REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To International Technological University

April 4-6, 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

A. Description of Institution and Accreditation History

International Technological University (ITU) was founded in 1994 by Dr. Shu-Park Chan, a former professor at Santa Clara University. In ITU Dr. Chan pioneered a new model of graduate education that accommodated the demands of working engineers in Silicon Valley. This model of graduate education in engineering and other disciplines draws on four principles:

- Serve working professionals by integrating solid academic content with practical experiences in professional work settings.
- Recruit doctorally-prepared Silicon Valley engineers and professionals to teach graduate students.
- Hold classes on weekends and evenings when both working graduate students and working faculty are more available.
- Focus on problems in theses and capstone projects that allow students to demonstrate high levels of professional competence in their fields.

Numerous conversations with faculty and students made it clear that ITU holds true to these principles in its seven masters and three doctoral programs.

In March 2013, ITU was awarded initial WSCUC accreditation. Shortly after the departure of a WSCUC team in 2014, a series of serious and disruptive changes occurred. Actions of the former president and a few staff members in 2013 and 2014 created gaps in student records and inaccurate submissions to the Student and Exchange Visitor Program (SEVP). These actions led to an ongoing process with SEVP representatives resulting in a notice to ITU for plans to withdraw approval for the university to admit F-1 international students. This was a potentially ruinous action given that, in the fall trimester 2017, 807 of the university’s 827 students (97.5%) were international. To the credit of its
leadership, ITU has actively sought, vigorously pursued, and has already begun to realize revenue from additional sources. ITU has appealed the SEVP decision and is awaiting its outcome.

WSCUC sent an investigative team that visited on February 6, 2015, reviewed allegations and documents, and interviewed faculty and staff. The team concluded that the allegations appeared valid and informed the ITU board that immediate corrective actions were necessary if the university were to maintain its accredited status. The board immediately removed the president from any position of authority.

ITU submitted a follow-up institutional report to WSCUC following the investigative team’s visit which documented changes quickly undertaken to remediate the damage done by the previous administration. Significant actions included the hiring of its new president Dr. Gregory O’Brien, a former university president with over twenty years of leadership experience. Upon his arrival Dr. O’Brien asked the faculty and staff to be guided in their immediate work by the four principles described in the strategic plan: Integrity, Student Centeredness, Mutual Respect, and Innovation.

In May 2015, WSCUC conducted another special visit to review the changes undertaken in response to the investigative team’s review. The team noted significant progress in many areas and identified three areas to be further addressed by ITU during its next self-study: Governance; Quality and Integrity; and Executive Management and Leadership. ITU’s responses to those three areas are summarized in Section IIA.

B. Description of Team’s Review Process

The team used WSCUC’ s 2013 Revised Accreditation Review Process which officially began with an Offsite Review (OSR) held on December 2, 2017 and ended with an accreditation visit on April 3 – 6, 2018. The team members received and carefully reviewed the ITU accreditation report, required data elements, and supporting appendices provided on September 29, 2017. The team held its first telephone meeting to discuss team assignments for the review of the report on October 31, 2017,
including federal compliance requirements. During this first meeting, the team provided initial observations and posed questions about the ITU report, which were discussed more extensively during the OSR and guided the team in forming its lines of inquiry around the following eight topics: Board, Leadership, Governance, Faculty, Assessment of Student Learning, Student Success, Financial Sustainability, and Planning and Institutional Assessment/Research.

An introductory conference call was held with the ITU president and senior academic and administrative staff at the conclusion of the OSR during which the team shared its initial commendations and lines of inquiry. On December 8 the team formally submitted its lines of inquiry along with a list of 22 requested additional documents. The team received the additional documentation from ITU on February 14. The team discussed the additional evidence during a telephonic meeting on March 2 and, in general, found the information provided was insufficient in addressing many of its questions, including multiple areas within the lines of inquiry. An additional nine documents were requested on March 5, five of which were provided by ITU on March 29, and the remainder by April 3. This additional documentation, much of which was newly created to meet the team’s requests, did partially address some questions, but ITU did not have the benefit of time to analyze and utilize the information for institutional improvement.

The accreditation visit to ITU began with the team’s first meeting on the evening of April 3 during which it discussed the additional information provided by ITU since its last submission to the team, the team’s preliminary report, and the schedule for the next three days. Over the course of the next two days, members of the team met with, among others, the president, provost, and chief financial officer, Steering Committee members, the board of trustees, many staff, faculty and students, and numerous committees, councils, and boards. Several documents were requested and reviewed during the visit to confirm or clarify team members’ understanding. Throughout the visit, the assistant team chair monitored the confidential email account. On the third morning, the team chair provided the
president and campus personnel with an exit report of the team’s commendations and recommendations.

C. Institution’s Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence

The team concluded that the 2017 ITU report and its responses to the lines of inquiry were well-organized and indeed demonstrated significant progress with core issues previously identified by WSCUC and also with respect to the standards at large. ITU’s institutional report provided frank recognition of areas needing further progress including, but not limited to: diversification of student exchange and visitors program, discrepancies between its catalog and website, faculty handbook, and improvements in policies relating to grievances, promotion, and code of ethics. The latter area ultimately led to increased transparency via the development of a university policies manual. (CFR 1.6 and 1.7)

While much initial evidence and data were provided in the institutional report and in the requested materials provided at later dates, the team found that many documents or charts were unclear, and were not accompanied by analyses, explanations of findings, and more importantly, indications of how the information was used for institutional improvement. In general, the team observed that, while the self-study was useful for the university for resourcing and decision-making, the institutional report was more descriptive and aspirational than evaluative.

Throughout the review process, ITU representatives were highly responsive to team requests for additional information both prior to and during the visit. The visiting team is most appreciative to ITU, and in particular to its Accreditation Liaison Officer (ALO), for effectively and efficiently facilitating the team’s comprehensive review process. (CFR 1.8)
SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to previous Commission actions

As referenced previously, the ITU Institutional Report - 2017 responded to prior Commission actions in three areas for improvement: Governance; Quality and Integrity; and Executive Management and Leadership. Improvements in these areas are summarized below.

- Governance: A description of ITU’s new governance measures is provided in Standard 3.

- Quality and Integrity: Staff and faculty reviewed and overhauled the university catalog; created the Policy Project, a searchable inventory of current policies; modified the annual operational planning process and linked it to the budget; and conducted two independent reviews of the integrity of student records. ITU created a Curriculum Review Committee and expanded the number of staff in critical positions. Additionally, trustees now annually review and sign a Conflict of Interest Disclosure Statement.

- Executive Leadership and Management: ITU launched a strategic initiative to identify, recruit, and retain experienced leadership personnel with familiarity and expertise in relevant regulatory constraints and professional best practices in American higher education. Standard 3 of this report contains additional information in this area. The university also broadened and deepened the transparency and involvement of faculty and staff in the development of the annual operational plan and unit budgets.

