REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Menlo College

March 21-24, 2016

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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

Description of the Institution

Menlo College was founded in 1927 as a private, residential, junior college for men. After completion of studies, graduates transferred to a four-year college or university to complete requirements leading to a baccalaureate degree. In 1949, business administration was established as a four-year program. Since that time, the college evolved into a coeducational, four-year, baccalaureate degree-granting institution. Revised and adopted by the Board of Trustees on October 2, 2009, Menlo College’s mission is to develop future leaders through a liberal arts-based business education that integrates academic study and fieldwork in a Silicon Valley environment unmatched in its potential for innovation.

Menlo College is located on a 40-acre campus in the residential community of Atherton, California and in close proximity to Stanford University in Palo Alto. Atherton is located approximately 25 miles equidistant between San Francisco and San Jose, California in the center of Silicon Valley. The surrounding towns of Menlo Park and Palo Alto offer a large array of cultural and recreational activities.

The college is governed by a Board of Trustees that has recently grown to include 21 members. The Board meets three to four times per year. The president reports to the Board of Trustees. Faculty, students, administrators, and staff have a voice in the welfare of the college through the Faculty Senate, Student Government Association, and various committees and working groups. Full-time faculty in fall 2015 numbered 29, including 14
male and 15 female faculty members. Seventy-two adjunct faculty members were also employed.

The fall 2015 total headcount is 768 students of which approximately 23 percent are freshmen, 22 percent are sophomores, 30 percent are juniors, and 24 percent are seniors. Eighty-seven percent of fall 2015 students are Business majors, 3.5 percent have not declared a major or are non-degree seeking, and 9.5 percent are Psychology majors. Fifty-five percent of fall 2015 students are male and 71.6 percent are non-Caucasian, other, or unknown ethnicity. The freshman-to-sophomore retention rates for 2012, 2013, and 2014 are 82 percent, 80 percent, and 71 percent respectively and have increased steadily over the past five years apart from the most recent year when the football program was closed. Overall six-year graduation rates reported to IPEDS were 36 percent for the 2006 entering student cohort year and 43 percent for the entering 2008 cohort year, respectively.

Degree programs are offered in a traditional day format and through an accelerated Professional Studies Program to accommodate working adults. Degree offerings under the traditional format include a Bachelor of Science in Business with majors in Accounting, Finance, Marketing, Management (including options in Entrepreneurship, International Management, Management Information Systems, Real Estate, and Sports Management); a Bachelor of Arts in Business with major in Management (including a Human Resource Management Option, a Marketing Communications Option, and an Individualized Option); and a Bachelor of Arts in Psychology. The Professional Studies Program features a Bachelor of Science in Business with major in Management (including an International Management Option and a Management Information Systems Option) and a Bachelor of Arts in Business
with major in Management (including an International Management Systems Option and a Management Information Systems Option).

Accreditation History

Beginning with Menlo College’s previous reaccreditation cycle, a Capacity and Preparatory Review (CPR) was conducted in October 2006. The College’s CPR report and the evaluation by the CPR Team highlighted the new institutional vision and mission statement, curricular and co-curricular live-learn initiatives, revitalization of the general education program, a comprehensive inventory of institutional data, and the College’s budget. The CPR Team report included a substantial list of recommendations related to all four Standards. The Commission found that the College did not meet the expectations of Standards 1, 3, and 4 with significant issues arising under Standard 2. The Commission acted to continue accreditation, issue a formal Notice of Concern, extend the length of Educational Effectiveness Review Visit by one day in fall 2008 to address issues from the CPR, and request a progress report by November 1, 2007 detailing an action plan for addressing the wide range of issues related to Criteria for Review cited in the February 27, 2007 action letter.

On January 25, 2008, a panel of the Interim Report Committee met to evaluate Menlo College’s progress report detailing an action plan as requested by the Commission in the February 2007 action letter. In a letter from the Commission dated February 1, 2008, the panel noted no formal action on the College’s mission or a renewal of program review guidelines, which left questions regarding the adequacy of shared governance procedures. Also noted was a concern about the College’s financial condition in light of enrollment declines, lack of fundraising successes, a projected deficit for the current academic year, no detailed
retrenchment plans, and continuing controversy with the Menlo School regarding an endowment bequest and facilities. The panel requested a full financial profile no later than August 1, 2008 and noted that the profile should include the composite ratios required by the U.S. Department of Education. In addition, for the fall 2008 EER visit, the panel requested a full examination of the strategic planning process to demonstrate how it integrates academic and financial planning, informs day-to-day decisions, has enthusiastic campus-wide support, and demonstrates how the College would continue to make progress towards its educational goals while addressing the precarious financial condition.

The EER visit took place from September 30, 2008 to October 3, 2008. In the Commission Action Letter of February 28, 2009, the Commission noted a number of areas for continued attention, including financial stability and the relationship with the Menlo School, faculty enhancement, retention and assessment activities, strategic planning, educational effectiveness, and program review. The Commission acted to remove the formal notice of concern, reaffirm the College’s accreditation, and request an interim report to be submitted by November 11, 2012, covering implementation of the strategic plan, enrollment trends, financial stability, as well as analysis of the development of a new general education program, of new co-curricular initiatives, and of refreshed major programs. The Commission also acted to schedule the next visit for fall, 2015.

The College submitted to the Commission a structural change proposal for a new Master of Business Administration (MBA) program, and the structural change site visit took place on September 16, 2010. The Commission Letter of January 28, 2011 noted approval of the MBA program, to be implemented within two years. Subsequent to this approval, the
College strategically refocused on remaining an undergraduate institution and decided not to pursue implementation of the MBA.

On November 11, 2012 the College submitted an Interim Report and attachments via LiveText as requested by the Commission, and an Interim Review Committee (IRC) call took place on November 29, 2012. In the subsequent letter of January 11, 2013, the IRC took note of the Institution’s progress on all areas of concern, urged the College to continue its focus on strategic planning, enrollment trends, and financial stability, and urged that “in future reports, data be presented with greater accuracy.”

B. Description of Team’s Review Process

An Accreditation Visit (AV) was conducted at Menlo College in Atherton, California from March 21, 2016 through March 24, 2016. The visiting Team evaluated evidence presented by Menlo College to support fulfillment of the expectations and intentions of the Core Commitments, the four Standards for Accreditation, the Components of the Institutional Report, the Federal Requirements, the remaining issues stemming from the 2009 EER visit cited in the Commission’s action letter dated February 26, 2009 and remaining issues alluded to in the Interim Report Committee letter of January 7, 2013. This report presents the findings of the Accreditation Visit team.

The Accreditation Visit did not include an evaluation of off-campus sites further than 25 miles from the campus, distance education programs, or a special visit to review a new doctoral program as Menlo College does not offer instruction at off-campus sites at a distance
greater than 25 miles, deliver programs through distance education, or offer a doctoral program.

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

Quality and Rigor of the Report and Institutional Evidence

The Institutional Report (IR) was clearly organized and well-written. The report detailed numerous changes through which the College has come since the last reaffirmation of accreditation. As confirmed through interview with the current ALO, the IR was written mainly under her hand with the former ALO and Dean of Business providing consultant support. Involvement of the wider campus in the self-study process, report preparation and commentary included 50 percent of the faculty as well as staff members (IR, page 69). The report featured informative detail in some areas (for instance, detailing the assessment rubrics for Core Competencies) yet lacked the level of specificity, depth and introspective rigor typically associated with an evidence-based self-study. Taken as a whole, the IR characterized the institution accurately as one in transition towards improved student success, greater self-reflection and enhanced curricular focus. Updates received for the Lines of Inquiry addressed most of the important questions posed by the Team, with the exception of a cohesive and meaningful update to the 2008-2013 Strategic Plan.
SECTION II - EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

The Interim Report Committee (IRC) Action Letter of January 7, 2013 focused on seven specific areas: strategic planning, enrollment trends, financial stability, general education, co-curricular initiatives, refreshed major programs, and inconsistencies in the presentation of data related to enrollment and finances.

