REPORT OF THE WSCUC TEAM  
For Reaffirmation of Accreditation

To  
PRESIDIO GRADUATE SCHOOL

Dates of Visit  
DECEMBER 5-7, 2019

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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

- Institutional background

  At Presidio Graduate School, students are educated and inspired to be a new generation of skilled, visionary, and enterprising leaders transforming business and public policy and creating a more just, prosperous, and sustainable world. Presidio activates students and professionals across a range of disciplines, industries, and sectors to bridge the gap between commerce and the common good. (www.presidio.edu/about-us/).

  With institutional roots stretching back to 1973, the Presidio Graduate School (PGS) was initially accredited as an independent institution by WSCUC in 2014. For many years, PGS operated under Alliant University during which time students could receive regionally accredited degrees while developing more maturity to obtain independent accreditation. With a well-established reputation for leadership in sustainable business and management education, PGS had high hopes for thriving as a standalone, specialized graduate institution. In 2016, PGS acquired Pinchot University in Seattle, Washington, with the belief that the two institutions considered at the top of sustainability programs would help bring enrollment stability. However, by mid-2017, it was apparent that despite the best efforts of its board (including very large financial contributions and a board member serving as temporary president), PGS simply lacked a sufficient base of financial support to survive, let alone achieve its academic and institutional vision. A WSCUC Substantive Change panel recommended in October 2017 that the institution move rapidly to establish its long-term financial security, including exploring the possibility of affiliating with another educational institution.

  Simultaneously, in August 2017, PGS announced its “Renewal Strategy,” an extensive revamping of its curricular offerings, as well as an expansive set of other actions designed to bolster enrollments and provide financial capacity. These efforts were the result of an intensive community-wide effort that involved faculty, administration, students and the board. In June 2018, WSCUC approved PGS’s central academic program, the MBA in Sustainable Solutions. Later that summer, WSCUC also approved a
revamped MPA degree and a creative dual degree (MBA/MPA) also based on the theme of sustainable solutions. Enrollments in these programs began immediately. It became apparent in 2018 that the Pinchot acquisition was draining financial resources from PGS which led to a closing of Pinchot with a teach out offered.

At the same time, recognizing that the Renewal Strategy and related enrollment growth were likely to take time, PGS was assertive in implementing the recommendation of the 2017 Substantive Change panel regarding possible affiliations and explored a range of possible partnerships. Thus, while working on the development of the Renewal Strategy, these affiliation efforts led to PGS submitting a Structural Change proposal for a Change of Form of Control. Its new partner was Amity Global Education Organization, and especially its principal higher education entity, Amity University. Amity, centered in India, was well-known to WSCUC, having gained WSCUC accreditation in 2016.

In July 2018, the Commission approved the Change of Form of Control and required a post-implementation review within six months of the completion of the transition in control. The Commission also endorsed five recommendations of the Substantive Change panel that underscored the need for complete transparency and full communication of the change and its actual and potential implications. In addition, the Commission emphasized the importance of preserving the distinctive features and historical mission of PGS. Acknowledging the financial stresses that led to the need for the Change of Control, the Commission reiterated the crucial importance of developing a long-term financial plan for institutional stability and sufficiency. (This latter recommendation was deemed necessary because the Change of Control agreement with Amity only guaranteed $2 million in funding, plus an additional $3 million that would be available “as needed.”) Finally, the Commission reiterated WSCUC’s longstanding commitment to independent governance by recommending the prioritization of board independence under the new structure, in particular the importance of the Board always acting in the best interest of PGS.
In response, PGS and Amity quickly responded by restructuring the board to include Amity representatives in a manner consistent with WSCUC standards and policy. In addition, numerous actions were taken to strengthen PGS capacity to pursue its goals within the new governance context. Central to this effort was a search for a new president/CEO, a search that culminated in February 2019 with the arrival of Ms. Liz Maw, an experienced non-profit organization leader.

As Ms. Maw arrived, however, two major WSCUC review processes were well underway. First was the mandated post-implementation visit and review that was conducted in early 2019 with a report to WSCUC submitted in March 2019. The post-implementation site visit was built around four themes: distinctiveness and independence, communication and transparency, financial sustainability, and continuing commitment and alignment to mission. As noted in the report, “Four questions thus formed the agenda of each of the meetings at the institution:

1. How PGS has kept and will keep its distinctiveness and independence under the change of control?
2. How effective has PGS been through its communication and transparency about the change of control process with its community?
3. How has the commitment to financial sustainability been ensured and what has taken place organizationally to support it?
4. How has PGS continued to evidence commitment and alignment to fulfill its mission?”

The review noted the progress PGS had made to date, commending PGS for accomplishing the Change of Control in ways that preserved board independence while building board capacity. PGS was also commended for preserving its mission and programs and continuing communication with all stakeholders. Commendation was also made for the PGS efforts to update its programs (the Renewal Strategy) and to hire new senior managers so as to improve outreach and enhance staff capacity.
At the same time, the review made five recommendations, largely related to enrollment and financial matters. These included crafting a medium-term realistic strategy for financial stability, implementing enrollment growth initiatives, engaging international students through Amity. Further, the review recommended the development of plans for enhanced assessment of core academic programs. Finally, it was recommended that board independence be continually monitored in order to assure board commitment to PGS as a separate institution.

The second concurrent project was the preparation and submission of the institution’s first reaffirmation of accreditation review, due to be conducted in late 2019. Therefore, in addition to the post-implementation report, WSCUC also received PGS’s Institutional Report that same month.

The Reaffirmation Review Team (OSR) was formed and conducted an Off-Site Review in May 2019. The OSR review considered the two prior reports, as well as extensive documentary evidence. The team’s review of these materials resulted in eight lines of inquiry:

1. Program vision: how does PGS see its niche in an increasingly crowded MPA and MBA academic space?
2. Intellectual leadership: how does PGS assure the faculty it needs to provide high quality programs while also engaging in outreach and thought leadership?
3. Enrollment strategies: how are enrollment strategies evolving and being implemented, especially in the context of the Amity agreement?
4. Student services: how does PGS provide and assess its services in support of students?
5. Alumni: how can PGS engage its alumni in support of enrollments and programs?
6. Academic quality: how is PGS assessing its academic programs, what are the outcomes of assessment and how are they used to improve offerings?
7. Budget planning and resource allocation: how is PGS building on the Amity agreement to move towards financial growth and stability.
The eighth line of inquiry was the most significant. It raised questions for both the PGS Board and the Amity partners as to their understanding of the nature the commitment of the Board to statements provided to WSCUC in the context of the Change of Control. The materials in the reviews seemed to present divergent views as to the basic nature of the actual Change of Control agreement and the vision for the future of PGS flowing from that document. The Team had a concern as to the extent the report portrayed the institution accurately. This concern arose not because of any issue of integrity. Rather, PGS has been experiencing such extreme changes in short periods, it may be difficult to have a report in March be fully accurate or relevant in December. This is particularly understandable because of the significant personnel changes that have occurred, as well as changed decisions by leadership.