Collectively, these are laudable steps designed to address the issues raised by the Commission. There was limited ability for the team to review position descriptions, lines of authority, credentials, and selection criteria for most of the executive leadership, management, and staff positions. Additionally, since performance measures were not provided, the team could not assess the impact of the actions in the three areas of improvement, determine if there are gaps in expertise still needed by the institution, and learn how ITU will assess the corrective measures it has undertaken. Thus, ITU should develop
methods for assessing the extent to which these new measures will effectively address the identified deficiencies in a meaningful way.

The team concludes that ITU has thoughtfully and deeply engaged the areas noted by the Commission. Note that each of these areas are more fully addressed in the applicable Standards where, as is described below, the team finds additional work is needed.

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

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. Final determination of compliance with the Standards rests with the Commission.

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

ITU has identified a mission and purpose, values, and elements which make it unique in Silicon Valley, and articulates how it contributes to the public good. (CFR 1.1) Indeed, education is its primary purpose and it operates as an academic institution within the appropriate economy. (CFR 1.5) In its review of the provided information and based on numerous interviews, the team found a broad and deep engagement of all stakeholders of ITU in support of the university’s mission. ITU demonstrates consistency with its mission and purpose in its admissions, hiring policies, programs, and, in general, organizational practices. (CFR 1.4) For example, over 50 different countries are currently represented in its student population. The team found this diversity to be truly inspirational. However, staff and the team both agreed that the vision statement needs to be updated so as to be consistent with ITU’s goals and current activities.

The team found the ITU Strategic Plan, in particular its goals and objectives, to be widely communicated to its stakeholders. When developing its annual operational plan, every unit references and connects to elements of the Strategic Plan; this is truly laudable. Each unit submits an annual comprehensive report on its activities, projected activities for the next year, and needed
resources for those projected activities. The finance staff meets with each unit annually to discuss resourcing priorities, again all based on linkages to the Strategic Plan. The team had concerns, however, about the apparent absence of regular and systematic institutional assessment of the ITU mission, strategic goals, and associated objectives. (See Standard 4 for detail.)

The team acknowledges the large improvements that ITU has made with respect to describing, mapping, and assessing student learning outcomes (SLOs), both course learning outcomes (CLOs) and program learning outcomes (PLOs). The team found that all of the institutional learning outcomes (ILOs), and some PLOs and CLOs, need to be defined and explained more precisely and understood more broadly. (See Standards 2 and 4 and Component 5 for detail on SLOs.)

ITU has revised its Academic Freedom statement and had adopted a statement for the Protection of Privacy in Human Subjects in 2015. (CFR 1.3) ITU has created a searchable inventory of all current policies and also continues to review existing policies for consistency and currency as part of its newly established review processes. (CFR 1.7)

The institution clearly demonstrates that it treats students fairly and equitably through its policies and procedures and how it addresses student conduct and grievances. ITU identified its ability to track student grievances as an area for improvement, and thus has already developed and is implementing a clear centralized system for doing so. (CFR 1.6)

Inventory of Educational Effectiveness Indicators:

ITU completed the Inventory of Educational Effectiveness Indicators worksheet in a meaningful and effective manner. Program learning outcomes are present and publicly available and all but one program have either conducted or are scheduled for program reviews. In the Inventory, ITU describes how every degree program has a system for assessing, tracking, and improving the learning of its students. It appears that the Inventory assisted the institution in determining the extent to which it has effective assessment systems, and what additional components or processes it needs to develop for
continuous improvement. This observation is based on the numerous forthright findings found after each Standard within the worksheet. For example, ITU has identified that, although its ILOs have been published, it is still in the process of improving assessment data quality so that it can aggregate assessment of CLOs and PLOs to measure how well the institution is doing.

There is a significant disparity in the quality of the information provided by all of its programs. ITU created an SLO Task Force that consists of the provost, institutional research (IR) personnel, two department chairs, and a manager from information technology. As a result of this group’s efforts, IR was able for the first time to present findings on its assessment work to the Academic Leadership Council (ALC). The team encourages ITU to continue analyzing, reporting, discussing, and using student achievement data as part of a systematic schedule. ITU may wish to consider continuing this SLO Task Force to ensure sustainability of ITU’s assessment efforts and, if so, if the composition of the Task Force is most effective in promoting faculty ownership of the assessment of student learning.

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

The faculty and administration of the university have developed curriculum maps showing the links from ILOs to PLOs and ultimately to CLOs. The learning outcomes at the course and program levels are defined and tracked, although those at the institutional level are not. Also included in ITU’s process for assessing learning outcomes are descriptions of “levels of knowing” based upon Bloom’s Taxonomy. The curriculum maps, records of student success within programs, and data on graduation rates are maintained for some programs and the team understands that data on CLOs (i.e., signature assignments), PLOs, and ILOs are being automated. These measures should be expanded, as is more fully explained in Components 3 and 4 of this report.

ITU presented an overview of how it identifies areas of learning that require immediate attention, as well as areas that should be monitored and addressed as part of internal continuous improvement. It is commendable that ITU, for example, has already responded to assessment data by
revising courses to build better communication and presentation skills. The team was pleased to note that ITU conducts a faculty orientation every trimester, and that adjunct faculty are encouraged to and do participate. Grades can no longer be submitted until signature assignments are completed, a useful precaution to help maintain a level of academic integrity in the program and insure that an essential element for student assessment is not omitted. The team observed that there was a commendable level of collaboration and cooperation among the various departments, particularly in these areas.

It is also commendable that ITU’s program review process includes external reviews from students and other university and industry personnel. Also admirable are the advisory boards for the business, electrical engineering, and computer science programs. There are academic and student affairs committees that strive to assure appropriate and high quality programs and services to meet student needs. However, the team did not observe specific evidence as to how those committees consider the program review process and utilize the results for program improvement. (CFR 2.3 and 2.7)

There are no direct measures for PLOs currently being systematically collected nor consistently analyzed. When asked if direct measures could provide essential and useful data, staff responded that there would be “extra complexity and confusion for faculty” to add these measures in addition to the “CLO-up” scheme in the education management system (EMS). This was problematic for the team which discussed that ITU could use reports on, for example, capstones, internship evaluations, and Peregrine scores (for MBA students) to assess quality of instruction and/or adjust courses or CLOs. The team suggests ITU incorporate a full analysis of the meaning and implications of quantitative data, both direct and indirect, collected both at the program and institutional levels.