Strategic Planning: The IRC noted in its letter that “Although the panel would have appreciated receiving more details about the strategic plan in the submission of materials, they commend MC for following through on the major elements of the [2008-2013] strategic plan as the college returns to its roots as a business college.”

Team members were given the March 2014 Update to the *Menlo College Strategic Plan 2013-2018* as part of the original submission, but not the 2008-2013 Strategic Plan upon which the 2012 Interim Report to the Commission was based. The 2013-2018 Strategic Plan was developed under the previous president, circulated to the campus community from August to September, 2013, and approved by the Board of Trustees in October 2013. The plan features six strategic goals, dealing respectively with students, faculty and staff, programs and services, alumni, resource acquisition and usage, and physical/technological infrastructure. The plan is further articulated into objectives/strategies supporting each goal, responsible parties, and accomplishments/status/date of completion or ongoing designation. Qualitative descriptions of accomplishments across many of the stated objectives were given and progress towards implementation was clearly evident. Team members did not find references to data and evidence used in the development of the strategic plan, information on expected or budgeted
costs of the objectives/strategies, or metrics by which to judge the success of each objective or strategy. Timelines and milestones were also scarce in the document. Most troubling to the Team was the lack of prioritization among the goals, and within goals among the objectives/strategies [CFR 4.6].

At the Team’s request, the College provided an update to the strategic plan, Defining the Future of Menlo College 2015-2020. This document stated five strategic goals (“Five in Five”), articulated initiatives to be undertaken pursuant to each goal, and provided an overview of the metrics being considered. No data to support the draft plan were provided, although a SWOT analysis was later provided to the Team by request. The Team was provided a timeline regarding the new strategic plan that addressed how various constituencies had been involved in the development of the new strategic plan to date, and this was also discussed during the site visit. As with the 2014 strategic plan update, no prioritization among the initiatives proposed was provided. As this new strategic plan is further fleshed out, the Team strongly suggests that the College more broadly involve its constituencies, strategically analyze its position based upon data and evidence, and articulate priorities for action to define the future and direction of the institution [CFR 4.6].

**Enrollment Trends:** While Team members were apprised of specific enrollment goals in a five-year projection provided, evidence of an enrollment plan to achieve those projected numbers was not apparent; nor were retention rate goals or graduation rate goals given. It is clear from the documentation provided (2009-2014 Enrollment, also student success data on the Menlo College website) that total enrollment has steadily increased over the past several years. Information provided on the NCES College Navigator web site notes low overall 6-year
graduation rates, but an improvement from 36 percent for the 2006 entering cohort year to 43 percent for the 2008 entering cohort year. In the financial information provided, the College projects adding to its total enrollment by 25 students for each of the next five years, and the IR cites an overall goal of 1000 enrolled students. No information on the data and evidence used to formulate these enrollment projections was provided [CFRs 3.4, 4.6].

**Financial Stability:** As noted in previous reviews in the IRC Action Letter of January 7, 2013, and as further detailed in the review of Component 7, the financial picture for the College remains a concern. Plans for fundraising were not clarified in the IR, although a new Chief Advancement Officer recently joined Menlo College and a new development plan was provided to the Team shortly before the Accreditation Visit. A strategy for engaging alumni was included in the development plan, but at the moment this has not been implemented [CFR 3.4].

**General Education:** In the January 7, 2013 Action Letter, the IRC panel commended the College for completely revamping its General Education program through appropriate faculty governance procedures. In addition, the studies engaged in as part of creating the new General Education program resulted in other positive changes such as the creation of a Math Center, the hiring of additional full-time faculty in science, math, and political science, and the creation of remedial English classes for international students taught by an ESL specialist. The Team agreed that the College has clearly taken the Commission’s concerns to heart in regards to general education and amply addressed this concern.
Co-curricular Initiatives: The IRC panel offered special commendations for the Freshman Experience, a program that has gone through several revisions as MC has learned what works best and results in heightened participation. Team members agreed that the recommendation appears to have been well-addressed.

Refreshed major programs: As part of its efforts to become accredited by AACSB, the College undertook a major study of its signature business programs, a review that resulted in new majors in Accounting, Financing and Marketing. The Interim Report Committee commended MC for pursuing AACSB accreditation and for the changes already made in business offerings. The recommendation appears to have been addressed.

Inconsistencies in Data: Like the Interim Report Committee, the Team had concerns about the limited presentation of data from the College and its accuracy. For example, no supporting data and evidence were given for either the original strategic plan or the update requested by the Team [CFR 4.2].

Component 2: Compliance with the Standards and federal requirements; Inventory of Educational Effectiveness Indicators

Standard 1

The Team’s finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with the Standard. The College’s mission statement and stated educational objectives clearly outline the purpose of the institution and its contribution to the public good and align with well-established norms for institutions of higher education [CFRs 1.1, 1.2]. Much work has been done on defining and measuring the core competencies since the last visit. Faculty interviewed by Team members noted the need
for more transparency and communication in shared governance, for example in naming of committee members. The College has at this point demonstrated only an emerging sense of shared governance, coupled however with a standing tradition of academic freedoms [CFR 1.3].

The College has a very diverse student body with 52 percent represented by students of color. Diversity amongst faculty and staff has made modest gains since the last visit. Women now constitute the majority (52 percent) of full-time faculty. Asian full-time faculty have increased to 24 percent over the past five years. However, no full-time Hispanic faculty are currently employed despite the College’s sizable population of Hispanic students. Among part-time faculty, modest gains are evident over the past five years in the proportion of Hispanic, African-American, and Asian faculty employed. The number of women has increased among the part-time faculty and the proportion of full-time women faculty has increased by 6 percentage points over the last five years. The Team agreed that greater clarity in defining roles and responsibilities with regard to increasing the diversity of faculty, staff and students is warranted, and that a faculty hiring plan should be developed to guide further hiring and broadening of diversity [WSCUC diversity policy, CFR 1.4].

Although the educational objectives are clearly stated, there is evidence that all stakeholders do not recognize the objectives and have easy access to them. Moreover, Team members agreed that much further work is needed to enable all College stakeholders to develop and articulate a clear understanding of how course student learning outcomes, programmatic student learning outcomes and institutional student learning outcomes link together to form a cohesive body of knowledge [CFRs 1.1, 1.2]. Further, there is evidence of the
need to complete implementation of the institutional self-review recommendations with regard to increasing minimum passing grade requirements on pre-requisite courses and mandating standardized assessment testing as part of specific courses, and to evaluate the impact on student success [CFRs 1.2, 2.6]. The Team agreed that while these are significant concerns, they do not rise to the level of non-compliance.

The Team agreed that progress has been made in the area of student complaints, specifically revising the grading/appeal policies and clearly defining most policies in the student handbook and the academic catalog (IR, July 16, 2015). However clearly defining all student facing policies, and of policy implementation across the board still needs attention [CFR 1.6].

**Standard 2:**

The Team’s finding, which is subject to Commission review, is that the institution has demonstrated adequate evidence of compliance with Standard 2. The Team acknowledges the College’s intensive and successful efforts to achieve AACSB accreditation as a major achievement from a highly rigorous professional accreditor known for some of the most difficult standards in the field. The achievement indicates that the professional accreditor has validated the quality of the program after the institution has spent enormous financial and human resources to achieve this prestigious accreditation. While not neglecting its ongoing commitment to AACSB requirements, the College now needs to turn its attention, focus and sustained commitment to educational effectiveness factors considered important for WSCUC
accreditation. In this light, the Team had specific concerns about a number of CFRs included in this standard as detailed below.

