates for all groups equaling or exceeding 92% for the period 2011-12 to 2016-17. The exception is American Indian/Alaskan Natives, who graduate at an 80% rate. However, only five such students have enrolled over the six-year period for which data are provided, making statistically robust conclusions difficult to draw. The only slightly worrisome statistic at SALS is the somewhat slower than hoped for time to degree of Ph.D. students, a challenge that the school has acknowledged and (apparently successfully) worked to remedy. (CFR 2.10)

With its first class of students set to graduate this spring, retention rates thus far at SoP are also quite high – at 95% -- and especially compared to other schools of pharmacy, which average in the high 80% range for first-year student retention. MSKGI also has not yet graduated students, but first-year retention rates for the first two cohorts at the school were 93% and 89% respectively – a very high average. There were no discernable differences in retention across race/ethnicity/gender categories in this case either. Given that the institution that has not yet graduated its first class of undergraduates, the graduation rate dashboard is currently not applicable. (CFR 2.10)

In summary, KGI elaborated a meaningful, broadly applicable definition of student success and provided evidence for each school that its goals for student success are being met. The team applauds KGI for this thoughtful and institutionally useful work. Looking forward, the team encourages KGI to identify sources of evidence beyond surveys for evaluating the success of its support programs. Career Service’s assessment of student performance in mock interviews is an example. At some point, the institution
may also want to evaluate whether there is value to adopting a periodic review process for these services as well. The process of comprehensive reflection, and the perspectives of external professionals in the field, may at some point be helpful to these units, particularly as demand for these programs increases as enrollment grows. (CFR 4.1)

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

The team commends KGI for responding to the 2011 Commission Action Letter by establishing and implementing a clearly defined and robust program review process. During the Accreditation Visit, the team confirmed that all programs across all schools are subject to a regular cycle of program review. In SALS and MSKGI reviews are conducted on a seven-year cycle. In SoP, reviews occur every eight years to align with ACPE accreditation. The program review process itself is structured according to the Guidelines for Program Review at KGI, which outlines a set of standard procedures essential to evaluating the program’s performance with an eye toward improving program success. These include a self-study, an external review site visit and report, and an action plan that is ratified by the dean and president. Through the self-study, programs consider a variety of inputs and outcomes including curriculum design, student learning, student outcomes, student demographics, faculty demographics, research outputs, teaching loads, and survey data. As per the guidelines, and in keeping with KGI’s values and mission, the program review process prioritizes the involvement of all stakeholders, the connections between the program and industry, and linkages between review and improvement, planning and decision-making, and resource allocation at program and institutional levels. The team was impressed by the guideline’s emphasis on developing broad consensus regarding how the program can be improved. (CFRs 1.2, 2.3, 2.4., 2.7, 4.1)

Since implementing the program review process, KGI has completed reviews of three programs in SALS: the Master of BioScience (MBS) degree in 2014, the Ph.D. in Applied Life Sciences, and the Ph.D. in Computational and Systems Biology offered jointly by KGI and Claremont Graduate University, the latter two in 2013. The review of the MBS program led to improved alignment of the learning outcomes of the required courses with learning outcomes at the program and institutional levels. Review of the Ph.D. programs concluded with a decision to shutter the joint program, create a doctoral oversight committee, and revise aspects of the curriculum. As a result, student research productivity and time-to-degree have improved, as has student enrollment in the program. (CFR 4.1, 4.3, 4.4)
SoP conducts program review in concert with its specialized accreditation review for improved efficiency and consistency. Consistent with its eight-year cycle, SoP’s first program review is scheduled for 2020-21. As part of the ACPE accreditation process, SoP has undertaken multiple ACPE reviews and site visits, including pre-candidate and candidate status visits and a focused site visit in February 2017. These reviews have strengthened the school’s planning processes and faculty involvement in planning. They have also led to expanded and improved facilities, increased faculty numbers, and improved support for faculty development and student advising. (CFR 4.1, 4.3, 4.4)

Like SoP, MSKGI’s programs have started too recently to have undergone review. However, all of the school’s programs are scheduled for program review, with the first two to take place in 2019-2020, following the school’s first graduating class this spring.

Looking forward, the team anticipates that the addition of a Director of Institutional Research and Effectiveness will further strengthen the institution’s program review process. Discussions during the Accreditation Visit revealed that institutional stakeholders looked forward to strengthened data systems capable of generating consistent and reliable data. The team anticipates that improvements in these areas will make the self-study process more meaningful and efficient. Integrating into program review the indicators of program quality and student success developed as part of KGI’s self-study will tighten the linkages between program review and advancement of institutional priorities.

Assessment of Student Learning.