ITU shared with the team its aggregated student achievement data which were presented in its institutional report. When requested by the team, ITU provided minimal data disaggregated by gender and country of origin, but are still developing processes to disaggregate by other student characteristics. Furthermore, the data were provided without analysis or discussion to facilitate interpreting the data in
a meaningful context. (CFR 2.3, 4.1, 4.2) Analyses of disaggregated data could reveal what segments of the student population are struggling or excelling, and thus provide guidance for instructional or curricular changes, student services, or, more broadly, the achievement of the ITU strategic goal of “Academic Excellence and Student Success.”

The team encourages ITU to consider how it is interpreting and utilizing the existing data it collects, as well as data being planned to collect in the future. (CFR 2.3 and 2.4) Some examples would include:

- Exception Admits: The number of reported “exception admits” increased from the second year to the third year. While the team discovered “exception admit” students were actually outperforming regular admits and discussed reasons for the performance phenomenon, the explanations for the increase itself was not clear. (CFR 2.2)
- Graduation Rates: Second year graduation rates have been decreasing since their 2011 highs. This would appear to be problematic unless the trend can be addressed or has a compelling and acceptable explanation. (CFR 1.2 and 2.10)
- Learning Outcomes: Achievement of overall summer trimester learning outcomes in 2017 were superior to those in the fall trimester and spring trimester, but for reasons not known to the team. (CFR 2.3)

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

Organizational structures and decision-making processes, in particular regarding the board, administrative leadership, International Student Office, Academic Leadership Council, and faculty and staff resources and employee success are presented below. The review of fiscal resources will be addressed in Component 7.

Board of Trustees: The ITU governing board added new board members to improve diversity in gender and experience. Vitae were provided for members of the board whose qualifications and
experiences align with the purpose and mission of ITU and reflect the likelihood that board members understand the content and context of institutional goals, issues, and challenges. Training for board members on their responsibilities for a non-profit entity was conducted and an ITU office of board of trustee relations created. Board members are leaders/members of five committees which have specific responsibilities and oversight of ITU: Academic and Student Affairs, Audit, Executive, Finance, and Planning. There are members of the board who take on additional responsibilities as officers: chairman, vice chairman, treasurer, and secretary. The by-laws of the board of trustees clearly describe the role of the board to hire and evaluate the chief executive officer (CEO), who is an ex-officio board member, and the board has conducted two annual evaluations of the CEO. (CFR 3.6, 3.7, 3.9)

The board of trustees is charged with oversight of strategy of the institution and ITU leadership worked with the board on approval of the 2015 – 2020 Strategic Plan. Regarding its fiscal charge, the Finance Committee receives the final draft of the budget for review after compilation of disaggregated ITU budgeting units by the Department of Accounting Services and the Office of Strategic Initiatives. Once approved at the committee level, the annual budget is submitted to the board for approval. The budgeting process is transparent and engages leadership within the faculty and staff to participate and contribute to the fiscal decision-making process as it pertains to their department or division. (CFR 3.10)

Board meeting minutes were provided for four meetings in 2016 and 2017 and reflect discussion of finances, strategies, evaluation of the CEO, external threats to ITU, board membership, and self-evaluation of the board. Voting and the resulting decisions are communicated to the ITU stakeholders. (CFR 3.6, 3.7, 3.9) In October 2016, six board members submitted evaluation forms for review by the chairman. The forms refer to an evaluation of “the past year” in its questions. In subsequent board discussions, concerns over ITU finances prompted recognition of the need for more networking and fundraising, increased oversight of ITU’s financial position, and possible personal contributions. It is not clear to the team how and when continued self-evaluation will occur. (CFR 3.4 and 3.6)
Leadership: ITU has a full-time CEO and Chief Financial Officer (CFO), both fully qualified. (CFR 3.8) In response to the recommendations of WSCUC and in light of the ongoing actions of SEVP, leadership of ITU has been strengthened with expanded duties for some roles and a remarkably large number of new positions. As mentioned in Component 1, however, there was little evidence of clear position descriptions, lines of authority, performance measures, or assessments of success to determine how these new positions and roles have positively affected its operations and mission. However, with new expertise of managers and officers in place and focused training for board members, officers, faculty, and staff, there is documented attention to compliance, quality, and adherence to the mission.

International Student Office: The accuracy of information on foreign students is critical, particularly at ITU given the SEVP situation. The team commends the university in making good strides in quality assurance in a number of ways. ITU separated offices dealing with admissions and services to international students so that those functions would be autonomous in operations and decisions. It is using an outside general counsel and a consultant from Stanford to provide external guidance. The new registrar, who has knowledge of international students, is assisting with student files.

The university has currently and has had a PDSO (Primary Designated School Official). However, it has been difficult for ITU to receive approval for additional Designated School Officials. The team concluded that the International Student Office would benefit from increased staffing with detailed position descriptions and lines of authority, to ensure accurate reporting and overall quality assurance in the program. Further, academic oversight would provide additional safeguards and support for international student reporting and services. (CFR 3.1 and 3.6)

Academic Leadership Council: The ALC, which was created in 2015 and undertook a significant expansion of authority in 2016, develops academic policies and provides input and recommendations on academic decisions. Generally, matters such as new programs are taken in succession from department chairs to the ALC to the provost and, finally, to the president for approval. Full-time and core faculty are
voting members, as are a number of academic administrators. Adjunct faculty are invited to and can participate, but they cannot vote. The team was particularly surprised to learn that both the president and provost are active members of the ALC; the provost chairs the Council and compiles its agenda. When asked by the team, it was difficult for staff and faculty at the ALC session to articulate and differentiate between the roles of the Cabinet and the Council when it came to decision-making within the institution. The team suggests that the university assess the effectiveness of the Council with respect to having the appropriate membership and consider separating faculty governance from that of senior administration. Further the team strongly suggests that the overlapping roles and decision making authority of the Cabinet and the Academic Leadership Council be clarified, to include those between executive management and academic affairs, and the distinctions be broadly communicated to stakeholders. (CFR 3.7 and 3.10)

Faculty: Within the draft Faculty Handbook, “full-time,” “core,” and “adjunct” faculty are distinguished, although responsibilities of each category overlap to some extent. All faculty members are involved in curriculum development and student advising.