The OSR proceeded with a recommendation to proceed with the Accreditation Visit scheduled for September 2019. In addition, it made a request for additional documents and information, some to be provided in August 2019 and the rest at the time of the site visit. Finally, the OSR requested a set of meetings, including with the President, the Chairman of the Board, and Board members. It was later determined that PGS needed more time to be able to prepare fully for the September visit and thus it was rescheduled. The visit occurred December 5-7, 2019.

The visit was well-organized, thanks to the efforts of PGS staff. All requested materials were made available and all requested meetings took place, including a discussion with the full Board, including Amity representatives who had traveled from India and also separately with the Chair.

The Team had several general concerns that can be grouped into three themes: governance, capacity and finances.

**Governance.** The materials and discussions seem to reflect a dissonance as to the nature of the relationship between PGS and Amity. PGS administrators emphasized the ongoing independence of PGS, seeming to treat the Amity financial contributions as philanthropic in nature. They stressed the WSCUC requirements for an independent board, even noting that in the case of a vote about Amity’s
commitment, independence would require all board members with any form of Amity connection to recuse themselves from voting. The Amity board members, especially the Chair, emphasized their commitment to supporting PGS, but providing future funding “as needed.” Their vision was expansive involving taking PGS programs to India and other areas of the world where Amity operates an extensive number of higher education institutions, building PGS beyond its current narrow scope, and making the entire venture truly global even beyond Amity’s education efforts.

*Capacity.* While PGS has brought on board a number of professional staff members, many other staff have been fired, resigned, or moved in the past year (perhaps at least 20). PGS seeks to build capacity to manage programs, administration and finance with fewer, but more skilled and experienced staff. Of particular concern was the announcement that PGS would, at the end of this year, move to a faculty model comprised of but one full-time faculty member, with all other faculty being adjunct or part-time. It was made clear this is being done largely for financial reasons. The team questioned whether this model would give PSG as a boutique niche institution the capacity needed to fulfill its vision. Finally, PGS is depending on significant enrollment growth over the next few years. The degree of realism of this strategy was a source of worry to the team.

*Finance.* It is clear that PGS is unsustainable on its current enrollment levels. While admirable efforts are underway to diversify its offerings, to build outreach and consulting capacity and improve fundraising, it seems unlikely that PGS can continue to exist without Amity’s continuing significant support for at least the next three years. The strategic planning documents provided were overly general and almost aspirational in nature. They lacked grounding in data and specificity. Furthermore, it was noted in the Board discussion (and admitted to by Board members) that earlier budgets made inaccurate assumptions and thus were unrealistic.

- **Recent accreditation history**
  - 2011: WSCUC Eligibility
- 2014: Initial Accreditation granted July 7, 2014 for a period of 5 years, through June 2019, contingent upon approval by the California Bureau of Post-Secondary Education (BPPE).
- 2016: Structural Change approval (Acquisition of Pinchot University)
- 2018: Structural Change approval (Change of Ownership)
- 2019: Post-implementation site visit since 2018 structural change
- 2019: Off-Site Review

B. Description of Team’s Review Process

The team conducted the Off-Site Review (OSR) in May 2019 and identified eight lines of inquiry for the visit. The team conferred on a team call on November 12, 2019. The accreditation visit occurred in San Francisco on December 5-7, 2019 at both the instructional site (space leased from LearnIt! at 33 New Montgomery Street) and administrative offices and meeting rooms on the grounds of the Presidio. The visit included meetings with the President; the Board; the Chairman of the Board; the Board Vice-Chair; the Provost; the Director of Partnerships; the CFO; the Enrollment Team; Career and Student Affairs staff; the audit partner and an accounting service representative; a student forum attended by five students; a faculty forum with six adjuncts participants via Zoom; and a staff forum attended by the Registrar, the IT Director and the Financial Aid analyst. The team also reviewed submissions to the confidential e-mail. The visit concluded with the team presenting its Commendations and Recommendations at an exit meeting attended by the President; two Board members (the Chancellor of Amity University who serves as Chairman of the Board + the Vice-Chancellor for Amity Universities, both of whom had flown in from India for the WSCUC visit); the Provost; and additional staff members. Throughout the visit, the team was shown courtesy and hospitality.

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

The team viewed the Institutional Report as a "serviceable" document. The report did well in outlining the history of the institution over the last few years (with all the multiple changes that
occurred), clarified the Renewal Strategy, and focused on addressing the recommendations of the Substantive Change panel.

The Report was problematic, however, in some of the particulars of the relationship with Amity. On the one hand, the lack of clarity was understandable given the early days of the partnership. On the other hand, the document was confusing especially with respect to the amount of funds the school could expect from the Amity arrangement. On page 5, the report expressly states, "AGEO agreed to contribute $5 million over a five-year span to PGS in support of PGS's budget." The next sentence reads "this contractual commitment provides $1 million in each of the first three years and then ‘up to’ 2 million during the following two years as needed..." On page 7, PGS once again states that AGEO will provide $3 to $5 million in funding over five years..." Then, in the Change of Control document, the team discovered that the commitment was for $2 million over two years with the possibility of an additional $3 million over the next three years (a fact confirmed during the visit). This was all confusing to the team and, given the central importance of this funding, the group would have appreciated a statement that, at the very least, matched what the Change of Control document includes.

The supporting documents prepared for the visit itself, including the statements of alignment of vision that were requested by the team after the OSR from both the Board and the PGS administration, were vague and incomplete. The team found the strategic plan (called "Three Year Strategic Priorities") to be far too high-level and imprecise without timelines or projected budgets. In the team’s judgment, the plan failed to give confidence of a thoughtful and substantive path forward. And although the documentation represented, at least on the surface, statements of an alignment between the Board and the administration, the team found anything but. Much of our report (and concern) will discuss the lack of collective purpose that the team believes exists at this time.

