REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Simpson University

September 27-30, 2016

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

A. Description of Institution and Reaccreditation Process

Simpson University is a Christian liberal arts university, founded in 1921 as Simpson Bible Institute in Seattle, Washington, with a mission to support students’ spiritual growth and prepare them for missionary work abroad. Simpson became the western regional campus of the Christian and Missionary Alliance in 1945 and in 1955 the school moved to San Francisco as Simpson Bible College. Simpson Bible College was granted a two-year initial accreditation in 1969 by WASC and Simpson Bible College renamed itself Simpson College in 1971 as it broadened its degrees to encompass the traditional liberal arts and professional degrees along with biblical studies. In 1989, Simpson College moved to Redding, California. Since the move to Redding, Simpson has received approval for several additional undergraduate and graduate programs (including ASPIRE [adult continuing education], the School of Education and the A.W. Tozer Theological Seminary) for both on-campus and online delivery. In 2004 Simpson College became Simpson University.

Simpson’s mission: Simpson University is a Christ-centered learning community committed to developing each student in mind, faith and character for a lifetime of meaningful work and service in a constantly changing world, and motto: Gateway to world service make clear connections between Simpson’s early history and purpose and its contemporary commitments. The campus culture includes mandatory chapel, clear behavioral expectations, and “strike teams” of students, faculty and administrators who serve the Redding community reinforcing the campus’ mission and motto.

Simpson offers 26 undergraduate majors in which 790 students are currently enrolled, 585 in the traditional undergraduate college (TUG) and 205 in ASPIRE. Simpson also has 222
students in graduate programs, 39 in the professional graduate programs, 144 in education, and 39 in the Seminary.

**B. Description of Team’s Review Process**

The visiting team reviewed Simpson’s self-study in summer 2015 in preparation for the Off Site Review in fall 2015. The review of documents included review of prior Commission action letters and substantive change actions. The financial data in Simpson’s self-study was often from AY 2013-14 and the team asked for additional and updated data from FY 2014, 2015 and 2016 including financial Key Performance Indicators (KPIs) during the Off Site Review (OSR) in October 2015. Although the team requested the updated reports be placed in the team room, the visiting team found that most were posted in the BOX account in July 2016, giving more time for review. The rest were provided in the team room.

During the campus visit (September 27-30, 2016), the team read postings on the confidential email account established for the review, and team members met with multiple constituencies to explore issues raised by the self-study and those issues identified for further inquiry in the OSR. The lines of inquiry identified by the team during the OSR were:

- **Strategic Planning:** status of current plan, decision-making authority, connection to resource allocation, and key performance indicators (KPIs) for student learning, and student, faculty, and staff satisfaction
- **Financial Stability:** plans to achieve sustainability given recent enrollment declines, role of off-site programs contribution to financial stability, use of data for analysis rather than description
- **Quality Assurance:** assessment of student learning and program review, comparability between programs to assure that all students in an academic program receive the same quality of teaching and learning regardless of location or delivery mode
• **Campus Climate**: leadership and shared governance, student satisfaction, diversity, faculty and staff workloads and morale

### C. The Institution’s Reaccreditation Report and Update: Quality and Rigor

The team found Simpson’s institutional report to be well organized and thorough, offering a fair representation of the current condition of the university, including its challenges. The one notable weakness of the self-study was the dated financial information provided. Most of those data provided in the self-study were from FY 2013. Responsibility for preparation of the report was not entirely clear to the team; the report was mostly prepared under the direction of the Associate Provost who was also the ALO. The Associate Provost is no longer with the university. Nonetheless, the self-study noted areas of strengths and weaknesses that faculty and staff committees had identified. So, while the exact structure of the work on the self-study was not clear, the team saw in the self-study explicit indicators of faculty and staff participation and perspectives. Further, the faculty and staff committees that reviewed the Standards and Simpson’s compliance with them identified areas in need of work at the university. The team noted that the data presented in the self-study was mostly informational not analytical. Still the committees offered a critical analysis of Simpson’s compliance with the standards.

The Institutional Research Director took on the role of Accreditation Liaison Officer in June 2016 and provided all supplemental data the team requested. The faculty and staff were aware of the pending accreditation review and clearly some had been involved in committees where draft essays were reviewed. The campus community clearly knew when the team was on campus and students; faculty, and staff with whom the team met formally or informally were welcoming and informative.

The self-study was supported by evidence. The team found the evidence in the self-study
to be mostly descriptive rather than analytical; nonetheless, the report presented a reasonable reflection of the pre-layoff campus when enrollments had generally exhibited modest increases. What the team found during the post-layoffs visit was not anticipated at the time the self-study was written. Simpson University administration, faculty, and staff openly addressed the effects reduced enrollments had on Simpson’s finances and the subsequent effects on staff and faculty with the team in a number of our interviews.

All requests for additional information and data, including requests coming out of the Offsite Review and the “Lines of Inquiry” document, were addressed in a timely manner.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to previous Commission actions

Simpson University’s accreditation history reflects many of the challenges faced by small private institutions. In the 47 years since initial accreditation in 1969, Simpson has been under probation, warning, or notice of concern for approximately 18 years (February 1981 – June 1995 and February 2006 – June 2010). Each of the Commission’s actions taken during those years were warranted by Simpson’s challenges in achieving and sustaining stable enrollment and finances, stable leadership, strategic planning, educational effectiveness, and diversity in leadership, faculty and students.

In 2006, the Commission issued a Notice of Concern to Simpson University and scheduled an Educational Effectiveness Review (EER) for fall 2007. The EER was conducted and Simpson’s accreditation was continued with an interim report due in May 2008. That 2008 report was received and the Commission reaffirmed accreditation. The Commission also acted to continue the Notice of Concern and request an interim report due June 2010. The Commission requested that the 2010 report focus on “a) finances (particularly budget management and fundraising); b) enrollment growth (including retention, graduation and
admissions rates); c) progress on educational effectiveness (including assessment of general education as well as majors, and of the ASPIRE and master’s degree programs).” The Commission’s last accreditation action was to remove the formal Notice of Concern in 2010 based on receipt of Simpson’s satisfactory 2010 interim report.

Since 2010, Simpson has asked for and received approval to offer 4 new programs: Bachelor of Arts in Organizational Leadership (distance education), Master of Science in Clinical Psychology (off campus teachout for Bethany University), Bachelor of Arts in Psychology (online) and Master of Arts in Organizational Leadership. In 2015 a Woodland, California, standalone location was approved. Of those programs, three are currently offered as they were approved: the BA in Organizational Leadership, BA in Psychology and the MA in Organizational Leadership are active programs with reasonable enrollments. The Woodland standalone program did not come to fruition. The location was established in Fall 2015, with an onsite staff member to recruit and market the programs; however, there was not enough projected enrollment for Spring 2016 and the Adult Studies programs were put on hiatus. Tozer Seminary offers courses towards a certificate at the location. Master of Science in Clinical Psychology became an MS in Counseling Psychology and enrollments indicate that it is a successful program. According to the team’s conversation with President Dummer, the Woodland community was in conversation with Simpson about how to shape an agriculture degree program that would best meet the needs of the community.

Although the self-study indicated that enrollment declines in 2015-16 had hurt Simpson finances, the scope of the problem was not apparent to the visiting team until the team arrived to find that in spring 2016 some 56 staff and faculty (mostly staff part-time positions) were let go. On a small campus, that size of staffing loss is significant for students as well as the faculty and staff. In addition, the team members heard from a wide range of faculty and staff that they feel
significant stress about the effect of the layoffs on their workloads and anxiety about uncertainties about the future and changes in leadership. The Board of Trustees selected Interim President Dummer as the permanent President in AY 2015-16. The Associate Provost resigned in spring 2016. The current Provost is in her fourth year at the university. The team’s observations during the visit indicated that the faculty, staff, and administration at Simpson are struggling in a crisis mode. Lines of communication between areas of the university are not clear and decision-making authority is opaque to most of the faculty and staff.