- “Full-time” faculty: Often in the role of program directors, those individuals do not have jobs outside of their roles at the university. Full-time faculty are charged with a leadership role in dealing with junior faculty, research associates, and students (CFR 3.10) and in developing programs and other university activities. Full-time faculty are required to pursue research projects and community service. (CFR 2.4, 2.8, 3.1)
- “Core” faculty: These faculty members are technically/legally full-time and assume roles of teaching and often some administrative functions. They are limited to teaching three courses per term and all or most have jobs in industry. (CFR 2.4, 2.8, 3.1)
- “Adjunct” faculty: These individuals have jobs outside of the university, are part time employees of the institution, and do not participate in other academic functions other than ALC. However,
there are monthly department meetings with adjunct professors by department for communication purposes. (CFR 2.4, 2.8, 3.1)

ITU has contracted with Profhire, a recruiting and screening service for hiring faculty. This organization specializes in screening adjunct faculty, but also processes applicants for full-time positions. The contract includes advertising, reference checking, and screening to meet institutions’ diversity requests, and then forwarding the top three respondents to the university. From there, the university management team interviews and further screens new faculty hires. Some general compliance training is also available through Profhire (i.e., FERPA, Title IX). (CFR 1.7, 3.1, 3.2, 4.3, 4.4) The process appears to function well for ITU. However, the team’s review of the few academic vitae for faculty that were provided suggested some teaching faculty may be under-qualified for doctoral-level courses and students. (CFR 3.1)

Professional development is encouraged and promoted by the administration of ITU. Adjunct professors report that they received exceptional introductory and training programs when they begin at the university. Briefly explained in the draft Faculty Handbook is the opportunity to take courses tuition free at ITU and participate in ITU sponsored events. Financial support for additional professional development outside of ITU offerings is available to full-time and core faculty with support of the appropriate chairs or administrators. (CFR 3.3) Faculty (and staff) have received training in the management of and reporting on international students under the guidelines of SEVP and university policy, and all faculty have had required training on assessment. (CFR 3.3) Faculty are aware of program learning outcomes and incorporate those in course development. (CFR 2.4)

Recently the faculty evaluation process is described as having “been restored” with a clear directive under the “Employee Success” goal in the 2015-2020 Strategic Plan. Evaluation practices and policies are described in the draft Faculty Handbook and summarized within the Confidential Employee Performance Evaluation document. This employee performance evaluation is completed by someone
other than the faculty member and includes classroom visits, student evaluations, and syllabi overviews. There is also a “self-evaluation form” in which the faculty report levels of achievement in meeting goals set by themselves in discussion with department chairs. The forms are extensive and detailed with descriptors for evaluation levels of achievement and contribution to the institution’s strategic goals and purpose. However, the schedule for faculty evaluation was unclear to the team during the visit and the team was not provided with any completed evaluations to determine how the process has actually been applied for improvement purposes. (CFR 3.2)

Staff: An evaluation process is present for staff, but the team was unclear at the time of the visit, as it was for faculty, as to its schedule and actual application. Apparently there is very little onboarding for staff, especially related to ITU as a unique employer, which is particularly difficult for staff who move from industry to higher education. Onboarding that includes more general information on the university’s mission, structure, and academic operations might help with that transition. The team has been told that there is an employee handbook on the university intranet that covers basic employment issues, but did not have the opportunity to review it. (CFR 3.2)

A concern expressed by staff was that they felt their new ideas, approaches, and suggestions were often misinterpreted as criticism. As this leads to hesitancy to contribute and innovate in discussions in meaningful ways, the team suggests that leadership pursue the establishment of “meeting ground rules” that encourage openness of discourse (i.e., pursuing broad participation by all attendees, actively demonstrating respect for contributions, and allowing questions to be submitted anonymously ahead of the meeting.) Staff also expressed concerns that strategic decisions and the associated rationale are often not sufficiently and regularly communicating across ITU. Staff shared that they receive information from their managers in regular staff meetings, but many expressed the desire for more frequent updates from senior leadership. The team encourages the university to continue to hold staff and faculty monthly meetings, sometimes attended by the president or provost, to address specific
topics as they arise. The team suggests that the university institute internal newsletters and quarterly reports from the president or provost, in addition to the biweekly internal newsletters from the Department of Marketing and Admissions.

**Employee Success:** The departments of Facilities Development and Operations and Human Resources are charged with the institution’s strategic goal of “Employee Success,” including training and retention of faculty and staff. Mentioned in the Operational Plan – 2017 and charged to Human Resources is a goal to increase retention, faculty/staff diversity and the number of campus events. While initiatives in campus events were described, the team is not clear on the number and diversity of full-time, core, and adjunct faculty and staff. For example, of the 20 or more adjunct faculty who attended a session with the team, there were no women. Questions also remain for the team as to the typical length of time that full-time, core, and adjunct faculty remain with the university and the turnover rate of staff. (CFR 3.1)

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

There appears to be sufficient institutional research capacity at the university given the positions of director of information technology, EMS project manager, and director of IR. They are responsible for collecting, analyzing, and disseminating assessment data. The IR office has recently begun considering such metrics as enrollment and retention data and is developing a database warehouse. The team encourages continuation of both.

Prior to and after the OSR and during the ITU visit, the team requested and reviewed numerous documents on institutional learning. Despite these reviews, the connections at ITU among data collection and analyses, planning, budgeting, and institutional improvement are still not clear to the team. ITU confirmed in its self-study that “additional work also needs to be done at the institutional level to create an active system of oversight of the institutional learning outcomes” (page 53). In
general, the regular and systematic institutional assessment of the ITU mission, strategic goals and associated objectives, and ILOs appears to be lacking. (CFR 4.1, 4.2, 4.3, 4.5, 4.6, 4.7).

Department leaders were involved in the creation of a process for progress reporting. Those reports were compiled in the 2016 – 2017 Progress Report and in the 2015 – 2016 Progress Report. In these reports, goals and levels of achievement by department are itemized and references to budget adherence are noted. The 2015 – 2016 Progress Report summarized institutional results in “Key Takeaways.” However, this type of summary was not found in the 2016 – 2017 Progress Report.

As suggested above, the team did not see evidence that ITU, at the institutional level, deliberately links its planning and assessment to its mission, vision, and Strategic Plan - all to inform strategic decision making. The team suggests that the university consider the following actions:

- Reexamine and, as appropriate, update its vision and mission.
- Conduct systematic and deliberate reviews of its strategic planning process.
- Ensure that vision and mission are more transparent on the university’s website, and become focal points in its next strategic planning process.
- Develop clear links of statements within the mission to clear and measurable goals and objectives to ensure each are accomplished.
- Develop plans for operationalizing the Strategic Plan at the institutional level, as is now done at the unit level. Operationalization could include establishing annual priorities that are informed by assessments aggregated at the institution level, and using these assessments to guide resourcing decisions.
- Analyze program reviews at an institutional level to facilitate the assessment of ILOs.
- Identify clear roles and responsibilities for strategic planning and its assessment at the institutional level, in particular for the board, the board’s Strategic Planning Committee, the president, provost, cabinet, and ALC.
• Seek appropriate developmental opportunities for those with significant strategic planning responsibilities at the institutional level for optimal leadership.

