July 7, 2014

Dr. Wanda Nitsch
President
University of St. Augustine for Health Sciences
700 Windy Point Drive
San Marcos, CA 92069

Dear President Nitsch:

At its meeting June 18-20, 2014, the WASC Senior College and University Commission (WSCUC) considered the report of the team that conducted a comprehensive Pathway B visit to the University of St. Augustine for Health Sciences (USAHS) with a visit held February 10-12, 2014. The Commission also had access to USAHS’s report and exhibits submitted prior to the visit and the institution’s response to the report submitted on April 28, 2014. The Commission appreciated the opportunity to engage with you and CEO Wallace Pond. Your comments were helpful in informing the Commission’s deliberations.

In keeping with WSCUC policy, USAHS completed a comprehensive institutional report that addressed in detail all four Standards of Accreditation and the related Criteria for Review (CFR) as found in the 2008 Handbook of Accreditation. The report was, in the words of the team, “well written, informative, content rich, and navigable as needed to answer their questions.”

The University was granted WSCUC eligibility in 2012 under provisions of Pathway B, which enables an institution already accredited by a United States Department of Education- recognized accrediting agency to be granted WSCUC accreditation with one visit. USAHS is accredited by the Distance Education and Training Council (DETC) and also holds accreditation from several programmatic accreditation agencies. In order to be eligible for WSCUC accreditation, the corporate headquarters moved from St. Augustine, Florida, to the university’s spacious campus in San Marcos, California. The Eligibility Review Committee panel identified four areas for attention prior to the visit: the new governance process needed if Laureate purchased the University; plans to hire non-USAHS-educated faculty with doctorates; integration of Laureate learning resources; and ongoing development of the university’s assessment structure. The visit team found that all areas had been addressed.

In the time between the granting of Eligibility and the February 2014 site visit, the Paris family, who founded the University, sold 80% of its ownership of this for-profit institution to Laureate Education, Inc. (Laureate). The ownership transfer took place only a few weeks prior to the visit. The Commission appreciates the evidence found by the team of a very smooth and seamless transfer.
The Commission commends USAHS for the following:

**Shared Mission.** The Commission commends USAHS for the sense of mission shared throughout the university, as confirmed by the team in visits to the institution’s three campuses in St. Augustine, Austin, and San Marcos. The team noted that this shared mission was “palpable, with faculty and students seeing professionalism, collegiality, and student-centeredness as core to the learning processes and campus culture.” Because USAHS is viewed as one of the leading schools in the nation in its academic offerings, recruitment has not been necessary thus far. With more growth being part of the strategic plan, however, the University is making greater efforts to spread the message of its value to an even wider audience and increasing its attempt to diversify its student population.

**Educational Effectiveness.** Programmatic accreditation, which USAHS holds in several areas, stresses educational effectiveness through the setting of clear and appropriate learning outcomes and their assessment. The team found that “expectations for student learning are evident, faculty are responsible for the attainment of expectations for student learning, and feedback is provided to the students in a timely manner.” Graduates usually have multiple job offers waiting for them upon graduation, with many growing out of the abundant internship opportunities available to them. The President is a graduate of WSCUC’s Assessment Leadership Academy (ALA) and her leadership is evident in all areas of educational effectiveness, including the setting of learning outcomes, their assessment, improvements made as a result of assessment, and an initial completion of two program reviews. A term frequently heard by the team was that the University has a “secret sauce” that has made it effective and that Laureate is committed to continue. The Commission commends USAHS for the outstanding results found by the team in educational effectiveness.

**Outstanding Facilities.** USAHS conveys its commitment to professionalism through state-of-the-art facilities at all three campuses, including modern classrooms and laboratories equipped with the latest technology. Most of the campuses also include fitness centers for the students; in the case of Florida, this is open to the public and adjacent to an occupational and physical therapy clinic where faculty can practice and students can engage in clinical work.

The Commission endorses the five major recommendations of the team, which primarily encourage further progress and maturation in such areas as increasing diversity, broadening the assessment of retention, systematically assessing learning and institutional effectiveness through all stages of the assessment cycle, the preserving institutional mission and values in the face of anticipated significant growth, and developing consistent and equitable peer evaluation processes for faculty. These areas were found by the team to be well developed with further maturation expected as the University continues its long-standing commitment to being a learning community. The Commission commends the University for the plans presented in its letter to the Commission outlining a response and action plan for each recommendation. The University is already well on its way to meeting each of the team’s recommendations.

The Commission supports the team’s concern about one major area that will require an Interim Report.

**Transition to Ownership by Laureate.** By every factor the team reviewed, the transition from primary ownership by the Paris family of USAHS to Laureate has gone exceedingly well. A key ingredient for this
success has been the transparency of the President and Laureate with all campus constituencies, including students and faculty. The enthusiasm for having a company with expertise in numerous areas beyond what a single University can afford and for how the transfer has taken place was widely shared.