Further, the team left the visit without a clear idea of where Simpson is with its strategic planning. The self-study indicated that the campus was in transition from a 2012 draft strategic plan to a revised strategic plan under President Dummer’s guidance. What the team heard when on campus simply indicated that the campus as a whole had no sense of what the strategic plan was or who was involved in making decisions about the strategic plan.

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

The self-study completed by Simpson University was built on more and better data than seen in its earlier self-studies. Simpson hired a new full-time Director for Institutional Research and Assessment in Spring 2014 and the data provided to support the self-study were appropriate to becoming an institution that is able to study itself and to use data to guide its decisions. The data the team reviewed were appropriately disaggregated and ready for analysis. It is clear to the team that the new Director is providing Simpson University with greater capacity to study itself and make data-informed decisions. While the new Director’s work is a significant improvement, the campus data used in the self-study is mostly descriptive in nature without accompanying analytical studies needed to guide strategic decision-making.
The campus provided a completed Inventory of Educational Effectiveness Indicators in the self-study. The work was thoughtful and couched in terms of Simpson’s history and current circumstances, as known at the time of the writing. The campus meets federal requirements for credit hour, marketing and recruitment, student complaints and transfer policy.

The team found that it was most effective to write to each of the four standards directly to best express the observations made from both the OSR and the team visit.

**Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives**

*Institutional Purposes (CFRs 1.1, 1.2):* Simpson University has a clear mission and appropriate sense of purpose that is broadly understood and embraced throughout the university community. The mission of Simpson University states: “Simpson University is a Christ-centered learning community committed to developing each student in mind, faith, and character for a lifetime of meaningful work and service in a constantly changing world.” In conversations with staff, students, faculty, and administration, Simpson community members made clear their commitment to Simpson’s mission and core values (CFR 1.1).

Consistent with its mission, Simpson University adopted institutional learning outcomes that are widely recognized throughout the institution. The Office of Institutional Research regularly collects and publicly shares data on student retention and graduation rates, and is in the nascent stage of assessing and sharing evidence of student learning outcomes (CFR 1.2).

*Integrity and Transparency (CFRs 1.3, 1.4, 1.5, 1.6, 1.7, 1.8):* Simpson publishes and abides by its policy on academic freedom, which is clearly stated in the faculty handbook. The catalogs specify the rights and responsibilities of students. Although the institution is affiliated with the Christian and Missionary Alliance, it operates with appropriate autonomy (CFR 1.3 and 1.5).
Simpson University has made little progress in nearly all aspects of institutional diversity (CFR 1.4). Although the Simpson community appears to recognize the value of diversity, there is a general lack of vision or direction on defining goals, developing strategies, and determining how to measure success (see example below). Simpson provided evidence that it truthfully represents its programs, services, and costs to students and the public generally. What the team heard from current students confirms that the programs they enrolled in met or exceeded their expectations. It also provided convincing evidence that it maintains fair and equitable policies dealing with a range of relevant areas (e.g., student complaints, grades, and grade appeals) (CFR 1.6).

For the past several years, the institution has received unqualified opinions from an independent CPA firm regarding the integrity of its financial statements (CFR 1.7). However, the team heard repeatedly from students, staff, and faculty that they did not know which individuals or committees were responsible for decision-making on a wide range of issues facing the university. For example, the team met with the Diversity Committee that was re-established for the fall 2016 academic year. The committee is comprised of faculty and staff. There are currently no students serving on the committee. Every committee member expressed genuine interest in increasing diversity on campus and supporting the diverse members of the Simpson community. Every committee member also expressed genuine frustration because they have no clear charge from senior administration, nor were they clear about who should provide the committee’s charge or to whom they report. The committee members did not know where they should be focusing their energy or what the scope of their work should be. They did not know if they were to sponsor events on campus, for which they have no budget, or suggest actions for recruitment or develop workshops and other trainings for the campus or something else.

While the Diversity Committee members were most vocal about their situation during the visit, the team heard from a number of staff and faculty that they did not know who was
responsible for most of the decision-making at Simpson. Simpson must be more transparent in its operations, particularly in how it formulates plans, policies and procedures (CFR 1.7).

From the team’s observations, it is clear that Simpson University has dealt with the accrediting agency in an open and honest manner. The institution has undertaken the accreditation review process with seriousness and candor (CFR 1.8).

The team’s finding, which is subject to Commission review, is that Simpson University has demonstrated sufficient evidence of compliance with Standard I. The team notes Simpson needs to operate with much greater transparency (CFR 1.7) and especially must continue to move forward on creating and supporting a more diverse student population and greater diversity among the senior administration, staff and faculty (CFR 1.4).

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

*Teaching and Learning (CFRs 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7):* The Provost’s Council is comprised of faculty and administrators and ensures that educational programs are appropriate in content for the degree level awarded, regardless of mode of delivery. However, not all the programs offered by the School of Adult and Graduate Professional Studies and the A. W. Tozer Seminary are staffed by a sufficient number of qualified faculty for either the undergraduate or graduate programs. For example, only one full-time administrative faculty (the seminary dean) is employed for both the Master of Divinity and Master of Arts in Ministry Leadership that are offered through distance education (CFRs 2.1 and 2.2b).

The degree programs are clearly articulated in catalogs for both undergraduate and graduate programs and the credit hours adhere to federal policy (CFR 2.2). The institution has developed clear learning outcomes for the institution and has mapped program and co-curricular activities to these learning goals. However, staffing reductions in 2015-16 threaten the institution’s capacity to continue to adequately support student services (CFR 2.3).
The university has recently deployed a new annual program assessment process, during which departments analyze data on student achievement for one institutional and one program-level outcome. At this time, the institution does not collect and analyze data from external stakeholders such as employers or alumni for the program reviews, nor has it implemented a systematic program review process (CFR 2.4 – 2.7). Simpson does not engage external reviewers to evaluate the PLOs, graduation and retention rates, benchmarking results, evidence from appropriate stakeholders including alumni and employers. The institution has not integrated program reviews into planning and budgeting processes. The nascent assessment committee does not yet provide feedback on the quality of outcomes, assessment plans, assessment studies, benchmarking results and assessment feedback. The curriculum development and assessment process, particularly program review, for online programs should be faculty-driven and generate evidence as to the comparability of outcomes for programs delivered online and on-campus and those programs offered in both TUG (the traditional undergraduate college) and ASPIRE (the adult non-traditional program).

**Scholarship and Creative Activity (CFRs 2.8, 2.9, 2.10, 2.11, 2.12, 2.13, 2.14):** Simpson University has policies for faculty promotion that recognize scholarship in appropriate ways for a small university (CFR 2.8 and 2.9). The institution has experienced modest improvement in its retention and graduation rates, as demonstrated by the first-year programming efforts and continued improvement in first-year retention rates. However, the institution should systematically compare its retention and graduation rates with its peer institutions and disaggregate student performance data and use such data to improve student achievement. Although the institution currently provides adequate student support services, staffing cuts, high employee turnover, and low morale among staff and faculty adversely affect the campus climate and the capacity of the institution to continue to deliver the support needed by its students (CFR 2.10 – CFR 2.13).
The institution also provided a clear policy and articulation agreements with area colleges for their transfer students (CFR 2.14).

The team’s finding, which is subject to Commission review, is that Simpson University has demonstrated sufficient evidence of compliance with Standard II. The team notes that there is a need for additional faculty to ensure that programs are staffed with sufficient numbers of faculty qualified for programs that are offered. (CFR 2.1). In addition, Simpson needs to develop authentic program review beyond the annual assessment of one university and one program learning outcome per department per year (CFR 2.7).