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

Two program reviews are scheduled for the current academic year and another five programs are scheduled through academic year 2020 – 2021. These reviews, based on data collected on CLOs, will provide ongoing information as to the meaning, quality, and integrity of degrees. (CFR 1.2, 2.3, 2.7)

A major component of the ITU degrees is internships and great strides have been made in ensuring their quality and integrity. In particular, moving the responsibility of internships to the Department of Academic Support Services, adding faculty oversight, and requiring reflective writing assignments have made them a much more integrated academic experience and a high-impact practice. (CFR 2.10 and 2.11)

Students can enroll in a maximum of three trimesters of paid full-time internships as part of their curriculum. One preparatory course is used to inform students about the internship program requirements which are agreed upon with and supervised by a faculty member. The internship host becomes part of the academic team for evaluation purposes. (CFR 2.5, 2.6) While in the process of engaging in internships, students sometimes leave the university and seek full-time employment instead of continuing their education. The university is developing programs for such students with the goal of assisting each individually to complete his or her degree program while working full time. A minor suggestion emerged from conversations with employers who provide internships was that it could be useful for both students and providers for mentors to see the students’ final reflection assignments. (CFR 2.11 and 2.13)

The team had multiple concerns about the quality and size of the PhD programs. While doctoral students were enthusiastic, their responses to team questions suggest inadequate preparation or guidance for achievement at the purported level of academic success, especially in dissertations. Classes
consist of one or two students, and DBA and PhD classes no longer meet together for reasons that were not clear to the team or to the students. The team was also concerned that students take a “qualifying exam” after 30 credits in the PhD program and the remaining 30 credits do not require a single class meeting, but rather entail the expectation of publishing or obtaining patents in some manner. It is not clear how this supports the academic rigor and integrity of the PhD program. The evaluation process with respect to signature assignments seemed excessively casual with regard to quality assurance.

The team suggests that ITU form an internal ad hoc team that is unbiased and broadly representative of its stakeholders to review the quality of the PhD programs. (See Component 4 for more detail on dissertations and theses.) (CFR 2.3, 2.6, 3.1, 3.4)

There seems to be a clear difference of opinion on the importance of doctoral research at the university, including student research and publishing. One leader said that these areas were critical for sustainability of the university and should be included in future prioritization; another indicated that PhD programs were not in the university’s “wheelhouse.” The underlying concern for the team is that there does not appear to be an active and broadly accepted culture of and support for research in the PhD program. (CFR 2.3, 2.4, 2.6, 2.7, 3.1)

A final area of concern for the team is the ability of the university to both respond to the market in a swiftly evolving high-tech world and maintain fiscal solvency with its programs. The team suggests that ITU form a similar, and perhaps second, ad hoc team as described above to objectively review the value of degree offerings that may be becoming obsolete or have consistently low enrollments, and simultaneously redirect resources to those programs which show growth or are on the horizon. More broadly, ITU should regularly reconsider the number and variety of its programs, especially PhD programs, with respect to fit with mission, market, and available resources. (CFR 2.1, 3.4, 3.5)
D. Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation

ITU uses a variety of approaches to assess student learning and achievement of core competencies, including, but not limited to, capstones, signature assignments, theses, and dissertations. These are among the more traditional valid measures in academia. (CFR 2.3 and 4.1)

At the masters level, a sample of 23 MBA theses were provided with little context and thus were not sufficient for the team to make a judgment as to the adequacy of these academic components for the masters student body at large. At the MBA level, learning outcome assessments were provided, but the stated conclusions, such as that business students display incredibly high scores on learning outcomes related to analyzing information and synthesizing information within the core courses, were not accompanied by evidence. Much of the MBA discussion appears defensive rather than proactive, and was further weakened by the absence of credible supporting evidence. (CFR 2.3, 4.1, 4.2) Similarly, evidence should be provided to support ITU’s ability to attain competency-based courses and a cross disciplinary curriculum. Clarification is also needed as to how the institution endeavors to meet the high standards of its own program advisory boards which consist of prominent Silicon Valley leaders.

At the DBA level, ITU provides external assessment results of learning outcomes that have similar limitations as those identified in the previous paragraph; data for a single DBA candidate made the results challenging to interpret. The team anticipates richer information may be available as additional candidates progress through the program and believes ITU’s consideration to conduct an internal audit to ascertain the relationship between the individual student’s work status and learning outcomes is a positive sign of a potential action step. (CFR 2.3, 4.1, 4.2)

The team heard one doctoral presentation, which was insufficient to demonstrate generally accepted doctoral standards, and was provided only two doctoral dissertations to review. One dissertation appeared to have a robust research plan and detailed analyses and references; the other
appeared less comprehensive and contained numerous grammatical errors. While the limited sample
does not allow the team to determine the quality of all doctoral products, it has implications for
assurance of educational quality. (CFR 2.2 and 2.3)

Regarding alternative measures of student learning, the team was led to understand that the
DBA program is being revised to have students complete work projects rather than dissertations. This
revision may make it more difficult to ensure and assess academic rigor. The team was also advised that
PhD students may be asked to get external certifications in lieu of traditional comprehensive
examinations. While this may have the advantage of outside review of student learning and
achievement outcomes, it also entails the limitation of less comprehensive internal review and rigor
within the programs themselves. These topics, along with the need for dissertation process guidelines,
could fall into the purview of the ad hoc task force suggested earlier in Component 3 to review the
quality of the PhD programs.

The team’s concern is that many aspects of ITU’s responses with respect to the accountability
components remain aspirational, with little or no articulation on how the university will address any
achievement gaps that it may uncover. The team was not confident that the institution provided
sufficient detail and direction as to how assessment and achievement analytics will be used to inform
corrective action nor how the various areas for corrective action will then be assessed and measured. To
address that concern, operational definitions of and plans for anticipated corrective actions should be
provided, and when these actions are not successful, other actions should be implemented. (CFRs 2.6,
4.2, 4.3, 4.4, 4.6)

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

ITU’s graduation rates have varied over the last few years as indicated by the two-year rate
ranging from below 30% for some cohorts to over 60% for others. There are noticeable differences
among students who matriculate in spring versus summer or fall trimesters. However, like its treatment
of student achievement data as described above in Standard 2, the institution does not disaggregate their retention and graduation data in any way that would be useful for targeting improvement efforts. In response to team inquiries, the university has indicated an intention to disaggregate by gender, country of origin, and other relevant variables and the team strongly urges ITU to begin that process. Similarly, although the information gathered through surveys of graduates and employers indicate high levels of satisfaction, it is less clear how this information, or data on reasons for withdrawal, vary by student demographic categories or how the data are systematically used in ‘closing the loop’ for continuous improvement. (CFR 1.2, 2.10, 4.1, 4.3)

