REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To American Conservatory Theater
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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.
# TABLE OF CONTENTS

**SECTION I – OVERVIEW AND CONTEXT** .................................................................3

A. Description of the Institution and its Accreditation History, as Relevant .................. 3  
B. Description of Team’s Review Process ........................................................................ 4  
C. Institution’s Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence .................................................................................. 5

**SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS** ......................................... 8

A. Component 1: Response to previous Commission actions ........................................ 8  
B. Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators ......................................................... 9  
C. Component 3: Degree Programs: Meaning, quality and integrity of degrees ............. 18  
D. Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation .................................................................................. 19  
E. Component 5: Student Success: Student learning, retention, and graduation ............ 21  
F. Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence ............................................................................................................ 23  
G. Component 7: Sustainability: Financial viability, preparing for the changing higher education environment .............................................................................................................. 26  
H. Component 8: Optional essay on institution-specific themes (not included in the Institutional Report) 
I. Component 9: Reflection and plans for improvement ................................................. 28

**SECTION III – OTHER TOPICS, AS APPROPRIATE (such as Substantive Change) – not included**

**SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS FROM THE TEAM REVIEW ...29**

**APPENDICES** .................................................................................................................32

A. Federal Compliance Forms 
   1. Credit Hour and Program Length Review 
   2. Marketing and Recruitment Review 
   3. Student Complaints Review 
   4. Transfer Credit Review
SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Accreditation History

The American Conservatory Theater (A.C.T.), founded in 1965 by William Ball, is the largest theater company in the Bay Area, employing more than 800 people each season. A.C.T. has operated a professional actor training conservatory since its inception, and now offers a Master of Fine Arts (MFA) Program in Acting – the institution’s sole degree-granting academic program. A.C.T. qualified as a candidate for accreditation with the Western Association of Schools and Colleges (WSCUC) in 1978, was granted initial accreditation in 1984, and has maintained it continuously since that time.

A.C.T. produces a mainstage season of professional plays under a League of Regional Theaters (LORT) contract with Actors Equity Association, the professional stage actors’ union. It also produces an annual season of MFA productions featuring its students. It operates four stages in downtown San Francisco: The Geary, a 1,025-seat facility that houses most of its mainstage plays; the Strand, which features a 283-seat theater and a 140-seat black box space, used primarily for MFA and Young Conservatory productions; and the 49-seat Costume Shop Theater, used for various student productions. In addition to its MFA Program, A.C.T.’s Conservatory operates four non-degree programs: the Young Conservatory, for students ages 8-19; the San Francisco Semester, for traditional undergraduate students; the Summer Training Congress, for new professional actors; and Studio A.C.T., for working adults. A.C.T.’s Education Department offers a Theater in Schools program that serves students in the Bay Area, operated with help from the MFA students.

A.C.T.’s main teaching, study, and rehearsal spaces are located at 30 Grant Avenue in downtown San Francisco, where the institution occupies three floors of the building. The MFA Program operates from this location, plus the three theaters described above. A.C.T. does not offer any distance education programs or operate any offsite locations as defined by WSCUC.
A.C.T.’s MFA Program is a three-year course of study that prepares actors for careers on the professional stage. Currently 37 students are enrolled in the program, which admits approximately 12 students per year. The conservatory director oversees all aspects of the program, working closely with five full-time core faculty, plus several dozen adjunct faculty and guest artists, a number of whom are also employed by A.C.T. in other capacities. All students take the same rigorous curriculum, with only a few elective course options. The program’s retention and graduation rates are very high, and nearly all students complete the program successfully within the prescribed three years.

The institution was last reaccredited by WSCUC in 2010. At that time, three issues were identified for follow-up: continued development of a culture of assessment; development of formal program review processes; continued focus on financial viability. These issues were addressed in an Interim Report submitted in Fall 2013. Continued concerns about A.C.T.’s financial viability were referred to the WSCUC Financial Review Committee at that time, a committee that has since been disbanded. A.C.T. conducted a program review of its MFA in 2015. In March 2017, A.C.T. submitted an Institutional Report that served as the basis of an Offsite Review in May 2017; its site visit took place on December 3-6, 2017.

