REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Argosy University

March 7-9, 2018

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

A.1 Description of the Institution

Argosy University (AU) began in 1976, with the founding of the Illinois School of Professional Psychology with one program in one location, eventually growing to over 70 programs in 28 locations. The AU professional doctoral psychology program is among the longest continuing professional doctoral programs in the nation.

In 1992, the founder and then-owner of the American Schools of Professional Psychology, Michael Markovitz, purchased the University of Sarasota. The University of Sarasota had a 30-year history of providing graduate-level educational opportunities to working adults, using a delivery format that consisted of a mix of distance learning and brief, intensive, on-campus study periods. This blended model is still practiced. In 2001, the Higher Learning Commission approved the formation of Argosy University, combining three institutions (the American Schools of Professional Psychology, the University of Sarasota, and the Medical Institute of Minnesota) owned by the Argosy Education Group.

Argosy University’s current mission statement adopted in 2008 is: *At Argosy University, our passion is teaching and learning. We develop professional competence, provide opportunity for personal growth, and foster interpersonal effectiveness. Students succeed because our university community engages and supports them.*

Accordingly, AU’s mission focuses on ensuring inclusive academic success in the areas of access, professional competence, and consistent support through the student lifecycle. Argosy University's history spans several decades of teaching and learning in psychology, counseling, health, education, business, law, and art. The institution employs faculty who actively practice in their fields of study, with the results that AU develops its curricula using practical world
experience, as well as professional standards identified by programmatic and regional accreditors.

AU has provided educational opportunities primarily to working adults who actively serve their local communities while seeking personal and professional growth. As the ability to augment instruction through online technologies has evolved, AU has created flexible program options that meet the needs of different types of students. This flexibility extends to providing various modalities and program delivery options, which include courses conducted entirely in traditional classroom settings, others that are conducted completely online, and a combined option that offers a blend of face-to-face and online instruction. With the addition of the College of Creative Arts and Design, Argosy's student population has expanded to include more students of traditional age. These students, who tend to be rooted in their communities, seek skills to further their careers within and beyond their communities through the pursuit of a creative arts education.

AU’s student support model engages students from the point of matriculation through to graduation, using an array of advising, tutoring, and feedback mechanisms. The University's mission strives to inform planning and decision-making, with the goal of achieving a balance between thoughtful management of its operations and investing in new and improved services and programs that will allow it to adapt to meet the changing needs of its diverse student population.

Argosy's students pursue associate, baccalaureate, graduate, and post-graduate degrees and certificates from one of Argosy’s eight colleges and schools (College of Arts and Sciences, College of Clinical Psychology, College of Counseling, Psychology and Social Sciences, College of Creative Arts and Design, College of Education, College of Health Sciences, College
of Law, and Graduate School of Business and Management). Degrees are offered at AU’s main campus, branch campuses, satellite locations, and via the online modality. In addition, the University has support structures for faculty and students, including a virtual tutoring lab (ThinkingStorm), career services support (e.g., resume building, networking, job placement, interview preparation), loan resolution coordinators who counsel students regarding loan repayment options available, campus specific tutoring and student groups, and a team that provides training opportunities to faculty and staff.

Argosy University is based in Orange County, California, with 30 campuses and 18 off campus locations in Arizona, California, Colorado, Florida, Georgia, Hawaii, Illinois, Minnesota, Tennessee, Texas, Utah, Virginia, and Washington. Due to declining enrollments, Argosy University, Seattle is currently on teach-out mode. As of the fall 2016 term, the University had 23,915 students (7,850 graduate and 16,065 undergraduate). The student body is highly diverse, with 65% of the student population identifying as non-white, including 29% African American and 22% Hispanic/Latino. In the same academic year, the University had 396 full-time faculty, 66 part-time faculty (46% of whom had terminal degrees), 2,224 adjunct faculty, and 1,085 full-time administrative staff members. The faculty and staff are similarly diverse, with 30% and 39% of full-time and adjunct faculty, respectively, and 44% of staff identifying as non-white. The student to faculty ratios range from 10:1, for the Clinical Mental Health Program, to 20:1, for the College of Arts and Sciences.

A.2 Accreditation History

Previously based in Chicago and accredited by the Higher Learning Commission (HLC) of the North Central Association, AU sought WSCUC accreditation in December 2009, contingent upon moving its headquarters from Chicago to Orange County. At that time, the
University served some 23,720 students through undergraduate and graduate programs in Psychology, Behavioral Sciences, Health Sciences, Business, and Education on nineteen campuses located in thirteen states.

In June 2010, WSCUC granted initial accreditation to AU, contingent on the relocation of AU headquarters to the WSCUC region, the release by HLC of its jurisdiction over AU, and approval of the U.S. Department of Education (USDE) for Title IV purposes. The administrative headquarters moved to Orange County; HLC did release its jurisdiction; and on August 25, 2011 USDE reported its recognition of the change from HLC to WSCUC accreditation. WSCUC accreditation became effective September 30, 2011.

In 2012, WSCUC approved the mergers of The Art Institute of California and Western State University College of Law with AU, and the Western State College of Law and College of Creative Arts and Design became part of Argosy University.

On July 7, 2017, the University received notification from WSCUC that the Commission approved a change in ownership, legal status, and control to be implemented in fall 2017, and no later than December 31, 2017, with recommendations to be implemented by AU and assessed during this March 2018 WSCUC reaffirmation visit.

A.3 Off-Campus Locations

The WSCUC Team carried out individual reviews of five different Argosy University Campuses in support of the reaffirmation visit:

- Twin Cities: February 1
- Nashville: February 12
- Santa Ana: February 22
- Tampa: February 23
- Irvine: February 27
The reports from these site visits are included in Appendix B of this team report.

B. WSCUC Visiting Team Review Process

As part of the reaffirmation of accreditation process of Argosy University, the WSCUC Team conducted an Offsite Review (OSR) October 2-3, 2017. The Team reviewed the AU institutional report, numerous appendices, and supplemental information that provided an insight as to progress made since AU’s initial accreditation review by WSCUC. Said background information and the Team’s internal discussion were the basis for a conversation with AU leadership concerning initial lines of inquiry, in anticipation of the March 2018 visit.

The OSR was followed by visits to five Argosy campuses between February 1 and February 27 of 2018. At each of the Argosy campuses, the corresponding WSCUC Team member toured the respective location, reviewed a select number of documents pertaining to that location, and conducted interviews with key campus leadership, faculty, staff, and students. An individual report was prepared for each of the five campuses.

In preparation for the reaffirmation visit, the WSCUC Team had several teleconference meetings to refine the lines of inquiry, to identify any information pending from or newly required of AU, and to review the list of interviewees and expand or amend as appropriate. March 6-9, 2018 the WSCUC Team was at the Orange County Headquarters of Argosy University to conduct the site visit. Numerous AU constituents were interviewed including the AU Board of Trustees, Dream Center Education Holdings’ (DCEH) leadership, the University Chancellor, Executive Leadership Team, AU WSCUC Steering Committee, College Deans, Faculty, Curriculum, and Assessment Leadership, Finance, Student Financial Services, Student Services, Library, Admissions, Marketing, Information Technology, Institutional Research, Students, Campus Staff, Online Team, and Human Resources.
C. Argosy University Institutional Report and Update

Due to the many changes at AU, the reaffirmation review was changed from the previous system of Capacity and Effectiveness visits to Offsite and Accreditation reviews beginning in fall 2017, with the institutional report due in summer 2017. Accordingly, in June of 2015, a Self-Study Steering Committee began work under the leadership of the Associate Vice Chancellor of Academic Affairs and Accreditation Liaison Officer. The Steering Committee consisted of eight individuals, with each member leading a separate sub-committee or chapter.

Given Argosy's geographically dispersed environment, an early challenge faced by the Steering Committee was how to gather data systematically from campuses, colleges, and operational unit leaders. This was accomplished by developing campus committees, with a single Campus Accreditation Coordinator as the main point of contact for all correspondence and requests for data. Each campus committee was comprised of six to 12 members, including faculty, staff, and students, when possible. Colleges and operational leaders hosted regular meetings with their counterparts. In total, there were approximately 180 individuals serving on the various committees.

Overall, the WSCUC Team observed a well-structured institutional report issuing from the self-study, with a strong overview, explaining history, mission, and context, along with many highlights and facts about AU. Numerous appendices provided supplemental information on students, faculty, programs, locations, structure and organization, and finances, among others. The report also shared the five strategic goals prepared by AU in March of 2016, designed to set the stage for sustainable growth and quality:

- Returning to a position of leadership in mental and behavioral health programs and growing practitioner-focused graduate and professional programs in all colleges;
• Offering select, high-value undergraduate programs aligned with Argosy’s career and graduate focus;
• Building a culture that engages faculty and staff in the common goal of supporting students;
• Enhancing Argosy's national and local reputation through brand identity (Care, Learn, Live) and community relationships; and
• Creating an exceptional student experience through the support model and delivery of quality academic program.

Notwithstanding the above, the Team also found limited information about the history of the institution that led to the recent change in ownership, legal status, and change of control, how this event will impact the ability to implement the newly developed strategic goals, as well as the financial and operational management of the institution moving forward. These issues are addressed in detail in Components 2 and 7, following.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to Previous Commission Actions

The context for the institutional report and review has been presented in Section I. With respect to previous Commission Action Letters, to which the institution is required to respond, some of those issues have become moot because of changes in WSCUC practices (e.g., elimination of the guideline of 45 units of general education) or because of organizational changes (e.g., the conversion of the institution from for-profit to non-profit status). Other critical issues related to past Action Letters are covered elsewhere in this report. The institution has noted its commitment to contributing to the public good, and cited examples of its actions and activities.