The institution offers educational programs that are clearly defined in terms of entrance and graduation requirements, appear to actively involve students in their learning, offers co-curricular programming that supports academic goals of the institution, and offers a variety of student support services; however psychological counseling is currently only informally offered on campus by the associate dean of student affairs who holds a graduate degree in clinical psychology but is not a licensed mental health professional [Institutional Report, p. 47; CFRs 2.1, 2.5, 2.11, 2.13]. The College recently heard from freshmen students that a professional counselor on campus is needed (Freshmen Focus Group + Survey Report), and during the visit reported plans to hire a professional counselor in the near future. The Team did not find evidence of parity across majors in the opportunities to apply what has been learned; for example, the College expressed that required internships are a signature feature of the institution, but Psychology majors do not have such a requirement [Institutional Report, p. 10; CFR 2.5]. The College does report plans to require an internship of psychology students beginning in the next academic year.

The institution has clearly defined degree requirements, and has developed a statement on the meaning of Menlo College degrees that it is working to evolve [CFR 2.2]. The originally shared Meaning of Menlo College Degrees document focused largely on how the institution addresses the Core Competency requirement within CFR 2.2a, and did not present a coherent philosophy that was clearly expressive of the institution’s mission. Just ahead of the Accreditation Visit, the College shared a draft of a document called “Meaning, Quality, &
Integrity of Degrees: Distinctiveness of a Menlo Degree.” This draft was created by the same committee of faculty and staff (the Meaning of Degrees Taskforce) who drafted the first Meaning document, incorporating information shared by faculty across the College, and is a good start toward expressing a coherent philosophy, expressive of the College’s mission, that guides the meaning of its degrees. The draft is a work in progress that does not currently connect to the original statement on the meaning of a degree or the identified institutional learning outcomes, something that the Meaning of Degrees Task Force expressed a desire to do, nor is there a clear plan at this point to ensure the quality and integrity of the components shared within the draft.

The Core Competencies, also called Institutional Learning Outcomes (ILOs), are designed in a way that sets the institution up to be able to make targeted, actionable change. The Team did not see evidence that the ILOs are widely shared among faculty, students and staff [CFR 2.3, 2.4]. Assessment of the ILOs has begun, and a plan to collect relevant student work each year for each outcome was shared. The Business core curriculum is reported to have been assessed on an annual cycle four times as part of the process of seeking accreditation from AACSB (Institutional Report, p. 21), but was put on hold following the granting of accreditation by AACSB in the spring of 2014 (IEEI) as the resources of the Associate Director of Accreditation, Assessment and Institutional Research were directed toward ILO assessment. Assessment of learning outcomes within all degree programs is reported in the IEEI as being planned and in development. The Team did not find evidence of an assessment infrastructure that is adequate to assess learning at the program level, nor did the Team find evidence that faculty capacity to engage in such assessment is being developed, beyond a planned fall 2016
workshop on creating learning outcomes [CFR 2.6]. The Faculty Handbook and the Dossier Requirements Document clearly define expectations for teaching, research, scholarship and creative activity for faculty, but do not recognize assessment of student learning in considerations of teaching effectiveness or promotion [CFRs 2.8, 2.9]. By not placing value on assessment of learning in the processes by which faculty are evaluated or promoted, the institution has created an impediment to the development of a culture of evidence around student learning.

Graduation rates are low. The institution does not give evidence of sustained disaggregation of student success data (Institutional Report, p. 50). While members of the Center for Academic and Student Success team and other stakeholders have been involved in discussions on retention and graduation improvement, no fully-developed, evidence-based written action plans to address retention and graduation improvement were in evidence to the Team [CFR 2.10].

The institution collects satisfaction survey data, but does not report extensive or timely use of the data; for example NSSE 2015 data, held by the Associate Director of Accreditation, Assessment and Institutional Research, will not be examined by the Associate Director until this coming summer, which will be nearly a year since receiving the data. The College has established a plan to better understand and improve academic advising [CFR 2.12]. The Menlo College Advising Program Assessment Plan is well-thought out and provided a level of detail that gave the Team a clear understanding of the initiative. The College adopted a new program review process in December, 2015 and began to implement it with one program this spring semester. The review process needs further adaptation to best function within the
structure of Menlo College, which the Dean of Academic and Professional Success noted will happen as they learn from programs moving through it. The new program review process and the results of the assessment of advising may help to improve graduation rates, especially those of transfer students [CFRs 2.7, 2.12, 2.14].

Inventory of Educational Effectiveness Indicators (IEEI):

The institution provided sufficient detail about existing assessment processes for the Institutional Learning Outcomes (which are the five WSCUC Core Competencies), general education, and the business core curriculum. Assessment within all degree programs was reported as planned and in development. During the visit the Team found that the Psychology program was engaging in assessment of student learning outcomes, but that faculty in other programs reported that they did not yet have program learning outcomes outside of the business core. This contradicted the IEEI, which indicated that programs did have outcomes, and the Academic Catalog, which includes links to program outcomes for each program. Faculty reported that the Associate Director of Accreditation, Assessment and Institutional Research is responsible for all stages of assessment, including collecting student work, arranging for it to be scored with rubrics, and reporting data back to faculty. The Associate Director reported that program assessment activity had not yet begun because of demands for AACSB accreditation followed by demands for WSCUC accreditation. A timeline for beginning the work of program assessment was not shared with the Team; however it was noted by the Associate Director that she will begin assessment for a program at the time they enter the new program review process, sometime in the next five years. The Team suggests that faculty be made responsible for program assessment, and that this work begin right away.
Standard 3: 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 adequate evidence of compliance with Standard 3. Among the CFRs included in Standard 3, financial sustainability is a crucial success factor for Menlo College to meet along with most specialized programs in the region and nation. In the Institution’s favor it has at present no debt, a $30 million endowment, and very valuable property with 40 acres of land worth hundreds of millions of dollars in the nation’s most expensive median housing market ($4 million median price for a home.) However, given the budget deficits of the past three years and the pro forma budget provided to the Team, the institution needs to develop a 5-year projected budget that is more realistic based on these assets and on the fundraising potential inherent in the College’s wealthy alumni donor base. In this light, the Team had specific concerns regarding several CFRs included in this standard as detailed below.

In the required document “Review under WSCUC Standards” submitted by the College, CFR 3.4 (concerning financial stability) was rated through self-review as “1 = We do this well; area of strength for us.” And regarding the level of “importance to address at this time,” the College rated CFR 3.4 as “C=Low priority.” The Team found much evidence to the contrary. In this section, we review the extent to which the College has met this standard, with primary focus on faculty development, financial stability, and organizational governance.

The College is constantly involved in faculty development. There is both internal and external faculty development. In reviewing source and use of faculty development budget, however, it was noted that for the 2014-15 school year, only 58 percent of the faculty
development budget was utilized ($47,713 of $82,500). Of the amount utilized, most was spent on faculty travel and conventions. In the interview with Provost Givens, Team members were informed that the low utilization for faculty development for 2014-15 was an anomaly due to a “leadership void.” Since Provost Givens arrived in July 2015, a Faculty Development Plan has been developed and implemented. The plan extends beyond travel and conventions to include reimbursable research expenses, a variant to past restrictions on these funds. Faculty members interviewed indicated that they were not aware of this plan.

In addition to travel and conventions, resources are also devoted to internal faculty development (including adjuncts and part-time faculty). A fairly recent hire, Marianne Neuwirth, Director of Oral Communication, reportedly spends approximately 20 percent of her time on internal faculty development. Programs include coaching faculty on professional presentations, conducting focus groups, and conflict resolution. The Faculty Development Plan 2016-17 includes a variety of workshops: faculty orientation, preparing and delivering lectures, and Integrating Liberal Arts with Business. The Team commends the College for being intentional in encouraging professional development activities for all faculty members as a matter of high priority. Every effort should be made to involve the faculty in the development of the plan as well as effectively communicate the plan to faculty and staff. Faculty and staff should also be allowed discretion in how funds can be used [CFRs 3.1, 3.3].