In all three schools, assessment activities are thoughtfully designed to facilitate formative and summative assessment of student learning at course and program levels, thereby providing both students and faculty with information necessary to strengthen student learning. At the course level, formative assessments typically involve both active learning pedagogies as well as formal assignments. In SALS students are engaged in polls conducted during or after class, provided with feedback on class participation, and complete quizzes and short-writing assignments. In SoP team-based worksheets are used to engage students in course content, a pedagogy that students have reported to be effective. Formative assessment is a fundamental component of MSKGI’s pedagogy, which is systematically grounded in learning science. All courses are taught exclusively using active learning pedagogies; there is no lecturing. In this context, formal formative assessment of student learning involves a preparatory assessment poll, and a closing reflection poll, both of which are aligned with course learning objectives and are scored with a rubric; comments are returned to students. On a weekly basis, faculty also assess
select in-class activities and provide students with formative feedback on their in-class contributions. Thus, formative assessment, grounded in direct evidence of student learning, is an instructional feature of all three schools. (CFRs 2.4, 2.5)

Summative course-level assessment, involving both direct and indirect evidence, is also used by the three schools. In SALS, direct assessment of course-level student learning is achieved through rubric-scored, discipline-specific exams, papers, projects, and presentations. In SoP, exams administered through Exam Soft are the principal mode of summative assessment. Questions are tied directly to ACPE standards and are tagged for the level of skill required using Bloom’s Taxonomy. Results are used to improve curriculum and instruction. At MSKGI, student achievement of each course objective and learning outcome is assessed through synthesizing class sessions, signature assignments, and final projects. All are scored using a mastery rubric. Across the three schools, indirect evidence in the form of course and/or instructor evaluations provides information used to improve courses, instruction, and student outcomes. (CFRs 2.4, 2.5)

Summative program assessment is accomplished in the three schools through a capstone assignment. Information describing the student experience and student perceptions of their learning is gathered through self-reflective assignments, course and instructor evaluations, student satisfaction surveys, focus groups, and exit and alumni surveys.

In SALS, students in the professional degree programs complete a year-long, team-based project, whereas students earning a research degree complete a thesis or dissertation. (Master’s students may elect to undertake a team-based project rather than a thesis.) In MSKGI, the capstone assignment for undergraduates is a project that results in an original research paper, while students in the master’s programs complete either a team-based project or a thesis, depending on the degree. All are scored with rubrics aligned to learning outcomes. In SoP, summative program assessment is accomplished primarily using externally benchmarked exams, including the PCOA and eventually the North American Pharmacist Licensure Examination (NAPLEX). Significantly, the SALS faculty recently agreed to apply the rubrics for teamwork and communication throughout the curriculum, which will both support formative assessment of individual student learning and provide longitudinal data to strengthen course and program curriculum. (CFRs 2.4, 2.5)

In conclusion, the team commends KGI’s carefully designed and well-articulated approach to fostering student learning through structured, school-specific systems of formative and summative assessment.
Looking forward, the team encourages KGI to continue to facilitate cross-school exchanges of assessment and instructional practices and results to the benefit of faculty, students, and the institution as a whole. The Institutional Effectiveness Committee is anticipated to be instrumental to these efforts.

*Use of Data – a Culture of Evidence*

KGI is committed to evidence-based planning and decision making and, consistent with this commitment, is in the process of strengthening institutional research capacity. This will be particularly important as the institution continues to grow. Critical to this evolution will be the development of its information systems and data reporting practices so that necessary data are readily available on demand. Having efficient data reporting systems will further strengthen the academic planning processes already in place. It will also free up time for faculty and staff to devote the myriad of other demands at a growing institution. Toward this end, the team notes that KGI will be hiring a Director of Institutional Research and Effectiveness by July 1. (CFR 4.2)

Equally essential to strengthening the culture of evidence-informed decision making will be the maturation of the institution’s planning processes. Looking forward, it will be critical to integrate enrollment, space, financial, technological, and Human Resources (HR) planning so that resource allocation in support of growth is coordinated, and KGI is taking steps to that effect. One outcome of the 2017-2022 Strategic Plan has been the development of a framework, and associated forms, for developing, reviewing, and analyzing new program initiatives as an institution. (CFR 4.6)

In conclusion, KGI’s quality assurance systems are functional and improving. The institution has developed assessment processes, including program review, that reflect its mission and, in their design, its deep commitment to student learning and success. KGI continues to develop these processes and will be linking them to larger institutional planning processes. The presence of the Chief Financial Officer (CFO) on the Institutional Effectiveness Committee speaks to this commitment. Looking forward the team encourages the institution to attend carefully to the continued cultivation of its culture of evidence-informed planning as the institution grows.

