July 10, 2013

Geoffrey M. Cox
President
Alliant International University
20 Haith Street
San Francisco, California 94102

Dear President Cox:

At its meeting June 19-21, 2013, the Commission considered the report of the Special Visit team that conducted an onsite review of Alliant International University-San Francisco Law School (AIU-SFLS) February 27-28, 2013. The Commission also reviewed the Special Visit report for San Francisco Law School submitted by the university prior to the visit and the institution’s May 20, 2013, response to the visiting team report. The Commission appreciated the opportunity to discuss the visit with you, Provost and ALO Russ Newman, Associate Provost Patty Mullen, and Dean Jane Gamp. Your observations were very helpful in informing the Commission’s deliberations.

Following consideration of Alliant’s March 22-24, 2011, Educational Effectiveness Review (EER) visit and team report, the Commission called for a Special Visit, scheduled for spring 2013, focusing on seven issues at the university’s San Francisco Law School: 1) integrating the law school with the university, 2) hiring an appropriate number of full-time faculty members and developing a faculty staffing plan, 3) engaging faculty in curriculum development, admissions, and establishment and application of academic standards and policies, 4) supporting faculty scholarship, 5) assessing student learning, 6) assessing co-curricular and student services functions, and 7) gathering and interpreting three years of data on student enrollment, retention, graduation rates and bar pass rates—disaggregated by gender and ethnicity—with specific plans to address disparities and/or low rates. The 2013 visiting team found that AIU-SFLS had addressed each of the issues in the Commission’s action letter, though with varied levels of success.

The Commission noted commendable progress since the last interaction with WASC in several significant areas. These include positive developments toward integrating the law school with Alliant International University, engaging the faculty further in curricular and other governance matters, and establishing methods to improve California State Bar Exam bar pass rates. Two areas stood out in particular:

**Integrating with Alliant International University.** Despite its many challenges, it is clear that the merger has brought, in the words of the team, "resources,
enhanced expectations, and the regional accreditation standards” that can contribute significantly to the future of the law school. The establishment of a committee to monitor the progress of integration, important upgrades to technology, the participation of the law school dean in university leadership, and inclusion of law school faculty in the Alliant Faculty Senate are all strong indications of a positive and ongoing integration. Furthermore, the team observed that “the leadership and staff are actively engaged with their counterparts at Alliant, share the same values, and consider themselves a part of the larger organization.”

**Improving mechanisms for collecting and utilizing data.** A vital prerequisite for engaging faculty in full ownership of the academic enterprise (particularly curricular development and assessment of student learning and success) is the availability of an adequate database. In this regard, the merger with Alliant has provided a deep reservoir of resources, including its institutional research function, upgrades in technology, and already established systems related to meeting WASC Standards.

The Commission endorsed the findings, commendations, and the seven recommendations of the Special Visit team and urges the university to follow up with further efforts. In particular, it wishes to highlight three areas, as identified below, for special attention and further development:

**Improving the record of student success.** The Commission concurred with the team’s observation that improvements in SFLS’s graduation rates and bar pass rates “have become institutional priorities.” The Commission was also pleased to learn of ongoing enhancements to student support services such as student orientation, academic support programs, financial assistance, and establishment of an ad hoc committee on student involvement in learning activities. However, additional efforts are needed to gather evidence, disaggregate data on student success, and develop strategies for assisting working adults to succeed in a challenging program. This will be particularly important in the current market, which is characterized by depressed enrollment figures and uncertain job prospects. Although recently the law school’s bar pass rates have “equaled or exceeded the average California-accredited schools” (with a cumulative rate of 48%), the Commission expects SFLS to continue working to identify and address factors leading to low graduation and bar pass rates, especially relative to disparities between student groups. For example, currently, women students’ graduation rates are stable at slightly above 50%, while rates among men have decreased from a high of 80% to 50%. The Commission also noted that African-American students graduate at the lowest rate (40%), compared to Hispanic students at nearly 80%. Additionally, in bar pass rates for the classes of 2010 to 2012, White students posted a 67% rate while underrepresented students had a much lower rate (33%). Consequently, the next interaction with WASC will be focused on demonstrated improvement in measures of student success, including bar pass rates. (CFRs 1.2, 2.6, 2.10, 2.11, 4.4, 4.6)