The Review under WSCUC Standards documents that “Menlo College has well-developed strategic planning and budgeting processes to align resources with academic and other priorities.” The Team found this to be an aspirational achievement rather than a statement of fact.
The Team believes there needs to be resolution of questions pertaining financial stability and operational deficits. The College has had decreases in net assets from financial operating activities (operating deficits) for the past three fiscal years (-$1.51m in 2013, -$2.29m in 2014, and -$2.82m in 2015). It is projecting operating deficits for the current fiscal year (2015-16) and for the next five years. If materialized, the accumulated deficit over the next five years will be in excess of $10m.

The 5-Year Financial Projection has various assumptions about revenue and expenditure that were not clearly substantiated to the team. There was no evidence that the financial plan was explicitly linked to a strategic plan. No schedule substantiating the veracity of the assumptions were presented to the Team before or during the onsite visit. For example, tuition and fees are projected to rise by 32 percent ($29m to $38m) over the five-year period, through a combination of tuition increase and enrollment growth. However, the College does not yet have a strategic enrollment plan. A comprehensive enrollment plan that is linked to the overall strategic plan should be developed and implemented as a matter of priority.

The IR suggests that President Moran is committed to fundraising and marketing. This was confirmed in an interview with the president. While this level of engagement by the president is admirable, it can prove to be an administrative burden that cannot be sustained as a strategy for the long term. The Team recommends that a development plan and a marketing/branding that link to the overall strategic plan be initiated and implemented without delay.

The declining trend in operating deficits is of concern to the Team. With persistent operating deficits, alternatives become few: cost containment, fundraising, debt financing, or
raiding non-core funds (endowment). The Team recommends that the college devise a plan to stem the deficit operations that include a board of trustees’ policy against approving deficit budgets. It also needs to demonstrate how the budget is linked to strategic plan [CFRs 1.7, 1.8, 1.9, 3.4, 3.5, 3.10, 4.2, 4.6, 4.7].

Menlo College’s leadership team is fairly new to the institution. The organizational chart illustrates established clear roles, responsibilities, and lines of authority as required by accreditation standards. The Team was, however, concerned that the EVP for Finance and Administration appears to have a varied portfolio of responsibilities which includes non-traditional functions like athletics, enrollment management, and marketing. The Team was also concerned that the governance structure for faculty leadership does not include department heads. In both cases, the institution is at risk for not having key leadership predisposed to performing at the highest level possible due to excessive responsibilities. This observation is even more critical as the institution’s goal is set on rapid enrollment growth. The Team recommends that the college makes it a strategic priority to review its organizational structure to make it more consistent with its purposes, placing place priority on sustaining institutional capacity and educational effectiveness [CFRs 3.6, 3.7].

The governing board of the College is comprised of individuals with diverse qualifications including age, professional background, and areas of expertise (Board of Trustees Matrix). However, diversity by race, ethnicity and gender is not characteristic of the Menlo College Board of Trustees at the moment. Of the 19 trustees currently featured on the Menlo College web site, 16 are white men and 3 are white women. The Team was not presented with any evidence that the Board regularly engages in self-review and training. The Board of Trustees
Development & Operations does call for orientation of new members as well as ongoing assessment. The College should work with the Board membership to provide orientation for new members, ongoing assessment, and regular Board development [CFR 3.9].

Standard 4

The Team’s finding, which is subject to Commission review, is that the institution has demonstrated adequate evidence of compliance with Standard 4. However, the Team had several noteworthy concerns, as detailed below.

The Team found evidence of curriculum analysis as part of the realignment of programs for AACSB accreditation. The IR states that the analysis undertaken for the AACSB application “effectively acted as an extended program review of the business degrees” (p.52), however Team members did not find evidence to support that an outcomes-based program review process has hitherto been in place, or that assessment processes at the program level have been undertaken at the College in any context outside of preparation for AACSB accreditation. Benchmarking information and use of comparative data from external sources as part of a deliberate quality assurance system were not available. Evidence of tracking learning results was also not available. Although highly aggregated trend data for year-over-year retention and graduation rates are published, no evidence of disaggregation of those data by relevant demographic and other factors was presented. Overall, it is evident that the College is at the very beginning stages of developing a deliberate quality assurance system [CFR 4.1].

The January 7, 2013 IRC Action Letter took note of data inconsistencies and inaccuracies in the data provided as part of the Interim Report. While required student success data is
posted on the College’s website as required, and IPEDS submissions appear to be up to date, Team members generally experienced difficulties in finding data to back up the progress reported in the 2013-2018 strategic plan update; to provide support for the reported program-level assessment processes in the IEEI (apart from assessment of core competencies and survey research data such as Noel-Levitz survey results); and to enable the campus to achieve an in-depth understanding of disaggregated student retention and success data. Line items for an institutional research (IR) position and professional development of the IR staff person were presented, however no evidence was available that periodic external review of the IR function had taken place. The Team recommends that the College undertake a comprehensive external review of the IR function [CFR 4.2].

The Team found that the College is at the beginning stages of creating a culture of assessment and improvement. The progress that has been made to date is largely due to the mandates of AACSB criteria rather than attention to the broader Educational Effectiveness requirements ofWSCUC. Apart from a new manual on academic program review, the Team did not find policies and practices in place and operations that support the creation of a culture of evidence and improvement [CFR 4.3].

The College’s self-review under the WSCUC standards pointed out several instances of how external stakeholders are involved in the assessment and alignment of its programs, including the School of Business Advisory Board, the Accounting Advisory board, and the Marketing Advisory Board. Alumni surveys have been undertaken every six years, but from the results these surveys appear to function as an address update mechanism rather than a true indirect assessment of student learning at and satisfaction with the institution. A new
A system of outcomes-based program review was adopted in December 2015 and one program has recently begun review under the new process, but as yet no outcomes-based reviews have been completed. A notable bright spot in the involvement of external constituencies is the nascent feedback system from employers for students doing their internships. The Team encourages Menlo College to utilize this employer feedback in a systematic manner, to relate it to student learning outcomes, and to use the results for improvements in programs and services at the College [CFR 4.5].

The existence of planning processes and implementation of plans are both demonstrated by the completion of initiatives undertaken to fulfill the goals of the 2008-2013 strategic plan, and are detailed in the 2012 Interim Report.

The College repeatedly states its intention to remain a small, focused undergraduate institution that delivers primarily business programs in a traditional campus-based format. Team members reviewed the extremely competitive environment in which the College exists as well as external trends towards fewer scholarships for foreign nationals enrolling at US institution, and urge the College to conduct a much more comprehensive analysis of the external and competitive environment, as well as the rapidly evolving changes taking place in higher education, for potential impact on the College’s ability to maintain its mission and goals [CFR 4.7].

This review under the standards represents the Team consensus view, however final determination of compliance with the Standards rests with the Commission.

Component 3: Degree Programs: Meaning, quality and integrity of the degrees
The updated Strategic Plan offers an opportunity to further define what makes Menlo College degree programs distinctive, and to design experiences, competencies and dispositions are unique to an education at Menlo College. While the foundation of some of these distinctions can be found in Menlo College’s history, location and curriculum, the Team observed little consistency in the way in which this was communicated.

The Institutional Report noted that shared experiences for all Menlo students include a Freshman Year Experience, comprised of Orientation and three courses: STS 100: Transition to College course, MGT 101: Business Management Practice, and STS 150: Personal Finance for College. In their senior year all Menlo College students have a culminating experience in the form of a capstone course or thesis. The Institutional Report noted that an additional competency associated with “an understanding and appreciation of diversity issues in the US” is addressed through mandatory enrollment in one of four diversity courses.