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

Staff have demonstrated their commitment to the institution and the success of its students. There is a clear sense of shared purpose, pride in their affiliation with the institution, and care for its students.
There exists a culture of support for staff development and continuing professional education, with individual departmental managers controlling budgets for such programs. The institution’s long-term commitment to enhanced professional development for staff is reflected Strategic Goal 6 of the 2017-2022 Strategic Plan, which highlights the connections between professional development, staff engagement, and enrichment of the institution’s culture. As is often the case with institutions experiencing significant enrollment growth, the expansion in staff and other areas has not kept pace. Better integration of planning for growth across multiple functional areas is needed. It should include finance, facilities, technology, and staff and faculty levels. (CFRs 3.1, 3.2)

The overall fiscal picture of KGI shows it is financial position has improved, and begun to stabilize, but remains weak. Since the time of the last WSCUC review in 2011, enrollment in SALS has grown significantly. SoP was launched and is showing strong enrollment. MSKGI has also added significant enrollment but the financial impact on KGI is not clear. The alliance itself is revenue neutral. However, there may be indirect effects on KGI’s bottom line. The institution has received unqualified audit opinions for all years since the last visit.

The ongoing viability and resource allocation raises some concerns for the team as described in the following paragraphs.

Five out of the most recent eight years’ audited financial statements (fiscal years 2010 – 2017) for the institution show deficits with only the two most recent fiscal years, 2016 and 2017, showing surpluses. While there is no accumulated deficit, the pattern of financial results runs counter to guidance from Standard 3 that an institution function without an operational deficit for at least three years. The Board of Trustees approved annual budgets showing planned operating deficits in at least some of those years, raising a concern about their knowledge of the ramifications both financially, and with respect to accreditation, of allowing operational deficits. (CFRs 1.7, 3.4, 3.6, 3.7, 3.9)

KGI’s institutional report references execution on the planned expansion of the core campus facilities as an indicator of improved quality of academic programs and outcomes. It should be noted that the financial statements reflect an increase from approximately $17.9 to $21 million in buildings and equipment from fiscal years 2013 to 2017, a moderate 4.1% average annual increase. The institution purchased a building containing 55,000 square feet of space. It is immediately adjacent to its campus, and is currently fully occupied by a single tenant. Rental income is sufficient to pay all operating costs and debt service. The building is shown on the balance sheet in investments, not in buildings and
equipment. No plans have been articulated for its eventual use but it is expected to be needed as enrollment grows. A student housing complex with capacity for slightly more than 400 students is currently under construction. It will also contain six classrooms. (CFRs 3.4, 3.5, 4.7)

Feedback during the Accreditation Visit indicated that the number and quality of laboratories is a concern shared by some constituents. Lack of ready access to labs for students to complete required coursework was reported, as was the general age and condition of equipment. Concern was also expressed by some about labs being out of date and not up to industry standards, making it difficult for students to gain meaningful practical experience. (CFR 3.5)

KGI’s institutional report also references a reversal of the historical pattern of net operating losses despite the deficits shown on most of the recent audited financial statements. The institution must take steps to continue the trend away from deficits going forward. (CFRs 3.4, 3.6)

Evidence provided by the institution shows a focus on cash balances in budgeting and financial planning, rather than on expense management and the generation of cash from operations as opposed to debt and delivering operating surpluses. KGI has been able to garner enough cash to operate, in large part, by materially increasing debt from just under $8.8 million or 14% of assets on the Statement of Financial Position in 2010 to nearly $36 million or 33% of assets on the statement in 2017. Percentage growth in Unrestricted and Total Net Assets has been a fraction of the increase in outstanding debt, raising a concern for the team of the long-term financial viability of the institution. The practice of increasing indebtedness to finance operations can significantly impact financial performance both immediately, and into the future, as annual debt service costs increase and the ability to obtain financing for capital expansion and improvements is limited by the amount of existing debt. (CFRs 3.4, 3.7, 3.9, 4.7)

The relationship with the Minerva Project, memorialized in the KGI-Minerva Project Alliance Agreement, raises some concerns regarding technology impacts on the institution should the alliance come to an end. The terms of the agreement, in particular its termination date and ability to use the technology platform after termination of the agreement, are not well known among the institution’s faculty and senior staff. There are no concrete plans in place, or being developed, to transition any of the institution’s courses from Minerva’s ALF platform after termination of the agreement. As per the agreement, KGI will continue to have access to the ALF until fall 2023 or two years after separate accreditation of Minerva, whichever is later. The institution is encouraged to ensure that faculty and
senior staff are aware of the agreement and associated timelines, and are taking these into consideration when engaged in instructional planning. (CFRs 3.5, 4.7)

There are concerns among faculty, as expressed in responses to the RUWS survey and during the Accreditation Visit, regarding research support and the role of research, in the balance between teaching and service, and in personnel reviews, and particular concern with shared governance and the role of faculty in the leadership of the institution. Clearly defining the governance roles, rights, and responsibilities of faculty and ensuring faculty have an influential voice in institutional planning and decision making will be of great benefit to KGI in the short and long term. The team applauds KGI’s recent progress in this area and encourages the institution to pursue its plans for addressing these concerns. (CFRs 3.10, 4.3)