The PGS Report also described a wide range of steps taken and plans made as of March 2019 that turned out to have changed or been brought into question by the time of the December 2019 visit.
Thus, the report was sufficient in describing some aspects of the history but was unhelpful in terms of the current December 2019 realities and plans. The team would have appreciated more informative and accurate updates before the visit.

SECTION II – EVALUATION OF INSTITUTIONAL EVIDENCE

Component 1: Response to Previous Commission Actions

Normally this section of the team report provides an analysis of how the institution has responded to recommendations from the last Commission Action Letter (CAL) granting Initial Accreditation or further letters, which in the case of PGS, would be the WSCUC Commission Structural Change Committee actions. In the case of the CAL granting Initial Accreditation, the institution has changed so much that the recommendations are no longer relevant. In the case of the WSCUC Commission Structural Change Committee concerns, most of this report deals with findings and recommendations from the committee’s report. It would be redundant to write a separate section in this report when the bulk of the report will be focused on follow-up actions taken by PGS and the team’s analysis of the follow-up, including recommendations for moving forward.

Component 2: Compliance: Review under WSCUC Standards and Compliance with Federal Requirements; Inventory of Educational Effectiveness Indicators

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

Standard I: Defining Institutional Purposes and Ensuring Educational Objectives

The team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to determine compliance with Standard I.

PGS has a clear sense of mission that permeates its culture and academic program: to educate students for leadership roles in the broad and interdisciplinary field of sustainability.
However, the team identified some CFRs that require additional attention under Standard I. The team recommends that PGS pay attention to:

- **CFR 1.1: Formally approved, appropriate statements of purpose.**
  
  Given its evolving partnership with Amity, the team recommends that PGS build alignment between the administration and the Board regarding the nature, goals, and vision for the PGS-Amity partnership; communicate the results to faculty, staff, students and alumni through a board-approved statement; provide regular updates and forums to keep the community apprised and engaged in the institution’s vision and direction.

- **CFR 1.2: Indicators of student achievement at institution, program and course levels; evidence of student learning made public.**
  
  The team recommends that PGS conduct regular direct assessment to ensure and demonstrate that graduates achieve educational objectives.

- **CFR 1.8: Open communication with WSCUC including notification of material matters.**
  
  WSCUC CFRs call for honest and open communication with WSCUC. The budget forecasts and descriptions of financial commitments shared with the team before the visit were confusing and were in need of factual clarification during the visit.

  Furthermore, the team recommends that PGS ensure that the administration’s actions to stabilize PGS are in alignment with the Board’s greater long-term vision as articulated in the Change of Control documents submitted to the WSCUC Commission in 2018. Any major changes to that vision should be communicated to WSCUC in a timely and comprehensive manner.

*Standard II: Achieving Educational Objectives Through Core Functions*

The team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to determine compliance with Standard II.

- PGS has clearly articulated academic programs and intended outcomes.
• Students are actively involved in learning and challenged.

• Student support services are available and contributing to strong retention.

• Assessment of student learning [CFR 2.6], disaggregation of student outcomes data [CFR 2.10], and program review [CFR 2.7] are slated for 2020. The team recommends that PGS conduct regular direct assessment of student learning to determine whether graduates achieve educational objectives and can demonstrate achievement of standards [CFR 2.6]. Satisfactory evidence in these areas will be expected on an ongoing basis and at the time of subsequent WSCUC reviews.

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

The team’s finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 3.

However, the team has concerns and wants to direct the institution’s attention to CFRs 3.1 and 3.10 (in particular, sufficient and qualified faculty; effective academic leadership by faculty) and to CFRs 3.4, 3.6, 3.7 and 3.9 (in particular, clear decision-making structures and processes; governing board oversight; responsible leadership; financial stability; integrated budgeting; diversified revenue sources; priority to sustain institutional capacity and educational effectiveness).

In its recent history, PGS has experienced enrollment and leadership challenges leading to financial operating losses. The peak of the financial stress occurred in mid-2017 when the institution realized a $1.5 million cash flow shortage, in large part due to non-billing of much of the tuition revenue. Thanks to emergency donor support provided by Board members, sufficient cash was received to stabilize the cash situation. The financial stresses of that year prompted the institution to find solutions to develop plans and changes to better ensure long-term financial stability. One initiative was a plan to change the academic programs and organizational structure. The other initiative was to find a partner to help fund PGS while the first initiative was being implemented and enrollment grew. This second initiative was
successfully concluded in early 2018 with a Change of Control Agreement with Amity Global Educational Organization (Amity) whereby Amity would contribute up to $5 million over five years.

A review of the past three years of clean, unqualified audited financial statements (CFR 3.4) and the preliminary results for fiscal 2019 (7/1/18 – 6/30/19) show a loss in fiscal 2017 (7/1/16-6/30/17), a slight surplus in 2018 (7/1/17-6/30/18) due in large part to a 26% reduction of expenses. A loss is projected for FY19 (7/1/18 – 6/30/19) despite a $1 million contribution from Amity. This loss is primarily a result of the change in the curriculum from the introduction of the Renewal Strategy program.

The team reviewed the auditor’s findings from their reports to the Board of Directors Audit Committee for the fiscal years 2016 – 2018. In 2016, there were numerous and significant concerns with internal financial controls and practices requiring several audit adjustments. Again in 2017, several audit adjustments were made including a significant pledge written off; however, most of the financial control issues were resolved. This is mainly due to the outsourcing of accounting services to a professional firm which the institution continues to do. The team spoke with both the audit partner and the accounting service representative and found the current arrangement of outsourcing an appropriate and cost-effective solution for this size organization.