B. Description of Team’s Review Process

The team conducted its Offsite Review in May 2017. After the team members read the Institutional Report and supporting documents submitted by the institution, they held a conference call to discuss their initial impressions of the materials and organize the Offsite Review itself, which was held May 1-2, 2017. The team reviewed all materials carefully and identified five major lines of inquiry: faculty, assessment and program review, leadership and administrative structure, students, strategic planning and financial viability. These lines of inquiry were shared with the A.C.T. leadership, together with a list of requests for additional written information – primarily audited financial statements and examples of assessment data – and a list of interview requests.
The site visit was conducted December 3-6, 2017. The institution scheduled meetings and appointments with all the faculty, staff, students, and administrators requested by the visit team. Team members interviewed the theater’s leadership, including the artistic director, the executive director, other administrative staff, and members of its board. The conservatory director, all five core faculty, several adjunct faculty, and a number of academic support staff were also interviewed. Team members met with current students, MFA Program alumni, and members of the MFA Board (which overlaps with the institution’s board); they also toured all of A.C.T.’s facilities, observed a rehearsal, and attended part of a mainstage performance that featured current MFA students. The team also reviewed several emails submitted to the confidential email account set up for the site visit. At the end of each day of the visit, team members discussed their observations, compared notes, analyzed their findings for the day, and formulated questions for the next day. The team considered all of the inputs described above in formulating its commendations and recommendations for the institution.

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

A.C.T. submitted an Institutional Report that was clearly written and comprehensive in scope. The institution formed a steering committee consisting of key administrators; it also formed ten committees which were each assigned several Criteria for Review (CFRs) under one of WSCUC’s four Standards. These committees included faculty and staff from across the institution, as well as Board members; in all, more than 40 individuals served on one or more of the committees. Each committee submitted a report covering its assigned CFRs; these reports, together with essays written by key administrators, were edited together into the final report under the supervision of A.C.T.’s accreditation liaison officer.

The institution chose to organize its written report around the four WSCUC Standards and attendant CFRs; nearly 60 of the report’s 90 pages consisted of a detailed self-review under the
standards (Component 2 of the report) that addressed each CFR in turn. Components 3-7 were thus fairly brief, as they summarized and drew conclusions from the detailed information presented in Component 2. The introduction (Component 1) provided a very thorough and helpful overview of the MFA Program and its relationship to the whole institution; the summary (Component 9) was fairly brief, but it drew together the major themes explored in the body of the report. The institution chose not to include an optional essay on a special topic (Component 8). The structure of this visit team’s report reflects, in part, A.C.T.’s decision to structure its Institutional Report as it did, with a greater emphasis on review under the Standards and shorter summary sections for the remaining components.

The visit team finds that A.C.T.’s Institutional Report was overall an accurate, honest, and thoughtful portrayal of the institution, including some of the challenges it faces. For example, A.C.T. has been very straightforward in discussing the significant amount of staff turnover that has occurred and is scheduled to occur, particularly in upper and middle management positions. Positions that were open at the time of the Institutional Report or that have turned over since the report was submitted include: executive director, chief financial officer, director of human resources, director of the Young Conservatory (who was also an associate artist), and marketing director. In addition, A.C.T.’s artistic director, its current executive director, and two more core faculty have indicated that they will depart sometime in 2018. The institution has demonstrated that it has a clear plan in place for filling key vacancies; for example, final interviews for a new artistic director occurred during the team’s visit.

The Institutional Report also highlighted several relatively recent developments that are having a large impact on the MFA Program: the opening of the Strand Theater, which provides two important performance venues for student actors; the expansion of the Citizen Artist program, which increases student involvement with local communities in arts education and engagement programs; and the formation of an Equity, Diversity, and Inclusion Council, partly in response to student concerns.
expressed regarding these issues. Again, the institution was very forthcoming about these developments and the ways in which they are improving the student experience at A.C.T.