In conclusion, the institution has accomplished much with respect to diversifying its portfolio of academic programs and enrollment growth, even without taking into consideration the alliance with Minerva, which will help position it more favorably for future financial sustainability and viability. The growth has, however, come at the cost of a significant increase in indebtedness that must be addressed soon. The long-term drag of debt on financial performance can be a barrier to future growth especially when financing is needed for capital improvement and expansion. In addition to its current emphasis on cash, the institution should more clearly focus its financial planning and projections on operational performance. Its board and management staff must have timely, accurate, and relevant information to support sound decision making, and faculty must have a clear role in the leadership of the institution.

IIH. Component 9: Reflection and plans for improvement

KGI’s institutional report includes reflections on the self-study process and how it has benefitted the institution. The report appropriately identifies the overarching benefits to the institution that will contribute to its increasing cohesiveness and intentionality, namely: 1) adoption of institutional learning outcomes; 2) a holistic definition of student success; 3) a strong statement on diversity; and 4) institution-wide use of benchmarking data to gauge the relative effectiveness of its programs.

This final component of the KGI’s report effectively summarizes the high-level conclusions and findings in the previous components of the self-study, even as the team did not agree with all of their self-assessments, in particular the treatment of KGI’s finances. The component ends by focusing on KGI’s plans for continuing growth of its programs and strengthening its institutional support functions as it
achieves higher scale. This section of the report thus exercised the choice of addressing the required content of Component 9 in a summary fashion, with greater detail provided in the body of the self-study report.

SECTION III: FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

As demonstrated through a well-written and thoughtfully conceived and executed institutional report, as well as discussions during the visit to the Minerva branch campus and the main campus in Claremont, KGI has substantially fulfilled the intended outcomes for the comprehensive review. The team found the review to have substantially engaged and broadly impacted the entire institution. The team was impressed with the responsiveness of the institution to the findings of its own self-study as well as the lines of inquiry identified by the team. The intellectual work of drafting the institutional report resulted in the development of definitions and indicators, particularly in relation to the meaning, quality and integrity of the degree and student success, which will be of long-term benefit to the institution, particularly as it continues to expand, adding programs, students, and faculty. Likewise, the development of a diversity statement has provided a clear foundation for furthering the institution’s ambitions to diversify its faculty, staff, and students, and realize the benefits of that diversity in its administrative operations and educational outcomes.

In light of KGI’s successes, the team highlights the following accomplishments and practices as particularly worthy of commendation:

1. Producing a clear and concise institutional report that conveys the institution’s understanding of, and commitment to, its mission. The essay on the meaning, quality, and integrity, of the degree was particularly thoughtful and well documented. The associated benchmarks for quality and integrity will support accountability and improvement going forward.

2. Expanding the portfolio of mission-aligned programs. This includes MSKGI, which has introduced innovative pedagogical practices to the broader institution.

3. Establishing a high level of confidence in the institution’s leadership, and assembling a highly involved and effective Board of Trustees. These have served the institution extremely well.

4. Exploring more deeply matters relating to shared governance, transparency, and the role of research in personnel reviews and the productive lives of faculty. These efforts include numerous
faculty surveys and focus groups and the appointment, most recently, of four committees of faculty and administrators to offer recommendations on these matters.

5. Establishing student learning outcomes that are clearly stated, linked to core competencies, aligned to institutional outcomes, and that are a part of program review. Student development and assessment of intended outcomes are well supported by rubrics, capstones, and externally benchmarked instruments. Evidence indicates that students are achieving the standards established by faculty.

6. Committing to active and experiential learning, as articulated by faculty and administrative leadership across the institution.

7. Achieving stellar retention, persistence, graduation, and placement rates by relative and absolute standards. This includes uniform rates across gender, race, and ethnicity.

During the visit, the team observed that as much as KGI’s rapid expansion has energized its stakeholders, it has also stressed existing systems for planning and governance and strained its workforce. At the same time, KGI’s success has also illustrated the promise of its plans, and positively reinforced among its stakeholders the possibilities of continued growth. As the institution moves forward on its path of “growth with quality,” the team believes the following to be particularly important to the institution’s continued maturation. Specifically, the team recommends KGI

1. Better manage growth by integrating planning across functional areas including finance, facilities, technology, and staff and faculty levels, and by basing decisions not primarily on their impact on cash but also on the extent to which they generate surpluses from operations. (CFRs 3.4, 3.5, 3.7)

2. Develop and execute a plan to significantly reduce debt incurred to finance operational growth so as to improve debt capacity for future capital growth. (CFR 3.4)