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

Since writing the self-study and the Off-Site Review in fall 2015, Simpson University continues to be in transition and recovery as evidenced by several factors including: enrollment decline, high turnover rate in employees (also connected to reduction of 56 persons including a few faculty positions), a vote by the faculty of “no-confidence” in the president and executive committee of the Board of Trustees in May of 2016, and a financial recovery plan that includes elimination of retirement contributions and management of approximately $22 million in long term debt. These factors when placed within the higher education ethos highlight the challenges to sustainability that Simpson faces.

*Faculty and Staff (CFRs 3.1; 3.2; 3.3):* Simpson maintains sufficient faculty to achieve the institution’s educational mission, although the number and categories of faculty create other issues of sustainability relative to assessment and quality assurance. As noted above in 2.1, Simpson has at least one case where a single full-time faculty member is responsible for more than one degree program. In Simpson’s self-study, faculty longevity and faculty-student ratio are viewed as indicators of success on this standard (CFR 3.1). Growth in the number of faculty in
2013-14 reflected changes in programs and the need for further attention to diversity. However, in 2013 the part-time faculty (147) was more than double that of the full-time faculty (51).

The May 2016 reduction in personnel further compromises Simpson’s capacity. While many more staff than faculty left or were let go, the loss of any faculty makes strategic faculty hiring imperative to foster a balance of faculty credentials appropriate for the various degree levels within the institution (CFR 3.1). The team realizes that it is a challenge to find faculty willing to move to Redding. Nonetheless, the need for full-time faculty to lead academic programs and guide students is significant. Simpson has better ability to develop institutional capacity with more full-time faculty than with the larger number of part-time faculty that Simpson already employs.

The staff capacity lags behind that of the faculty. Simpson recognizes that it may not have sufficient staff to address the changed and increased workload as a result of the layoffs. The team, however, heard of no clear plans for staff hiring. Since AY 2013-14’s growth in staff and faculty, the number of both groups has declined. Most of the layoffs were of part-time staff and the current staff are left juggling the work of more than one position. Staff across the university report a strong commitment to Simpson and its mission. Nonetheless, the fatigue, stress, and distress that the staff reported portend additional declines in morale and reductions in the university’s ability to support faculty and students.

Present faculty and staff development needs improvement, particularly in the area of technology, as Simpson seems to be developing more online programs (CFRs 3.3; 3.5). More support for faculty development is essential given the relatively high number of part-time faculty. Because so much of the curriculum is being taught by part-time faculty, Simpson must be deliberate in monitoring faculty performance in assessment practices and quality assurance. Interviews with the full-time faculty attest to the fact that they not only carry the load for ongoing assessment and planning for the future given financial uncertainties about the resources to
fill vacant faculty positions but that they fill gaps left open because of the revolving door of the part-time faculty and the resulting need to cover particular curricular areas and orient new part-time faculty (CFR 3.3).

Simpson’s history of high turnover was exacerbated with the reduction of personnel in spring–summer 2016. Sustainability has been compromised in several ways including the capacity of the remaining personnel to cover the added responsibilities of multiple roles, the decision-making process, and related decisions. Interviews with faculty and staff indicate a high level of dedication and ongoing commitment to the university’s mission and care for students. Even so, the multiple role transitions in the institution, the lack of clear communication regarding financial and decision-making matters, the opaqueness of much decision-making have led to high stress and low morale. Faculty and staff question their capacity to sustain the level of performance effectively without either sacrificing their health and well being or sacrificing the quality of their service to the students. For example, the longest serving person in one department of seven has been in the role only three years. The challenge of whole offices without much institutional history is certain to reduce the efficiency and effectiveness of the department. In addition to the relatively new staff, with few exceptions, the staff as a whole exhibits inexperience and the need for professional development in their areas of responsibility. In the student services areas, the need for professional development is crucial to Simpson’s success. For example, a mostly inexperienced staff in enrollment management impedes Simpson’s understanding of and success in recruitment, admission, retention and graduation as well as their ability to provide accurate and informative enrollment projections (CFR 3.3).

**Fiscal, Physical, and Information Resources (CFR 3.4):** The team heard from members of the staff and faculty that over the last six years, Simpson’s perpetual transitions have affected the pace of the work done toward reaccreditation. Fiscal planning and recovery has been an ongoing theme at Simpson for a few years. The committee charged with Standard 3 review at
Simpson recognized the need for more faculty support and development. As a result, some adaptation to improve opportunities for faculty development and research has been undertaken recently (Self-Study p.28). The planning has incorporated the strategic plan and the “prioritization plan” (see Component 7 for further information on budget matters). In most cases the KPIs listed in 2012 Strategic planning documents are focused on fiscal matters.

Over the years Simpson has increased their use of distance education models. Recently, the faculty have been offered increased avenues for funding on-line curriculum and Instructional Technology (IT) support staff, including a new director, have been hired to provide support for the Simpson community and distance education. Particularly important has been the provision of training for faculty via the Center of Excellence for Learning Technology. As with other areas/divisions within the institution the turnover rate has also affected IT. At the time of the team visit in late September 2016, the IT director had been on the job for almost two months. Students may not be aware of the transition but they are aware of inconsistency in IT support—namely, that technical support for Moodle users in online courses is currently only available via email or phone and only during working hours (8:00am-6:00pm). Likewise, students are aware of the varying levels of faculty readiness to teach online and they noted the need for more development opportunities for faculty regarding online pedagogy and responsiveness in an online environment (CFR 3.5).

In Spring 2016, Simpson took various steps to reduce its operational costs. In Spring 2016, additional steps were taken, including reduction of personnel cost by eliminating 56 positions and eliminating the university’s 4% retirement contribution. The elimination of the 4% matching retirement contribution during Fall 2015 resulted in a savings of approximately $158K during FY16. The 1% elimination, implemented June 1, will result in an additional $60k savings for FY17. The staff and faculty cite the elimination of the retirement contribution as a key factor in the low morale.
Simpson reports a balanced budget for FY16 and projects a balanced budget for FY17. Even so, Simpson is experiencing cash flow difficulties. The KPIs suggest the need for further planning that incorporates educational costs among the indicators of institutional success and the need for budgetary alignment processes. The academic planning process must be clearly and consistently integrated into resource management practices and procedures. For example, Simpson has eliminated staff and administrative positions that are key to strategic enrollment planning and to faculty assessment and quality assurance practices. Simpson’s senior administration has not articulated any plan for filling vacant faculty or staff positions, nor has it been transparent about decisions on resource allocation, alignment of administrative functions, or plans for hiring in strategic areas of the institution.

Organizational Structures and Decision-Making Processes (CFRs 3.6; 3.7; 3.8; 3.9; 3.10): Simpson is in flux as evident in the high turnover in staff and key administrative positions, made even worse by the spring 2016 layoffs. The organizational chart made available to the visiting team situates the Cabinet as the senior leadership body of the university. In speaking with the Cabinet members, it became clear to the visiting team that the position and function of the Cabinet in the organizational structure need to be further articulated and clarified relative to authority to make decisions and expectations regarding the Cabinet’s areas of responsibility. It appears to the team that the Cabinet and the Board of Trustees oversee the budget—the Cabinet giving input and the Board approving the budget. However, the decision-making process and procedures are unclear to university personnel, leaving much room for confusion about the budget. The decision-making process regarding the institutional annual budget must be clarified especially as these decisions affect the educational viability and sustainability of the institution. The transition in the CFO role is one of many transitions that the Simpson is currently making. Particularly in regards to the CFO, the areas of responsibilities have changed such that HR and facilities now report to the President, not to the CFO. Simpson
must be diligent in fostering clear communication to the community that aligns personnel and facilities decisions and budget management procedures and decisions.

The Provost’s Council appears to be well functioning for academic decisions. The effectiveness of the decision-making on the Cabinet has yet to be demonstrated given the relative newness of body (in place since August 2016) and of the newly appointed members to their roles and to the Cabinet. Interviews demonstrated how unclear the decision-making structure regarding academic and administrative matters is to participants and to Simpson’s faculty and staff. Issues related to the strategic plan are muddled and a source of contention between the faculty and the president and Board of Trustees. Faculty members are clear that Simpson lacks a vision and strategic plan that would guide its future and that the President is ill equipped in articulating or operationalizing such a vision.