One key area in which the visit team would have liked to see more documentation and evidence is in A.C.T.’s approach to assessment. The A.C.T. Readiness Rubric developed by the institution since the last visit serves as a holistic rubric for assessment of student learning outcomes at the end of each term and at the time of graduation. Each student participates in a faculty-led individual oral critique session at the end of each term, and a written assessment is also provided. However, it was not always entirely clear to the team exactly how individual faculty members’ written comments connected to the Readiness Rubric, or how those comments were compiled and analyzed by the faculty to assess overall student achievement of program learning outcomes by program class or year. After the offsite review, the team requested more detailed documentation of A.C.T.’s assessment processes; A.C.T. responded promptly by furnishing copies of individual faculty evaluations of students by course and by year. While this information was very helpful, it did not demonstrate fully how A.C.T.’s faculty are “closing the loop” by using compiled assessment data to identify areas for improvement in curriculum and pedagogy. In addition, though the A.C.T. Readiness Rubric is cited as the primary means of assessing student learning outcomes holistically, the institution has developed a separate rubric for its Citizen Artist program that includes elements not found in the Readiness Rubric. Both rubrics are well-designed, but it is unclear how each is used, or how the two relate to one another. It is the team’s opinion that the information provided was not sufficient to demonstrate a truly rigorous approach to assessment, and that A.C.T.’s assessment system can be developed more fully while still preserving the unique and interactive nature of actor training associated with a high-quality MFA program.

Apart from the area of assessment, the team finds that the questions addressed in the Institutional Report, the evidence and documentation provided, and the rigor of the report are appropriate to the nature and purpose of the institution.
SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

WSCUC’s March 3, 2010 Commission action letter to A.C.T. requested that the institution submit an interim report in 2013 to address three areas: 1) continued development of a culture of assessment, 2) development of formal review process, and 3) continued focus on financial viability. A.C.T.’s Interim Report, submitted November 1, 2013, presented information regarding progress to date in each of these three areas. The Commission’s response letter of December 18, 2013 commended A.C.T. for progress made in assessment, particularly in the development of rubrics, while noting that “the goal of rubrics is to provide a tool for assessment which may or may not be useful with certain approaches to learning. What is most important is that A.C.T. has a formal practice of demonstrating educational effectiveness for its academic program that is meaningful and useful to its faculty” (p. 2). The Commission noted that A.C.T. had not yet organized a program review for its MFA, but had scheduled one for 2015. This program review, which included both external and internal reviewers, was completed in June 2015 as scheduled, and the report was provided to the visit team as part of the 2017 Institutional Report. The program review was organized as a two day “mini-accreditation visit,” and the team’s report covered all major aspects of the MFA Program’s operation. Its findings were very positive, and the team made only two main recommendations for improvement:

we would encourage the leadership to follow through on a more coordinated philosophical and aesthetic approach across the constituent departments of A.C.T.—artistic programming, the Conservatory and educational outreach—with an airing of problems faced in more open group discussion, for greater transparency.... We would also say, from our observations, that more involvement from the MFA students in content creation and programming ideas for community outreach might yield some very positive results” (p. 20).
The Commission’s 2013 response letter indicates that the panel voted to “refer the continued concerns about financial viability to WASC’s Financial Review Committee which will review A.C.T.’s finances within the next two or three years” (p. 3). The visit team notes that A.C.T. has opened the Strand Theater successfully since that time, and that the FY2016 audited financial statement provided by A.C.T. shows a net operating deficit for that year. A.C.T.’s recently hired CFO has indicated that the FY2016 operating deficit and a similar deficit expected when the FY2017 audited financial statement is released are due primarily to the additional depreciation cost of placing a new multi-million-dollar asset (The Strand Theater) into service. The team did not conduct a comprehensive financial review, but based on its interview of the new CFO, it appears that A.C.T. is on track to move in the direction of greater financial stability.

Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators

A. Review under WSCUC Standards

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

Institutional Purposes (CFRs 1.1-1-2)

A.C.T. has developed and published a statement of purpose for its MFA Program on its website, in its program handbooks, and in other printed materials. Additional statements in these documents define the program’s values and character. The MFA Program’s overall educational objectives are articulated in the A.C.T. Readiness Rubric, which also serves as the basis of faculty assessment of individual student achievement of learning outcomes. Students receive oral and written assessments directly from the faculty at the end of each semester, at the end of each year, and upon completion of the program. Retention and graduation rates are published on the A.C.T. website; the completion rate averages roughly 90% over the past five years. Evidence of student learning is generally made public in
the form of regular student participation in public performances. Third-year students perform in one or more mainstage productions at the Geary Theater; students in all three program years also perform publicly in MFA productions at the Strand Theater and at the A.C.T. campus. A.C.T. does not publish written data regarding aggregated student achievement of learning outcomes. (CFRs 1.1, 1.2)

Integrity and Transparency (CFRs 1.3-1.8)

The A.C.T. Faculty Handbook and Student Handbook include a clear and appropriate policy regarding faculty academic freedom, and the team received no faculty complaints regarding limitations on academic freedom. The handbooks also include a policy establishing an Equity, Diversity, and Inclusion Council, and students interviewed by the team described the work of the Council as important and effective. (CFRs 1.3, 1.4)

The MFA Program is affiliated with and operated by the American Conservatory Theater, which provides financial and administrative support for it, as well as for several other non-degree educational programs. The MFA Program has its own conservatory director, who reports to the artistic director, as well as its own board of directors, which shares some members with A.C.T.’s board. The team finds that A.C.T.’s oversight of the MFA Program is consistent with the educational mission and purposes of the program. (CFR 1.5)

The team also finds that A.C.T. represents itself truthfully to its students and to the larger public in terms of academic goals, programs, services, and costs, which are available on the institution’s website. The MFA Program’s curriculum is self-contained and carefully integrated, and students complete the program on time at a rate of 90% or more. A.C.T.’s website and Student Handbook include detailed grading, student conduct and financial aid policies, as well as a general grievance policy for students. The team was informed that no formal written student complaints have been filed during the past six years. The Faculty Handbook includes policies regarding Title IX, hazing, harassment, workplace bullying, sexual assault, and sexual misconduct. The Handbook’s open door policy describes a procedure
for handling faculty and staff general grievances, though the policy’s title does not reflect this. The team recommends that the policy be renamed for the sake of clarity, and that faculty and staff be informed of their right to appeal to the Bureau of Private Postsecondary Education (BPPE), in the same way that the student general grievance policy communicates this information. (CFR 1.6, 1.7)

The A.C.T. Faculty Handbook delineates appropriate policies and procedures. As previously mentioned, A.C.T. has recently experienced a high degree of staff turnover; the new staff are working hard to improve policies and procedures, and to fix problems and resolve delays they inherited. For example, the new CFO (who has been at A.C.T. for five months) reports that due to the disorganized financial information he inherited, the FY2017 external audit will not be completed until early January 2018. The institution seems to be making rapid progress in these areas. A.C.T. has communicated with WSCUC and with the visit team in a very straightforward and transparent manner, responding to all requests for materials promptly and as completely as possible. (CFR 1.7, 1.8)

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

Standard 2: Achieving Educational Objectives Through Core Functions

Teaching and Learning (CFRs 2.1-2.7)

A.C.T. has a well-constructed curriculum and demonstrates commitment to student success and learning through its individualized attention to student progress and performance and exceptional retention and graduation rates. The A.C.T. Readiness Rubric plays a central role in the ongoing assessment of student achievement (2.5). The Readiness Rubric should now be reflected much more consistently in student learning outcomes (SLOs), and SLOs need to be more consistently present in all syllabi (2.3-2.4).
Scholarship and Creative Activity (CFRs 2.8-2.9)

Creative activity is central to the mission and curriculum of the institution and is fostered by the unique interconnectedness of the conservatory and the theater company. The scheduling pressures necessitated by this arrangement, however, can limit opportunities for faculty involvement with scholarship and creative activities outside the institution. Care should be given to addressing issues of faculty burnout and valuing creative work done by faculty outside the institution which can, in turn, enrich the perspective they can bring to their students in the MFA Program.