An internship is required for all Business majors, and Menlo College has defined other learning outcomes for these experiences. A review of two internship syllabi revealed very different approaches to the structure of internships, and this is an area that Menlo might revisit to insure consistent and purposeful internship experiences for all students [CFR 2.3].

In the Institutional Report, discussion of the Psychology major curriculum and learning outcomes followed the substantial section for Business majors. The Psychology curriculum follows APA guidelines for content, including a knowledge base in psychology, scientific inquiry & critical thinking, ethical & social responsibility in a diverse world, communication, and professional development. The Psychology curriculum is also mapped
against the five APA-recommended content areas. Internships are not yet required for Psychology majors, though the college is moving towards implementing this requirement now that the Business internship program is established. Overall, the Team has questions regarding parity and the quality of experience for students studying psychology at Menlo College, as the focus appears to be primarily on Business majors. However, it was clear from discussions at the site visit that the Psychology major was valued, but under-resourced with just one full time faculty member assigned. There is one additional full time faculty line that has gone unfilled due to a failed search last year. With just 10 percent of the students, the Psychology major was not viewed as “equal” but important nonetheless [CFR 2.1].

The “Meaning of Menlo College Degrees” was explored through two separate documents shared with the team. The first document, dated March 2015, offered a systematic examination of the degree programs and how courses and learning outcomes are aligned to the ILOs. However, the first document offered a very limited and constrained view of the Meaning, Quality and Integrity of the Degree (MQID) at Menlo College because the narrative revealed little about how the institution articulates the value and distinction of their degree. Instead, this document was focused on Institutional and Program Learning Outcomes, and how they are taught. Following feedback from the Off-Site Review, the Meaning of Degrees Taskforce worked with faculty over the last six months to develop a qualitative data set and summary that reflects a more authentic view of a Menlo education; this document was presented to the Team during the Accreditation Visit. Characteristics include experiential learning, community service, the development of pedagogical tools for inquiry and analysis, internships, and the value placed on fostering a sense of competitiveness and teamwork. The
2016 MQID document is not complete, but is well on its way to being developed as a clear document that will engage faculty, students and staff in fostering a meaningful and authentic learning environment at Menlo College. The Team recommends the College continue to develop this statement [CFRs 2.2, 2.2a].

The College has made some progress in establishing a plan to ensure the quality and integrity of the degree, but a great deal more needs to be done. Learning outcomes appear on course syllabi, but faculty and staff are aware that more needs to be done to help students understand all outcomes. It was not apparent to the Team how learning outcomes are discussed by faculty or students or systematically evaluated [CFRs 2.4, 2.6. 4.1].

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

The institution has developed a set of Institutional Learning Outcomes (ILOs) that consist of the five Core Competencies broken down into component elements. By defining the component elements for each Competency, the institution has set itself up for actionable assessment. This is most clearly seen in the assessment of the written and oral communication ILOs. By examining how well students demonstrated each ILO through the application of rubrics to student work, the Core Competencies Committee was able to make a number of recommendations for action, which were reported as taken in the 2014-2015 academic year (Assessment Reports and Template-Tabbed by Competency). For example, for written communication the passing grade for ENG 102, a key prerequisite course, was raised from D- to C-. Additionally, the scoring rubric was reported as being made available to faculty, who
were asked to share it with students. These changes have potential to make a positive impact on student learning across the institution [CFRs 2.2a, 2.6].

Assessment of Quantitative Reasoning was undertaken, but Psychology students were not included in the process. This methodology makes it difficult to see how the results apply to all students. Steps have been taken toward assessment of the remaining two required Core Competencies, including developing a rubric for critical thinking and providing library instruction sections with a quiz for information literacy. The Institutional Report notes that the ILOs will be assessed annually for three years, and then will be assessed on a rotational basis (p. 31). The assessment reported to-date does not follow this schedule, nor does it appear to currently follow the Menlo College Outcomes Assessment Plan: 2015-2020 (which indicated that all five ILOs will be assessed this academic year) making it unclear what the schedule for assessment of the ILOs will be. [CFRs 2.2a, 2.6].

A great deal of survey data is reported by the institution, including the National Survey of Student Engagement (NSSE), EBI Undergraduate Business Exit Assessment, and the Noel-Levitz Student Satisfaction Inventory, but data are not consistently incorporated into understanding student learning and the environment that supports that learning when it comes to the ILOs. For example in the Institutional Report, NSSE data are included in the discussion of assessment data for each core competency, but NSSE data are not incorporated in the Assessment Reports spreadsheet. The Core Competencies Committee was not fully aware that NSSE contained data that might inform their understanding of ILO achievement. The Associate Director of Accreditation, Assessment and Institutional Research reported that the NSSE data from 2015 is available in her office, that she plans to review those data this coming
summer, and that she will share those data with appropriate groups in fall 2016. The Team did not find evidence that survey data is utilized appropriately or sufficiently for ILO assessment [CFRs 4.1, 4.2].

Engagement with ILO assessment, including responsibility for establishing appropriate standards of performance for achievement and engaging in using the results of inquiry to improve, is not widespread at the institution. The ILOs came from a committee, assessment of the ILOs is conducted by the Associate Director of Accreditation, Assessment and Institutional Research, and findings are reported to the Core Competencies Committee. The Institutional Report notes that about half the faculty have been involved with learning outcomes or their assessment through the makeup of three committees, the Core Competencies Committee, the Assurance of Learning Committee and the Meaning of Degrees Task Force (p. 38). While engaging half of the faculty in these three major initiatives is admirable, it implies that only a small number are involved in each initiative. The Team found that the important work of using evidence to understand and improve learning as it relates to the ILOs is not happening outside of the Core Competencies Committee [CFRs 2.4, 4.3, 4.4].

Component 5: Student Success: Student Learning, Retention, and Graduation

Menlo College has well developed academic support, advising and career services resources. The Math Center, a well-staffed Writing Center and part-time oral communication specialist provide support to Menlo students. In addition, an Academic Support Center provides tutoring, disability services and other academic support needs. In 2015, these services
were brought together to create the Center for Academic and Professional Success (CAPS) to provide more cohesive and streamlined support services to students [CFR 2.13].

Retention and graduation rates have improved overall since the 2008 WASC visit. The fall to spring semester retention rate for the fall 2008 cohort was 86 percent; for the fall 2014 cohort, the retention rate was 92.8 percent. The six-year graduation rate for the 2002 cohort was 32 percent; for the 2009 cohort, it was 38 percent. However, six year graduation rates are still low, and there seems to be little understanding of why students leave Menlo College. It was not possible to discern patterns or trends based on race or ethnicity based on the two cohort years provided (2008, 2009), except for the fact that enrollments for some groups is very small. For example, in the 2008 cohort there were five Black students and three graduated; for 2009, there were again five Black students and one graduated. While enrollments by under-represented minorities may be small, it may be worthwhile to gather qualitative data in the form of exit interviews or open-ended survey questions instead of focusing on the statistical significance of a small sample.

There is no explanation offered for why more than half of Menlo College students leave before completing a degree. Menlo College does not have a process for collecting or analyzing student data across commonly tracked groups, such as financial need or Pell eligibility, first generation college status, on/off campus residential status, or home state/country. Sometimes it appears these data were collected but not analyzed in context of student attrition. Though there was a good amount of anecdotal evidence (e.g., lack of financial resources, Menlo is too small, or the desired major is not offered), there does not appear to be systematic analysis of
student data related to attrition [CFRs 2.10, 4.3]. The Team learned at the onsite visit that the college is initiating an exit interview/survey process soon to begin collecting this information.

While Menlo College has robust academic support and student services in CAPS, the lack of consistent institutional data collection and analysis across key student indicators is a serious impediment to a long term retention and graduation plan [CFRs 2.10; 4.1].