Following the financial and administrative challenges in 2017, the Board and administration realized that the higher education market had been changing. Their sustainability education was no longer as unique as it once was because similar programs were being offered at competitive institutions. The Board and administration began an initiative to revise the strategic plan which resulted in the Renewal Strategy. This plan’s two main goals are the achievement of short-term financial sustainability and building a foundation to achieve long-term financial stability. Achieving the second goal includes changes to 1) shorten the length of the MBA and MPA programs, 2) improve the student experience through networking and career development, 3) expand faculty contribution and external partnerships
and 4) improve organizational capabilities. While it seems somewhat peculiar that the primary goals of the Renewal Strategy are financial sustainability, it does make sense given the serious situation the institution experienced at the time. It is hoped that achieving the objectives in the plan will lead to long-term financial stability. (CFRs 3.4, 3.7)

The team was presented with two very different financial projections: one in the institutional report and subsequently a different projection as part of the offsite review request. The former projected optimistic operating surpluses over the next four years as PGS anticipates enrollment increases. The most recent projection is a much more conservative approach to growth showing essentially break-even or small surpluses through 2025. It appears that all of the $5 million commitment from Amity or other donors will be needed. Revenue and expenses through 2025 are projected to increase at 14% compounded. When the team inquired about the discrepancy between the two projections, the Chair of the Board Finance Committee acknowledged that the original projection shared with the team was not developed with any realistic planning or proper review.

Regardless of which projection is more realistic, it will take a coordinated effort as outlined in the Renewal Strategy objectives to achieved financial stability. As was evidenced in fiscal 2018, the institution has the ability to reduce expenses when necessary, however the current lean budget limits flexibility to significantly reduce expenses. With the very thin margins, the institution will need more accurate revenue projections and cost management for the foreseeable future. The team asked about contingency plans should revenue projections not materialize. The administration was aware of their financial vulnerabilities but does not yet have contingency plans in place. In some instances, the financial projections do not align with plans for growth in enrollment, new programs or alternative sources of revenue. The team recommends the development and management of multi-year financial projections that are aligned with educational purpose, realistic enrollment assumptions, core faculty development, as well as promotion and product diversification. (CFR 3.4)
In its meeting with the Director of Partnerships, the team learned of the strategies, approaches and successes of outreach into companies interested in sustainability. Through its consulting services, the institution has knowledgeable consultants, alumni, and students who can provide expertise. While net revenue will be generated from consulting, it will take many years for this activity to scale up to make a significant contribution to the financial situation.

In 2017, the President, Interim President, and CFO all resigned. In February 2019, the new President arrived. A new CFO started in October, 2019 (CFR 3.8). Additionally, a new VP of Marketing and VP of Enrollment Management have been hired with the latter starting in January 2020. While still new to the organization, the leadership appears capable and confident that they can execute the plans and programmatic changes as outlined in their Renewal Strategy. The team commends PGS for being well underway in forming a new leadership team to ensure expertise in enrollment, marketing and finances. (CFR 3.6)

In a survey for the institutional report, questions concerning adequacy of faculty and staff, employment policies, and personnel development, the respondents were overall neutral on these criteria, but found them in need of attention by the administration. There is currently no formal organized faculty or staff development plan. Faculty or staff written policies were in the process of being revised, but the team did not review any currently existing ones. (CFRs 3.2, 3.3)

During the accreditation visit, the team was informed that many organizational changes had been made over the last few months resulting in anywhere from fourteen to twenty staff members and all but one full-time faculty member leaving the school voluntarily or otherwise. A number of new staff and administrators were hired, but total staff headcount is still less than before. The institutional report stated the faculty were reorganized with program directors responsible for parts of the programs and to ensure adjunct faculty effectiveness. However, the team learned during the visit that the program director positions were being eliminated. The number of staff is also small with most job responsibilities
handled by only one person leaving them vulnerable should a vacancy occur. There was concern with all the attrition that much institutional knowledge has been gutted from the organization. (CFR 3.1)

The institution is moving toward an all adjunct model for faculty as a cost saving strategy. While the institution utilizes many very qualified adjuncts, there is concern that curriculum development, retention of knowledge, and program development will be negatively impacted by the change to the all adjunct model. The team recommends that the institution ensure academic quality and cohesion through strategic faculty hiring, faculty development, structured opportunities for faculty dialogue, regular direct assessment of student learning outcomes, and the formation of an Academic Affairs Board Committee. (CFR s 2.1, 2.4, 2.8, 3.10, 4.4)

With the Change of Control agreement with Amity, the number of the Board of Directors was reduced to eleven of which seven were nominated by Amity and the remaining from members then on the Board but approved by Amity. While the Chair, Second Vice Chair and Treasurer are associated with Amity University, the majority of the Board must remain independent as required by the Change of Control agreement. Since its formation, the new Board has exercised its responsibilities for governing and oversight of PGS. As the team interviewed different groups or individuals, it became evident that there was not consensus about aspects of the Change of Control agreement between the administration and the Board. There were also mixed responses from various groups about how the agreement terms were communicated. The team recommends PGS build alignment between the administration and the Board regarding the nature, goals, and vision for the PGS-Amity partnership; communicate the results to faculty, staff, students, and alumni through a board-approved statement; and provide regular updates and forums to keep the community apprised and engaged in the institution’s vision and direction. (CFRs 1.1, 3.7, 3.9, 4.6)

During the accreditation visit, the team separately interviewed the President and the Board of Directors. The team observed several instances where there were differences of interpretation on some
aspects of the agreement or management decisions. One example focused on which Board members were allowed to vote on future Amity contributions. Another was the decision on moving toward an all-adjunct faculty. One of the most significant strategic disagreements concerned how the current financial stabilization of PGS relates to the long-term vision of Amity. There is no disagreement on the need for financial discipline, but there is a serious question about how the current measures will lead to a robust future. With the all-adjunct faculty, who will lead the intellectual/academic conversations about new programs that Amity seeks? Without planting seeds now to diversify degree program offerings, how will the institution grow? Why would the promotional/marketing line in the long-term budget remain flat if Amity anticipates growth? The team is concerned that this lack of cohesion and, in some instances disagreement, has the potential to cause confusion and disruption. The team recommends that the administration’s actions to stabilize PGS align with the Board’s greater long-term vision as articulated in the Change of Control documents submitted to the WSCUC Commission in 2018. Any major changes to that vision should be communicated to WSCUC in a timely and comprehensive manner. (CFRs 1.8, 3.4, 3.6, 3.7, 3.9)

Like many smaller institutions, PGS is highly tuition and contribution dependent. A study conducted of the market place found that PGS is price competitive. One of the changes recommended by the Renewal Strategy was to reduce the MBA and MPA programs from 60 to 45 hours but required prerequisite courses. The resulting impact on enrollment was a precipitous decline in full-time to part-time students as new enrollees had to find other institutions offering the prerequisite courses. The concluding statements of PGS’s report states that the number of hours for the degree programs would be increased to 53 hours starting in Spring 2020 with the incremental hours satisfying the prerequisites courses.
PGS currently leases all of its facilities. Its classroom spaces are rented on an as-needed basis in downtown San Francisco while its administrative offices are located in the Presidio, near the Golden Gate Bridge. This current leasing arrangement gives it the flexibility to expand or contract as needed, but there was some concern about the amount of space that would be available should enrollment grow as planned. Technology resources are adequate for the institution. All technology is supported by one IT professional which could make the school vulnerable should an absence occur with the support person. The school has no library or librarian. All materials are available on-line through subscriptions maintained by the school. (CFR 3.5)

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

The team’s finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 4.