3. Translate the diversity statement into action in a way that reflects the value KGI places on diversity in backgrounds, disciplines, and thought. Such action should include broadening participation in graduate education by underrepresented students. (CFRs 1.4, 3.1)

4. Continue the productive dialogue regarding shared governance; transparency; research support; and expectations for research, teaching, and service in personnel reviews. Of importance to
progress in these areas is ensuring the faculty has an influential voice in the leadership of the institution. (CFRs 2.8, 3.2, 3.10)
**APPENDICES**

**A. Federal Compliance Forms**

### 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?  X YES □ NO</td>
</tr>
<tr>
<td></td>
<td>If so, where is the policy located?  <em>The policy is posted on the KGI website under Academic Programs, on Sakai, and the learning management system with other KGI Policies and Procedures and is summarized in the student handbooks.</em></td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</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)?  X YES □ NO</td>
</tr>
<tr>
<td></td>
<td>If so, does the institution adhere to this procedure?  X YES □ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: <em>The school Curriculum Review Committees review credit hours as new courses are proposed, as courses and curriculum changes are proposed, and during program reviews.</em></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?  X YES □ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: <em>The course schedules are posted to the KGI website, following review for appropriate credit hours required.</em></td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed? 14</td>
</tr>
<tr>
<td>Please review at least 1 - 2 from each degree level.</td>
<td>What kind of courses (online or hybrid or both)? Both</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)?  □ AA/AS  □ BA/BS  □ MA  □ Doctoral</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)?  <em>Business and Science (SALS grad level) and all five majors for undergrad level (MSKGI) and Decision Analysis for grad level (MSKGI)</em></td>
</tr>
<tr>
<td></td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  X YES □ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</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? 12</td>
</tr>
<tr>
<td></td>
<td>What kinds of courses?  <em>Team Master’s and Design Projects, Thesis (master’s level SALS); Professional Development 4 (SoP); Thesis (master’s level MSKGI)</em></td>
</tr>
<tr>
<td></td>
<td>What degree level(s)?  □ AA/AS  □ BA/BS  □ MA  □ Doctoral</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)?  <em>Applied Life Sciences, Pharmacy, Decision Analysis</em></td>
</tr>
<tr>
<td></td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  X YES □ NO</td>
</tr>
<tr>
<td><strong>Please review at least 1 - 2 from each degree level.</strong></td>
<td>Comments: N/A</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Sample program information (catalog, website, or other program materials)</strong></td>
<td><strong>How many programs were reviewed?</strong> 13</td>
</tr>
<tr>
<td></td>
<td><strong>What kinds of programs were reviewed?</strong> All five undergraduate majors (MSKGI); 6 masters programs (SALS and MSKGI); and two doctorates (SALS and Pharmacy)</td>
</tr>
<tr>
<td></td>
<td><strong>What degree level(s)?</strong>  □ AA/AS  X BA/BS  X MA/MS  X Doctoral</td>
</tr>
<tr>
<td></td>
<td><strong>What discipline(s)?</strong> Science and Business (SALS); Pharmacy (SoP); all five undergraduate majors and Decision Analysis (MSKGI)</td>
</tr>
<tr>
<td></td>
<td><strong>Does this material show that the programs offered at the institution are of a generally acceptable length?</strong>  X YES  □ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</td>
</tr>
</tbody>
</table>

Review Completed By: David Fairris  
Date: March 9, 2018
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? X YES ☐ NO  
Comments: KGI adheres strictly to the requirements; no incentive compensation is provided. |
| Degree completion and cost | Does the institution provide information about the typical length of time to degree? X YES ☐ NO  
| Careers and employment | Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? X YES ☐ NO  
Comments: Information on the kinds of jobs for which its graduates are qualified is provided by program on KGI’s websites: [http://www.kgi.edu/about-kgi/student-achievement](http://www.kgi.edu/about-kgi/student-achievement), [http://www.kgi.edu/pharmacy/academics/doctor-of-pharmacy-(pharmd)](http://www.kgi.edu/pharmacy/academics/doctor-of-pharmacy-(pharmd)), [https://www.minerva.kgi.edu/career-development/](https://www.minerva.kgi.edu/career-development/). These same websites include information about graduate employment for those programs that have graduates (MBS, PPM, PhD, MS). The MEng, PharmD, and MSKGI programs will report when the first full class graduates. |