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

Standard One

The institution defines its purposes and establishes educational objectives aligned with those purposes. The institution has a clear and explicit sense of its essential values and character,
its distinctive elements, its place in both the higher education community and society, and its contribution to the public good. It functions with integrity, transparency, and autonomy.

*Indicators of student achievement at institution, program, and course levels (CFR 1.2).*

The institution needs to make its student achievement data available on its institutional page on the WSCUC website. In addition, as noted in its institutional report, not all of Argosy’s Colleges are posting this information on the Argosy website, and this also needs to be corrected. Further, regarding student achievement data (CFR 2.1), the institution needs to develop its capacity to disaggregate and analyze data by demographic group.

*Diversity: policies, programs, and practices (CFR 1.4).* While the institution should be commended for the diversity of its students, faculty, and staff, it needs to take more effective steps to increase the diversity of the upper administration (including among the executive leadership team and the deans) and of the board of trustees.

*Education as primary purpose; autonomy from external entities (CFR 1.5).* In order to more fully meet this criterion, Argosy needs to develop greater clarity regarding the relationship of its Board of Trustees to Dream Center Education Holdings.

*Sound business practices (CFR 1.7).* While Argosy appears to be in compliance with this CFR, there are some questions regarding sound business practices in relation to Dream Center Education Holdings which are raised in the team’s response to the Structural Change, also under review by the Commission.

*Institution is committed to open and honest communication with the Accrediting Commission (CFR 1.8).* Argosy has been open and forthcoming with all requests for information.

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

**Standard Two**
The institution achieves its purposes and attains its educational objectives at the institutional and program level through the core functions of teaching and learning, scholarship and creative activity, and support for student learning and success. The institution demonstrates that these core functions are performed effectively by evaluating valid and reliable evidence of learning and by supporting the success of every student.

**Teaching and Learning (CFRs 2.1 – 2.7).** The visiting team carefully reviewed the AU institutional report and its appendices, its catalog and course syllabi, comments captured from faculty and student interviews, observations from facilities visits, the faculty handbook and other documents and found sufficient evidence that AU mainly satisfies Standard 2 criteria. However, AU needs to improve in several areas.

**Teaching and Learning (CFRs 2.1, 2.2, 2.2a, 2.2b).** The team found evidence that AU has paid closer attention to the Standard 2 criteria during the years since its last majorWSCUC review. The team confirmed that Argosy University’s (AU) programs are adequate for the degrees offered. The institution appears to have sufficient faculty with the requisite experience necessary for the type of courses and degree programs offered. AU's program reviews and other assessments help ensure that CFRs are met, academic rigor is appropriate, and undergraduate/graduate differentiation is clear.

AU’s student learning outcomes (SLOs) and expectations are reflected in the pertinent documents. The faculty share responsibility for SLOs and other related standards. AU students are actively involved and challenged in their learning via assessments, projects, online discussions, and signature assignments called LASAs, or Learning Assessment System Assignments.

AU’s assessment processes have improved and are expected to mature further over the coming years. Program reviews contain the appropriate measures although retention data should
be improved. External reviews are conducted during disciplinary accreditations or with external evaluators. (CFRs 2.3, 2.4, 2.5, 2.6, 2.7).

**Scholarship and Creative Activity (CFRs 2.8, 2.9).** Full-time faculty members are provided with modest ($750/year) financial support to keep them up-to-date in their disciplines (e.g., to attend conferences and to present scholarly work). Support for re-assigned time to reflect on their teaching effectiveness, to develop plans for improvement, and to refresh their perspective on student learning is limited and could be increased. Faculty evaluations include the four key elements, but the emphasis on scholarship appears low. (CFRs 2.8, 2.9)

**Student Learning and Success (CFRs 2.10 – 2.12).** AU moderately supports the needs of its students but there is significant room for improvement. AU does not disaggregate student achievement by race or ethnicity which is particularly important for an institution with high student diversity. This may be the result of a lack of appropriate technology systems. (CFR 2.10)

**Support for student learning (CFRs 2.11; 2.12; CFR 2.13).** AU’s co-curricular programs align with its academic goals and co-curricular assessment of support units has begun with Student Services, Student Financial Services, and the Library. The institution provides appropriate program information and advising. For the most part, AU’s student support services are appropriate. However, it is clear from its most recent Noel-Levitz report that AU’s financial support services are lacking. It's not clear if the two new "roving" financial aid officers will fix this problem, and the institution is encouraged to pay attention to this important function.

**Information to and treatment of transfer students (CFR 2.14).** AU demonstrates its commitment to transfer students through its website and student services.

AU’s improvement in Standard 2 compliance stems largely from the focus of its WSCUC Steering Committee that addressed student learning and related issues. This Committee's
membership consists mostly of academic leaders and would better serve the institution if more members from non-academic areas were added.

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

**Standard 3**

*The institution sustains its operations and supports the achievement of its educational objectives through investments in human, physical, fiscal, technological, and information resources and through an appropriate and effective set of organizational and decision-making structures. These key resources and organizational structures promote the achievement of institutional purposes and educational objectives and create a high-quality environment for learning.*

*Faculty and Staff (CFRs 3.1 to 3.3)* The institution employs full-time, part-time, and adjunct faculty at a ratio of approximately 1:9, although these are calculated on headcount rather than FTE. There appear to be sufficient administrative and support staff to carryout operations, and the team found a high commitment to the institution among all faculty and staff. There are regular, although limited, opportunities for professional development.

*Fiscal, Physical, and Information Resources (CFRs 3.4 and 3.5)* Past history of institutional financial performance provides little insight into future performance, given the change from for-profit to non-profit status. AU provided the necessary audited statements, but they are of a legal entity that no longer exists. The team concluded that the institution has met the requirement for CFR 3.4; likewise, the team concluded that it is the intent of the decision-making bodies to provide the necessary resources for the institution to grow and prosper. However, it also believes that close monitoring of AU’s financial performance during its initial non-profit years will be necessary. Two areas in particular that will require careful monitoring are net revenue management and capital spending. AU is a tuition dependent institution with nearly 97% of its net revenue coming from “net degree revenue” (tuition and fees less institutionally funded
financial aid). The University’s net revenue has declined every year in the past five years. Net revenue declined from $608.8 million in FY 2013 to $312.4 million (est.) in FY 2018, an overall decline of nearly fifty percent. This decline in net revenue, which is driven primarily by reductions in enrollment, has been a major factor in the institution’s reporting negative net income of approximately $30.0 million during each of the past four years. The institution is expecting net revenue to remain relatively flat for the next fiscal year, and then grow at a rate of approximately 4.9% in FY 2020. Going forward, the institution is projecting annual net revenue growth in the 3% to 5% range. The institution is forecasting positive net income for FY 2018 and for each of the next two years. These net revenue projections are based primarily on the achievement of new student enrollment goals.

In regards to capital investment, the University’s capital spending has fluctuated from year to year, but the average total annual capital spend between FY 2013 and FY 2016 was $6.9 million. Of this amount, the average annual investment in technology and software was approximately $2.4 million. In FY 2017, total capital spending was $1.5 million with approximately $741K of this total directed at technology and software. The institution is forecasting an investment in capital spending of approximately $2.8 million in the current fiscal year and $2.4 million in each of the following two fiscal years, including approximately $1.2 million of this total being invested in technology and software each year. Given the University’s size and complexity, there is concern as to whether the planned annual spend at proposed levels will be sufficient to meet the institution’s capital needs, particularly in the technology category. The institution is investing in technology enhancements in the current fiscal year, including in the implementation of a new learning management system.
With respect to CFR 3.5, AU acknowledged in its institutional report and during the Accreditation Visit and Offsite Review that it needs to increase its information technology infrastructure, both in hardware and software. The team believes the institution understands its needs and has taken initial steps to respond to them.

*Organization Structures and Decision-making Processes (CFRs 3.6 to 3.10)* As noted in the institutional report, 17 days before the report was due the Commission authorized AU’s conversion to non-profit status. With that conversion came a completely new organizational structure at the corporate level. While the institution’s internal structural mechanisms appear to have changed little, their interface with crucial corporate decision-making bodies has changed markedly. The team that produced this report also prepared a Structural Change Team Report that focuses primarily on these issues, including the need for the institution to better clarify its budget development, review, and approval process, with particular attention on the coordination of budget and financial planning between the institution and DCEH. In order to provide the fullest review possible, the reader is referred to that report for the team’s conclusions and recommendations, which are complementary to this Reaffirmation of Accreditation team report.

With regard to CFR 3.8, the team notes that the CEO also holds the position of CAO, which are normally two independent full-time positions.

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

**Standard 4**

*The institution engages in sustained, evidence-based, and participatory self-reflection about how effectively it is accomplishing its purposes and achieving its educational objectives. The institution considers the changing environment of higher education in envisioning its future. These activities inform both institutional planning and systematic evaluations of educational effectiveness. The results of institutional inquiry, research, and data collection are used to establish priorities, to plan, and to improve quality and effectiveness.*
Anticipating and responding to a changing higher educational environment (CFR 4.7). Argosy University found itself on the front lines of a rapidly changing higher educational environment and should be commended for its persistence to convert from a for-profit to a not-for-profit structure. In addition to the change that the institution has experienced, it continues to anticipate future changes. As such, it continues to actively explore the role of on-site and on-line educational approaches and how those approaches can be blended to meet the needs of students and enhance learning outcomes.

**Reflection and planning with multiple constituents; strategic plans align with purposes; address key priorities and future directions; plans are monitored and revised as required** (CFR 4.6) In December 2017, Argosy University presented a draft strategic plan to its Board of Trustees that incorporates the mission of Dream Center Education Holdings to provide accessible, affordable, relevant, and purposeful educations services. The strategic plan incorporates four strategic priorities, which are focused on student success, responsible stewardship, the need to secure the future, and to achieve enrollment growth. The institution should be commended for putting forth a strategic plan that aligns the mission of DCEH with Argosy University shortly after completion of the change of control. As the institution moves forward, the team recommends that the institution seek to align the strategic plan with the strategic direction of its constituent schools.