*Quality Assurance Processes.*

PGS recently undertook a Renewal Strategy for their academic offering, seeking to transform the organization (i) to meet the evolving challenges it faced in its field, (ii) to remain true to its purposes and principles, and (iii) to help achieve a foundation for long-term financial sustainability. The resulting MBA, MPA, and dual program are based on previous program versions which had clearly identifiable Program Learning Outcomes (PLOs), hence PGS has continued a solid academic tradition going into the future.

Guidance provided by the new President and work done by the Provost have resulted in a reinforced “Academic and Excellence Framework”, which sets out the steps carried out to teach and assess courses, hire and train faculty, where to apply student surveys and alumni assessment, ending with Program Review. The starting points are the syllabi faculty use to teach, which are reviewed by the
Provost, based on a template that is sent with clear instructions in order to assure uniform design around facilitating course outcomes that are connected to the PLO’s [CFRs 4.1, 4.2]

Institutional Learning and Improvement

That Renewal Strategy was developed based on extensive market research and an assessment of its academic, marketing, financial, and operational practices. A team of over 50 stakeholders representing the PGS community took part in this effort, resulting in a leaner program of 45 credits. [CFRs 4.5, 4.6, 4.7]

The institutional report stated that with the implementation of the Renewal Strategy, the core academic team developed a process to intensify and focus oversight of the programs through the appointment of program directors. During the visit, the team learned that as a result of the financial and enrollment challenges faced, program directors and core faculty would be phased out, moving to an all adjunct model.

The team recommends that the institution work to ensure academic quality and cohesion through regular direct assessment of learning outcomes and through focused faculty development. [CFR 4.3, 4.4]

IEEI: Inventory of Educational Effectiveness Indicators

PGS provided an Inventory of Educational Effectiveness Indicators (IEEI) which indicates that PGS has clearly articulated Program Learning Outcomes at the institutional (ILO) and program (PLO) level. The visiting team was able to ascertain that. Program Review is slated for 2020. Assessment of signature assignments at course-level is identified in the IEEI but the visiting team was not provided with evidence of direct assessment. This topic is discussed further under component 5 of this report.
**Compliance with Federal Requirements**

The team found evidence that PGS is in compliance of federal requirements.

See the Appendix to this report.

1. Credit Hour and Program Length Review
2. Marketing and Recruitment Review
3. Student Complaints Review
4. Transfer Credit Review

**Component 3: Degree Programs: Meaning, Quality and Integrity of the Degrees**

PGS has had a strong academic reputation over the years. This was built up by faculty who were well-regarded in the fields of sustainability and environmental management. Indeed, for many years PGS offered an almost unique MBA degree focused in such fields. Nonetheless, as a specialty or niche institution, its enrollments were never robust and it typically was stressed financially.

At the same time, competitor institutions and programs grew as general interest in matters of climate change, sustainability, and environment management also grew. Where once PGS had most of the (small) market, it now faces a much more competitive market. Thus, enrollment growth is challenging and its small scale limits opportunities for investment.

One important response to this situation was the academic components of the PGS Renewal Strategy. This comprehensive effort included most full-time and many adjunct faculty members, as well as students, staff, board members and alumni. Particular emphasis was placed on the growing and changing professional labor markets for graduates. Two 45-unit degree programs (MBA in Sustainable Solutions and MPA in Sustainable Solutions) and one 60-unit dual (MBA/MPA) program resulted. In addition, several specialized certificate programs are now offered that utilize existing courses and lead to certification in Sustainable Operations, Sustainable Marketing, and Product Development, Sustainable Leadership and Sustainable Energy Solutions. These programs were approved by WSCUC in 2018 and
initially offered in the Fall of 2018. All existing and recently admitted students opted to transfer into these new degree programs.

In addition to a focus on sustainability in the context of more traditional MBA and MPA courses in management, strategy, or innovation, PGS now emphasizes the social justice dimension of these programs. Integrating this theme was the result of market research, a reflection of current social and economic trends, and student feedback.

All PGS curricula are focused on outcomes and PGS has articulated an elaborate set of Program Learning Outcomes (PLOs). Similarly, each course has its particular student learning outcomes, all of which are structured as integrated across the programs and the curriculum as a whole. This is reflected in the formulation of three institution-wide proficiencies: Sustainable Systems, Sustainable Leadership, and Business Foundations.

While students seem pleased with the new programs and enrollments for the coming term are up, it is too early to assess fully the efficacy of these programs. The structure is well-articulated, but it is unclear as to program review outcomes, as well as the degree of true impact on enrollment growth.

Component 4: Educational Quality: Student Learning, Core Competencies, and Standards of Performance at Graduation

The March 2019 PGS Institutional Report describes the process, initiated over a decade ago, of institutional review of the central focus of its curriculum, the original six competencies that were part of the earlier curriculum. An audit of learning outcomes was taken and results synthesized prior to a comparison with data gained from surveys of students, alumni, and employers. (CFRs 2.1, 2.4, 2.7) The institution’s full-time faculty took the lead in this effort, culminating in 2009 in faculty acceptance of 10 Program Learning Outcomes (PLOs) and three institutional learning outcomes: Sustainable Systems,
Sustainable Leadership, and Business Foundations. These outcomes were incorporated into the full curriculum and were reviewed in earlier accreditation reviews.

In 2016, the full-time faculty adopted an 11th PLO (Information and Communication Technology). The updated set of outcomes were central to the Renewal Program project (2017) that has been the PGS principal strategic academic effort since then. The Renewal curriculum (MBA, MPA, Dual degree) integrates the outcomes through each of its three terms. The first term focuses on principles of sustainable management, the second on core courses for business and public leadership (Finance, Marketing, Leadership), the third term on a concentration integrating five courses (Social Justice, Management, Strategy, etc.).