In May 2016, the faculty cast a vote of ‘no-confidence’ against the president and the executive committee of the Board of Trustees. Decision-making processes and procedures to address this expression of concern, if available, are not discernible and/or are ineffective. As a result, the current Simpson environment is one of distrust and suspicion about the integrity of the president and doubt about the Board to lead effectively and to make decisions in the best interest of the institution. Fear of retaliation is palpable throughout the institution and is a deterrent to engaging in the challenging and necessary conversations about resource allocation, workload, and performance evaluation of the president and other staff positions (CFR 3.6; 3.7).

The team’s finding, which is subject to Commission review, is that Simpson University has not demonstrated sufficient evidence of compliance with Standard III. The team notes that Simpson needs to make decisions that assure that the university has sufficient full-time staff to support each of the degrees and majors offered (CFR 3.1). The current financial situation indicates that Simpson has not found financial stability nor did the team hear of realistic plans for moving to greater stability (CFR 3.4). It is clear that as a result of layoffs required to bring
Simpson’s budget into balance, CFR 3.5 requirements for sufficient and aligned resources are not being met. Critically, the team found little ability of faculty or staff to identify a clear decision-making process or structure for the issues facing the university (CFR 3.7). The spring layoffs and other administrator resignations have resulted in a paucity of key administrative staff (3.8). Faculty leadership is also neither sufficiently knowledgeable about nor involved in budgetary leadership that affects academic programs (3.10).

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

*Quality Assurance Processes:* Following the completion of their self-study in 2015, Simpson University continues to struggle with financial challenges and significant reductions in real and human resources. Over the past year (2015-16) the budgetary challenges appears to have had the effect of placing many processes in a holding pattern as staff and faculty grapple with surviving.

While the campus cited solid quality assurance with such programs as Nursing, given the pass rate of graduates with the required NCLEX exams and the associated accreditation of the Nursing program, there was little evidence of similar quality assurance in other academic programs. (CFR 4.1) The Education Credential program had similar assurance given the need for graduates to meet the credentialing requirements of the State of California.

The Institutional Research office developed and disseminated data through the Academic Dashboard displaying both aggregate and disaggregated information, but there did not appear to be any use of the data to inform decision-making, again, likely owing to the “crises” mode of the campus overall. (CFR 4.2)

*Institutional Learning and Improvement:* The academic program evaluation process was changed during the 2014-15 academic year and requires each academic program to provide a
review of their program annually rather than every 5 years. Program review now requires that each department evaluate student learning on one institutional and one program student learning outcome. It is too early to determine the efficacy of the program as the campus has just begun this level of review, but the process is appropriate and doable for the faculty and should be continued (CFR 4.3, 4.4, 4.5).

The current status of a strategic plan (CFR 4.6) for the campus remains in question and thus academic and support units must rely on the plan that was in place, if one was guiding the campus. Absent a strategic plan that addresses the campus’ direction, the programs will continue, as they exist currently. This was an area of concern in Simpson’s self-study (CFR 4.3) and with the further elimination of faculty and staff, any metrics and timelines that might have been in place will need adjusting.

Furthermore, an Enrollment Plan was developed in 2015 but with the subsequent departure of the vice president for Enrollment Management and the associated restructuring of enrollment services under a director of admissions, the team is not clear if the enrollment plan is being followed and therefore what, if any, data is being gleaned from applicants about why they do or do not choose Simpson. (CFR 4.3) In the current context, it is unclear if an enrollment plan exists and, if so, how it supports the campus’ strategic planning. Thus, enrollment appears to be in the business of filling seats rather than utilizing more precise planning as marketing and admissions are seemingly operating without a true sense of direction that would be articulated in a campus strategic plan.

The Simpson University faculty are committed to the Faculty Development Committee and the provost has instituted a seminar for all new full-time faculty members where issues in higher education are being addressed (CFR 4.7)

The students who were interviewed (largely from on-line courses) expressed a very high level of satisfaction with the instruction and support provided by faculty and often mentioned the
mentoring provided by faculty. Both classroom based and on-line students shared their enthusiasm regarding the quality of interaction with faculty and peers and their belief that they were receiving a quality education.

Given the difficulty experienced this past year in terms of fiscal resources, Simpson University should be encouraged to be proactive in anticipating enrollment increases or decreases and should be based on the Strategic Plan that needs to be revised or developed. The realities of fewer high school graduates combined with the competition between faith based institutions needs to be acknowledged, considered, and incorporated by Simpson University as it develops its institutional and enrollment planning initiatives. (CFR 4.7)

The team’s finding, which is subject to the Commission’s review, is that the institution has not demonstrated sufficient evidence of compliance with Standard IV. The team notes particularly the lack of analytical, evidence-based decisions that would assist the campus in finding productive strategies for addressing financial, enrollment, and program challenges (CFR 4.1). The team applauds the new annual program review process that focuses on assessment of learning on one institutional and one program learning outcome. However, this level of work is just a beginning. Full-fledged program review actively solicits feedback from a range of external and internal constituencies and responds to that feedback (CFR 4.5). Likewise, individual course evaluations, which are informative about student responses to a particular course and instructor, are not sufficient for determining the quality of Simpson’s curricular and extracurricular programs and services (CFR 4.3).

When Simpson has a strategic plan, it must be a living document understood by the entire campus community. From all the team members’ conversations with administration, staff, and faculty it was clear that almost no one knew what the strategic plan was or if it was undergoing revision or if they would have the chance to offer input in revisions or a new plan (CFRs 4.3 and 4.6). Simpson University needs to act with openness and collaborate with the campus
community on enacting or developing a meaningful strategic plan. Without a strategic plan, or with one that is not shared with the community, community members are unsure about the university’s direction and less able to support Simpson’s move to a sounder financial future with a steady stream of students. In other words, without knowing what direction the strategic plan anticipates for Simpson’s future, there is no way for community members to participate in leading to the plan’s desired outcomes (CFR4.6).

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

C. Component 3: Meaning, Quality, and Integrity of the Degree

The meaning of a Simpson University degree is defined by its Institutional Learning Outcomes (ILOs) that are clearly aligned with its mission and core values. Simpson’s mission states that it “is a Christ-centered learning community committed to developing each student in mind, faith and character for a lifetime of meaningful work and service in a constantly changing world.” Simpson has five ILOs; the first two are academic and the last three are character-based (Christian commitment, cultural engagement, and servant leadership). At Simpson, the meaning of a degree is also defined by its co-curricular activities that help shape and mold students during their tenure at the institution.

The General Education (GE) curriculum also reflects Simpson’s values, as it is designed to give students the breadth and depth of a Christian liberal arts education. For example, undergraduate students must complete 12 credits in Bible and theology courses. As part of their general education, undergraduate students complete a ministry practicum (service requirement) based upon the theology of service.

The primary co-curricular activity that bonds the university community is chapel, which normally convenes twice weekly, providing opportunity for community worship. Because of the
important contribution chapel makes to each student’s education and spiritual formation, full-time undergraduates are required to attend 66% of the chapel services offered each semester.

Simpson demonstrates its emphasis on service through “strike teams” and the WorldSERVE program. Locally, Simpson serves the community each year through a day of service and strike teams that respond throughout the year to immediate needs in the community. The WorldSERVE program reflects the institution’s motto: “Gateway to World Service.” Simpson has demonstrated this service commitment by deploying short-term WorldSERVE mission teams over the past two decades (with over 1,700 students serving in 70 countries).

Simpson’s First-Year Experience Course, which is required of all freshmen, defines the quality of the undergraduate programs. This course is based on high-impact practices and assists students in the transition to college (e.g., how to study and form study groups, and understanding time management). As a result, the one-year retention rate for first-time freshmen improved from 74% in 2015 to 82% in 2016.