The Student Affairs, student engagement and residential components are well developed and reflect conventional standards for small colleges. It would be important to integrate co-curricular programs and student services in the annual program review process. Student Affairs was last reviewed in 2011, though an extensive self-study was completed in 2014. Recent Student Affairs surveys on orientation, residential life, and student engagement are informing the work of the staff and offering insight on student needs and expectations. In 2016-17, the office of Student Affairs will be hiring a counselor to provide mental health services on campus [CFR 2.1].

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

From the evidence examined, the Team found that Menlo College is in the early stages of developing a culture of evidence and improvement. The program review process is new, and depends on the use of evidence, including assessment evidence, to make decisions about the future direction of the program. The first program, Management, has begun the process of review during the current semester [CFR 2.7]. Program assessment is noted as planned and in
development for all degree programs (IEEI), and it was reported during the visit that program assessment will be conducted for each program as they enter program review [CFR 2.6].

A great number of student surveys are conducted on the campus, such as the Noel-Levitz Student Satisfaction Inventory and the NSSE. Survey data appear to be utilized in understanding some academic components of the institution, such as satisfaction with the library (Institutional Report, p. 47), but such use appears to be limited. The recently hired Dean of Student Affairs has administered a number of surveys related to residential life, orientation and student engagement and is using these to modify practices [CFR 2.11].

In the past, the institutional research function was primarily fulfilled by the Dean of Business and Academic Affairs with support from a Coordinator for Institutional Research. When the Dean left the College two years ago, the Coordinator for Institutional Research was made the Associate Director of Accreditation, Assessment and Institutional Research. The Dean position remains vacant. The Associate Director provides some institutional research functions, but the institutional research function needs further development in order to be able to appropriately provide analysis and interpretation of data that will help the institution fulfill its accreditation, planning and decision-making functions. It will be important for each of the areas described in Component 6 to continue to grow and develop as they are essential for the institution to improve retention and graduation rates. [CFRs 2.4, 2.7, 2.10, 4.1, 4.2, 4.3, 4.4, 4.5]

Program Review

In the Institutional Report it was noted that the faculty had developed a new program review process. The process presented noted that an earlier version had been “approved by the Faculty Senate on September 27, 2007” (p. 52). There was no explanation for how the
version shared, dated April 13, 2015, was developed, who had been involved in the
development or who had decided upon this process (e.g., Faculty Senate, Academic Dean).
The Institutional Report does note that “the new plan uses the same procedures approved by
the Faculty Senate in 2008” (p. 52).

The program review document provided a basic overview of steps for three required
elements, including a self-study, a five-year plan and the report of a single external reviewer.
The self-study was largely to consist of the presentation of data that, while not specified, it is
assumed the program would receive from institutional research, and a plan for future
assessment of student outcomes. The Team was not clear on how the data each program was
to present in the self-study would assist the program with making an evidence-based, five-
year plan. A timeline for five programs to move through the one-year process of review was
provided (Institutional Report, p. 53), with no indication of a plan to review general education,
the Professional Studies Program, or Student Affairs (which the Institutional Report noted had
gone through the previous process in 2011-2012, p. 52). No committee or office was charged
with responsibility for implementing or managing the program review process. The Team had
concerns that this process of program review would be limited in its ability to support
programs with continuous improvement or evidence-based resource alignment unless a more
comprehensive and well-managed plan was developed [CFRs 2.7, 2.11, 4.1].

Upon request for additional documentation, the institution provided a completely new
program review process. This process was dated December, 2015 and noted as version 1.0. The
process is closely based on the one developed by John F. Kennedy University, which is noted
in a footnote on page 3; however Menlo College has not yet adapted the document for its own
environment. This process is extensive, highly detailed, and was clearly designed to achieve the goals of continuous improvement, and evidence based resource alignment. That said, the process does not include an audit of credit hour policy compliance, which is specified by the Menlo College Credit Hour and Program Length Policies and Review Process Guidelines document. The December program review document specifies that the Program Review Council, in coordination with the Faculty Senate Curriculum Committee, will implement the program review process as well as outcomes-based learning assessment. No explanation was provided to the Team of the process by which the April 2015 program review document was replaced with the December 2015 version. The five year schedule of one program at a time moving through review will be followed, with the Management Program recently beginning review, just a semester behind schedule (Institutional Report, p. 53).

Team members agreed that the program review processes are at a beginning stage [CFRs 2.7, 2.10, 2.11, 4.1, 4.2, 4.3, 4.4, 4.5].

**Assessment of Student Learning**

The College reports having been engaged in assessment of student learning since 2008. Early efforts included examination of written and oral communication, critical thinking and mathematics within the General Education program (Institutional Report, p. 53). In 2010 assessment efforts were largely focused on seeking accreditation by AACSB. In preparation for AACSB, learning outcomes were established for the business core curriculum [CFR 2.4]. These outcomes were assessed following an annual cycle that utilized a combination of direct and indirect evidence of learning. The process led to a number of meaningful changes for improvement of the business core curriculum. For example, the addition of an applied
statistics project, requiring use of descriptive statistics, estimation, and hypothesis testing, was added to MTH 251 in order to further emphasize practice and interpretation (AACSB Self-Evaluation Report spreadsheet, Statistics Knowledge). However, the IEEI reports business core curriculum assessment activity from 2011 to 2013, and the AACSB Self-Evaluation Report spreadsheet only reports assessment processes through the spring of 2013. During the visit it was reported to the Team that assessment of the business core curriculum has been on hold since the granting of accreditation by AACSB in the spring 2014 semester so that resources could be devoted to the assessment of ILOs in preparation for reaccreditation by WSCUC [CFR 2.6].

The institution described plans to assess the internship program that was launched in 2014 for business students (Institutional Report, p. 55). The psychology program is engaged in assessment of its learning outcomes, but other programs have not begun program learning outcomes assessment. It was noted that the Associate Director of Accreditation, Assessment and Institutional Research will begin assessment activities for each program when the program enters program review under the new process [CFRs 2.3, 2.4, 2.6, 4.3, 4.4].

In the Institutional Report the College raised the challenges to assessment that it is working to overcome. One of these challenges is that “faculty rightfully object that too much time is or could be devoted to assessment at the expense of instruction” (Institutional Report, p. 56). The partial solution that the institution proposes is the use of existing course assignments. The phrasing of the challenge and solution imply that the institution approaches assessment as an activity that is separate from the teaching and learning processes. Further illustration of this separation was found in faculty interviews, during which faculty reported
that, with rare exception, faculty outside of assigned committees are not asked to engage in the process of learning outcomes assessment and responsibility for conducting assessment rests primarily with Institutional Research. Including all faculty in the assessment process will create a more sustainable process that fosters a culture of evidence [CFRs 2.4, 4.3, 4.4].

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

In concluding the IR, it is stated that “Menlo College feels it is well positioned to grow and be a recognized leader as a private, residential business-focused college located in the heart of Silicon Valley.” Such aspiration is inextricably hinged on the College being a financially viable concern. As was alluded to earlier in this report, the College continues to be fiscally challenged, ending each of the last three fiscal years with operating deficits. And, the challenges are likely to persist into the intermediate future, as evidenced by a five-year plan that projects deficits for the next five years. Without positive and improving indicators, the likelihood of the College achieving its strategic goals is effectively stymied. Fiscal exigency will always preempt strategic opportunities as the College deals with substantial and growing deferred maintenance.

Menlo College unfortunately fits the profile of small colleges with regards to its financial profile: high cost of attendance ($58,000), low enrollment (768), very high discount rates (48 percent), lack-luster philanthropic support ($1,325 per student), small endowments ($30m), and razor-thin or negative operating margins (-12 percent). These small colleges seem unable to stave off the technological, demographic, and economic forces that come to bear on its resources each year.
One significant and positive attribute of the college is its non-reliance on debt financing for capital acquisitions or to leverage operations. This presents a significant opportunity for the College if it should ever choose to diversify its capital structure. The College is to be commended for not pursuing debt financing considering that they would have difficulty servicing debt.