Student Learning and Success (CFRs 2.10-2.14)

The small size of each student cohort makes it possible for the faculty to support the needs of the students effectively, while simultaneously posing challenges in tracking statistically significant aggregated data on student achievement. The excellent retention and graduation rates reflect success in demonstrating timely progress. The team applauds the plan to implement a campus climate survey and encourages making this a regular practice (2.10). The visiting team recognizes the development of the Citizen Artist program as evidence of strong alignment between co-curricular programs and academic goals (2.11).

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

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

Faculty and Staff (CFRs 3.1-3.3)

To echo the peer review provided in the MFA Program Review of 2015, A.C.T. is a “first-class” operation, but like all institutions, it faces a multitude of complex and difficult tasks. The March 2017 Institutional Report is commendably open, if not always detailed, about some of the challenges faced in
the areas of faculty growth and development and peer review. With new human resources staff and a new *MFA Program Faculty Handbook*, A.C.T. seems headed in the right direction in terms of hiring diverse and qualified faculty and in terms of fair and consistent review of existing faculty—an area that has clearly been a locus of discontent, as evidenced most succinctly on p. 58 of the 2017 Institutional Report. The Report notes a special meeting with HR centered around program governance, and it makes a clear recommendation for a “detailed and consistent process of evaluation that applies to all MFA Program faculty” that “includes the record of such evaluations.” To that effect, alongside its glowing recommendations, the 2015 program review “encourage[s] a more coordinated philosophical and aesthetic approach … with an airing of problems faced in more open group discussions, for greater transparency” (p. 20).

While A.C.T. provided strong evidence of commitment to students’ well-being and a desire to learn about student concerns and growth (e.g., the Climate Surveys, student evaluations, Readiness Rubric), we did not find evidence of similar inquisitiveness related to faculty and staff. It is also worth noting (even though it is no longer pertinent given the pending changes in leadership) that the 2016 draft of a strategic plan does not address the staff and faculty satisfaction issues raised in the 2015 program review.

Developing structures to assess and then address governance, workload and employee evaluation is paramount. While not organizationally the same, increased turnover and stress due to the opening of the Strand Theater (p. 60) may also be a reflection of some serious but fixable systemic problems. In short, there may be deeper structural issues that further echo the need for a coordinated and comprehensive approach to faculty and staff development across the institution.

**Fiscal, Physical, and Information Resources (CFRs 3.4, 3.5)**

In fiscal years 2015 and 2016, the A.C.T. financial audits are independent and unqualified. These audits are not just for the academic program offered by A.C.T., but for the entire organization. Deficits
posted for these past two fiscal years reflect depreciation for the new Strand Theater facilities. Though subscriber revenue is shrinking (a trend sector-wide), single ticket revenue is growing. A.C.T.’s two most recent capital campaigns (to increase endowment for student scholarships and to develop the Strand Theater and Costume Shop Theater) established a track record of fundraising success. The creation of an M.F.A. board of trustees helped to diversify revenue by expanding the program’s base of individual supporters. The MFA Program relies on the fiscal stability of the theater as a whole, as the degree program operates at a deficit that must be subsidized by the greater A.C.T. budget. Long-term financial viability is still aspirational as significant financial, facility, and operational challenges remain:

- the teaching campus operates in leased space with projected future rent increases;
- MFA students are struggling with debt and a very expensive local housing market;
- the MFA Program continues to operate at a deficit;
- Staff are spread thin, and many have been in place less than a year;
- the Strand Theater has not yet proven to attract a reliable new audience base that will subsidize the increased cost of operating this second stage, while funds to underwrite more ambitious programming in this new space are as yet unidentified.

To meet these challenges A.C.T. needs to realize multi-year goals, objectives and strategies tied to a specific timeline and with clear assignment of responsibilities. No strategic or business plan is yet created to operationalize A.C.T.’s ten-year vision plan.

A.C.T. achieved its goal of acquiring and building out the Strand Theater and the Costume Shop Theater as a public performance space for the MFA Program. These new facilities provide much needed, high-quality performance, rehearsal, and instructional space for students. However, A.C.T. does not own its training campus and leadership is well-aware of the financial challenges that result from operating in leased space. The board and executive leadership have been assessing options for an appropriate facility for the A.C.T. campus which would house MFA training facilities and administrative
space for the organization as a whole. Leadership understands that a new capital campaign will be required to fund acquisition and any needed renovations once a space is selected.