ITU has made strides in developing learning outcomes at all levels – course, program and institution – that provide a well-developed framework of expectations for student success. (CFR 1.2, 2.3, 2.4, 2.10) However, as indicated in Standard 1, ILOs need definition. They appear as one-word concepts (i.e., “Research”, “Responsibility”, etc.) and were defined only when requested by the team. While these ILOs provide a succinct presentation of priorities, the concepts themselves are generally quite broad making it a challenge for implementation. This seems a missed opportunity to provide explicit guidance to students and faculty alike about what, specifically, academic success at ITU really means. (CFR 2.4) Well-defined ILOs also would provide a better foundation for considering how to assess progress toward achieving those goals. Currently, such assessment relies on scores aggregated from rubrics for all the individual CLOs and it was unclear to the team what those scores really mean. The team encourages ITU to consider better measures to assess the ILOs and set clear targets and benchmarks. (CFR 4.1 and 4.3)

ITU recently hired an experienced registrar and associate registrar who now provide regular reports of student status to academic advisors and faculty, enabling early intervention when problems arise. The team applauds the dedication of resources for struggling students provided by the Department of Academic Advising, the Tutoring Center, the Writing Center and other support offices. (CFR 2.12 and 2.13)
Co-curricular programs, such as Toastmasters (a club to help members improve their communication, public speaking, and leadership skills) and Hackathons (gatherings where programmers collaboratively code), provide unique opportunities for students to apply their learning in professional environments. With the recent hire of an experienced student affairs officer, the university is clearly on the right path to expand and improve such programming. As those efforts progress, the team encourages ITU to also consider how to integrate these activities, along with internships and student services, more closely into the learning outcomes and assessment processes. (CFR 2.11)

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

ITU shows a strong commitment to quality assurance and improvement at the program and course levels. As noted above in Standard 2, ITU has made great strides in developing student learning outcomes at multiple levels, and in revising their course and program assessment processes. (CFR 2.7) The workshop on course learning outcomes that the university organized in 2017, and the training faculty received at events such as WASC’s Academic Resource Conference, appear to have reaped large benefits in terms of the number of CLOs and PLOs that are well-aligned. (CFR 2.4 and 3.3) The university is still in the process of transitioning to a stable cycle of program review, but ITU’s departmental programs appear to have a solid assessment framework. The integration of assessment into the education management system is particularly impressive; data on signature and capstone assignments are captured there along with rubrics tied to CLOs and PLOs. These efforts facilitate easy incorporation into program and institutional reports. (CFR 2.6, 2.7, 4.1, 4.3)

The next step for the institution, programs, and individual faculty is to make real meaning of the data and use them for continuous improvement (“close the loop”). The team encourages ITU to explore best practices for assessment as it continues this work. For example, rather than reporting average rubric scores for CLOs, it is likely more useful to consider the number/percentage of students who are achieving at each level, particularly when there are small numbers of students in a course. Establishing
targets for those measures would then help indicate where current approaches are working and where more attention is needed. The institution may want to consider establishing a process or schedule for programs to discuss and use assessment data on an on-going basis in between formal program reviews. Finally, as mentioned above in this report, each program already has some capstone experience that requires students to synthesize their learning. These could be direct measures of PLOs, augmenting the aggregated scores for CLOs currently used.

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

WSCUC defines institutional sustainability as having at least three dimensions: the appropriate alignment of resources, adjustment to the higher education environment, and adequacy of financial resources. Each will be discussed in turn.

As mentioned earlier, the allocation of institutional resources is primarily based on unit assessment reports. The team feels that ITU would be more effective in allocating its resources if ITU considered funding institutional priorities first, and then unit priorities, although certainly some unit priorities could be so significant that they are also institutional priorities.

The team compliments ITU for its ability to stay abreast of the evolving higher education landscape and anticipate ways in which the institution itself may need to change. To do so, ITU emphasizes the following: program reviews informed by external practitioners in the field; adjunct faculty who are extremely successful practitioners in the fields in which they are teaching; and the internship experiences in Silicon Valley. These areas of emphasis and others ensure the university is continuously updating its programs and learning opportunities. Given the constant change of the technology in Silicon Valley, ITU should be lauded for its educational model which ensures it is keeping up with the ever changing higher education sector. As referenced earlier, the team suggests ITU update its vision statement to better reflect this role in 21st century higher education.
The team feels that ITU’s financial sustainability is uncertain given the current SEVP situation and its large number of international students. It is truly unfortunate, given that all issues identified from SEVP have been addressed by ITU, that ITU’s status has yet to be resolved. ITU has made tremendous strides in so many areas as outlined in this report and has established multiple best practices for other schools to emulate while doing so, yet it is still severely constrained by the lack of clarity on the SEVP situation.

The student population at ITU has decreased significantly and enrollment estimates upon which to base current financial projections show a revised estimate of 853 students during spring trimester of 2018. This is down from a target for the trimester of 1,104. With actual enrollment and pending results from SEVP, the CFO and budgeting staff will be able to further refine the accuracy of financial projections. However, the university has been consuming cash reserves over the most recent three years due to a drop in tuition revenues and its increased operational costs, which are largely “fixed” in nature. (CFR 3.4) In the ITU institutional report, reserves were reported as being maintained at about $11 million. By June 30, 2017, the year-end report showed the reserves were approximately $10.9 million (cash & cash equivalent for $8.8 million and investment, a risk-free Certificate of Deposit, for $2.1 million).

In determining the financial stability of ITU, the audited financial statements of 2015 – 2016 were reviewed, followed by the audited set of financial statements for the fiscal year ending June 30, 2017. The university was audited by Moss Adams as a “going concern,” though stipulations were noted that a negative determination by SEVP would introduce substantial doubt as to that designation. (CFR 3.4)

From 2015-year end to 2016-year end, there was a decline in liquidity by approximately $2.5 million. By 2017-year end, that trend continued with an additional decline in liquidity of another $2 million. The auditors noted the current status on the issue with SEVP is reportable to the Government
Auditing Standards. The “reportable compliance matter” was an issue of lapses in the proper reporting required by the federal government about non-immigrant students at the university. The ITU management response to the auditors’ notes and report reflect diligence in efforts to “maintain best-of-breed compliance with SEVP regulations” (Auditor’s Report, International Technological University, Schedule of Findings and Responses, Year Ended June 30, 2017, page 21).