To inform its determination of financial viability of Menlo, the Team reviewed the following documents: Menlo College’s Institutional Report, audited financial statements, five-year financial projections, enrollment statistics, the strategic plan, and minutes of the Board of Trustees’ Audit & Budget Committee. In addition, interviews were conducted with Mr. Steven Weiner (EVP for Financial Administration), Dr. Richard Moran (President), Dr. Terri Givens (Provost), the Enrollment Management Team, select Business Office Team members, and Ms. Jessica Ayres (Director of Financial Aid).

In its institutional report, Menlo pivoted on positive cash flow from operations as the key indicator of financial stability and sustainability (p.59). The IR states that “Since 2008, the college has improved its financial situation and has operated in a positive cash flow position” (p.68). In a meeting with the Board of Trustees, they too seem resolved to only monitoring cash flow as a matter of expediency until such time that non-cash items like depreciation can be “funded.” The Team believes that while positive cash flow from operations is certainly a positive financial indicator for any organization, it can lull the institution into losing sight of a more comprehensive picture. For example, positive cash could be the result of investment returns or an increase in liabilities, and not necessarily the result of fiscal prudence. And, for the past two fiscal years, receivables constituted 66 percent of total current assets. Thus, a more
inclusive financial risk assessment should include other indicators of viability, returns, and reserve, as recommended by NACUBO and the US Department of Education.

Menlo College has two significant concentrations of risk that could further threaten its financial viability: 1) student revenue dependency, and 2) low philanthropic support from a broad base of donors. Student revenue dependency hovers around 90 percent at Menlo. “For the years ended June 30, 2015 and 2014, one donor accounted for 100 percent of contributions receivable” (Financial Statements, p.23). Financial sustainability requires that Menlo seek to further diversify its revenue sources. Also, Menlo must intentionally seek broader philanthropic support from alumni, trustees, faculty and staff, as well as friends of the College.

Menlo included a five-year pro forma of its financial operations in its institutional report. Various members of the College’s administration were interviewed by the Team regarding the assumptions used to derive the future financial state of the institution. Based on the evidence only, the Team concluded the assumptions were not informed or supported by empirical data nor were they the result of strategic deliberations. For example, there is no strategic enrollment plan or advancement plan that correlates to the overall strategic plan or the strategic budget. In most cases, the assumptions appear to be aspirational. The Team found no evidence to support the assumptions of the five-year financial projection.

The five-year financial projection also suggests negative financial operating results for each year, following three years of actual negative results. Again, Menlo is focused on positive cash flow derived through elimination of depreciation expenses. Such calculation is commonly acknowledged as a rudimentary estimation of cash flow and not an operating strategy. Further, best practice would suggest acknowledging prior years’ deficits in budgeting for
ensuing years as a strategy to curtailing operating losses. Menlo has chosen not to employ such practice. It is recommended that Menlo embrace the strategy of acknowledging all operating costs in its budget and employ a strategy of approving only balanced budgets.

**Component 8: Optional Essay on Institutional Specific Themes**

Not applicable – The College included no optional essay.

**Component 9: Reflection and Plans for Improvement**

Component 9 was addressed in the Institutional Report under four subheadings: (1) Menlo College since 2008: Key Strengths, (2) Reflections on the Self-Review Process, (3) Next Steps for Menlo College, and (4) Conclusion. The first section, Key Strengths, detailed positive changes since the last WSCUC EER review in 2008: a focused set of academic programs relevant to the mission, enrollment growth, AACSB accreditation of the College’s business programs, and strategic planning efforts. Team members had been given the 2014 update to the 2013-2018 Strategic Plan along with the original submission of the IR. Upon request following the OSR, the College provided a draft outline of a new Strategic Plan taking shape since President Moran’s arrival, *Defining the Future of Menlo College: 2015-2020*. The Team was subsequently provided with two documents describing the planning process, *Menlo College Strategic Planning Process 2015-2016* and *Menlo College SWOT Analysis, March 2016*. These last two documents served somewhat to address Team concerns around the involvement of campus and other constituencies in the planning process, the College’s awareness of its strengths, weaknesses, opportunities and threats, the level of detail to be provided in the plan, and the time frame for the development of the plan.
While appreciating the provision of more specific planning process documentation, Team members were unable to discern a basic orientation at the College towards using evidence and data as the basis for planning. The 2014 update to the 2013-2018 Strategic Plan described numerous actions and accomplishments, and provided qualitative evidence that the plan was being implemented. The planning update had few budgetary estimates attached to the objectives and strategies put forward, and concentrated mostly on accomplishments. Prioritization among the goals and within goals among objectives/strategies was largely absent, as were detailed timelines. Underlying evidence and data serving as a rationale for a particular course of action were not found, nor was a consistent use of baseline measurements, benchmarks, quantitative metrics, or measurable goals, for example decreasing the tuition discount rate from 48 percent to 30 percent. Defining the Future of Menlo College: 2015-2020 articulated five broad strategic goals, with a bulleted list of initiatives and key metrics outlined for each. Specific data and/or evidence used to formulate the goals and initiatives (for example, enrollment projections) were not included. The Menlo College SWOT Analysis, March 2016 cited a number of repeated themes, such as “Many entering students are underprepared for the rigors of work here,” yet the propositions advanced were again not supported by underlying data and evidence. While applauding the growing institutional orientation towards strategic planning, the Team recommends that Menlo College engage in institutional reflection and planning processes that are based on the examination of data and evidence [CFR 4.6].

Reflections on the Self-Review process were provided, chiefly concentrated on detailing increased faculty involvement in assessment. The IR notes that about 50 percent of the faculty
were engaged in relevant committees during the self-review (IR p.69), yet this means that of 29 total full-time faculty, only 15 would have been involved. Team members had difficulty regarding that level of involvement as indicative of a faculty-driven review process, and wondered why involvement of the faculty had not been more broad-based. The IR also discussed the activities of the Core Competencies Committee to create appropriate learning outcomes and assess them. Of the WSCUC Core Competencies, written communication, oral communication, and quantitative reasoning are the only ones that have been assessed at this point. According to members of the Core Competencies Committee, assessment of critical thinking and information literacy has begun during the current academic year. Separately, a faculty task force identified institutional and programmatic learning outcomes as part of the Institution’s efforts to better define the meaning, quality and integrity of the degrees at the College.

Component 9 also included a section on “Next Steps for Menlo College.” In this section, the IR speaks to furthering the assessment of Core Competencies and participation in the Assessment Leadership Academy, activities conducive to the future development of a culture of assessment at the College. The hiring of an almost completely new leadership Team and the expansion of the Board of Trustees are noted in the section on new leadership and strategic initiatives, and a development plan for the Board of Trustees was created and provided to the Team upon request. Not discussed in the IR but noteworthy to the Team is that neither the majority of the institutional leadership team nor new members of the expanded Board of Trustees have been in place at the College for a sufficient length of time to be able to demonstrate their functioning as high-performing teams. Visiting Team members agreed that
the success of these changes has not yet been fully established or sustained [CFRs 3.6, 3.7, 3.8, 3.9].

A section on financial sustainability rounds out the discussion of next steps. The hiring of a new Chief Advancement Officer, the creation of an advancement plan, expanding traditional enrollment, and expanding adult education opportunities are mentioned in that plan. At the Team’s request, a strategic plan for institutional advancement was supplied, yet Team members were somewhat surprised to see that the advancement plan envisions up to eight new FTE positions and wondered about the sustainability and potential for return on investment of such a plan [CFR 3.4].

Conclusion: Team members regarded the concluding section of Component 7, the “future evolution of Menlo College” (IR, pages 65-66) as providing a good framework for understanding the future evolution of the College as a “recognized leader as a private, residential business-focused college located in the heart of Silicon Valley” (IR page 65), including leveraging the location advantage of the College, distinguishing the College’s programs through the mandatory internship program, and retaining the inviting small-college atmosphere characterized by high faculty-student interaction.