**Quality assurance processes** (CFRs 4.1, 4.3, 4.4). Argosy has developed robust quality-assurance processes that have the capability to analyze and interpret data. Faculty and academic leadership display a commitment to continuous improvement, based upon self-assessment and student feedback, in a manner designed to improve curricula and pedagogy.
Creating an organization committed to learning and improvement strategic thinking and planning (CFRs 4.1, 4.5). Argosy University plans to implement a new learning management system and customer relationship management system that will offer the institution new opportunities to collect and analyze data. The learning management system has been deployed and existing data transferred into the system. The institution now has the ability to collect data in a manner that can enhance quantitative analysis of student outcomes. Together with the future implementation of the customer relationship management system, the institution should have an opportunity to enhance the use of quantitative and predictive analytics as part of the institution’s quality assurance processes. In addition, AU may have opportunities to enhance the input from alumni and DCEH leadership in its assessment processes.

Plans align academic, personnel, fiscal, physical, and technology (CFR 4.2). The collection of data through these systems may help to streamline the development and dissemination of reports. Future investments in the capacity of institutional research may be needed following the implementation of the new learning management and customer relationship management systems to enhance the capacity to support assessment processes.

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

Inventory of Institutional Effectiveness Indicators

Argosy University completed the Inventory of Institutional Effectiveness Indicators and indicated that the process enabled “faculty, staff and administrators to actively participate in collecting and organizing the information and reviewing the assessment processes of the various colleges and their programs” (Institutional Report, p. 14). The team observed a high degree of
engagement in the process during its visits to the Tampa, Twin Cities, Orange, Nashville and Western State sites.

**C. Component 3 – Meaning, Quality, and Integrity of Degrees**

AU rightly claims that the meaning, quali, and integrity of its degrees are "articulated in its mission statement, purpose, values, and ILOs." While AU's mission is necessarily broad given its wide variety of programs, "professional competence" stands out as a defining element and is also one of its ILOs. Moreover, AU's written values state that it is "a university community dedicated to delivering high quality professional education programs to working professionals." Thus AU's clear focus on practice-oriented education makes sense for its graduates who tend to be older than the traditional student. AU's five other ILOs are appropriate given its mission and WSCUC criteria. AU's ILOs are clearly mapped to its PLOs and both are included in every course syllabus and course catalog. (CFRs 1.1, 1.2, 2.3, 2.4)

AU documents and delineates the standards and processes it uses to ensure the MQI of its degrees through its ILOs, PLOs, signature assignments, curriculum maps, and its assessment processes with follow-up. Student performance data are captured via rubrics and other assessment tools and then analyzed at three levels of performance - introductory, reinforced, and mastery. Curricular and program revisions are made as necessary. (CFRs 2.3, 2.4, 2.5, 2.6)

Drawing on the framework provided by AU's Institutional Learning Outcomes, as well as guidelines and standards established by external government and accrediting bodies, each degree program delineates and assesses a set of Program Learning Outcomes. Both ILOs and PLOs are published in the AU catalog and all syllabi. Grading rubrics also indicate the Course Objectives used to evaluate student assignments and align with and implement the ILOs and PLOs. (CFRs 2.2, 2.4, 2.6, 2.7, 4.3)
D. Component 4 – Educational Quality: Student learning, core competencies, and standards of performance at gradation

Argosy University provides clear evidence of a comprehensive structure for designing and assessing degree programs and for measuring student performance. This structure includes institutional and program outcomes that define student learning suitable to each degree level. (CFR 2.1)

Two of AU’s three of undergraduate colleges -- CoAS and CoHS -- provide traditional general education experiences that support the appropriate student outcomes. These two colleges use a "learning outcomes" management system to collect and store student data for their courses. Also, a student “exit” examination is administered in GE capstone courses in these colleges. CCAD, unlike the other undergraduate colleges, uses a different "qualitative judgment" approach for assessing GE that appears to be effective. When GE results are unsatisfactory in any college, course revisions are made, thereby "closing the loop." Revisions may also be made to curriculum maps, signature assessments, and grading rubrics. (CFRs 2.2a, 2.6, 4.3)

The three undergraduate colleges developed useful mappings of their PLOs to WSCUC Core Competencies. As with GE, CoAS and CoHS use a traditional approach for assessing program performance for these competencies while CCAD uses a different approach that assesses final portfolio reviews. These approaches all appear to discover student strengths and weaknesses with follow up, to be improving dynamically over time, and to be overall effectual. (CFRs 2.2, 2.6, 4.3)

Most graduate programs are aligned with programmatic accreditors who have rigorous standards for scholarship and professional practice. The results have been strong, reflecting well on the institution. Although necessarily different from other AU colleges, Western State College
of Law has several policies (e.g., faculty) that are particularly strong and the rest of AU could benefit from its experience. (CFRs 2.2b, 2.6, 2.7, 4.3)

The six Institutional Learning Outcomes at AU are prevalent in academic documents and assessed program by program to enhance student achievement. Appropriately, assessment of student learning outcomes is a never-ending activity at AU that has engaged the faculty and academic administration. The recent installment of a common schedule and reporting template across the university will help with consistency and overall assessment of student learning. With its built-in assessment tools, the full implementation of the LMS Brightspace will help as well. (CFRs 2.2, 2.6, 2.7, 4.3, 4.4, 4.5)

**E. Component 5 – Student Success: Student Learning, Retention and Graduation**

The institution states that "Student success is the core of Argosy University’s mission and is a responsibility shared by all academic and operational units." While this may be true, AU still has much to do to ensure improved student success and improved graduation rates. For example, AU's recent ground undergraduate graduation rate is less than 17% in its College of Arts and Sciences (AU's largest) and about 45.5% in its College of Health Sciences (mostly Associate degrees). AU's ground graduate graduation rates are better overall, for example above 52% in its College of Counseling, Psychology and Social Sciences. However, the rate is lower in its Graduate School of Business and Management at about 43%. (CFR 1.2)

AU promotes student success in a variety of standard ways for undergraduate admits beginning with initial student admissions support, a new student orientation, and a readiness/skills success course (for students transferring with less than 24 units). These lead to informed student choices, although financial support services need improvement as seen in the pertinent Noel-Levitz score. Appropriately, Student Services and faculty advisors support
students as they progress through their programs. AU's focus on qualitative measures and support for student success related to its wide diversity is admirable. (CFR 2.13)

AU has made a number of recent changes to help improve its retention and graduation rates. Its identification as an “attendance-taking institution” helps the University gather key data about student engagement and attendance that supports compliance with USDE policies (although retention rates may suffer). AU’s weekly “Continuing Student Review” reports facilitate the assignment of a retention risk factor to each student based on attendance, GPA, and input from faculty and staff. Students found at risk are contacted directly and supported as needed (although an early warning system for students needs to mature). Results of these efforts are not yet available but are expected to improve student retention. (CFR 2.13)

AU’s new Student Success Grant (SSG) program for good students who left Argosy without graduating is promising. The SSG program provides each qualifying student with a free course to help reboot his/her academic success. AU uses a standard Satisfactory Academic Progress (SAP) process to track and support student achievement across the academic life of each student. The institution also provides individualized coaching and remediation for students who demonstrate poor personal behavior such as plagiarism. (CFR 2.13)

Programmatic accredited degree programs appear to employ mature and successful methods for supporting student success. AU would improve its retention and graduation across the entire university if those methods were propagated across all its programs. Examples of these methods and "closing the loop" were provided to the visiting team. Also, although AU has a number of data extraction methods and techniques, it apparently does not have a universally available simple graduation rate dashboard. (CFR 2.7)
It's clear that AU has invested significant resources and efforts toward the goal of student success. The institution should understand that both of these need to be continued and expanded to increase retention and graduation rates to the highest level possible given its wide mix of programs and student diversity (race/ethnicity, age, background, and prior success). There are encouraging signs that this will occur.

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

Argosy University integrated its process for the development of its inventory of institutional effectiveness indicators with its periodic programmatic review process and annual reviews of learning outcomes.

In fall 2014, Argosy University revised its comprehensive program review process. At that time, the university adopted guidelines to improve student learning; evaluate proposals to revise curriculum and programs; foster a culture of continuous improvement; link its processes to institutional planning, including the allocation of resources; and improve educational experiences. The process seeks to foster an outcomes-based assessment of student learning; provide for evidence-based claims and decision-making; integrate the results of programmatic review with planning and budgeting; and enable effective action plans.

The colleges have mapped institutional learning outcomes to program learning outcomes, and further mapped program learning outcomes to its curriculum. Comprehensive program reviews occur every five to eight years, depending upon the length of the program and whether the program has a specialized agency accreditation. Annual assessment reviews are conducted on selected program outcomes on an annualized basis. The annual process seeks to align its programmatic outcomes with its institutional learning outcomes. The institution has developed
training materials, and provides self-study templates to programs to facilitate the process. The self-study template focuses the review on student demographics; the meaning and integrity of the degree; degree quality; and composition of faculty. The institution provided evidence that it has followed the guidelines it established.

As Argosy University builds institutional capacity to enhance data and analytics, it should evaluate its guidelines and templates to ensure that annual assessments and comprehensive programmatic reviews take advantage of new capabilities currently under development.

At present, standardized dashboards and data extractions generated by Institutional Research are limited. For example, a graduate rate report was used for the first time during the AY2016-17 assessment cycle for comprehensive program reviews. While average class sizes and data from the Noel-Levitz report are also utilized, additional information related to student retention, workforce matriculation, and other data collected through the new learning management system and customer relationship management system should help the institution with future annual assessments and comprehensive program reviews. Should the institution implement these systems, but fail to analyze data in its assessment process, it will miss continuous improvement opportunities.