*§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: Laura Martin  
Date: 3/9/2018
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? X YES ☐ NO  
If so, is the policy or procedure easily accessible? Is so, where?  
The basic KGI policy is posted at [http://www.kgi.edu/about-kgi/consumer-information/complaint-policy](http://www.kgi.edu/about-kgi/consumer-information/complaint-policy) and is included in the student handbooks.  
Comments: N/A |
| Process(es)/procedure | Does the institution have a procedure for addressing student complaints? X YES ☐ NO  
If so, please describe briefly: Students report safety concerns anonymously through the LiveSafe App and to Campus Safety, and may report any complaint online at studentservices@kgi.edu. Complaints are directed to student affairs staff, who investigate and respond to students as quickly as possible.  
If so, does the institution adhere to this procedure? X YES ☐ NO  
Comments: MSKGI has had no student complaints. |
| Records | Does the institution maintain records of student complaints? X YES ☐ NO  
If so, where? Student Affairs maintains records of student complaints. With respect to safety, records are maintained in Annual Security Reports. No formal written complaints have been received in the past six years. Suggestions, grade petitions, and Title IX complaints are not covered by this policy.  
Does the institution have an effective way of tracking and monitoring student complaints over time? X YES ☐ NO  
If so, please describe briefly: A work order is generated in Student Affairs for each complaint to enable follow through and tracking.  
Comments: N/A |

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

Review Completed By: David Fairris  
Date: March 9, 2018
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>
<tbody>
<tr>
<td>Transfer Credit Policy(s)</td>
<td>Does the institution have a policy or formal procedure for receiving transfer credit? X YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>If so, is the policy publicly available? X YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>If so, where? For MSKGI, the only school that accepts transfer students, the policy is available on the MSKGI website: <a href="https://www.minerva.kgi.edu/admissions/transfer-students/">https://www.minerva.kgi.edu/admissions/transfer-students/</a>. It is also in the Student Handbook.</td>
</tr>
<tr>
<td></td>
<td>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? X YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: The main campus does not accept transfers into its programs. MSKGI accepts up to 8 credits, due to its unique curriculum.</td>
</tr>
</tbody>
</table>

*§602.24(e): 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: David Fairris
Date: March 9, 2018
B. OFF-CAMPUS LOCATION REVIEW-TEAM REPORT APPENDIX

Institution: Keck Graduate Institute  
Type of Visit: Reaccreditation  
Name of reviewer/s: Eduardo Ochoa, Dawn Eastmond  
Date/s of review: February 26, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed

1. Site Name and Address

Minerva Schools at KGI  
1145 Market Street, Ninth Floor  
San Francisco, CA 94103

2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a branch campus standalone location, or satellite location by WSCUC)

Minerva Schools at KGI (MSKGI) is one of three schools in KGI. MSKGI in San Francisco is designated as a branch campus by WSCUC, and has been since February 2014 when the Commission approved the Structural Change that resulted in the creation of Minerva Schools. MSKGI offers Bachelor’s degrees with majors in five areas (Art & Humanities, Social Sciences, Computational Sciences, Natural Sciences, and Business), which are residential programs in that student live together and engage in learning outside of class live and in person; however, they are classified as “distance education” under the ED definition because the students and their teachers are not in the same room. Two small master’s programs are also offered out of the branch, a Master of Decision Analysis (recently renamed) and a Master of Applied Arts and Sciences, which is offered exclusively to MSKGI undergraduates who wish to pursue a master’s before or soon after completion of their Bachelor’s degree. These programs do not have a residential component but are offered out of the branch campus in SF. All programs are taught on the Minerva Active Learning Forum (ALF), a proprietary learning platform developed by Minerva Project that uses live video and is taught synchronously using active learning. Undergraduate students live in San Francisco for a year and then travel to six major cities outside the US during their next six semesters, returning at the end of their last year for capstone presentations and commencement.

At the time of the visit in spring 2018, there are about 461 undergraduates and eight graduate students. About 190 undergraduates are living in SF in student housing and the rest (second- and third-year students) are studying in Hyderabad, India for the semester. A few advanced

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4 See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.
students are studying in San Francisco or remotely from Minerva locations. The academic team has 55 members including the deans, and 44 faculty members, mostly full- or ¾-time.

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

The team members met with the MSKGI senior leadership, academic team leaders/deans and associate deans, faculty, technology team that develops and supports the ALF, student affairs, student services, student experience personnel in both SF and Hyderabad and with groups of students in both SF and Hyderabad. The team report explains the branch in San Francisco in Component 1 and an organization chart was also provided.