Well-defined ILOs, Program Learning Outcomes (PLOs) and core competencies demonstrate the quality of Simpson degrees. Curriculum maps are employed to align student-learning activities with expected learning outcomes. The institution has also developed templates for program assessments and has gathered and analyzed evidence on one ILO and one PLO for each of its programs.

However, Simpson has not demonstrated with sufficient evidence the quality of its degree programs, particularly for programs delivered online. Simpson does not deploy sufficient qualified full-time faculty to provide collective responsibility for the development and evaluation of the online curriculum offered by the School of Adult and Graduate Professional Studies. The A.W. Tozer Theological Seminary has only one full-time faculty devoted to two graduate degrees: (1) Master of Divinity, and (2) Master of Arts in Ministry leadership. In addition, the institution does not formally disaggregate retention and graduation rates by mode of delivery, nor
does it compare data on student achievement for programs that are delivered both on-ground and online. As a result, the institution could not demonstrate comparable quality regardless of mode of delivery.

Integrity is normally ensured through multiple levels of curriculum oversight, program review, and other processes to assess student achievement. The Provost’s Council provides oversight for curriculum development and approval; and the new Assessment Committee provides leadership in the design, implementation, analysis, and dissemination of assessment results, and on-going administration of campus-wide assessment activities.

The area of assessment of learning outcomes on all levels (course program and institutional) has shown substantial growth over the last two years. Historically, Simpson’s assessment activities were focused primarily at the course level (e.g., annual syllabi review). At the program and institutional level, the institution relied on indirect evidence (e.g., student opinion surveys) two years ago. Assessment appears to have reached an emerging level (data on only just ILO and one PLO have been collected and evaluated). As discussed in Standard II of this report, Simpson does not engage “external evidence and evaluators” in its current program review (CFR 2.7).

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

Over the past two years, Simpson University has developed and embedded (mapped) Institutional Learning Outcomes (ILOs), Program Learning Outcomes (PLOs) and the Core Competencies to most of its programs. Among those outcomes is development of a “Christian Commitment: To internalize a maturing relationship with Christ as Savior and Lord manifested in spiritual and character growth, intimacy with God, commitment to the Christian community, and the confession of a Christian world view.” The non-traditional programs offered through the
School of Education and School of Adult Studies do not require a statement of faith. In these programs, the outcome of Christian commitment is replaced by moral commitment, and the servant leadership outcome is replaced by academic achievement. However, the School of Business and Graduate Professional Studies (SGPS) does not require a statement of faith, but unlike the other non-traditional programs, the self-study illuminated the need for SGPS to adopt a set of ILOs to guide them. Regardless, students understand that all of the professors will be teaching their classes from a Christian worldview.

ILOs and PLOs are primarily communicated to students through the course syllabi. The syllabi contain course learning outcomes that generally show alignment to either the ILOs or PLOs. Additionally, assignments are encouraged to show alignment to the course learning outcomes.

Simpson has collected data on two outcomes: Constructive Thinking (ILO 1) and Effective Communication (ILO 2). Assessment Findings were shared with the departments concerning ILO #1. Assessment findings for ILO #2 will be summarized and shared with academic departments during the fall of 2016.

The Association of American Colleges and Universities (AAC&U) VALUE rubric for writing was used to assess the final papers in the Bible & Theology program. The assessment of final papers served to measure the ILOs of constructive thinking, effective communication, and, as the essay topics were faith-based, Christian commitment. Data were collected and will be shared this year on effective [written and oral] communication

Most of the annual reports have been submitted, and the Director of Institutional Research and Assessment has noted that the assessment quality varied by program. The 2016-17 academic year will include individual meetings with department chairs to review their assessment reports and build the level of assessment being conducted. The Director also noted “a gap in the communication process of outcomes to students” (p. 64, Self Study) and Simpson is
now considering changes to the requirements for the assessment processes for core competencies, including the use of portfolios and the integration of rubrics in the syllabi so that students are more aware of the guiding learning outcomes for individual courses.

Simpson uses a variety of indirect evidence to assess student learning and student performance at graduation. The National Survey of Student Engagement (NSSE), given to freshmen and seniors in 2013, indicates that faculty are engaging students in the classroom. Students responded that the higher-order cognitive skills of application, analyzing, evaluating, and forming new ideas were emphasized more than just memorizing course material. Students also responded that faculty clearly communicated expectations, used examples to illustrate difficult concepts, and provided prompt feedback. The mean scores for these questions were comparable to other Council for Christian Colleges and Universities institutions that participated in the survey.

Another source of indirect data includes course evaluations. These evaluations, conducted on every course each term, are centered on student learning, including questions such as “classroom sessions were effectively used to increase learning,” and “new concepts were connected to what was previously learned.” Faculty use these evaluations to improve instruction and ensure students are learning.

In addition, senior surveys are given each spring to students who are graduating or in the capstone courses. The senior surveys contain a primary set of questions asking the students to rate their achievement on statements that reflect each of the ILOs, and each program has a set of corresponding questions regarding the program outcomes.

In the 2015 survey, students rated themselves with a mean score between 4.23 (written communication) and 4.52 (constructive thinking) on a scale from 1 to 5.

Although Simpson refers to the annual assessment of ILOs and PLOs as program review, the institution does not conduct a holistic review of programs. The institution does not engage
external reviewers to evaluate the PLOs, graduation and retention rates, benchmarking results, evidence from appropriate stakeholders including alumni and employers. The institution has not integrated program reviews into planning and budgeting processes. The nascent assessment committee does not yet provide feedback on the quality of outcomes, assessment plans, assessment studies, benchmarking results and assessment feedback. The curriculum development and assessment process, particularly program review, for online programs should be faculty-driven and generate evidence as to the comparability of outcomes for programs delivered online and on-campus and those programs offered in both TUG (the traditional undergraduate college) and ASPIRE (the adult non-traditional program).

The team recommends that Simpson develop a program review process which incorporates the “Good Practices” described in the WASC Resource Guide for ‘Good Practices in Academic Program Review,” at https://www.wascsenior.org/content/program-review-resource-guide.

E. Component 5: Student Success: Student learning, Retention, and Graduation

Simpson has made progress in its retention and graduation rates over the past five years. A university-wide Retention Committee was formed in 2014, and an Enrollment Management Plan was completed in spring 2015. In this regard, the work of the Office of Institutional Research and Assessment is particularly commendable.

Simpson defines student success as the students’ ability to persist, make continuous progress toward, and complete a credential, certificate, or degree program. The institution tracks student success (graduation and retention rates) through an Academic Dashboard that is updated every fall. The Academic dashboard tracks retention and graduation rates for first-time freshman and transfer students with disaggregated data based upon gender and ethnicity.
The overall fall-to-fall retention rate for first-time freshman increased from 61% in 2011 to 74% for 2015, with concomitant increases in the retention rates for women (66% to 77%) and men (54% to 70%) and by ethnicity (e.g., retention of Hispanic students improved from 66.7% to 75%). The one-year retention rate for transfer students has remained relatively constant over this time period, hovering around 70%.

These higher retention rates are also reflected in the graduation rates. Five years ago, the 2005 cohort of first-time freshman had a six-year graduation rate of 44%, but 52% of the 2009 cohort graduated within six years. While an 18% increase in graduation rates represents significant progress, Simpson’s average graduation rate is still lower than the average graduation rate of 52% for Simpson’s regional peers. The team recognizes the importance of increasing graduation rates for all its students and urges Simpson to continue with those activities that supported increased graduation.