G. Component 7 – Sustainability: Financial Viability; Preparing for the Changing Higher Education Environment

The institution presented historical financial information documenting its difficult past as an institution within the EDMC network, and shared plans for its future stabilization and growth. The plans are well-conceived and promising, focusing on core activities of the institution both in academic program development and alternative revenue strategies. Some initial steps have been
taken. However, the institution is in the midst of enormous corporate change, and the team could not conclude if the plans – once more fully implemented – will reasonably lead to the desired outcomes. The institution’s financial sustainability depends significantly upon to-be-negotiated agreements with its superior corporate entity. In the absence of those agreements, it is not possible to say that the institution has provided evidence of its future sustainability. On the other hand, the structural change to non-profit status has energized faculty and staff, created new opportunities for alternative revenue streams, and embedded the institution in an organization whose sole purpose is educational outcomes. The institution will need to mature in its new organizational form before it can be comprehensively evaluated on this dimension. The team concluded that there were no immediate threats to the institution’s ability to deliver its programs in an appropriate fashion, and that the ambiguity of settling into a new corporate organization calls for careful monitoring.

H. Component 9 – Reflection and Plans for Improvement

The self-study process provided Argosy University with a rich opportunity for self-reflection. AU pointed out that the institutional report was as a living document that served as a launching point for several initiatives undertaken by the institution to fine tune the alignment of its programs with the Standards, as well as to begin to tackle some emerging issues relating to its transformational change.

The AU self-study lists some areas of strength such as:

- Purposes that focus on professional competence align with Argosy’s mission
- Transparency and integrity of institutional operations
- The dual reporting of campus leadership (within the campus and to the Colleges or content areas, such as admissions)
- The University Leadership and Board of Trustees commitment to ensuring the quality of educational offerings and sustainability of the institution
- The continuing evolution of the assessment process
• An institutional research function that supports a comprehensive assessment system

At the same time, the AU institutional report identified concerns that in some way are the result of AU’s complexity and variety of programs:

• Inconsistency in the manner of public reporting and dissemination of achievement data across all colleges
• More regular and consistent engagement of adjunct faculty in the assessment process
• Continued refinement and improvement in the collection and disaggregation of data, especially by gender and race or ethnicity
• The diversity of the institutional research process and formats
• The need for better tracking of graduation rates as well as benchmarking of retention and graduation rates with peer institutions
• Continued attention to diversity, particularly at the upper administrative level
• Diversity at the level of the Board of Trustees
• Uneven campus-based IT support

Among the supplemental information provided by AU was the AU Strategic Plan presented to and approved by the Argosy University Board of Trustees at its December 12-13, 2017 meeting. Said plan intends to achieve the following:

• Return AU to a position of leadership in mental and behavioral health programs and growing practitioner-focused graduate and professional programs in all colleges;
• Offer select, high-value undergraduate programs aligned with Argosy’s career and graduate focus;
• Build a culture that engages faculty and staff in the common goal of supporting students;
• Enhance Argosy’s national and local reputation through brand identity (Care, Learn, Live) and community relationships; and
• Create an exceptional student experience through the support model and delivery of quality academic program.

The document discusses Brand Research, presents SWOT Analysis, carries out a Competitive Analysis and Customer Profiles, and lists Strategic Priorities as follows:

• Student Success and Excellence in the Student Experience
• Responsible Stewardship
• Secure AU’s Future
• Enrollment Growth
Financial Projections are presented as is the necessary Organizational Structure.

SECTION III – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

The WSCUC Team presents the following Commendations and Recommendations.

The team commends:

1. The leadership of the Dream Center Educational Holdings (DCEH) for bringing a management style that reflects greater and more direct communication, such as the listening tours, and launching key initiatives that are generating a positive impact across different constituents, colleges, and campuses: LMS, CRM, IT support, alumni scholarships, and speed with which the Strategic Plan has been put together.

2. The impetus and timing in adapting Argosy University from a for-profit to a not-for-profit organizational structure.

3. The diversity of students, faculty, and staff.

4. Argosy University’s progress in the development of ILOs, assessment, and program review.

5. The visible commitment of faculty and staff to Argosy University and the students it serves.

6. Argosy University’s comprehensive work to develop the institutional report, appendices and additional information, as well as extensive participation across colleges and campuses during the reaffirmation process.

The team recommends that:

1. Argosy University must continue to develop clarity and precision in terms of its arrangements with DCEH, including the organizational structures, decision-making processes, shared services agreements, and sound business practices. (CFR 1.5, 1.7, 3.6, 3.7, 3.9)

2. Argosy University must expand its efforts to secure resources for continued sustainability, including enrollment growth, fund raising capacity, and the introduction of new degree programs. The institution should also improve the coordination of budget and financial planning between Argosy University and DCEH. (CFR 3.4)

3. Argosy University should address the requirement for a full-time CEO. (CFR 3.8)
4. Argosy University should continue current efforts to expand system-wide technology capacity so that the LMS can enable new types of data collection together with the future rollout of the CRM. The institution should also use the new data collection to drive analytics that can enhance program assessment as well as improve student assessment. In addition, AU should increase the level of investment in information and technology resources and equipment for classrooms, laboratories, and offices across the campuses. (CFR 3.5, 4.1, 4.3).

5. The institution should provide greater support for faculty scholarship and creative activity. (CFR 2.8)

6. The institution should enhance and expand its commitment to student financial services and advising. (CFR 2.13)

7. In order to further demonstrate the institution’s commitment to diversity and equity, Argosy University should make a more concerted effort to increase diversity at upper administrative leadership and the Board of Trustees, and must disaggregate and analyze student achievement data by race and ethnicity in order to identify measures that may be needed to better support the success of all of its students. (CFR 1.4, 2.10)

8. Argosy University must take the necessary steps to have the appropriate URL or website link to indicators of student achievement and retention and graduation data. (CFR 1.2)

9. The institution should consider future investments in Institutional Research that may be needed following the implementation of the new LMS and CRM systems to enhance the capacity to support assessment processes. (CFR 4.2)

10. Having transitioned from a for-profit entity to a not-for-profit entity, Argosy University should continue its efforts to understand and embrace the values and obligations of a non-profit culture. (CFR 4.7)
APPENDICES

The report includes the following appendices:

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

B. Off-Campus Locations Review for five locations

C. Distance Education Review
APPENDIX A

FEDERAL COMPLIANCE FORMS

OVERVIEW
There are four forms that WSCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:
1 – Credit Hour and Program Length Review Form
2 – Marketing and Recruitment Review Form
3 – Student Complaints Form
4 – Transfer Credit Policy Form

During the Accreditation Visit, teams complete these four forms and add them as an appendix to the Team Report. Teams are not required to include a narrative about any of the matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM
Under federal regulations, WSCUC is required to demonstrate that it monitors the institution’s credit hour policy and processes as well as the lengths of its programs.

Credit Hour - §602.24(f)
The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution’s assignment of credit hours.

(1) The accrediting agency meets this requirement if-
   (i) It reviews the institution’s-
       (A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and
       (B) The application of the institution’s policies and procedures to its programs and coursework;
   and
   (ii) Makes a reasonable determination of whether the institution’s assignment of credit hours conforms to commonly accepted practice in higher education.

(2) In reviewing and evaluating an institution’s policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

Credit hour is defined by the Department of Education as follows:
A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

See also WASC Senior College and University Commission’s Credit Hour Policy.

Program Length - §602.16(a)(1)(viii)
Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor’s degree, and 30 semester credit hours for a master’s degree; there is greater
variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.

## CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible? X ☐ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Where is the policy located?</td>
</tr>
<tr>
<td></td>
<td><a href="https://catalog.argosy.edu/content.php?catoid=65&amp;navoid=12843#Unit_of_Credit">https://catalog.argosy.edu/content.php?catoid=65&amp;navoid=12843#Unit_of_Credit</a></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)? X ☐ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Does the institution adhere to this procedure? X ☐ YES ☐ NO</td>
</tr>
<tr>
<td>Schedule of on-ground courses showing when they meet</td>
<td>Does this schedule show that on-ground courses meet for the prescribed number of hours? X ☐ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed? 5</td>
</tr>
<tr>
<td>Please review at least 1 - 2 from each degree level.</td>
<td>What kind of courses (online or hybrid or both)? Both</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? Bachelor and Masters</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Criminal Justice and Organizational Leadership</td>
</tr>
<tr>
<td></td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? X ☐ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</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? 3</td>
</tr>
<tr>
<td>Please review at least 1 - 2 from each degree level.</td>
<td>What kinds of courses? On ground and online</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? Masters</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Psychology and Clinical Mental Health Counseling</td>
</tr>
<tr>
<td></td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? X ☐ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? 4</td>
</tr>
<tr>
<td></td>
<td>What kinds of programs were reviewed? Online and on ground</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? Bachelors and Masters</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Graphic/Web Design and Public Health</td>
</tr>
<tr>
<td>Does this material show that the programs offered at the institution are of a generally acceptable length?</td>
<td>YES</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td>-----</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
</tbody>
</table>

Review Completed By: Christopher Oberg  
Date: March 8, 2018
MARKETING AND RECRUITMENT REVIEW FORM
Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</th>
</tr>
</thead>
</table>
| **Federal regulations**           | Does the institution follow federal regulations on recruiting students?  
✓ YES 

Comments: 

Team Member Dr. Michael K. Mahoney confirmed this and the other federal regulations by reviewing the Argosy website and related documents and also by meeting with the following four staff members from Argosy: 

Wendy Cullen, Vice Chancellor of Admissions and Marketing 
Andrea Zawacki, Brand Marketing Manager 
Kelly Schnitker, Regional Vice President of Admissions 
Frank Marranzini, Regional Specialist of Admissions |

Degree completion and cost        | Does the institution provide information about the typical length of time to degree?  
✓ YES 