Another aspect of the Renewal Strategy was the effort to reduce the length of the degree programs to 45 units. This was to be accomplished by treating a set of foundational courses (accounting, statistics, microeconomics, and macroeconomics) as prerequisites, on the assumption many students would already have had such sources at the undergraduate level or could readily take them elsewhere and transfer them in.

The first classes under the Renewal curriculum entered in Fall 2018. Thus, since no students have yet completed the full Renewal program, it is too soon to assess its effectiveness or impact. (CFR 2.6) The Institutional Review puts forth a planned assessment process.

Discussions on these topics were held during the visit with academic leadership, students, and faculty. While the vision of the Renewal curriculum was clear and well-articulated, its implementation and assessment of outcomes pose challenges. First, it was reported that too many entering students did not have the foundational prerequisites and thus PGS was having to experiment with providing such basics internally. Second, much was made of by students about the rigor and value of Experiential Learning opportunities through PGS outreach efforts. (CFR 2.5) However, Experiential Learning is not
discussed in the Educational Quality section of the review. This separation would appear to be counter to the overall theme of educational integration.

Third, and most significant, there are questions about PGS’s capacity to implement the reviews and assessments posited as next steps for the nascent degree programs. As noted in the March 2019 institutional review, the decade-long push to revitalize and reinvigorate the curriculum was led by the full-time faculty. Their imprint on the academic planning behind the revised PLOs and ILOs is obvious and speaks well of their commitment and professionalism. (CFRs 2.1, 2.3, 2.4) The problem is that going forward there will be only one full-time faculty member. The team’s meeting with the faculty (all adjunct) made it clear there was little awareness of the assessment plans or processes. Further, faculty members at the meeting conveyed that they were uninterested in investing time in curriculum development or innovation since as adjuncts they had no assurance of continued employment. Furthermore, there is no sense of faculty engagement in institutional governance. They reported that the Amity relationship was a mystery to them and saw it only in terms of financial sustainability, not curricular or program opportunity.

While it is understandable that the Renewal effort is too new to fully assess or that certain assumptions (prerequisite courses) may be invalid, it is difficult to see how assessment is done by part-time adjunct faculty members with little organizational engagement. The full-time faculty of a decade ago took major steps to craft a vibrant and relevant degree program design. There will be no such faculty available to assess, improve, or further integrate it.

The team recommends that PGS ensure academic quality and cohesion through strategic faculty hiring, faculty development, structured opportunities for faculty dialogue, regular direct assessment of student learning outcomes, and the formation of an Academic Affairs Board Committee. [CFRs 2.1, 2.4, 2.8, 3.10, 4.4]
Component 5: Student Success: Student Learning, Retention, and Graduation

PGS runs its MBA and MBA/MPA as a low-residency program. They intake one cohort of about 30 students each fall and each spring. Students come to campus for a Thursday to Sunday session once a month. Students value the cohort bonding that occurs during these residencies. PGS added a 3-day orientation for the Fall 2019 entering cohort, which students spoke about with enthusiasm, describing how enriching it is to learn from one another’s interests and perspectives. PGS students also elect student government representatives to further keep students connected to one another and the administration.

The five students the visiting team met during the open forum exuded passion for their studies and strong commitment to broader societal goals. They were highly articulate, visibly comfortable speaking with one another, and grounded in specific career objectives. They expressed backgrounds and systems interests ranging from waste management and emergency management to substance abuse prevention. Their interests are interdisciplinary and they appreciate PGS’s systems approach and what they characterized as its liberal arts approach to the MBA/MPA.

During the residency weekends, students also have access to PGS staff. In particular, an alumna was hired to provide career services, which include webinars, an internship guide, resume help, mock interviews, a job board, alumni relations, and help with salary negotiations. While most of the students work, either full-time or part-time, many are seeking a career pivot. While 47% of the students have federal loans, the student loan default rate is low (under 4%).

A Student Success and Retention Committee with representation from faculty, financial aid, and student affairs meets frequently to review at risk student situations and support retention. At the time of the site visit, the VP for Student Affairs was leaving; career and co-curricular responsibilities would fall under the new VP for Enrollment hired to start in January 2020. Staff speculated that the retention
committee model would continue in some form. PGS reports 90% term to term retention and 80% graduation rates.

The program includes three Experiential Learning (EL) commitments. These require time outside the once-a-month residencies and are meant to strengthen students’ applied learning and project skills. In addition, PGS’s Director of Partnerships, hired in the past eighteen months, is focused on connecting the PGS mission with industry, seeking to develop businesses as leaders in sustainability and social justice. While this is meant to strengthen the brand and generate auxiliary revenue, the network of employers she is developing can serve as a source of guest speakers, an Expert-in-Residence, and client projects for students’ EL, internships (for academic credit) or consulting assignments (for pay). It was noted that the intellectual property rights to ideas generated as part of the client project belong to the client (students participating in the project are asked to sign a waiver.)

Students are surveyed through mid-semester and end-of-semester course evaluations. The institution has yet to engage in formal direct assessment of student learning, however. That may represent a productive opportunity for professional development of faculty and academic staff capacity building. (CFRs 2.6, 3.3, 4.1) The institution will also need to track and report disaggregated outcomes data [CFR 2.10].

**Component 6: Quality Assurance and Improvement: Program Review, Assessment, Use of Data and Evidence**

PGS programs resulting from the Renewal Strategy are designed to last three terms. In the last term, the tools and concepts acquired during the first two are applied to a specialization area. This was designed by the core faculty, who clearly defined learning outcomes based on the experience of prior PGS work. The programs have students create portfolios that capture what was learned and demonstrate PLO’s. These portfolios also capture the Experiential Learning components in their
assessment, which provides a good framework to determine learning. What has yet to be done is set standards of achievement by PLO. [CFRs 2.4, 2.6]

The core academic team also developed a new process for course and instructor evaluation to assure academic quality through the appointment of program directors, one for each first and second term, and one for each of the concentrations. The functions of the directors were course syllabi and key assignment evaluation, student evaluation of teaching, class observation, and focus groups with students, instructor self-reflection, and instructor course portfolio evaluation. Much of this work will fall directly on the Provost, the one remaining full-time faculty member, and a yet-to-be-hired academic staff member, since the program director positions are being eliminated as part of the effort to balance the budget. The challenges faced by PGS and the need to make changes in staff and faculty will make this process challenging to maintain. [CFRs 2.7, 4.4]