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

The move to annual reports is a positive step. The annual report provides opportunity for review of PLOs and their alignment with the ILOs. Consultation with the provost is an integral part of the assessment and helps toward closing the loop. Although this is a positive aspect of Simpson’s assessment program, even this is challenged by the capacity of faculty members to sustain fruitful assessment across programs and with the involvement of part-time faculty and vacancies within some departments. The faculty’s commitment is the energy that continues to drive the work forward but reduced capacity makes the level of work on issues of quality assurance unsustainable, especially in light of low morale and lack of resources. The next major step for Simpson is to articulate a program review process that incorporates the annual reports and other data sets in evaluating the effectiveness of the programs. Further clarity about the
PLOs within the program review of degrees that incorporate online courses (e.g., Organizational Leadership) must seek to understand the comparability of student performance of online vis-à-vis on the ground programs and courses.

G. Component 7. Sustainability: Financial Viability; Preparing for the Changing Higher Education Environment  (CFRs 3.4, 3.7, 4.1, 4.3-4.7) (Self-study pp. 84)

Simpson is aware of some of the challenges that it faces relative to the changes in higher education and is seeking to adapt its practices and resources to meet such challenges. Simpson’s ability to adapt is based both on its awareness of the challenges and the capacity to address present and future projected demands. Regarding awareness of the changes in higher education, Simpson must be diligent in providing staff development opportunities to foster awareness of the changes in higher education and to forecast the impact on the university. Because of the high rate of turnover in leadership over the years and the new senior leadership in place since 2013 (including the majority of the cabinet), Simpson runs the risk of attending to immediate needs for stability and daily operation vis-à-vis the looming challenges precipitated by enrollment decline and the need to diversify revenue streams. The inexperience of the staff in key roles (e.g., Admissions) must be closely monitored and enrollment management must be part of the strategic planning because of the potential crucial role of enrollment to Simpson’s fiscal stability.

Simpson acknowledges a seven-year recovery effort and identifies several factors included in its perspective on sustainability. The 2012 strategic plan and 2007 Financial Strength plan sought to align resources with strategic initiatives. A budget strategy team consisting of the president, the president’s cabinet, and the controller regularly review the financial strength goals. It is unclear whether this team is still in place given the resignation of the former CFO and the changes in the decision-making structure. As of August 2016, a newly formed team is tasked to focus on sustainability. This team consists of a member of the Board of
Trustees, the President, the Provost, the CFO, and the faculty president (CFR 3.8). The team is uncertain whether the new CFO is likely to succeed given shifting responsibilities and unclear decision-making institutional processes.

*Identified challenges:* “Challenges include declining annual fund giving, erratic fundraising results, and a traditional undergraduate discount rate that has been between 39.2% and 41.1% for the past seven years” (*Self-Study*, p. 85). Regarding the pension plan, the University has a 403(b) and 457(b) plan, which in past years covered full-time employees. According to the Audit Report (2016 and 2015), the University “contributes and matches employee contributions up to 4% of eligible wages.” The total pension expense for the years ended April 30, 2016 and 2015, was $169,928 and $328,013, respectively, a difference of $158,085 from 2015 to 2016. As of October 1, 2015, Simpson no longer contributes the 4% matching of eligible wages, and, as of June 1, no longer contributes 1%.

The reduction in personnel was intended to reduce operating costs and is a part of the fiscal recovery plan. Some indicators of fiscal recovery may also indicate the need for further development. Long-term debt includes a total of $22,430,078 “resulting from investments in institution’s land, buildings and equipment.”

The interest expenses as of April 30, 2016 are $890,186, which includes the following:

- An $18 million note held by the Evangelical Christian Credit Union (ECCU) was refinanced in December 2014 at 4.625% is due in June 2022.
- A $4 million line of credit established with the Redding Bank of Commerce with a monthly interest payment 5% matures on May 1, 2018 and will be refinanced upon maturity.
- An unsecured note of $380,000 to an individual at a 10% interest only payment until maturity.
The leadership roles at all levels of the institution are compromised by the lack of clear communication and decision-making process as well as the distrust between the faculty on the one hand and the president and Board of Trustees on the other. Simpson’s academic leadership is clearly defined and directed. The faculty has well defined roles in overseeing the curriculum and academic programs (CFR 3.10). From the staff and faculty perspective, the same cannot be said of the presidential and Board leadership. The May 2016 vote of ‘no-confidence’ looms over the president and the Board of Trustees and sustains a culture of anxiety and mistrust. Several hopeful signs that Simpson could resolve ongoing leadership challenges include:

- In October following its regular meeting, the Board plans to convene a conversation with the Simpson community to communicate on key matters and decisions.

- The Board has also entrusted its past chair to mentor the President on several issues including communication.

- The Board indicates that it is exploring how it may clarify its functions and evaluate its performance.

- In light of the breakdown in leadership, the Board must follow through with these plans and take action to enhance effective and sustainable leadership and institutional effectiveness (CFR 3.10)

Simpson defines student success as the students’ ability to persist, make continuous progress toward, and complete a credential, certificate, or degree program. The institution tracks student success (graduation and retention rates) through an Academic Dashboard that is updated every fall. The Academic dashboard tracks retention and graduation rates for first-time freshman and transfer students with disaggregated data based upon gender and ethnicity.

The overall fall-to-fall retention rate for first-time freshman increased from 61% in 2011 to 74% for 2015, with concomitant increases in the retention rates for women (66% to 77%) and
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These higher retention rates are also reflected in the graduation rates. Five years ago, the 2005 cohort of first-time freshman had a six-year graduation rate of 44%, but the 2009 cohort had 52% of the students graduating within six years. While an 18% increase in graduation rates represents significant progress, it equals the average graduation rate of 52% for Simpson’s regional peers.

H. **Component 8: Optional essay on institution-specific themes (not included in self-study)**

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

Simpson University’s concluding essay frames the ways in which Simpson has made progress since their 2010 review, particularly in their efforts to become a learning institution. The final essay highlights the four ways in which Simpson’s Strategic Plan has guided the campus’ efforts:

- The design of an Enrollment Management Plan to improve recruitment and retention of students, the primary financial resource of the university;
- The creation of the Provost’s Council that oversees academic affairs, and particularly the Council’s role in leading assessment of institutional and program outcomes;
- The establishment of CELT, a Center for Excellence in Learning Technology to support faculty, staff and students on all aspects of online aspects of courses; and
- Finances, to guide operating practices.

Areas of continued work identified include continuing focus on the student experience and particularly student learning. The campus hopes to develop a one-stop center for Student
Success that would include career services, advising, success seminars, tutoring, testing, and accommodations, and added support for first-generation and underprivileged students. Financial stability will continue to be significant focus of Simpson’s efforts in the future.

The team generally recognized and confirm the growth points summarized in Essay 9. However, the team visited the campus a year after the report was submitted to WASC and found the campus in crisis, rocked by financial shortfalls that led to layoffs of significant numbers of staff and a few faculty, eliminated the university’s contribution to retirement funds, added significant stress to a committed faculty and staff to cover the work formerly done by those laid off, and fostered anxiety and distrust about the future across the faculty and staff. The team found the campus in crisis about who and what were driving campus decisions. The President, inaugurated in fall 2015, has not been successful in communicating the senior administrations’ and Board of Trustees’ reasons for decisions to the campus community. The actions of the Board of Trustees are opaque to the faculty and staff who fear their voices and concerns are not heard or, if heard, not honored. Worries about the financial stability of the university, the concerns about leadership and visions for the future, and lack of knowledge about who is making what decisions for what ends remain at the top of mind for most of the community members with whom the team spoke.

SECTION 111: OTHER TOPICS, AS APPROPRIATE

SECTION IV: FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

Simpson University has a long history as a religious institution committed to the development of students who will carry the message of Christianity to peoples around the world. Simpson’s motto, “Gateway to World Service” remains a guiding core of Simpson’s character. Although founded to provide missionaries prepared to carry the message of Christ abroad, Simpson now sees their service area at home as much as service abroad. The team left the visit
with no doubt that Simpson’s motto, mission, and vision continue to energize students as well as the staff and faculty. The campus community clearly embraces and commits to the goals of the university. Increasing retention and graduation rates are a positive development and assessment of student learning has begun and is now regularized in annual departmental reports. The new Director of Institutional Research and Assessment will provide analysis of the student learning data it is now collecting and disseminating. The Provost’s Council provides faculty leaders with access to academic decision-making. These are all important and laudatory changes since the last review.