Does the institution provide information about the overall cost of the degree?  
✓ YES 

Comments: 

See comment above. |

Careers and employment            | Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable?  
✓ YES ☐ NO 

Does the institution provide information about the employment of its graduates, as applicable?  
✓ YES |

Comments: 

See comment above. |

*§602.16(a)(1)(vii) 

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

Review Completed By: Dr. Michael K. Mahoney 
Date: March 8, 2018
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>
<tbody>
<tr>
<td>Policy on student complaints</td>
<td>Does the institution have a policy or formal procedure for student complaints? X ☑ YES ☐ NO</td>
</tr>
</tbody>
</table>
|                                   | If so, Is the policy or procedure easily accessible? YES Where?  
https://catalog.argosy.edu/content.php?catoid=65&navoid=12840#Student_Complaint_P rocedure                                                                 |
|                                   | Comments:                                                                                                                                 |
| Process(es)/procedure             | Does the institution have a procedure for addressing student complaints? X ☑ YES ☐ NO                                                                 |
|                                   | If so, please describe briefly: The procedure and policy are interwoven and fully explained in the section of the catalogue on Student Rights and Responsibilities |
|                                   | 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? In an online institutional database                                                                                                                                 |
|                                   | Does the institution have an effective way of tracking and monitoring student complaints over time? X ☑ YES ☐ NO   
If so, please describe briefly: The online institutional database is designed to track as well as maintain records of student complaints |
|                                   | Comments: I reviewed 10 different complaints in the database, from initial submission to resolution. Resolutions varied from the complaint not being appropriate (dislike of a syllabus) to disagreement about student performance. |

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

Review Completed By: Christopher Oberg
Date: March 8, 2018
TRANSFER CREDIT POLICY REVIEW FORM
Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices accordingly.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer Credit Policy(s)</td>
<td>Does the institution have a policy or formal procedure for receiving transfer credit?</td>
</tr>
<tr>
<td></td>
<td>☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Is the policy publically available? ☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>If so, where?</td>
</tr>
<tr>
<td></td>
<td>On the website: <a href="https://www.argosy.edu/admissions/transfer-credits">https://www.argosy.edu/admissions/transfer-credits</a></td>
</tr>
<tr>
<td></td>
<td>Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education?</td>
</tr>
<tr>
<td></td>
<td>☑ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments: Policies are clear, appropriate, and accessible.</td>
</tr>
</tbody>
</table>

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

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

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

See also WASC Senior College and University Commission’s Transfer of Credit Policy.
Review Completed By: Steven Schapiro
Date: March 8, 2018
Institution: The Art Institute of California - Orange Country a Campus of Argosy University
Type of Visit: Reaffirmation of Accreditation
Name of reviewer/s: Dr. Fernando León García
Date/s of review: February 22, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed\(^1\). One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address
   **The Art Institute of California - Orange Country a Campus of Argosy University**
   3601 West Sunflower Ave, Santa Ana, CA 92704

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

   AI AU Orange County Or CCAD Orange County campus opened in 2004 as The Art Institute of Los Angeles-Orange County. It now offers 27 undergraduate degree and programs and 5 diploma (non-degree) programs in Media, Culinary, Design, and Fashion.

   The Mission Statement of the College of Creative Arts and Design provides education in design, media arts, fashion and culinary arts that builds careers and has the potential to transform the lives of those who teach, learn and work at the college.

   The Art Institute of California Orange County campus occupies approximately 93,000 square feet. In addition to classrooms, studios, laboratories, offices, a student lounge, a learning resource center, and an exhibition gallery, The Art Institute of California – Orange County campus maintains an art supply store for the convenience of students. Equipment provided at The Art Institute of California – Orange County campus is specific to the program of study. This includes, but is not limited to: projectors, editing decks, PC and Macintosh computers, printers, and equipped kitchens.

   AI AU Orange County has faced declining enrollments for at least the last 5 years, with the Fall enrollment of 1,005 Headcount and 719 FTE. The current breakdown involves 209 New Students and 518 Returning Students. The three year plan (2018-2021) reflects a recovery strategy that will result in 774 students by 2021, while also improving its operational results from (1.7) million in 2018 to (1.2) million in 2021.

   Said three year plan is the result of a broader CCAD planning effort (see below) that focuses on 4 goals that are then translated into specific actions for AI AU Orange County.

   **CCAD Strategic Goal 1: Quality Academic Programs**
   **CCAD Strategic Goal 2: Quality Support Services to Students**

---

\(^1\) See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.
CCAD Strategic Goal 3: Campus Growth
CCAD Strategic Goal 4: Compliance

The Orange County Campus SWOT Matrix identified the following top two aspects as part of the analysis:

Strengths
- Experience Faculty/Staff-knowledge/industry
- Programs/Career focused

Weaknesses
- Communication/process/internal/external
- Marketing/Community exposure

Opportunities
- Alumni Relations
- Hosting more community events

Threats
- Public Perception
- Increased competition/similar programs

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

The site visit to AI AU Orange County involved access to and review of documents pertaining to CCAD in general and to AI AU Orange County in particular, as well as meetings and interviews with a cross segment of constituents covering senior academic and administrative leadership, faculty, staff, and students. Please see the list below:

Mark Lucero, Campus President
Lindsey Morgan Oliger, Campus Dean of Academic Affairs
Shelby Gugel, Director of Student Services
Silvia Dimas, Director of Student Financial Services
Richard Mendoza, Senior Director of Admissions
Sheila Estaniel, Director of Campus Relations
Andrew Letona, Associate Director of Admissions
Adrianna Vasquez, Associate Director of Admissions
Neyehy Reyes, Associate Director of Admissions
Raenell Jones, Associate Director of Admissions
Rick Taylor, Associate Director of Admissions
Esther Lima, Assistant Director of Readmissions

Faculty
Todd Pheifer, Full Time Faculty – General Education
Scott Underwood, Full Time Faculty – General Education
Katlyn Greiner, Adjunct Faculty – General Education
Kenneth Frawley, Adjunct Faculty – General Education
Chef Michael Backouris, Full Time Faculty – Culinary
Chef Wendy Jacobs-Riche, Adjunct Faculty – Culinary
Raul Gardea, Full Time faculty – Design
Amy Curran-Norton, Adjunct Faculty – Design
Fredrick Vang, Adjunct Faculty – Media
Andrew Bac, Full Time Faculty – Media  
John Haberstick, Photography  
Layal Idriss, Media  
Allan Morgan, Media

Student Support Services  
Shelby Gugel, Director of Students Services  
Kelley Lewis, Associate Director of Career Services  
Grace Hong, Career Services Advisor  
Meghan LaFirst, Student Advisor  
Silvia Dimas, Director of Financial Services  
Isaac García, Student Accountant  
Christian Guerra, Financial Aid Officer  
Yanel Morgan, Financial Aid

Department Chairs  
Christian Bradley, Program Chair – Media  
Denese Menard, Program Chair – Design  
Steve Gostin, Program Chair – Culinary  
Steven Gold, Program Chair – General Education  
Laurence Christian, Academic Resource Center

Students  
Cross segment of students from Culinary Management, Culinary Arts, Food and Beverage Management, and Graphic and Web Design.

<table>
<thead>
<tr>
<th>Lines of Inquiry</th>
<th>Observations and Findings</th>
<th>Follow-up Required (identify the issues)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>For a recently approved site.</strong> Has the institution followed up on the</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>recommendations from the substantive change committee that approved this</td>
<td></td>
<td></td>
</tr>
<tr>
<td>new site?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Fit with Mission.</strong> How does the institution conceive of this and other</td>
<td>Relevant fit with Mission. Uses matrix like structure both from a College perspective</td>
<td></td>
</tr>
<tr>
<td>off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? <em>(CFRs 1.2, 3.1, 3.5, 4.1)</em></td>
<td>that allows strategy and policy at a system level, and more detailed attention and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>service at a local level. Site well maintained and operationalized.</td>
<td></td>
</tr>
<tr>
<td>Connection to the Institution. How visible and deep is the presence of the</td>
<td>Tradition as part of the Art Institutes clear and strong; AI as part of AU still</td>
<td></td>
</tr>
<tr>
<td>institution at the off-campus site? In what ways does the institution integrate</td>
<td>emerging and work in progress.</td>
<td></td>
</tr>
<tr>
<td>off-campus students into the life and culture of the institution? <em>(CFRs 1.2, 2.10)</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality of the Learning Site. How does the physical environment foster</td>
<td>appropriate for nature and focus of programs. Is moving from having three buildings for</td>
<td></td>
</tr>
<tr>
<td>learning and faculty-student contact? What kind of oversight ensures that the</td>
<td>a larger student population to one building for a smaller population. Current imprint</td>
<td></td>
</tr>
<tr>
<td>off-campus site is well managed? <em>(CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</em></td>
<td>appropriate for current population with room for further growth.</td>
<td></td>
</tr>
</tbody>
</table>
Student Support Services. What is the site’s capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)

Responsive and increasing focus not only for entering students but also for returning students. Student peer mentor program very positive and innovative. Interview with students reflected appreciation for the support provided by AI AU Orange County.

Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)

Although number of faculty has been adjusted as a result of declining enrollments, those who have remained show strong sense of commitment and service to the institution. Faculty at AI AU Orange County takes part in curriculum and program development via processes established by the CCAD.

Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)

CCAD with broad participation from campus based faculty. Because of matrix like approach to curriculum and program development, there is a greater degree of consistency and comparability across locations.

Retention and Graduation. What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)

Data reviewed more focused on progression from year to year rather than graduation rate as such.

Student Learning. How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)

Consistent as per CCAD and AU guidelines.

Quality Assurance Processes: How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)

AI AU Orange County is in and of itself one of the numerous locations that AU has across its different colleges and institutions. The matrix like approach to management and quality assurance leads to increased consistency across locations.