Also included in the opinion notes in both reports were references explaining what is meant by “internal control procedures.” The auditors did not identify any deficiencies in internal control procedures, but noted that their report was deemed “not for the purpose of expressing an opinion” on such. In the conclusion of that section of the report, the possibility of the existence of material weaknesses is present. Of the two possible issues the auditors identified (“Internal Control Procedures” and “Compliance with Federal Regulations”), their larger concern was with “Compliance.” Appropriate management responses to those concerns have been implemented. Also, an Audit Committee of the board was chartered, with functions of “compliance” with federal laws regarding international, non-immigrant students, and with “internal control procedures” oversight for ITU in preparing financial information for external auditors. (CFR 2.13, 4.1, 4.3)

To provide realistic budgets, ITU grouped projected revenues and expenses into three scenarios. All scenarios covered fiscal years beginning with July 1, 2017 and ending with June 30, 2021. The first scenario reflected the status quo with SEVP. The second showed expected financial activity if SEVP disallowed ITU from issuing I-20’s beginning in the fall trimester 2018. The third reflected ITU’s eligibility to issue I-20’s to new students in fall of 2020. For the 2017 – 2018 fiscal year, all three budgets show a decline in liquidity of over $1.9 million. For 2018 – 2019 and 2019 – 2020 projections, an item which assists with positive cash flow is, in the ITU institutional report assumptions, “private donations” of $2 million and $5 million for those two years, respectively. In the third scenario, projections for positive cash flow are not dependent upon those donations. (CFR 3.4 and 4.6)
The most dramatic differences, scenario to scenario, are the tuition revenues if SEVP disallows ITU eligibility to issue I-20’s beginning fall trimester 2018 (the second scenario). Consistent with the auditors’ opinion, ITU would lose significant opportunities to recruit students. In the second scenario, ITU expects that tuition revenue from existing programs would decrease precipitously from more than $11 million per year to $5.6 million in 2018-2019, then to $ 2.1 million in 2019-2020 and $2.9 in 2020-2021 (Institutional Exhibit: appendix B36- Projection Scenarios for 2017-2021). Many of the expenses of the university seem to be fixed and could not, therefore, be adjusted to correspond with a drop in student population attending ITU. Diversification of revenues include “other university fees” and the private donations previously mentioned. The likelihood of a $2 million donation to ITU seems likely to the CEO and the CFO, who both expressed confidence in receipt of that gift. A second potential gift of $5 million is less likely.

To its credit, ITU has developed numerous financial strategies to overcome these challenges, but unfortunately, would only scratch the surface in enabling the tremendous potential ITU has in achieving its mission and vision. To increase revenues and to contribute to diversity, defined as international versus domestic students, ITU is in the process of promoting programs in the Silicon Valley. These outreach activities include reduced revenue for employees of area companies, deferred tuition payments for students whose companies offer tuition reimbursement, and reduced tuition to active-duty military and local teachers. For better name and community involvement recognition, ITU currently offers free tuition to police, fire, and other first responders. The team urges ITU to continue to pursue alternative revenue resources, accordingly revise budgets and, as outlined in Component 3, regularly reconsider the number and variety of ITU’s programs with respect to fit with mission, market, and available resources. (CFR 1.1, 3.4, 4.6, 4.7)

H. Component 8: Optional essay on institutional specific themes – Not Applicable

I. Component 9: Reflection and plans for improvement
The institution did not summarize its findings, interpretations, conclusions, and plans as part of this Component. Instead it referred to “steps along...a path forward that promises to fulfill and even broaden the original vision” (page 62) that are described throughout the report. Many action steps are indeed presented but, as stated in Section IC, the team observed that the report was more descriptive and aspirational than evaluative. ITU emphasized in Component 9 of the institutional report that “rarely has a university begun with such promise, in such a unique setting, with such a distinct mission, only to meet with challenges that threatened its very existence – not once, but repeatedly. Yet even more rarely has such a university managed to overcome those challenges while doggedly maintaining its mission and even enlarging its vision at the same time” (page 62). The team felt that “overcome” was a strong term that seemed to minimize the continuing jeopardy that ITU faces given the continuing sustainability pressures outlined in Component 7.

As a result of the self-study effort, it was very apparent to the team that stakeholders learned much about each other and about the institution. Their broadly based preparation for the visit seems to have improved understanding of who their students are and need to be; the value of sharing problems for mutual support; and the importance of working together to overcome the university’s serious challenges.

SECTION III – OTHER TOPICS (such as Substantive Change) Not Applicable

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

ITU deliberately conducted the comprehensive review and planned carefully for the team’s visit. Team requests for evidence and confirming documents were readily provided. The team appreciated learning about an institution with such a unique mission and engaging with its stakeholders, all of whom displayed enormous commitment and willingness to work toward successes in teaching and learning.
**Areas of Commendation** - The team wishes to commend ITU for the following accomplishments and practices:

1. **Self-Study Process**: There was widespread and deep engagement of all stakeholders in the transparent, forthright, and deliberate self-study process.

2. **Culture and Working Relationships**: All stakeholders demonstrated great enthusiasm for and commitment to ITU and its mission, despite financial challenges, and all expressed a culture of collaboration within and among teams and departments.

3. **Leadership**: ITU has established numerous leadership positions and concurrently hired new personnel who have extensive experience in critical areas of American higher education. ITU leaders head integrated and collaborative teams that embrace the innovative ideas and strategies brought by newcomers.

4. **Student Learning Assessment**: ITU has established a comprehensive student learning assessment framework that includes mapping course, program, and institutional learning outcomes; embedding outcomes in a learning management system; developing signature assignments; developing faculty; and engaging in a Program Review process that requires opportunities for input from multiple internal and external stakeholders.

5. **Policies and Procedures**: ITU completed a comprehensive review of policies and the development of new needed policies, which resulted in the alignment of an annual university catalog, an updated faculty handbook, and a policy and procedure manual.

6. **Unit Planning Process**: All units and departments engage in an extremely effective and thorough annual operational planning process that links operations and budget needs to ITU’s strategic goals.
7. **Educational Model:** The use of highly qualified faculty, most of whom are currently employed in the technology industry, assures cutting edge content and industry application, both consistent with the ITU mission.

8. **Internship Program:** Enhancements and changes in the internship program have resulted in a high impact educational practice that ensures academic value.