<table>
<thead>
<tr>
<th>Lines of Inquiry</th>
<th>Observations and Findings</th>
<th>Follow-up Required (identify the issues)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>For a recently approved site.</strong> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</td>
<td>The site was approved as branch in 2014. See Exhibit 1.08 for responses to all Substantive Change recommendations relating to the site. Some students expressed a need for a thicker network in host cities to support student projects and linking them to the class work. Minerva should consider exploring support for faculty research as part of resourcing professional development.</td>
<td></td>
</tr>
<tr>
<td><strong>Fit with Mission.</strong> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</td>
<td>This is KGI’s only full off-campus site/branch. The site operates only the Minerva Schools programs and operates somewhat autonomously given the level, nature, and character of the programs but always under the approval and authority of the main campus President and Board. The site was planned by MSKGI and the President approves all major decisions. See Exhibit 7.01 Alliance Agreement. Even though the undergraduate focus of Minerva differs from the KGI mission’s focus on the health sciences, both organizations are keenly interested in innovative pedagogies, active learning, and the use of information technology to leverage faculty.</td>
<td></td>
</tr>
<tr>
<td><strong>Connection to the Institution.</strong> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</td>
<td>MSKGI is deeply embedded in KGI; however, given the difference in the level, nature, and character of the programs at the two sites, the students do not have much interaction. The two sites share a common culture that is characterized by innovation, active learning, practical knowledge, globalism, and student-centeredness. Interaction between the sites takes place daily and across functions and teams.</td>
<td></td>
</tr>
<tr>
<td><strong>Quality of the Learning Site.</strong> How does the physical environment foster learning</td>
<td>Students take class on the Active Learning Forum, which creates deep connections between faculty and students and</td>
<td></td>
</tr>
<tr>
<td>Lines of Inquiry</td>
<td>Observations and Findings</td>
<td>Follow-up Required (identify the issues)</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</td>
<td>among students because of the active learning methods deployed in the small seminars. All students have faculty advisors with whom they meet regularly. Regular reports, meetings, and visits from the President and others provide oversight.</td>
<td></td>
</tr>
<tr>
<td>Student Support Services. What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</td>
<td>All students utilize the Claremont Libraries online access. All other services are offered out of SF and/or in person in each location. See descriptions in Component 5 and Exhibits 5.05-5.07 and 5.16-5.20 for details on services and support and assessments of their effectiveness.</td>
<td></td>
</tr>
<tr>
<td>Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</td>
<td>Faculty members are mostly full-time, with some opting to take a half- or ¾-time load. Faculty can teach from anywhere in the world, but are required to participate in orientation, general faculty meetings, annual retreats, and regular course-specific meetings and are evaluated by deans, peers, and students. All contribute to curriculum development as a routine expectation and all assess student learning in their courses using rubrics. See Components 4 and 6 for details of curriculum development and faculty role.</td>
<td></td>
</tr>
<tr>
<td>Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</td>
<td>The programs were designed and are refined by the faculty and deans. The programs are not offered on the main campus. The President approves new programs and major changes in programs.</td>
<td></td>
</tr>
<tr>
<td>Retention and Graduation. What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</td>
<td>Data on demographics, gender, and home country are collected and analyzed. Retention rates by class range from 87 to 96 percent to date with the first students to be graduated in spring 2019. The first master's class graduated all 10 students in its pilot class in 2017. There are no significant disparities in performance among groups of students. See Exhibit 5.16.</td>
<td></td>
</tr>
<tr>
<td>Student Learning. How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</td>
<td>Student learning is assessed in every class, including the capstone. Undergraduate students also take the CLA+. Both indicators show strong learning results. See Component 6 and Exhibits 6.14-6.16.</td>
<td></td>
</tr>
<tr>
<td>Lines of Inquiry</td>
<td>Observations and Findings</td>
<td>Follow-up Required (identify the issues)</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td><strong>Quality Assurance Processes:</strong> How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</td>
<td>The quality assurance processes are the same regarding program review, but each school has its own assessment plan, and MSKGI has its own IR function separate from KGI. See Component 6 and Exhibits 6.1 – 6.19. Direct evidence of student learning outcomes as assessed using rubrics, and strong retention rates, are evidence that the courses are educationally effective.</td>
<td></td>
</tr>
</tbody>
</table>
C. DISTANCE EDUCATION REVIEW-TEAM REPORT APPENDIX

Institution: Keck Graduate Institute  
Type of Visit: Reaccreditation  
Name of reviewer/s: Eduardo Ochoa, Dawn Eastmond  
Date/s of review: February 26, 2018

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)

   MSKGI undergraduate courses:
   - SS156 14.2 - Fall 2017
   - SS141 4.1 - Spring 2018

   MSKGI graduate courses:
   - MS312 14.1 - Fall 2017

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)

   Minerva Schools at KGI (MSKGI) is one of three schools in KGI. MSKGI in San Francisco is designated as a branch campus by WSCUC. MSKGI offers Bachelor’s degrees with majors in five areas (Art & Humanities, Social Sciences, Computational Sciences, Natural Sciences, and Business), which are residential programs in that student live together and engage in learning outside of class live and in person, but are classified as “distance education” under the ED definition because the students and their teachers are not in the same room. Two small master’s programs are also offered, a Master of Decision Analysis (recently renamed) and a Master of Applied Arts and Sciences, which is offered exclusively to MSKGI undergraduates who wish to pursue a master’s before or soon after completion of their Bachelor’s degree. Master’s programs do not have a residential component. All programs are taught on the Minerva Active Learning Forum (ALF), a proprietary learning platform developed by Minerva Project that uses live video and is taught synchronously using active learning teaching methods in small seminar classes of no more than 20 students.