There was an overall sense of hope and excitement as AI AU Orange County and AU as such continue to experience moving from a for-profit institution to one that is not-for-profit.

Several examples were mentioned regarding changes that the campus community is experiencing: Implementation of the LMS, scholarships that are now being offered to students, greater contact with and openness from different organizations including high schools that were not open before to AI AU Orange County, the visit by senior leadership of DCEH and the walk around approach to the campus, among others.

In the specific case of AI AU Orange County, while there have been declining enrollments, the three year plan is not aiming at exponential growth but rather to begin a slow turnaround that by 2021 enrollments are at least at
the level of or slightly higher than 2017. The focus is on making sure that AI AU Orange County continues to be a special place for students and that the net result is better quality students.

The main challenges and areas of improvement are:
- Stabilize enrollments
- Right size AI AU Orange County
- Accentuate what makes AI AU Orange County special and distinctive
- Improve financial performance and sustainability
- Better use of metrics, KPIs at AI AU Orange County in particular campus ownership, empowerment, and commitment
to achieving said indicators
OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX

Institution: Argosy University
Type of Visit: Accreditation visit
Name of reviewer/s: Steven Schapiro
Date/s of review: February 12 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

4. Site Name and Address

   Argosy Nashville Campus
   100 Centerview Dr. Suite 225
   Nashville, TN  37214

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

The Nashville campus opened in January 2001 as a satellite of the Atlanta campus and offered only the professional counseling degree program. Nashville became a full-service campus of Argosy University on December 15, 2006. The campus currently offers 8 undergraduate degree programs and 17 graduate degree programs in Business, Education, Counseling and the Social Sciences.

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

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2 See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.
Met with campus president, executive team, admissions team, staff, students, faculty, program chairs

<table>
<thead>
<tr>
<th>Lines of Inquiry</th>
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<th>Follow-up Required (identify the issues)</th>
</tr>
</thead>
<tbody>
<tr>
<td>For a recently approved site. Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Fit with Mission. How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</td>
<td>Site is committed to serving non-traditional adult learners and providing access to higher ed. Programs in counseling, business, and organizational leadership are well connected to the community. Campus president and staff provide adequate leadership for this small site.</td>
<td></td>
</tr>
<tr>
<td>Connection to the Institution. How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</td>
<td>There is clear commitment to Argosy. Staff and faculty are well connected to the relevant university departments.</td>
<td></td>
</tr>
<tr>
<td>Quality of the Learning Site. How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</td>
<td>On site campus president manages the site. The classrooms and staff and faculty office spaces seem adequate. There were concerns expressed about outdated workstations and equipment and staff, and classroom technology.</td>
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<tr>
<td>Student Support Services. What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</td>
<td>A full staff of advisors were on-site. Students had access to a computer lab and library shared with the Art Institute. All seemed adequate and expressed satisfaction with the support they received</td>
<td></td>
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<tr>
<td>Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</td>
<td>The counseling programs had mostly full time faculty, with a few adjuncts due to professional accreditation needs. The business programs were mostly staffed by adjuncts. The full time faculty serve on university wide committees which are charge of the curricula for their programs. All faculty appropriately assess student learning.</td>
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</tr>
<tr>
<td>Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</td>
<td>The programs and courses are designed, approved, and evaluated at the University of School level, sharing content and curricula across sites.</td>
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</tbody>
</table>
**Retention and Graduation.** What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)

Data show strong retention and graduates rates in the graduate programs, less strong for the undergraduate program. For them, more advising support and early intervention efforts are being implemented for students identified as at risk.

**Student Learning.** How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)

Same as for students at all sites for the University. Data not provided on learning outcomes by site.

**Quality Assurance Processes:** How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)

Same as for students at all sites, as all in a sense are off-campus – there in no main campus.
OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX

Institution: Argosy University
Type of Visit: Re-Accreditation Visit
Name of reviewer/s: Daniel Feitelberg
Date/s of review: February 23, 2017

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

7. Site Name and Address:
   Argosy University
   1403 North Howard Avenue
   Tampa, Florida  33607

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

   The Tampa location is a branch campus which opened in 1999 as a satellite campus of the University of Sarasota specializing in business and education. It now offers 8 undergraduate programs and 30 graduate programs in education, business, clinical psychology and counseling.

   The Tampa location has offered or currently offers a total of eight undergraduate programs, which include associate and bachelor programs. In addition, the location offers thirty graduate programs, which include five specialist programs, sixteen master’s programs, and nine doctorate programs.

   The Tampa location currently employs 11 faculty.

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

   The visit was conducted at the Tampa location and included meeting with staff and faculty who serve both the Tampa and Sarasota locations; and students at the Tampa location. The visit included the following activities:

   - A tour of the Tampa campus;
   - Meeting with the Campus President;
   - Meeting with the Campus Executive Committee;
   - Meeting with the admissions department;
   - Meeting with twenty-one members of faculty;
   - Meeting with student support services staff;

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3 See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.
- Meeting with academic leadership; and
- Meeting with students.

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<tr>
<td>For a recently approved site. Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</td>
<td>N/A</td>
<td>Opportunities to enhance community engagement and develop local partnerships were expressed and should be explored.</td>
</tr>
<tr>
<td>Fit with Mission. How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</td>
<td>Campus students, faculty and staff are engaged with the Argosy brand. Significant levels of enthusiasm regarding the recent change of control were noted, as well as identified opportunities for the location to engage with its local community to enhance the Argosy brand within the community. The process of moving from a for-profit status was universally lauded by various groups at the off-site location. Executive leadership, admissions, program chairs, faculty and students all expressed enthusiasm about the opportunities that might emerge as a result of the conversion. There was a high-degree of expectations that the conversation would yield new partnerships within the community, opportunities of philanthropy, scholarships and financial aid. The institution should take care to ensure that they</td>
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<tr>
<td>Connection to the Institution. How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</td>
<td>The brand of Argosy university is prevalent throughout the location, from exterior signage through branding within interior hallways and classrooms. The location does not have on-campus housing and therefore all students are off-campus students. All courses are offered in a single building and therefore student engagement is largely facilitated on-site, with the exception of periodic opportunities for students to engage with the university in community-based off-site events.</td>
<td>None.</td>
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<tr>
<td>Quality of the Learning Site. How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</td>
<td>The physical structure appears to be well-maintained and students and staff expressed a general sense of safety on campus. Every group on campus indicated a need for basic technology enhancements, including computers, iPads, wireless connectivity, and frequent functional issues in classroom audio/visual equipment. In addition, there was universal recognition that budgetary approval had</td>
<td>Confirmation of the start of the on-site technician and installation of new hardware equipment will validate that the process of improving technological functionality has commenced.</td>
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<td>Lines of Inquiry</td>
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<tr>
<td>Student Support Services. What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</td>
<td>been provided for an on-site technology service technician and new hardware shortly after the completion of the Dream Center Foundation purchase had occurred.</td>
<td>Need to connect day-to-day services to institutional KPIs. Campus President and Executive Leadership understands the importance of stabilization and improvement to financial success. The focus on institutional KPI outcomes did not seem to be reflected by academic advising, financial aid and/or admissions staff.</td>
</tr>
<tr>
<td></td>
<td>The site provides advising, counseling, library and computing services. The need to enhance the functionality of technological equipment was noted (see above). Several students indicated that on-site student financial services staff were responsive to their needs, but also noted concern about the turnaround time for issues related to these services to be addressed. The data show significant volatility in 90-day and 180-day retention rates for both the Sarasota and Tampa locations. Campus leadership provided an indication that retention rate and graduation rates had stabilized. Formal targets had not appeared to have been established for student success metrics, which could be an opportunity to enhance the effectiveness of the location moving forward.</td>
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<tr>
<td>Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</td>
<td>Courses are taught by full-time faculty, many of whom have been employed at the location for a long period of time. There was a sense of loyalty to the mission of the institution by the faculty who teach there.</td>
<td>None.</td>
</tr>
<tr>
<td>Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</td>
<td>Faculty expressed direct responsibility for course development and involvement with programmatic review. Overall, there appeared to be a sense of collaboration between faculty and academic leadership to ensure that curriculum development is linked to institutional learning outcomes. Collaboration between deans, program chairs, and faculty at multiple locations help faculty to validate common approaches and focus on institutional learning outcomes. Faculty and program chairs validated that courses taught on-site follow the process for the assessment of student learning on an annual basis described in the Chapter 6 of the Institutional Report.</td>
<td>None.</td>
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<tr>
<td>Retention and Graduation. What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable</td>
<td>[Source data]</td>
<td>Need to connect day-to-day services to institutional KPIs. Campus President and</td>
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<td>to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</td>
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<td>Executive Leadership understands the importance of stabilization and improvement to financial success. The focus on institutional KPI outcomes did not seem to be reflected by academic advising, financial aid and/or admissions staff.</td>
</tr>
<tr>
<td>Student Learning. How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</td>
<td>Faculty and program chairs validated that courses taught on-site follow the process for the assessment of student learning on an annual basis described in the Chapter 6 of the Institutional Report. Specific review to student learning assessments for courses on-site were not specifically reviewed.</td>
<td>None.</td>
</tr>
<tr>
<td>Quality Assurance Processes: How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</td>
<td>Argosy University does not have a main campus and is organized to deliver education across multiple campuses; hence all processes are designed to apply equally to all locations.</td>
<td>None.</td>
</tr>
</tbody>
</table>
OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX

Institution: Argosy University – Western State College of Law (Irvine)
Type of Visit: Reaffirmation of Accreditation
Name of reviewer/s: Dr. Michael K. Mahoney
Date/s of review: February 27, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address

Western State College of Law
Argosy University
1 Banting
Irvine, CA 92618

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

Juris Doctor degree (law) – Accredited by the American Bar Association (ABA)
Master of Law in Compliance (Online, managed at this site)

FTE Faculty = 19
Enrollment = 409

Founded in 1966, Western State College of Law is the oldest law school in Orange County, Southern California, and is fully ABA approved. Western State College of Law’s 11,000+ alumni are well represented across public and private sector legal practice areas, including 150 California judges and about 15% of Orange County’s Deputy Public Defenders and District Attorneys.