Information and technology resources are adequate but not robust and can hinder rather than facilitate communication and learning. Classes taught online by faculty off-site can be compromised by unreliable wifi at the 30 Grant learning spaces. Lack of student email accounts issued by the institution makes communications challenging, as students are using their personal email accounts.

Organizational Structures and Decision-Making Processes (CFRs 3.6-3.10)

All of this points to an ongoing weakness in the area of organizational structure (at the M.F.A level) of shared governance and faculty input. It is interesting that in addressing organizational structure and decision-making processes (2017 Institutional Report, p. 64), decision-making by and for the MFA Program is not provided in detail. The “Committees Appendix” seems already organized around some possible institutional organizations that might begin to address these concerns, but the team did not see significant evidence of a more formal governance effort outside of reaccreditation.

The 2017 Institutional Report should be commended again for its openness in this area. We reiterate the importance of allowing for greater engagement of faculty and staff as stakeholders in the development of systems and performance review criteria and in outlining a philosophy of growth in teaching and artistic achievement. In short, this means greater input into A.C.T.’s decision-making and policy-development processes. Lack of incentives and pathways to faculty development such as time away for growth (in the spirit of sabbaticals), accounting for time and effort—all of these are important structures for a healthy teaching organization. If allowed to continue, the apparent frustration may someday lead to issues of commitment and quality and therefore require attention and support.

The teaching and learning outcomes for students seem to have been developed over time and by a large set of stakeholders. Yet there seems to be a disconnect in closing the loop in the performance evaluation of teaching. The Institutional Report highlights a potentially problematic area in faculty
review. Clear guidelines are lacking for the conservatory director when conducting a formal meeting with students at the end of the year (p. 57), and the lack of formal written feedback to MFA core and adjunct faculty call again for a more systematic approach to evaluation. Though small institutions can often achieve much in personalized small-group and one-on-one conversations, employees both need and deserve written feedback to help them and the institution meet its standards and continue to grow.

A.C.T. has demonstrated a strong commitment to academic excellence in developing core faculty, and it seems the next step might be to address some of the above issues by further developing the *MFA Faculty Handbook* to include policies around the concerns raised in the Institutional Report. As always, buy-in from administrative, core faculty and adjunct faculty will be a challenging conversation, but can lead to a more positive experience for students through stable governance structures.

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

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

The overall structure of A.C.T. is complex and involves professional theatrical productions as well as several educational programs that demonstrate a deep commitment to the surrounding community. The Education Program includes the Young Conservatory, the San Francisco Semester, the Summer Training Program, and the Fellows. Thus, the MFA is one of many semi-autonomous educational initiatives supported by the overall organization.

However, the offsite review and subsequent site visit indicate that the institution needs to continue to develop quality assurance processes as described under Standard 4, and that it needs to develop a culture that encourages all stakeholders, including faculty, to participate fully in the regular assessment of institutional effectiveness.
Quality Assurance Processes (CFRs 4.1-4.2)

While the visit team is fully cognizant of the fact that the MFA Program is quite small and would not lend itself easily to complex data collection and analysis, it also notes that there is no demonstrated institutional research capacity and no evidence that processes are in place to collect or analyze data.

Institutional Learning and Improvement (CFRs 4.3-4.7)

The visit team found that institutional learning and improvement for the MFA Program are based primarily on an “oral culture” which, while pervasive and sincere, nonetheless fails to systematically and strategically address issues raised by its constituencies. A.C.T. faculty and academic leadership readily demonstrate their commitment to the educational and artistic growth of their students, made possible by the small cohorts admitted yearly. Students are evaluated and assessed regularly, sometimes daily, in their classes and through the myriad of workshops, showcases, and performances in student and professional productions. Curricular and pedagogical improvements appear as the outcome of informal discussions and observations made by faculty and academic leadership (4.3, 4.4). Further discussion of these issues appears under Component 6 of this report.