Nonetheless, the team found significant deficiencies that pose significant challenges for the university: financial instability and opaque planning and decision processes and actions and of less immediate but essential concern is diversity in faculty, staff, and students. The team found that while Simpson had increased the diversity among freshmen, they have challenges retaining those diverse students. Simpson’s community has not embraced the need for or value of a diverse student body and there is a lack of support services for those students, due to the financial stress experienced by the campus. The student body, however, is more diverse than the staff or faculty. None of these three issues, financial stability, planning and decision-making processes, and diversity, are new concerns for Simpson in its accreditation history.

The self-study pointed to Simpson’s 2012 Strategic Plan to be vital to the changes made between the two visits. If the 2012 Strategic Plan provided a guiding light for the self-study its light has gone out. The team found that practically no one at the university knew if the campus was still operating under the 2012 Strategic Plan or under some new iteration that may or may not be in process. It was also the case that most community members did not know if they would be involved in any way in the revision or development of a new plan. It was, frankly, clear that communication about the status of any Strategic Plan had become muddled for the campus community: they had heard little formal information and the indirect communications they heard
only made the situation more confusing and therefore more anxiety provoking. The “no confidence” vote against the President and the Executive Committee of the Board of Trustees is a direct reflection of ineffective communication with the community. These issues are explored in more detail above. Here, the visiting team offers the following commendations and recommendations.

**Commendations**

Based on the team’s review of Simpson’s accreditation history, its institutional report and supporting documents, and our meetings and conversations during the onsite visit, the team has developed a set of commendations and recommendations. The team commends Simpson for:

1. We commend the entire Simpson University community for its commitment to the institution’s mission to be “a Christ-centered learning community committed to developing each student in mind, faith, and character for a lifetime of meaningful work and service in a constantly changing world” and its commitment to serving students despite the considerable challenges it has faced.

2. We commend Simpson University, especially the ALO, for its openness to sharing information with the Accreditation Visit team and the timely way in which our many requests were met.

3. We commend Simpson University for the deep awareness of—and commitment to—that mission and motto “Gateway to World Service” exhibited by students.

4. We commend the Provost for modeling strong leadership and clear lines of communication within Academic Affairs.

5. We commend the Board for understanding the need to respond generously to the campus’s anxieties about the future.
Recommendations

1. We recommend that the President and Cabinet quickly provide clarity about the strategic plan—what it is, who is responsible for revising it, who is responsible for approving it, and who is responsible for implementing it. There is also considerable need for a University-wide understanding of—and involvement in—the strategic planning process. As an early step in that process, there should be clear communication about the make-up, role, and responsibilities of the Cabinet going forward. (CFRs 1.7, 3.6, 3.7, 3.8, 3.10)

2. We recommend that Simpson University’s strategic plan address the need for adequate faculty and staff to support the mission. To avoid burnout and increased turnover, the community should be given clear information about the budget and what it will allow in terms of filling positions. (CFR 3.1)

3. We recommend that Simpson University’s strategic plan clearly articulate strategies for generating the resources necessary to support the educational mission. This will include enrollment and financial aid strategies as well as projections for net tuition revenue based on analytical models. We recommend that the community receive regular and consistent information about the current year budget and budget planning for the years ahead. (CFRs 1.3, 1.7, 2.3, 3.4)

4. We recommend that Simpson University build on the foundation in place a year ago, but now apparently in some disrepair, to use data to regularly assess and improve educational effectiveness. Direct evidence of student learning needs to be gathered consistently and used to improve teaching effectiveness and student learning. (CRFs 4.1, 4.3, 4.5, 4.6)

5. We also recommend that Simpson University return to the path from a year ago of engaging all stakeholders in gathering data, reflecting on its meanings, and planning to improve the institution’s ability to respond to a volatile higher education environment. (CFRs 1.2, 2.1, 2.4, 2.6, 2.7, 2.10)
6. We recommend that Simpson University make a stronger commitment to diversity of all sorts in the recruitment and retention of students, faculty, and staff. Evidence should become available to show perceptions of privilege for certain groups are being reduced through the use of implicit bias training and other interventions. (CFR 1.4)
APPENDICES

A. Federal Compliance Forms

Federal Requirement 1: Credit Hour and Program Length Review

<table>
<thead>
<tr>
<th>MaterialReviewed</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</td>
</tr>
<tr>
<td></td>
<td>Where is the policy located? 2016-17 Simpson University Catalog (page 26)</td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</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</td>
</tr>
<tr>
<td></td>
<td>Does the institution adhere to this procedure? X YES</td>
</tr>
<tr>
<td></td>
<td>Comments: The institution uses credit-hour based guidelines in designing courses including syllabi. Students reported devoting 20-25 hours per week working on 5-week online courses.</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</td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses Please review at least 1-2 from each degree level.</td>
<td>How many syllabi were reviewed? five</td>
</tr>
<tr>
<td></td>
<td>What kind of courses (online or hybrid or both)? Online</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? undergraduate and graduate</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? psychology, leadership and ministry</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</td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) Please review at least 1-2 from each degree level.</td>
<td>How many syllabi were reviewed? 2</td>
</tr>
<tr>
<td></td>
<td>What kinds of courses? Nursing and Psychology</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? undergraduate and graduate</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? nursing and psychology</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</td>
</tr>
<tr>
<td></td>
<td>Comments: N/A</td>
</tr>
<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? 5</td>
</tr>
<tr>
<td></td>
<td>What kinds of programs were reviewed? Psychology, leadership and ministry</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? undergraduate and graduate</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Psychology, Leadership and Ministry</td>
</tr>
<tr>
<td></td>
<td>Does this material show that the programs offered at the institution are of a generally acceptable length? X YES</td>
</tr>
</tbody>
</table>
MARKETING AND RECRUITMENT REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal regulations</strong></td>
<td>Does the institution follow federal regulations on recruiting students? <strong>X YES</strong></td>
</tr>
<tr>
<td><strong>Simpson University indicated that they comply with the federal regulations on full-disclosure</strong></td>
<td></td>
</tr>
<tr>
<td>Degree completion and cost</td>
<td>Does the institution provide information about the typical length of time to degree? <strong>X YES</strong></td>
</tr>
<tr>
<td>Does the institution provide information about the overall cost of the degree? <strong>X YES</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Fee schedules are found on page 20 of the Simpson University 2016/2017 Catalog</strong></td>
<td></td>
</tr>
<tr>
<td>Careers and employment</td>
<td>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <strong>X YES</strong></td>
</tr>
<tr>
<td>Does the institution provide information about the employment of its graduates, as applicable? <strong>X YES</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Simpson University has a Career Services/Advising office. Employment of graduates is more pronounced for the Educational Credential and Nursing programs.</strong></td>
<td></td>
</tr>
</tbody>
</table>

*§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: Drew Calandrella
Date: 9/29/16
3 - STUDENT COMPLAINTS REVIEW FORM
Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s student complaints policies, procedures, and records.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints? **X YES**  
If so, is the policy or procedure easily accessible? **X YES**  
Is so, where? Found in the Catalog index, page 11 and at http://simpsonu.edu/Pages/About/Resources/Student/Student-Rights/Student-Complaint-Process.htm  
Grievance procedure on page 33-34 of catalog  
Comments:  
Process for complaints and Student Academic Grievance process easy to locate and prominently placed in catalog and on web site |
| Process(es)/ procedure | Does the institution have a procedure for addressing student complaints? **X YES**  
If so, please describe briefly: Students are encouraged to begin informally with the campus at the informal level and they are directed to the Ombudsman, Registrar for help with addressing their particular concern. Grievance procedures begin at the level of the faculty and moves to arbitration panel, hearing and appeal to the Cabinet.  
If so, does the institution adhere to this procedure? **X YES**  
Comments:  
Policy and procedure point to specific paths for resolution |
| Records | Does the institution maintain records of student complaints? **X YES**  
If so, where? Office of the Registrar and grievance records held in academic dept.  
Does the institution have an effective way of tracking and monitoring student complaints over time? **X YES**  
If so, please describe briefly:  
Comments:  
Hard copy files maintained in academic office with access limited to provost, department chair, involved faculty, student grievant and arbitration panel on a “need to know” basis |