The Renewal Strategy is yet to have a cohort of students complete the full program, hence Program Review is planned for the following academic cycles. Given the current changes facing PGS in staff and faculty, the team recommends the institution seeks to address this issue via professional development aimed at helping set standards of achievement, direct assessment of learning outcomes, and the forthcoming program review, so it preserves institutional memory and programs continue to improve. [CFR 2.7, 2.10]

A committee for Student Success and Retention meet frequently to review student progress and challenges they face, along with information from the Institutional Dashboard which the President, Provost, and others at the institution review, including rates of retention, graduation, and job placement. The data for the past few years shows high rates of success in all these indices. [CFRs 2.10, 4.2, 4.3]
When meeting with students, it became evident that the current academic processes at PGS have been effective, especially as students shared their experiences in class with their teachers and with their Experiential Learning projects, both of which they found challenging, but at the same time fulfilling.

PGS has made solid strides to improve on its tradition as it moves forward with additional competitors in the sustainability area, seeking to have a quality academic portfolio.

Still, it would benefit from additional disaggregation of outcomes data. (CFRs 2.4, 2.6, 4.2)

**Component 7: Sustainability: Financial Viability, Preparing for the Changing Higher Education Environment**

PGS has entered into one of the most critical periods of its history where its very viability, financial stability, and sustainability will be tested. Over the last several years, PGS recognized that similar offerings at competitive institutions were eroding its unique place in the market. Additionally, as with graduate business degree programs across the country, PGS has seen pressure on keeping and growing enrollments as demographic shifts and a full employment economy have reduced the appeal of many graduate degrees. This will certainly be one of the main challenges PGS will face as it tries to successfully implement the strategies and plans outlined in the report.

Initially the financial stability and sustainability goals rely on contributions while PGS re-builds enrollments. Longer-term, the institution projects increased enrollments that will allow it to achieve financial stability without reliance on significant annual contributions or other sources of revenue such as consulting. A key challenge for PGS will be to distinguish itself from the competition by offering programs and experiences that will attract students passionate about sustainability.
Component 8: Optional Essay on Institutional Specific Themes (Optional)

N/A


PGS has undergone a tremendous amount of challenging changes in the last few years from near financial collapse, complete change of senior administration, total reorganization including eliminating many faculty and staff positions, and the successful partnering with an organization willing to provide the expertise and resources to bring about the necessary changes. Throughout this period, the institution has maintained its commitment to its core program of sustainability as evidenced by its reputation, student satisfaction, and retention.

The partnership with Amity offers PGS a unique opportunity to not only stabilize its enrollment in the current program, but to grow it with the possibility of international students. PGS may be able to export its curriculum and expertise to other institutions within the Amity network or expand its program offerings with the help of Amity’s guidance and resources. The potential for PGS to take advantage of Amity’s successes in higher education throughout the world cannot be underestimated. The team recommends that PGS strategically diversify the product mix beyond the current sustainability MBA by leveraging existing PGS curriculum and exploring synergistic program development opportunities including those available through the Amity partnership. (CFRs 3.4, 4.6)

What the team discovered in the visit was a very new administration that was in the process of reorganizing the institution by making very tough decisions, some of which have adversely affected the personnel and potentially the quality of its academic program. There were several instances where the Board and administration were not on the same page regarding decisions or direction. The team was told that more effective communications have recently taken place and the strategic decisions have now
been made more clear. Continuing this communication of ideas and strategy will not only help stabilize
PGS, but offers the potential to grow to its potential to be a significant leader in sustainability education.

The partnership with Amity provides PGS with an opportunity available to few US academic
institutions to develop a truly innovative, , and comprehensive international educational program. The
team recommends that PGS explore ways to expand its potential impact and reputation through its
partnership with Amity and in the context of Amity’s network, including, but not limited to, enrollment
growth, academic program development, international study, faculty exchange, team projects, and
research collaboration. [CFR 4.7]

There is still much uncertainty about the direction PGS will take and certainly much more work
to be done before it achieves its goals. It will take a deep commitment and shared focus to achieve the
desired results.

SECTION III – COMMENDATIONS, AND RECOMMENDATIONS

Commendations

1. PGS has secured a key strategic partnership to help sustain and grow the institution through its
partner’s network, resources, and experience.

2. PGS is deeply committed to making a difference in the world through its values-based education on
sustainability and has been able to inspire a core of engaged board members, instructors, staff,
students, and partners.

3. PGS data demonstrates strong student satisfaction and retention as well as an impressively low
student loan default rate.

4. PGS has enhanced its curriculum to include complex issues of social justice and diversity, equity and
inclusion.

5. PGS has invested in a consulting initiative that has the potential to bring in auxiliary revenue, engage
alumni, enhance its brand, and provide a source of student experiential learning projects.

6. PGS is well into its process of forming a new leadership team to ensure expertise in enrollment,
marketing, and finances.
Recommendations

1. Build alignment between the administration and the Board regarding the nature, goals and vision for the PGS-Amity partnership. Communicate the results to faculty, staff, students and alumni through a board-approved statement. Provide regular updates and forums to keep the community apprised and engaged in the institution’s vision and direction. (CFRs 1.1, 3.7, 3.9, 4.6)

2. Ensure that the administration’s actions to stabilize PGS are in alignment with the Board’s greater long-term vision as articulated in the Change of Control documents submitted to the WSCUC Commission in 2018. Any major changes to that vision should be communicated to WSCUC in a timely and comprehensive manner. (CFR 1.8, 3.4, 3.6, 3.7, 3.9)

3. Develop and manage multi-year financial projections that are aligned with educational purpose, realistic enrollment assumptions, core faculty development, as well as promotion and product diversification. (CFR 3.4)

4. Ensure academic quality and cohesion through strategic faculty hiring, faculty development, structured opportunities for faculty dialogue, regular direct assessment of student learning outcomes, and the formation of an Academic Affairs Board Committee. (CFRs 2.1, 2.4, 2.8, 3.10, 4.4)

5. Ensure that graduates achieve educational objectives through regular direct assessment that demonstrates achievement of standards. Create an appropriate cycle of program review. (CFRs 1.2, 2.6, 2.7, 4.1, 4.3)