The mission of the MFA Program within the wider context of A.C.T. appears well understood by all constituencies but it is also evident that Core Faculty and Adjunct Faculty, although critical actors in the delivery of the program, are not systematically involved in regular assessment of institutional effectiveness. Reflection and planning take place at the academic leadership level without the full involvement of the faculty, although this faculty is committed, engaged, and eager to express its points of view (4.5, 4.6).

A.C.T.’s MFA Program is traditional in its approach, but the conversation of faculty and academic leadership demonstrates their awareness of an evolving environment. This conversation includes the changing nature of audiences and the continuing desire to serve an increasingly diverse community. The A.C.T community would likely benefit from a wide-ranging discussion of new opportunities for
actors in a changing society that features technologically driven fields and a rich entertainment culture (4.7).

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

B. Compliance with Federal Requirements

The team finds that A.C.T. is in compliance with all Federal requirements as stipulated. Please see Appendices 1-4 for completed Federal compliance forms, digitally signed by team members.

C. Inventory of Educational Effectiveness Indicators

A.C.T. has completed the IEEI for the institution’s sole academic program. The A.C.T. Readiness Rubric is the primary means of describing and assessing student learning outcomes. Evidence for achievement of learning outcomes is identified, and a system for assessing evidence and generating findings on an individual student basis is described. These findings are used to enhance individual student learning and to help determine casting for the program’s productions. It is unclear from the IEEI whether assessment findings are used to make improvements to curriculum or pedagogy.

Component 3: Degree Programs: Meaning, quality and integrity of the degrees

The focused nature of A.C.T.’s MFA Program means that the institution has a very clear sense of the meaning of its degree. The curriculum, actor training, and professional productions are all clearly aligned with the mission. Quality is defined in part by the A.C.T. Readiness Rubric, as discussed in Component 4, below. The integrity of elements within the MFA Program curriculum is strong, and links to the co-curriculum have been strengthened by the formal inclusion of the Citizen Artist program in the curriculum. The greatest challenge to program integrity lies in maintaining the appropriate relationship of the academic program to the mission and resources of the overall institution. While the team found evidence of a strong commitment to the academic program at the time of the visit, these will be
important topics of ongoing conversation during the transition in leadership that will be taking place during the next year.

**Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation**

The close, individualized attention students receive at A.C.T. forms the basis of a powerful educational model. Indeed, the team saw first-hand the intensive and iterative formative assessment methods employed in the MFA and the institution’s deep commitment to student outcomes in acting.

The team found that A.C.T. has worked diligently and fully engaged stakeholders (CFR 4.5) in developing a good assessment tool in the form of the Readiness Rubric. Core faculty, administrators and adjunct faculty were knowledgeable about the Readiness Rubric and noted its usefulness in helping diagnose and intervene when students showed deficiencies in acting skills or professionalism. In the team’s meetings with faculty and adjuncts as well as administrators, the rubric was characterized as “useful” and “relevant” to the curricular goals at A.C.T.

The evidence provided of aggregated data and program review was, however, wholly insufficient. That is, the institution is struggling to collect, analyze, and interpret data over time (CFR 4.1) and has not pursued a committed effort to consider what “institutional research” might mean at A.C.T. (CFR 4.2). This was true in the realms of both student and faculty evaluation data. This means that A.C.T. is hampered when it comes to program review. The team, in spite of seeing the strong teaching and learning practices, did not find evidence of the use of comparative data, aggregated data, or broad assessment of teaching (CFR 4.3) beyond student evaluations and feedback—and even these lacked aggregated data. Developing mechanisms and systems that will fit well within the culture and practices of A.C.T. and that will allow A.C.T. to document and reflect on what is working and what needs improvement is absolutely fundamental to institutional advancement. Not all issues of a program are immediately visible on the rehearsal floor, and potential problems often only appear when seen from a
birds-eye-view. Are one professor’s evaluations slipping? Are parts of the curriculum becoming less relevant to student needs? How can one understand patterns or lacunae that are separated by time or space other than regular documentation that is reviewed in aggregate?