**Enhancing a culture of evidence and academic quality assurance.** Improving student success and fulfilling institutional mission require full development of a culture of evidence and academic quality assurance processes informed by best practices in the WASC region and beyond. The Commission acknowledged that SFLS has achieved a modest beginning in the collection of evidence and disaggregated data. In addition, the law school has adopted student learning outcomes, embedded those outcomes in course syllabi, created curriculum maps, and developed other
characteristics typical of a culture of evidence. However, as highlighted in the team report, the law school is in “the very early stages of creating a culture of evidence-based decision making and assessment of student outcomes.” The Commission noted, for example, that the findings from many assessments, and analyses leading to improvement, are at a nascent stage or have been referred to the Faculty Council for future action, as was the case for Moot Court assessments. The team concluded that many quality assurance processes were too recently established to enable an evaluation of their contribution to a culture of evidence and there was a lack of clarity as to how data collected would be useful in making programmatic changes or improvements. The Commission expects the law school to make significant progress and be able to clearly demonstrate results in gathering, analyzing, interpreting and using data to make improvements in programs and in student learning. (CFRs 2.4, 2.7, 2.10, 4.4, 4.6, 4.8)

**Developing the role of the faculty in governance.** A significant transitional issue in the merger of AIU and SFLS is the expectation that the law school will take on what WASC Standards designate as characteristics of a graduate culture. The team found that a Faculty Council has been established “to ensure the active representation of the faculty” in governance of the law school, while putting in place several committees. However, the team also found that a faculty governance model that reflects WASC Standards “remains a work in progress.” The Commission expects SFLS faculty to set admissions standards, create academic policies and practices, and review the curriculum. The Commission also expects SFLS administration to provide programs in faculty development and to promote faculty scholarship and creative activity. In a related matter, the Commission noted the need for additional full-time faculty who can be readily available to advise and mentor students, conduct research that can be brought into the classroom, serve on governance committees, and undertake other efforts to assure a strong academic culture within SFLS. (CFRs 2.4, 2.8, 2.9, 3.2, 3.4, 3.11, 4.6)

The Commission acted to:

1. Receive the Special Visit report.
2. Continue with the next comprehensive review of Alliant International University, with the Offsite Review in fall 2019 and the Accreditation Visit in fall 2020.
3. Request a Special Visit to San Francisco Law School in fall 2015 focusing on the following issues cited in this letter and in the 2013 Special Visit team report: 1) improving the record of student success, including demonstrated results in graduation rates and bar pass rates 2) enhancing a culture of evidence and academic quality assurance, and 3) strengthening the faculty’s role in governance. Progress should be demonstrated as defined above.

In accordance with Commission policy, a copy of this letter will be sent to the chair of Alliant International University’s governing board in one week. The Commission expects that the team report and this action letter will be widely disseminated throughout the institution to promote further engagement and improvement, and to support the institution’s response to the specific issues identified in them. The team report and the Commission’s action letter will also be posted on the
WASC website. If the institution wishes to respond to the Commission action on its own website, WASC will post a link to that response.


As the university works on the issues cited above, it should be mindful of the expectations that it will need to meet at the time of its next comprehensive review, which will take place under the revised Standards of Accreditation and institutional review process in the 2013 Handbook of Accreditation. These expectations build on past practice and include, for example, student success, quality improvement processes such as assessment and program review, planning, and financial sustainability. However, the 2013 Handbook also includes new foci: the meaning, quality, and integrity of degrees; student performance in core competencies at the time of graduation; and more visionary institutional planning for the “new ecology” of learning. AIU will be well served to familiarize itself with the 2013 Handbook and to approach its challenges in ways that will address both old and new expectations.

Finally, the Commission wishes to express its appreciation for the extensive work that Alliant International University and San Francisco Law School undertook in preparing for and supporting this Special Visit. WASC is committed to an accreditation process that adds value to institutions while assuring public accountability, and we are grateful for your continued support of our process. Please feel free to contact me if you have any questions about this letter or the action of the Commission.

Sincerely,

[Signature]

Ralph A. Wolff
President

RW/ge

cc: Harold Hewitt, Commission Chair
    Russ Newman, ALO
    Julius Robinson, Board Chair
    Members of the Special Visit team
    WASC Staff Liaisons: Keith Bell and VP Barbara Gross Davis