6. Strategically diversify the product mix beyond the current Sustainability MBA by leveraging existing PGS curriculum and exploring synergistic program development opportunities (including those available through the Amity partnership). (CFRs 3.4, 4.6)

7. The partnership with Amity provides PGS with an opportunity available to few US academic institutions to develop a truly innovative, integrated and comprehensive international educational program. PGS should explore ways to expand PGS’s impact and reputation through its partnership with Amity and in the context of Amity’s network, including, but not limited to, enrollment growth, academic program development, international study, faculty exchange, team projects, and research collaboration. (CFR 4.7)
APPENDIX: Federal Compliance Forms

1. Credit Hour and Program Length Review
2. Marketing and Recruitment Review
3. Student Complaints Review
4. Transfer Credit Review
### 1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible? ☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>If so, where is the policy located? Catalog and website</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Process(es)/ periodic review of credit hour</td>
<td>Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? ☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>If so, does the institution adhere to this procedure? ☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: Oversight by CAO</td>
</tr>
<tr>
<td>Schedule of on-ground courses showing when they meet</td>
<td>Does this schedule show that on-ground courses meet for the prescribed number of hours? ☑ YES ☐ NO</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed? 1</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)? Hybrid</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? ☑ AA/AS ☐ BA/BS ☑ MA ☐ Doctoran</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? MA/MPA</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? ☑ YES ☐ NO</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? 2</td>
</tr>
<tr>
<td>Please review at least 1-2 from each degree level.</td>
<td>What kind of courses? Experiential learning</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? ☑ AA/AS ☐ BA/BS ☐ MA ☑ Doctoran</td>
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<tr>
<td></td>
<td>What discipline(s)? MA/MPA</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? ☑ YES ☐ NO</td>
</tr>
<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? 1</td>
</tr>
<tr>
<td></td>
<td>What kinds of programs were reviewed/Hybrid</td>
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<tr>
<td></td>
<td>What degree level(s)? ☑ AA/AS ☐ BA/BS ☑ MA ☐ Doctoran</td>
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<tr>
<td></td>
<td>What discipline(s)? MBA</td>
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<tr>
<td></td>
<td>Does this material show that the programs offered at the institution are of a generally acceptable length? ☑ YES ☐ NO</td>
</tr>
</tbody>
</table>

Review Completed By: Chester Haskell  
Date: 12/6/19
## 2 - MARKETING AND RECRUITMENT REVIEW FORM

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

Review Completed By: Chester Haskell  
Date: 12/6/19
3 - STUDENT COMPLAINTS REVIEW FORM
Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints? Yes ☑️ No ☐

<table>
<thead>
<tr>
<th></th>
<th>If so, is the policy or procedure easily accessible? Is so, where? Catalog and website</th>
</tr>
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</table>
| Process(es)/ procedure        | Does the institution have a procedure for addressing student complaints? Yes ☑️ No ☐

<table>
<thead>
<tr>
<th></th>
<th>If so, please describe briefly: Review by staff and CAO</th>
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<tbody>
<tr>
<td></td>
<td>If so, does the institution adhere to this procedure? Yes ☑️ No ☐</td>
</tr>
</tbody>
</table>
| Records                      | Does the institution maintain records of student complaints? Yes ☑️ No ☐

<table>
<thead>
<tr>
<th></th>
<th>If so, where?</th>
</tr>
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</table>
|  | Does the institution have an effective way of tracking and monitoring student complaints over time? Yes ☑️ No ☐

<table>
<thead>
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<th></th>
<th>If so, please describe briefly:</th>
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Review Completed By: Chester Haskell
Date: 12/6/19
# 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 publicly available?  
  ☐x YES ☐ NO  
  If so, where?  
  The Student Handbook is available on the Presidio Graduate School website at:  
  https://www.presidio.edu/academics/student-handbook/  
  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 |

Review Completed By: Chester Haskell  
Date: 12/11/19

PGS degree programs are intended as a unique and integrated experience. Therefore, acceptance of transfer credit from other institutions is rare. When requesting transfer credit, students must provide clear evidence that the standards set forth below have been met.

**Credits Eligible for Consideration**  
PGS will consider the transfer of academic credits only for equivalent graduate-level courses from institutions accredited by agencies recognized by the United States Department of Education. Such credits must have been earned within 3 years prior to the student’s first term at PGS, and the student requesting transfer credit must have received a grade of B or higher in earning those credits.  
A maximum of 8 semester credits of graduate coursework will be accepted into PGS degree programs. Undergraduate-level courses and work experience cannot be transferred or substituted for PGS courses.  
As of May 15, 2019, Presidio Graduate School has not entered into an articulation or transfer agreement with any other college or university.

**Standards for Evaluating Transfer Credits**  
The Provost and the Registrar shall review each request for transfer credit application and decide whether to approve the requested transfer. In making this decision, the Provost shall consult with the faculty member who teaches the course for which transfer credit is requested to substitute, and any other person who may be helpful in making the decision.  
The Provost and Registrar shall approve transfer credit if:  
- The breadth and depth of transfer credit curricular content is comparable or exceeds that of the PGS curriculum, at the topic and concept level;  
- The quality or rigor of the transfer credit is at least equivalent to that of PGS;  
- The depth and integration of sustainability into the credit requested for transfer is at least equivalent to those in the corresponding PGS course;  
- The PGS course for which transfer credit is requested does not include an Experiential Learning (EL) project*; and  
- Approving the transfer credit does not jeopardize the academic integrity of the PGS degree program(s) or institution.
* If the PGS course for which transfer credit is requested includes an EL project, but the credits requested to transfer do not include an EL component, transfer credit may be granted if the student also completes an EL or equivalent client-related project under the supervision of a faculty member.

Transfer Credit Limit
No student may transfer more than 8 credits.

Transfer Credit and Grade Point Average
Transfer credits are not included and do not impact the student’s PGS cumulative grade point average.

Exceptions
It is within the Provost’s discretion to make an exception to these transfer standards. In such cases, the Provost will:
1. Write a complete account of the reasoning for the exception and place the written account in the file of the student requesting transfer; 2. Present this account to the Program Directors at a Program Directors meeting; and
3. Obtain unanimous approval of the Program Directors to authorize the transfer credits, as evidenced in approved minutes of a Program Directors meeting.