**Recommendations** - The team has identified the following recommendations to focus ITU’s ongoing and future efforts:

1. **Institutional Planning Process:** Develop and implement an annual institutional planning process that is data driven and informed by the Strategic Plan, resulting in the prioritization of annual institutional initiatives and allocation of resources. (CFR 4.1, 4.2, 4.3, 4.5, 4.6, 4.7)

2. **Student Outcomes Data Analysis and Use:** Systematically analyze student outcome data, both aggregated and disaggregated, to inform continuous improvement efforts at the program and institutional levels ("close the loop"). (CFR 2.10, 4.3, 4.4)

3. **Financial Sustainability:** Pursue alternative revenue resources and accordingly revise budgets. Regularly reconsider the number and variety of ITU’s programs with respect to fit with mission, market, and available resources. (CFR 2.1, 3.4, 3.5)

4. **International Students:** Increase staffing and provide academic oversight of international student operations to further improve quality assurance. (CFR 3.1, 3.3)

5. **Governance and Decision Making:** Clarify the overlapping roles and decision making authority of the Cabinet and the Academic Leadership Council and broadly communicate to stakeholders the distinctions between the two bodies. (CFR 3.7 and 3.10)
# 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>
</table>
| Policy on credit hour | Is this policy easily accessible? X YES ☐ NO  
If so, where is the policy located?  
The policy is located in the 17-18 Student Handbook and Catalog, page 25.  
Comments:  
CREDIT HOUR POLICY  
Except as provided in Federal Regulation 34 CFR 668.8(k) and (l), a credit hour is an amount of work represented by intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than:  
1) One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or  
2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution, including laboratory work, internships, practice, studio work, and other academic work leading to the award of credit hours.  
ITU has adopted the United States Department of Education requirements for “courses offered entirely online and without any required face-to-face class meetings.”  |
| Process(es)/ periodic review of credit hour | Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? X YES ☐ NO  
If so, does the institution adhere to this procedure? X YES ☐ NO  
Comments:  
The Curriculum Review Committee reviews any new course that is proposed to be added to the curriculum. Final approval of the committee is required prior to the course being added to the catalog and to the class schedule.  |
| Schedule of on-ground courses showing when they meet | Does this schedule show that on-ground courses meet for the prescribed number of hours? X YES ☐ NO  
Comments:  
The ITU Class Schedules are available at itu.edu/schedule. All courses are 3 credit hours unless otherwise noted.  |
| Sample syllabi or equivalent for online and hybrid courses Please review at least 1 - 2 from each degree level. | How many syllabi were reviewed? 2  
What kind of courses (online or hybrid or both)? online  
What degree level(s)? ☐ AA/AS ☐ BA/BS X MA ☐ Doctoral  
What discipline(s)? Integrating Academic & Internship Learning  
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  
Comments:  |
<table>
<thead>
<tr>
<th>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)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please review at least 1 - 2 from each degree level.</td>
</tr>
</tbody>
</table>

| How many syllabi were reviewed? | 1 |
| What kinds of courses? | Internship |
| What degree level(s)? | AA/AS ☐  BA/BS ☐  MA ☒  Doctoral ☐ |
| What discipline(s)? | |
| Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? | ☒ YES ☐ NO |

| Comments: |
| ITU has made great strides in ensuring the quality and integrity of this program element |

<table>
<thead>
<tr>
<th>Sample program information (catalog, website, or other program materials)</th>
</tr>
</thead>
</table>

| How many programs were reviewed? | 4 |
| What kinds of programs were reviewed? | MBA, MSEM, MSDA, MSCE |
| What degree level(s)? | AA/AS ☐  BA/BS ☐  MA ☒  Doctoral ☐ |
| What discipline(s)? | |
| Does this material show that the programs offered at the institution are of a generally acceptable length? | ☒ YES ☐ NO |

| Comments: |

Review Completed By: Kathryn Tooredman  
Date: April 6, 2018
<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: Federal requirements do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid. ITU students do not receive financial aid. |
| Degree completion and cost | Does the institution provide information about the typical length of time to degree?  
X YES □ NO  
Does the institution provide information about the overall cost of the 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  
Does the institution provide information about the employment of its graduates, as applicable? □ YES X NO  
Comments: Jobs:  
See "Career Opportunities" or "Job Possibilities" listed under each program in the 2017-1018 catalog.  
Employment: ITU did not historically collect student salary or post-graduation data. New efforts are already resulting in engagement of the alumni community and increased post-graduation outcome data collection. Results of efforts described in Institutional Report, page 36. |

Review Completed By: Kathryn Tooredman  
Date: April 6, 2018
### 3 - STUDENT COMPLAINTS REVIEW FORM

<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? (see comments)  
Comments:  
The university has published policies for both academic and non-academic complaints or grievances. These policies can be found on pages 36-38 of the catalog and are available online at http://itu.edu/sites/default/files/2017-12/ITU-Catalog-2017-2018.pdf. In addition to the formal channels outlined in these policies, students that submit tickets regarding complaints to the general support ticketing system would also be routed to the appropriate department to initiate the appropriate process.  
Within these policies, students are directed to contact the appropriate office to begin the review process. Depending on the nature of the claim, an administrator would be assigned from either the academic affairs or student services department. This administrator would then work within the defined procedures to review the merits of the claim and issue a decision. A formal appeals process is also outlined online and in the catalog, in the event either party is unsatisfied with the result of the process. |
| **Process(es)/procedure** | Does the institution have a procedure for addressing student complaints?  
X YES  □ NO  
If so, please describe briefly: see comments  
If so, does the institution adhere to this procedure? X YES  □ NO  
Comments:  
The university process varies slightly between academic and non-academic concerns. In general, both processes follow a model of informal-to-formal resolution. Relevant parties are expected to make a good-faith effort to resolve the issue before formally escalating. Once escalated, an assigned administrator will ensure all appropriate informal resolution options have been undertaken and initiate the formal process as needed. During a formal grievance, the evidence of a claim is brought to either an assigned administrator or academic committee. Upon review, a decision is made and provided to all parties. A formal appeals process is also outlined online and in the catalog, in the event either party is unsatisfied with the result of the process. |
<table>
<thead>
<tr>
<th>Records</th>
<th>Does the institution maintain records of student complaints?</th>
<th>X YES □ NO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>If so, where? The university has a centralized grievance and complaint log housed on our internal share drive tool (Box). This log is shared among senior leadership and the directors of the Office of Academic Affairs and the Office of Student Services.</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Does the institution have an effective way of tracking and monitoring student complaints over time?</th>
<th>X YES □ NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>If so, please describe briefly: Both grievance records logs (academic and non-academic) are stored in a company share drives and accessible to relevant parties or key figures in university leadership. These logs will provide a running list of event data to accommodate trend and pattern analysis over time.</td>
<td></td>
</tr>
</tbody>
</table>

Comments:

Review Completed By: Jennifer Imazeki
Date: April 6, 2018
### 4 – TRANSFER CREDIT POLICY REVIEW FORM

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit?  
X YES ☐ NO  
If so, is the policy publically available?  
X YES ☐ NO  
If so, where? The university catalog.  
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  
Comments:  
When a student applies to the university and does not meet certain admission requirements, an “Exceptions Committee” tries to work with the applicant to assist them in becoming eligible to begin a program at ITU. This usually includes additional coursework at an approved and accredited institution. That potential student is provided clear guidance on what courses to take in preparation for their planned program at ITU. |

Review Completed By: Carol Coman  
Date: April 1 - 19, 2018

**B. Off-Campus Locations Review, as appropriate – Not Applicable**

**C. Distance Education Review, as appropriate - Not Applicable**