WSCL was housed in Fullerton California for many years but recently moved to a newer building in Irvine California.

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

The website and scores of documents were thoroughly reviewed. A tour plus a full day of meetings were held onsite including with the following: the Dean/Campus President, the Campus Executive Committee, about 20 faculty, the Admissions team, Student Support Services, 6 law students, and the Academic Leadership. A file review of 3 students at three different levels and 3 faculty members at 3 different professor levels were reviewed.

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4 See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.
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<td>For a recently approved site. Has the institution followed up on the recommendations from the substantive change committee that approved this new site?</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Fit with Mission. How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)</td>
<td>Mission meshes with overall mission of Argosy yet identifies clearly with the law school.</td>
<td></td>
</tr>
<tr>
<td>Connection to the Institution. How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</td>
<td>Presence of Argosy is not deep but doesn’t need to be given that this is a law school independent of Argosy.</td>
<td></td>
</tr>
<tr>
<td>Quality of the Learning Site. How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</td>
<td>New building in Irvine has all of the needed facilities and works well for the law school.</td>
<td></td>
</tr>
<tr>
<td>Student Support Services. What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</td>
<td>All are housed in the new building so convenient for students.</td>
<td></td>
</tr>
<tr>
<td>Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</td>
<td>Mostly full-time with highly qualified adjuncts including practicing lawyers and judges.</td>
<td></td>
</tr>
<tr>
<td>Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</td>
<td>The faculty design the curriculum and deliver it. No online for the law school but the MS in Compliance is all online.</td>
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</tr>
<tr>
<td>Retention and Graduation. What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</td>
<td>The Standard 509 Information Report is required by the American Bar Association. It contains retention/graduation information for the law school and is unrelated to Argosy.</td>
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</tr>
<tr>
<td>Student Learning. How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</td>
<td>Evaluations by students done at the end of every class. Assessment appears simpler than at Argosy overall. The LSSSE report is used heavily.</td>
<td></td>
</tr>
<tr>
<td>Quality Assurance Processes: How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</td>
<td>Closing the loop with the assessments has changed a variety of curriculum and delivery/learning.</td>
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</tbody>
</table>
Lines of Inquiry identified in the Off-Site Review

**Brand:** Everyone at WSCL considers the place to be “Western State” even though they all realize that they are part of Argosy. WSCL has been in existence for some 50+ years with an impressive alumni (judges, district attorneys, public defenders, good law firms), so regardless of their ownership or profit status they have remained a quality institution with a clear identity.

**Enrollment:** WSCL’s enrollment declined for several years (along with the national decline in law school enrollment) until the most recent year. They had a nice increase in new enrollees (up to 150 from barely half that several years ago). Comments from everyone at WSCL indicated that they had kept up their quality and for the most part had not enrolled weaker students (e.g., those with lower LSAT scores). Although this led to lower enrollment for several years, WSCL has kept its reputation intact. Contrast this with their close competitor Whittier College which enrolled weaker students for several years which eventually led them to announce closure recently (low retention, low bar pass rates). Given their physical proximity this also has helped WSCL’s enrollment as some 10-20 students have transferred from Whittier College. WSCL’s main law school competitors are LaVerne, Cal Western, Southwestern and Jefferson (in San Diego).

**For-profit to non-profit:** This change has had little effect on the day-to-day activities of WSCL but has helped them connect better with alumni and helped their potential for fund-raising. The change of ownership seems to have provided a “breath of fresh air” and helped them feel better because they are no longer associated with EDMC.

**Information Technology Systems:** WSCL uses the TWEN LMS which is linked with the WestLaw legal research system. This is very convenient since students go to WestLaw regularly anyway to do research. They also use Lexis-Nexis. Computers on campus aren’t up-to-date but students and faculty typically use their own laptops, iPads, etc. Nonetheless, these on-campus computers together with the classroom computers are in line to be upgraded. The biggest complaint I heard all day was that WiFi was slow. Fortunately, WiFi was undergoing a doubling of bandwidth this week!

**Financial Stability:** WSCL experienced a $400K deficit a year ago but will show a modest profit this year. The enrollment turnaround is the reason and near-term enrollment projections are positive.

**Closing the loop:** The pressure of the pending WSCUC review and writing the institutional report has energized WSCL to respond positively to their assessments over the past two years. WSCL use their LSSSE reports (similar to NSSE but specific to law schools) and other feedback to improve their courses and student support. The Noel-Levitz report, which shows weakness in financial support at AU, does not apply to WSCL.

**Tuition:** Tuition is about $43K/year and hasn’t changed in several years. About 75% of students get some form of financial support. When WSCL was for-profit, scholarships were few and far between, but their new non-profit status will provide new opportunities.

**Faculty:** The faculty labeled themselves “collegial” and I saw nothing to dissuade me of that. They have a traditional model of Assistant/Associate/Full professorships with tenure. They have appropriate faculty
committees are guided by the “standard” 1940 AAUP statement on Academic Freedom. Some of them sit on AU-wide committees and they feel connected to AU.
OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX

Institution: Argosy University (Twin Cities)
Type of Visit: Re-Accreditation Visit
Name of reviewer/s: Phillip L. Doolittle
Date/s of review: February 1, 2018

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed\(^5\). One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

10. Site Name and Address
   Argosy University – Twin Cities
   1515 Central Pkwy
   Eagan, MN  55121

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

   The Twin Cities is a branch campus of Argosy University located in Eagan about twenty minutes from Minneapolis/St. Paul. Twin Cities is a legacy Argosy campus originally established in the 1960’s when the Medical Institute of Minnesota, originally known as Park Medical Institute, was founded to provide skilled allied healthcare personnel to hospitals and clinics. In 1963, the school officially became the Medical Institute of Minnesota. In 1970, the Medical Institute of Minnesota was authorized to grant an Associate of Science terminal degree. In 1971, the Medical Institute of Minnesota, General College, entered a collaborative agreement with the University of Minnesota, General College, which agreed to grant associate’s degrees to students who had earned a certificate from the Medical Institute and had satisfied the degree requirements of the General College. Over time, new programs were added, including veterinary technology, dental hygiene, and medical laboratory technology. In 1980, the school was granted initial institutional accreditation with the Accrediting Bureau of Health Education Schools (ABHES). As part of a merger in 2001, the school became Argosy University, Twin Cities. Today the Twin Cities campus offers a total of forty-seven programs and degrees including (but not limited to) programs in allied healthcare, nursing and psychology. The number of degrees/programs are as follows:
   - Undergraduate Degrees  19
   - Master’s Degrees       16
   - Doctoral Degrees       9
   - Specialists Programs   3

   The Twin Cities campus currently serves approximately 1225 students with about 90% of the courses being delivered on ground.

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

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\(^5\) See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.
The website and a number of documents related to the Twin Cities campus were reviewed. A tour plus a full day of meetings were held on site with following individuals and groups:

- Meeting with Campus President
- Meeting with Director of Accounting & Finance Services
- Meeting with Campus Executive Committee (Campus President, Campus Vice President of Academic Affairs and Dean of the College of Health Sciences, Registrar, Director of Career Services, Director of Student Financial Services, Director of Accounting and Finance Services, Senior Director of Admissions, Program Dean of Clinical Psychology, Senior Human Resources Business Partner)
- Meeting with Admissions Team
- Meeting with Student Services, Student Advisors, and Student Support
- Meeting with members of the faculty (18)
- Meeting with Academic Leadership/Department Chairs
- Meeting with students (14)

### Lines of Inquiry

**For a recently approved site.** Has the institution followed up on the recommendations from the substantive change committee that approved this new site?

<table>
<thead>
<tr>
<th>Observations and Findings</th>
<th>Follow-up Required (identify the issues)</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

**Fit with Mission.** How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)

The Twin Cities site is focused on serving non-traditional adult students and providing this segment of the population with access to higher education. The campus offers a variety of programs and degrees, but has a particular focus in the areas of health sciences/allied health, psychology, nursing and health services management. The faculty and student appears to be knowledgeable and connected to the Argosy University mission and its brand. The campus is well connected to the local community. The Campus President and staff provide appropriate leadership and direction to site operations.

**Connection to the Institution.** How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)

There appears to be a clear commitment to Argosy University. Faculty and staff are appropriately connected to and knowledgeable about the relevant university departments and services.

**Quality of the Learning Site.** How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)

The site is managed by the Campus President. The classrooms, laboratories, offices and public spaces appear adequate and maintained. There were concerns expressed by faculty, students and staff about outdated workstations, classroom
<table>
<thead>
<tr>
<th>Student Support Services. What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</th>
<th>The site provides academic advising, financial aid counseling, counseling services, library and computing services, admissions, online support services and academic tutoring support. As mentioned previously, the need for enhanced functionality of technology and laboratory equipment was noted. Students commented on the need for the on-site financial aid staff to be more timely and responsive.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculty. Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</td>
<td>Courses are taught by both full-time and adjunct faculty. Many of the faculty have taught at the location for a number of years. Faculty appear to be committed to the mission of the institution, loyal to the institution, and passionate about their teaching and the success of their students. Many faculty expressed that they put “students first”. As mentioned previously, the faculty expressed concern about the quality of the technology and equipment and that the laboratory equipment is not what students are experiencing in the “real world”. Faculty also expressed concern about salaries for both full-time and part-time faculty (no salary increases in three to four years).</td>
</tr>
<tr>
<td>Curriculum and Delivery. Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFRs 2.1-2.3, 4.6)</td>
<td>Faculty expressed direct responsibility for the curriculum and its delivery. Faculty are directly involved with programmatic review and process improvement. There appears to be a good collaborative relationship between the Faculty, Deans and other academic leadership.</td>
</tr>
<tr>
<td>Retention and Graduation. What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</td>
<td>Similar to the institution as a whole.</td>
</tr>
</tbody>
</table>
### Student Learning

How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)

Faculty and the Deans confirmed that courses taught on-site follow the institutional process for assessment of student learning/outcomes and that the assessment occurs on an annual basis.