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

Review Completed By: Drew Calandrella  
Date: 9/29/2016
4 – TRANSFER CREDIT POLICY REVIEW FORM
Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices accordingly.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer Credit Policy(s)</td>
<td>Does the institution have a policy or formal procedure for receiving transfer credit? X YES</td>
</tr>
<tr>
<td></td>
<td>If so, is the policy publically available? X YES</td>
</tr>
<tr>
<td></td>
<td>If so, where? Page 18 and 26 of catalog and at <a href="http://simpsonu.edu/Pages/Admissions/Transfers.htm">http://simpsonu.edu/Pages/Admissions/Transfers.htm</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? X YES</td>
</tr>
<tr>
<td>Comments:</td>
<td>See “Transfer of Credits” page 26/27</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.

Review Completed By: Drew Calandrella  
Date: 9/29/16

B. Off-Campus Locations

Simpson University has only one off-campus location in Columbia, Missouri. It is a location for the A.W. Tozer Seminary. Students are connected to the Redding campus via internet and video. Visiting team members made no visit. The Woodland campus offers Tozer students courses towards a certificate.

C. Distance Education
Simpson offers several degrees online through the ASPIRE and Graduate Programs, particularly the A.W. Tozer Seminary. Course materials, including review of Simpson’s Moodle as a delivery system, were reviewed as a part of the on-campus visit.

### Distance Education Review-Team Report Appendix

<table>
<thead>
<tr>
<th>Institution:</th>
<th>Simpson University</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Visit:</td>
<td>Accreditation Renewal Visit</td>
</tr>
<tr>
<td>Name of reviewer/s:</td>
<td>Charles Bullock</td>
</tr>
<tr>
<td>Date/s of review:</td>
<td>September 24-27, 2016</td>
</tr>
</tbody>
</table>

A completed copy of this form should be appended to the team report for all comprehensive visits to institutions that offer distance education programs 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)

The following programs were reviewed:

- Master of Arts in Ministry Leadership (2009)
- Master of Divinity (2007)
- Bachelor of Arts in Organizational Leadership (2011)
- Master of Arts in Organizational Leadership (2013)
- Bachelor of Arts in Psychology (2013)

The following courses were reviewed:

- NT 6211: New Testament
- OL 6010: Strategic planning & Positioning
- MNGT 4670: Management of Organizational Behavior
- PSYC 3070: Foundations in Psychology
- COMM 1260: Oral Communication

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)

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1 See Protocol for Review of Distance Education to determine whether programs are subject to this process. In general, only programs that are more than 50% online require review and reporting.
Simpson University offers five programs by distance education. Moodle and Google hangouts are the platforms used by the institution to deliver asynchronous and synchronous instruction. The following table reflects the requested data for 2015 and 2016.

<table>
<thead>
<tr>
<th>Programs</th>
<th>Level</th>
<th>Started</th>
<th>2015 Enrollments</th>
<th>2016 Enrollments</th>
<th>Percentage Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ministry Leadership</td>
<td>Graduate</td>
<td>2009</td>
<td>3</td>
<td>5</td>
<td>66%</td>
</tr>
<tr>
<td>Divinity</td>
<td>Graduate</td>
<td>2007</td>
<td>18</td>
<td>17</td>
<td>-6%</td>
</tr>
<tr>
<td>Organizational Leadership</td>
<td>Undergraduate</td>
<td>2011</td>
<td>72</td>
<td>62</td>
<td>-14%</td>
</tr>
<tr>
<td>Organizational Leadership</td>
<td>Graduate</td>
<td>2013</td>
<td>19</td>
<td>8</td>
<td>-53%</td>
</tr>
<tr>
<td>Psychology</td>
<td>Undergraduate</td>
<td>2013</td>
<td>98</td>
<td>78</td>
<td>-20%</td>
</tr>
</tbody>
</table>

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

The content of five online courses were reviewed, including syllabi, course lectures, audio and video recordings, and discussion board postings by faculty and students. Online students, faculty, staff and administrators were interviewed. For example, the following administrators and staff were interviewed: Dean of Adult and Graduate Professional Studies, Dean of Tozer Seminary, Director of Center for Excellence in Learning Technology, Assistant Dean of Adult Studies, and Online Learning Manager.

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>Simpson distance education programs provide increased access, particularly for adult and working students, to the university’s undergraduate and graduate programs. Distance education programs are planned and supported by the School of Adult and Graduate Professional Studies and the Center for Excellence in Teaching and Learning.</td>
<td>The School of Adult and Graduate Professional Studies should also address and assess the faith-based Institutional Learning Outcomes (ILOs): Christian Commitment, Cultural Engagement and Servant Leadership.</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>All distance education students take part in online orientation. They are also invited to attend events at the university and are included in student support services.</td>
<td></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</td>
<td>Moodle and Google hangout are used to facilitate learning and interaction between faculty and students. Technology is</td>
<td>The five distance education courses reviewed appear to satisfy the Federal</td>
</tr>
<tr>
<td>Question</td>
<td>Response</td>
<td></td>
</tr>
<tr>
<td>----------</td>
<td>----------</td>
<td></td>
</tr>
<tr>
<td>adequately supported? Are there back-ups?</td>
<td>supported by the Center for Excellence in Teaching and Learning. Beginning in 2016, the LMS is hosted off-site and is backed-up off-site.</td>
<td></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>Distance education students obtain academic advising, counseling and other types of support from a dedicated online program manager. Research databases and inter-library loans are available online through the library. Interview with online students indicates that these services are effective in meeting the needs of distance education students.</td>
<td></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>Adjunct faculty teach all of the distance education, including online, courses. Distance learning faculty are oriented and supported by the Center for Excellence in Teaching and Learning and the Online Program Manager. The faculty teaching distance education courses should be engaged in the development and revision of online courses and assessment of student learning.</td>
<td></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 in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</td>
<td>Distance education programs and courses are designed, approved and evaluated by the staff and administrators in the School of Adult and Graduate Professional Studies. Full-time faculty should be engaged in the development, evaluation and oversight of online programs and courses. The institution did not produce evidence of comparable quality of online programs offerings to on-ground offerings.</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>Based handwritten data produced during the visit, online students appear to graduate at a higher rate than on-ground students. Simpson regular tracks retention and graduation rates through its Academic Dashboard on an aggregated basis. The institution should track graduation and retention data on a disaggregated basis for both on-ground and distance education students.</td>
<td></td>
</tr>
</tbody>
</table>
### Student Learning

**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?

Simpson is in the initial stages of assessing student learning. Institutional learning outcomes and program learning outcomes are defined and mapped to learning activities and data on one ILO and PLO has been collected and analyzed.

Simpson should accelerate the program assessment process, particularly for online programs and courses through the collection and evaluation of disaggregated data by program and delivery mode. Program Review should also be conducted, particularly for programs offered on-ground and online to ensure comparability of learning results regardless of mode of delivery.

### Contracts with Vendors

**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?

Technology vendors include Moodle, which comport with the policy on Contracts with Unaccredited Organizations.

### Quality Assurance Processes

**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?

The institution’s quality assurance processes are in the early stages of development, and presently rely on training and development by the Center for Excellence in Teaching and Learning and oversight provided by the online program manager.

The institution should implement quality assurance processes covering distance education based upon best practices (e.g., Quality Matters).