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5 See Distance Education Review Guide to determine whether programs are subject to this process. In general only programs that are more than 50% online require review and reporting.
At the time of the visit in spring 2018, there are about 461 undergraduates and eight graduate students. About 190 undergraduates are living in SF in student housing and most of the rest (second- and third-year students) are studying in Hyderabad, India for the semester. A few students in the advanced classes are studying remotely. MSKGI started in fall 2014 with 28 students in its pilot/founding year and has grown steadily to about 200 students in this fall’s entering class. The master’s program for non-Minerva students remains in a pilot form with only eight students as it is being taught only for the second time and in a part-time format.

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

The team members met with the MSKGI senior leadership, academic team leaders/deans and associate deans, faculty, technology team that develops and supports the ALF, student affairs, student services, student experience personnel in both SF and Hyderabad and with groups of students in both SF and Hyderabad. The team had discussion about the Active Learning Forum with the staff who created and support it, faculty who teach with it, and students who take all their courses on it. Syllabi and lesson plans were reviewed in Exhibits 6.12 and 6.17 and additional lesson plans for the courses viewed were provided.

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>
</tr>
</thead>
<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>KGI is committed to using technology to increase access to its programs and to deploy active learning for all instruction. Although only MSKGI offers its programs entirely on the platform, the School of Applied Life Sciences uses the platform and Zoom for some of its courses. MSKGI is funded entirely by the Minerva Project, which owns the ALF.</td>
<td>*</td>
</tr>
<tr>
<td><strong>Connection to the Institution.</strong> How are distance education students integrated into the life and culture of the institution?</td>
<td>All undergraduate students at MSKGI are taking courses on the ALF but they also live and study together so have a residential experience as well. Graduate students study remotely but work in groups. In addition they can opt-in to receive weekly and monthly invitations to events that they can attend (usually virtually).</td>
<td>*</td>
</tr>
<tr>
<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>Active learning methods are the foundation of the ALF; there are no lectures and delivery is live and synchronous with a series of activities where students apply what they are learning. Students also have many student activities on the ground and have faculty advisors. Technology has multiple back-up and monitoring of each class session. Attendance is required.</td>
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<td>Observations and Findings</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>All students utilize the Claremont Libraries online access. All other services are offered out of SF and/or in person in each location. See descriptions in Component 5 and Exhibits 5.05-5.07 and 5.16-5.20 for details on services and support and assessments of their effectiveness.</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>
<td>Faculty members are mostly full-time, with a few opting to take a half- or ¾-time load or less. Faculty can teach from anywhere in the world, but are required to participate in orientation, general faculty meetings, annual retreats, and regular course-specific meetings and are evaluated by deans, peers and students. All contribute to curriculum development as a routine expectation and all assess student learning in their courses using rubrics. See Components 4 and 6 for details of curriculum development and faculty role. There is some student concern about lesson plans sometimes being followed too rigidly and cutting off interesting discussions, particularly when the instructor is not the course designer.</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>
<td>The programs were designed and are refined by the faculty and deans, but some instructors are not the course designers. The academic instruction is not offered on-ground. The President approves new programs and major changes in programs.</td>
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<td><strong>Retention and Graduation.</strong> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions’ online offerings? If any concerns exist, how are these being addressed?</td>
<td>Data on demographics, gender, and home country are collected and analyzed. Retention rates by class range from 87 to 96 percent to date with the first students to be graduated in spring 2019. The first master’s class graduated all 10 students in its pilot class. There are no significant disparities in performance among groups of students. The programs are not offered on ground. The rates are comparable to selective on-ground programs at other institutions. See Exhibit 5.16.</td>
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<td><strong>Student Learning.</strong> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results</td>
<td>Student learning is assessed in every class, including the capstone. Assessment is frequent, more than in on-ground courses, as students are assessed for performance in every class in addition to being assessed on their papers. Rubrics are used for all assessments. Undergraduate students also</td>
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<td>of on-ground students, if applicable, or with other online offerings?</td>
<td>take the CLA+. Both indicators show strong learning results. See Component 6 and Exhibits 6.14-6.16.</td>
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<td><strong>Contracts with Vendors.</strong> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on Contracts with Unaccredited Organizations?</td>
<td>Minerva Project owns the ALF and provides it to MSKGI, including the service in compliance with WASC policy.</td>
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<td><strong>Quality Assurance Processes:</strong> How are the institution’s quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?</td>
<td>MSKGI adheres to KGI’s program review process but each school has its own assessment plan, and MSKGI has its own IR function separate from KGI. See Component 6 and Exhibits. Direct evidence of student learning outcomes as assessed using rubrics, and strong retention rates, are evidence that the courses are educationally effective.</td>
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