### Quality Assurance Processes

How are the institution’s quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)

Quality assurance processes are organized to deliver educational programs across multiple campuses. Processes are designed to apply across all of the campus locations.
Distance Education Review-Team Report Appendix

Institution: Argosy University
Type of Visit: Reaffirmation of Accreditation
Name of reviewer/s: Dr. Marilyn Eggers, Dr. Michael K. Mahoney, Dr. Steve Shapiro
Date/s of review: March 6-9, 2018

A completed copy of this form should be appended to the team report for all comprehensive visits to institutions that offer distance education programs\(^6\) and for other visits as applicable. Teams can use the institutional report to begin their investigation, then, use the visit to confirm claims and further surface possible concerns. Teams are not required to include a narrative about this in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report. (If the institution offers only online courses, the team may use this form for reference but need not submit it as the team report is expected to cover distance education in depth in the body of the report.)

1. Programs and courses reviewed (please list)

<table>
<thead>
<tr>
<th>Program</th>
<th>Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advanced Educational Administration</td>
<td>Professional Doctorate</td>
</tr>
<tr>
<td>Advanced Educational Administration</td>
<td>Education Specialist</td>
</tr>
<tr>
<td>Business Administration</td>
<td>Associate</td>
</tr>
<tr>
<td>Business Administration</td>
<td>Bachelors</td>
</tr>
<tr>
<td>Business Administration</td>
<td>Masters</td>
</tr>
<tr>
<td>Business Administration</td>
<td>Professional Doctorate</td>
</tr>
<tr>
<td>Clinical Mental Health Counseling</td>
<td>Masters</td>
</tr>
<tr>
<td>Competency-based Master of Business Administration</td>
<td>Masters</td>
</tr>
<tr>
<td>Counseling Psychology</td>
<td>Professional Doctorate</td>
</tr>
<tr>
<td>Criminal Justice</td>
<td>Associate</td>
</tr>
<tr>
<td>Criminal Justice</td>
<td>Bachelors</td>
</tr>
<tr>
<td>Curriculum and Instruction</td>
<td>Professional Doctorate</td>
</tr>
<tr>
<td>Curriculum and Instruction</td>
<td>Masters</td>
</tr>
<tr>
<td>Educational Administration</td>
<td>Masters</td>
</tr>
<tr>
<td>Educational Leadership</td>
<td>Professional Doctorate</td>
</tr>
<tr>
<td>Health Services Management</td>
<td>Masters</td>
</tr>
<tr>
<td>Higher and Postsecondary Education</td>
<td>Masters</td>
</tr>
</tbody>
</table>

\(^6\) See Distance Education Review Guide to determine whether programs are subject to this process. In general only programs that are more than 50% online require review and reporting.
A total of 21 online courses were carefully reviewed from a wide variety of online programs:

<table>
<thead>
<tr>
<th>Program</th>
<th>Course</th>
<th>Brightspace Course Offering Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>AS in Business Administration</td>
<td>ACC201</td>
<td>Principles of Accounting</td>
</tr>
<tr>
<td>AS in Information Technology</td>
<td>IST2111</td>
<td>Ethics and IT Governance</td>
</tr>
<tr>
<td>AA in Psychology</td>
<td>PSY230</td>
<td>Psychology in the Community</td>
</tr>
<tr>
<td>AA in Psychology</td>
<td>PSY260</td>
<td>Child and Adolescent Psychology</td>
</tr>
<tr>
<td>BS in Criminal Justice</td>
<td>CJA455</td>
<td>Transportation Protection &amp; Vulnerability Assessment</td>
</tr>
<tr>
<td>BS in Information Technology</td>
<td>IST347</td>
<td>Application Security</td>
</tr>
<tr>
<td>BA in Psychology</td>
<td>PSY481</td>
<td>Substance Abuse and the Family</td>
</tr>
<tr>
<td>MA in Sport-Exercise Psychology</td>
<td>SP6499</td>
<td>Applied Sport Psychology I: Theory &amp; Research</td>
</tr>
<tr>
<td>MA in Industrial-Organizational Psychology</td>
<td>IO6401</td>
<td>Performance Appraisal and Feedback</td>
</tr>
</tbody>
</table>
2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)

There are 41 distance education programs listed in section 1 above. There are 4 distance education Associates programs, 6 Bachelor’s programs, 19 Master’s programs, 11 Professional Doctorate programs, and one Education Specialist (EdS) program.

*Brightspace* (from vendor *Desire to Learn*) is used for Argosy’s learning management system (LMS).

Distance education enrollment summary follows:

<table>
<thead>
<tr>
<th></th>
<th>Fall 2016</th>
<th>Fall 2015</th>
<th>Fall 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distance Ed. undergrad FTE</td>
<td>6609</td>
<td>6877</td>
<td>8602</td>
</tr>
<tr>
<td>Distance Ed. graduate FTE</td>
<td>1407</td>
<td>1780</td>
<td>2344</td>
</tr>
<tr>
<td>Total Distance Ed. unduplicated headcount</td>
<td>7121</td>
<td>8657</td>
<td>10946</td>
</tr>
</tbody>
</table>

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

Argosy’s “Online Programs” web page at [https://www.argosy.edu/locations/online](https://www.argosy.edu/locations/online) was reviewed extensively. Numerous appendices submitted by Argosy as part of its Institutional Report were also reviewed.
Dr. Marilyn Eggers reviewed the 21 online courses prior to the site visit.

Argosy’s Vice Chancellor of Online Operations Matt Gavlik and his team (Anne Petrella, Katie Rader and Levi Jacobs) delivered an extensive demonstration of Argosy’s Student Portal and its D2L Brightspace LMS site to team members Dr. Michael K. Mahoney and Dr. Steve Shapiro on March 8, 2018. Numerous questions were asked and answered satisfactorily. Several courses were reviewed and the implementations were good but the system should be upgraded in the next year or two to support more student/course analytics for student retention efforts.

Observations and Findings

<table>
<thead>
<tr>
<th>Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)</th>
<th>Observations and Findings</th>
<th>Follow-up Required (identify the issues)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Fit with Mission.</strong> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?</td>
<td>Distance education plays a very large role at Argosy and fits its mission, operations and administrative structure.</td>
<td>Individual issues in need of improvement addressed below in this column.</td>
</tr>
<tr>
<td><strong>Connection to the Institution.</strong> How are distance education students integrated into the life and culture of the institution?</td>
<td>The Online Psychology Club provides a good example to keep online students connected</td>
<td>Replicated the Online Psychology Club across additional programs.</td>
</tr>
<tr>
<td><strong>Quality of the DE Infrastructure.</strong> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there backups?</td>
<td>Brightspace with an improved student portal were recently implemented.</td>
<td>Continue to improve the student portal and LMS to improve student learning, analytics and student retention.</td>
</tr>
<tr>
<td><strong>Student Support Services:</strong> What is the institution’s capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</td>
<td>The services are good but not outstanding.</td>
<td>Continue to improve existing student services and implement the Customer Relations Management (CRM) system as soon as possible.</td>
</tr>
<tr>
<td><strong>Faculty.</strong> Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</td>
<td>Online instruction is done by both full-time and adjunct faculty. Most faculty members who teach online classes teach only online. (On-site courses are primarily blended, so all faculty members get some experience in online instruction.) Faculty members are expected to complete the Argosy Online Faculty Orientation course within a two week period. They are also expected to read all content, watch the associated videos, and complete all activities in the course and in a sandbox course. An exam is given at the end of the course.</td>
<td>Adjunct online faculty should be better integrated into university life. Financial support for faculty scholarly and creative activity should be increased.</td>
</tr>
<tr>
<td><strong>Curriculum and Delivery.</strong> Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable with on-ground offerings?</td>
<td>Full-time faculty members design the online programs and courses. Overall they appear to be comparable with on-ground offerings.</td>
<td>Increased faculty support for development and upgrading of courses should be considered.</td>
</tr>
<tr>
<td>Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)</td>
<td>Observations and Findings</td>
<td>Follow-up Required (identify the issues)</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Retention and Graduation.</strong> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions’ online offerings? If any concerns exist, how are these being addressed?</td>
<td>The 90-day retention rate of undergraduate online students averages about 70%. The 180-day rate for those students averages about 54%. The 90-day retention rate of graduate online students averages about 75% while the 180-day rate averages about 67%.</td>
<td>These rates should be improved with improved student support services (e.g., the new CRM) and improved Argosy branding.</td>
</tr>
<tr>
<td><strong>Student Learning.</strong> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings?</td>
<td>Standard assessment processes are used across Argosy’s ground and online programs and courses (e.g., student evaluations, program review).</td>
<td>Argosy should continue to improve the assessment processes and use LMS and other technology analytics to improve retention.</td>
</tr>
<tr>
<td><strong>Contracts with Vendors.</strong> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on Contracts with Unaccredited Organizations?</td>
<td>Brightspace is leased and housed by D2L. Tutoring and other support services are purchased from vendors. No evidence surfaced to indicate a violation of the policy.</td>
<td>Quickly acquire and implement the newly proposed CRM system. Orient staff, students and faculty to the system.</td>
</tr>
<tr>
<td><strong>Quality Assurance Processes:</strong> How are the institution’s quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?</td>
<td>Comments above address this question.</td>
<td></td>
</tr>
</tbody>
</table>

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