Because the transfer took place in November 2013, with the site visit taking place in early February 2014, the new relationship’s promise was as yet largely untested and needs time to mature. The Commission therefore requests an Interim Report to WSCUC focused on ongoing progress in the following areas:

a. **Board of Trustees.** The current Board, which has only been in existence a few months, contains thirteen members. A majority are independent; four members are from Laureate and two are from the Paris family, which continues to hold 20% ownership in the University. As is the practice when Laureate purchases institutions, a senior administrator from Laureate chairs the Board to allow for Board development. The Commission understands that Laureate intends this to be a short- term appointment, of approximately two years, at which time an independent Board Chair will be appointed. The Commission expects the institution to make progress toward this goal. Another issue is the nineteen areas for which unanimous support from the four Laureate Board members is required for approval. These include such major areas as approval of the annual operating budget and the hiring and firing of the CEO. The Commission expects assurances that these reserved powers and the way the Board functions are in alignment with the WSCUC “Policy on Independent Governing Boards” and that the Board can demonstrate that it makes independent decisions on behalf of the institution while recognizing the ownership rights and responsibilities of Laureate. (CFR 3.9)

b. **Faculty Governance.** The team found that faculty are “fully involved in the development and oversight of the curriculum at the university.” However, clearer policies on faculty governance are needed. As the team found, “Faculty governance at USAHS is in an emerging state, as no self-elected faculty committees exist.” Although the Board Chair indicated an interest in starting a Faculty Council, this important element of a normal faculty governance model had not yet been implemented. The Commission will be interested to learn about further developments in a well-defined faculty governance model. (CFR 3.10)

c. **Management.** The team found that “internal decision making processes are clearly defined in organizational charts, committee charters, and job descriptions. The University is managed by an Executive Committee and a Management Committee with well-defined roles. The team was concerned that the President also serves as the Chief Academic Officer; however, since Laureate has assumed ownership, a CEO has been appointed as the top administrator while the President maintains her title and serves as Chief Academic Officer. The roles and relationships between these positions will need to be clearly defined over the next few months with an update provided in the Interim Report. (CFR 3.7)

Given the above, the Commission acted to:

1. Receive the Pathway B team report.
2. Grant initial accreditation for five years to the University of St. Augustine for Health Sciences.

3. Schedule the next comprehensive review with the off-site review in fall 2018 and the accreditation visit in spring 2019.

4. Request an Interim Report in spring 2016 focused on the transition to Laureate ownership, including an update on governance issues focused on faculty governance, management structures, and Board of Trustee development.


In taking this action to grant initial accreditation, the Commission confirms that the University of St. Augustine has satisfactorily addressed the Core Commitments to Institutional Capacity and Educational Effectiveness and demonstrated substantial compliance with the four Standards and associated Criteria for Review as adopted by the Commission and expressed in the 2008 Handbook of Accreditation. Between the action taken by the Commission granting initial accreditation and the time of the next review, the institution is expected to continue its progress.

Accreditation status is not granted retroactively. Institutions granted the status of accreditation must use the following statement if they wish to describe the status publicly:

_The University of St. Augustine for Health Sciences is accredited by the WASC Senior College and University Commission, 985 Atlantic Avenue, #100, Alameda, CA 94501, (510) 748-9001._

The phrase “fully accredited” is to be avoided, since no partial accreditation is possible. The accredited status of a program should not be misrepresented. The accreditation granted by WSCUC refers to the quality of the institution as a whole. Because institutional accreditation does not imply specific accreditation of any particular program at the institution, statements like “this program is accredited” or “this degree is accredited” are incorrect and misleading.

The Commission stipulates that this action encompasses the degrees offered and explicitly planned by USAHS at the time of this action as listed in the attachment to this letter. In keeping with the WSCUC Policy on Degree Level Approval, USAHS is designated as having an “I” (Individual) status for each of the degree levels currently being offered. This means that all new degree programs initiated by the institution will require prior approval through WSCUC’s Substantive Change process. Degree programs that have been reviewed and included under this action may be extended to other campuses without prior Substantive Change action.

In keeping with WSCUC policy adopted in November 2011, this letter and the underlying team report will also be posted on the WSCUC website shortly after you receive this letter. If you wish to post a response to the letter and/or team report on your own website, WSCUC will also post a link to that response on its website. Any link that you wish to provide should be forwarded to the attention of Richard Osborn so that it may be included on the WSCUC website. As noted in the Commission policy, team reports and action letters are foundational for institutional accountability and improvement. Institutions are expected to disseminate these documents throughout the institution for the purposes of
promoting ongoing engagement and improvement and encouraging internal communications about specific issues identified in team reports and action letters.

As USAHS prepares for the next review, it should be mindful of the expectations that it will need to meet at the time of its next comprehensive review, which will take place under the revised Standards of Accreditation and institutional review process in the 2013 Handbook of Accreditation. These expectations build on past practice and will include, for example, student success, quality improvement processes such as assessment and program review, planning, and financial sustainability. However, the 2013 Handbook also includes new foci: the meaning, quality, and integrity of degrees; student performance in core competencies at the time of graduation; and more visionary institutional planning for the “new ecology” of learning. The University will be well served to familiarize itself with the 2013 Handbook and to approach its challenges in ways that will address both old and new expectations. In addition, a Mid-Cycle Review will be required scheduled for spring 2017.

Finally, the Commission wishes to express its appreciation for the extensive work that the University undertook in preparing for and supporting this accreditation review. WSCUC is committed to an accreditation process that adds value to institutions while assuring public accountability, and we are grateful for your continued support of our process. Please contact me if you have any questions about this letter of the action of the Commission.

Sincerely,

Mary Ellen Petrisko
President

MEP/do

cc: Harold Hewitt, Jr., Commission Chair
Dr. Wallace Pond, CEO
Paula R. Singer, Chair, Board of Directors
Richard Osborn, WSCUC Staff Liaison
List of Approved Degrees – University of St. Augustine for Health Sciences
June 2014

First Professional Degree Programs:

Masters of Occupational Therapy (MOT)
Masters of Orthopaedic Assistant (MOA)
Doctor of Physical Therapy (DPT)

Post Professional Degree Programs:

Master of Health Science in Athletic Training (MHScAT)
Transitional Occupational Doctorate (tOTD)
Transitional Doctor of Physical Therapy (tDPT)
Doctor of Education (EdD)
Doctor of Health Science (DHSc)