SECTION III – OTHER TOPICS (such as Substantive Change)

Not applicable.

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

Holistically evaluating the capacity of the College for self-reflection in the context of the many challenges and changes through which it has come since the last reaffirmation of accreditation,
the Team view is that the Institutional Report and the process that led to its creation taxed the capacity of the College very nearly to its limits and that the process has already led to a number of positive outcomes.

**Commendations**

- The Team commends the College on its progress since the last WSCUC report.
- The Team commends the faculty and staff for taking the bold step of investing in the AACSB accreditation process.
- The Team commends the College for the highest enrollment in its history at 768 students for the 2015-2016 academic year.
- The Team commends the College for its impressive Center for Academic and Professional Success. This center brings academic and support services together in a way that is a collaborative, integrated blend of student and support services that has potential to impact retention and student success.
- The Team commends Menlo College for integrating required internships as part each student’s college experience. Once it is implemented across all programs it has the potential to become a signature program and significant differentiator.
- The Team commends the College for its steady increase in incoming student quality, as evidenced by incoming GPA and standardized test scores.

**Recommendations**

- The College has had three years of financial operating deficits and projects five more years of operating deficits. The Team recommends that the College develop and implement a realistic plan for eliminating deficits [CFR 3.4].
The Team recommends that the College continue the development and implementation of the strategic plan. The process should include all stakeholders, be based on data and evidence, and be socialized throughout the greater community in a timely manner; in addition:

a. The Team recommends that the College develop and implement a detailed enrollment plan that aligns with the overall Strategic Plan and the financial forecast of the Organization; and

b. The Team recommends that the College develop and implement a detailed development plan that aligns with the overall Strategic Plan and the financial forecast of the Organization; and

c. The Team recommends that the College develop and implement a comprehensive branding and marketing plan that draws upon the many differentiating strengths of Menlo College, and leverages talent available on campus and through Board leadership [CFRs 4.6, 3.4].

d. The Team recommends that institutional budgets reflect allocation of resources towards strategic priorities that generate sustainable outcomes [CFR 3.4].

The Team applauds the recent progress on the Meaning of a Menlo College Degree statement, however the Team recommends that the College engage in continued development of this statement and in work towards understanding how the College ensures the Quality and the Integrity of the degree [CFRs 2.2, 2.2a].
• Assessment is at a nascent stage at the College. Programs have learning outcomes and those PLOs are included in the 2015-2016 Academic Catalog, but apart from Psychology program-level assessment was not evident. Assessment of institution-wide learning outcomes has begun, but faculty need to take collective responsibility for their assessment. A detailed plan for meaningful, sustainable assessment of the institution-wide outcomes needs to be developed. The Team recommends that the College further develop and integrate its assessment efforts [CFRs 2.3, 2.4, 2.6, 4.4, 4.5].

• The Team recommends that the College continue to adapt and implement its program review process. In addition, attention should be given to credit hour audits in context of the program review process [CFRs 2.7, 4.1].

• The Team recommends that the College continue to build capacity and leadership of the Institutional Research function, and that it undertake an external review of the function [CFR 4.2].

• Shared Governance and communication: The Team recommends that the College work towards increasing collaboration and communication to fully implement policies and guidelines in the faculty handbook [CFR 3.10].
### APPENDICES

#### A. Federal Compliance Forms

**1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM**

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible? ☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Where is the policy located? Abbreviated version p. 84 of 2015-2016 Academic Catalog, called “Course Syllabi”</td>
</tr>
<tr>
<td></td>
<td>Comments: Full policy shared with Team by request. The Team recommends that the College make the full policy available on its website.</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>Does the institution adhere to this procedure? ☐ YES ☑ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: Policy reflected in Curriculum Committee Petition for New Course Approval, but the Chair of the Curriculum Committee was not aware of the policy, and reported that he and the Committee had not engaged in review of credit hour for new course proposals. The Team recommends that the College implement the review process within new course proposals, and include an audit of credit hour within the program review process.</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></td>
<td>Comments:</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed? N/A</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)?</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)?</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)?</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></td>
<td>Comments: The College does not offer online or hybrid courses</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) Please review at least 1 - 2 from each degree level.</td>
<td>How many syllabi were reviewed? 3</td>
</tr>
<tr>
<td></td>
<td>What kinds of courses? 2 internship, 1 directed research</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? Bachelor’s</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Human Resource Management (directed research), Accounting, “major field”</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></td>
<td>Comments: Two of the shared syllabi (for directed research in Human Resource Management and for internship in “major field”) indicate sufficient required work. The Accounting internship syllabus does not provide sufficient detail.</td>
</tr>
<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? 3</td>
</tr>
<tr>
<td></td>
<td>What kinds of programs were reviewed? Traditional</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? Bachelor’s</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Psychology, Accounting, Marketing</td>
</tr>
<tr>
<td>Does this material show that the programs offered at the institution are of a generally acceptable length?</td>
<td>YES [x]  NO [ ]</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
</tbody>
</table>

Review Completed By: Laura Massa  
Date: 3/23/2016
2 - MARKETING AND RECRUITMENT REVIEW FORM
Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices.

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

*5602.16(a)(1)(vii)

**Section 487(a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

[Signature]

Review Completed By: ___________________________
Date: ___________________________
### 3 - STUDENT COMPLAINTS REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s student complaints policies, procedures, and records.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints? X YES ☐ NO  
If so, is the policy or procedure easily accessible? X YES ☐ NO  
If so, where? It is published in the Menlo College 2015-2016 Catalog and in the catalog online.  
| Process(es)/procedure | Does the institution have a procedure for addressing student complaints? X YES ☐ NO  
1. For academic complaints, students can complete a form and file a formal complaint with the Office of the Registrar. The Registrar then forwards the complaint to the Academic Appeals Committee (AAC), which is comprised of faculty. The AAC reviews any specific appeals such as grade or policy appeals and makes a determination that is communicated to the student by the AAC chair. Once the issue is resolved, records are maintained in the Office of the Registrar.  
2. Regarding non-academic appeals, the Dean of Student Affairs tracks and resolves any complaints related to student or residential life. Title IX complaints are referred to and tracked by our Title IX Officer (who is our Director of Human Resources). Any documentation regarding Title IX cases are stored securely in his office.  
If so, does the institution adhere to this procedure? X YES ☐ NO  
Comments: |
| Records | Does the institution maintain records of student complaints? X YES ☐ NO  
If so, where? Academic complaints and appeals are maintained in the Office of the Registrar. Records of non-academic appeals and complaints are maintained by the Dean of Student Affairs. Title IX complaint records are maintained by the Title IX Officer, the Director of Human Resources.  
Does the institution have an effective way of tracking and monitoring student complaints over time? X YES ☐ NO  
If so, please describe briefly: Complaints are monitored and tracked manually by the Registrar (academic complaints and appeals), by the Dean of Student Affairs (non-academic complaints) and by the Director of Human Resources (Title IX complaints).  
Comments: |

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

Review Completed By: Tracy Tambascia and Joseph Hoey.  
4 – TRANSFER CREDIT POLICY REVIEW FORM
Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices accordingly.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit?  
X YES ☐ NO  
If so, is the policy publicly available?  
X YES ☐ NO  
If so, where? It is published in the Menlo College Catalog 2015-2016, pages 38-39, and available online.  
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  

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

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

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

See also WASC Senior College and University Commission’s Transfer of Credit Policy.  
Review Completed By: Tracy Tambascia  
Date: 3/24/2016

B. Off-Campus Locations Review

Not Applicable. Menlo College offers no programs at off-campus locations further than 25 miles from the main campus.

C. Distance Education, as appropriate

Not Applicable. Menlo College offers no programs via distance education.