This not to say that reflection and innovation are not happening. The recent introduction of the Citizen Artist program as a component of the MFA is a good example of using input and information (from students and faculty) and then making an informed change (CFR 4.3, 4.6, 4.7). One might ask, though: would more systematic data-gathering have made this change happen earlier? How exactly did it happen? Would more formal written feedback and analysis have led to adding student learning expectations in the Citizen Artist program to the readiness rubric or adding new ways of measuring student success to A.C.T.’s practices?

One of the team’s recommendations for A.C.T. is to reflect on assessment and to find synergies between what is happening in A.C.T.’s Education department and the MFA. The Education department’s attunement with external and internal constituencies (students, faculty, differing administrative sectors) was made apparent to the visit team in multiple ways and could provide an opportunity to integrate new categories into the Readiness Rubric. Alternatively, additional rubrics of student learning outcomes (such as the existing Citizen Artist rubric) could be used in parallel to the Readiness Rubric and therefore add to the picture of A.C.T. student outcomes. The team strongly encourages discussions and collaborations that engage the community in order to determine methodologies of assessment that are already working at A.C.T. and, from there, expand practices that already function well.

Dedication to A.C.T.’s mission is palpable on every level, from students all the way to the Board, and with some attention to integrating assessment data more deeply into the A.C.T. culture, it is possible to establish and enhance a strategic vision that continues to grow and develop in alignment with the values and activities of A.C.T.’s diverse constituents (CFR 4.5-4.7). Students receive additional personal support through their “adoption” by A.C.T. Board members, who mentor and provide support
through regular conversations and family meals. Both Board members and students described in emotional terms the impact this program has had on all who participate.

It should be noted, finally, that a more robust and more comprehensive engagement with institutional learning and improvement need not be burdensome. For example, periodic surveys, such as the one going on in “Organizational Health,” more formal reviews of faculty, aggregating student evaluation data, and more formal use of the Readiness Rubric should not require tremendous effort and would yield benefits in tracking not only individual learning outcomes and individual teaching success, but also provide needed data on change over time and program outcomes and success (CFR 4.1-4.4). Such data is invaluable in assessing the present and strategizing for the future (CFR 4.6-4.7).

**Component 5: Student Success: Student learning, retention, and graduation**

A.C.T. communicates its definition of student success in its statement of purpose and statements from the Artistic Director and the Conservatory Director on its website. The A.C.T. Readiness Rubric also provides a clear definition of student success in the MFA Program.

Student learning is assessed primarily by faculty oral evaluation and critique of student work in class and in rehearsal, and by faculty written and oral evaluation of each individual student at the end of each academic term. In this evaluation, faculty write comments on an evaluation form for each student in which they refer to elements of the A.C.T. Readiness Rubric. The Core Faculty and the Conservatory Director meet as a group with each student individually to provide a 15-minute oral evaluation at the end of each term; students are subsequently provided with a summary written evaluation as well.

While the faculty make reference to the A.C.T. Readiness Rubric in these evaluations, the team found only minimal evidence that faculty use aggregated evidence of achievement of student learning outcomes to make improvements to curriculum or pedagogy. For example, faculty discussion after end-of-term evaluations led to the observation that a number of students were not meeting the professionalism portion of the rubric as fully as the faculty thought they should; as a result, the faculty
workshop on professionalism was lengthened and made more rigorous during the following semester. This improvement was described as an isolated case, however; the team did not find evidence of a system for compiling assessment information regularly or reviewing it in order to “close the loop” in improving student achievement of learning outcomes.

In addition, the A.C.T. Readiness Rubric, which focuses on students’ ability to perform on A.C.T.’s stages, describes learning outcomes for most of A.C.T.’s curriculum, but not all of it. For example, the recently added Citizen Artist coursework and community engagement experiences, which are praised by students and faculty alike, do not seem to be reflected fully in the Readiness Rubric, even though they are now a required part of the curriculum with their own separate rubric. The team recommends that the MFA conservatory director and faculty expand the MFA learning outcomes to reflect the full range of curricular content and expectations for student learning through the program. The MFA Program has been improved in important ways during the past few years, but the assessment system has not kept pace with those improvements.

A.C.T.’s MFA is a very small, highly specialized graduate program, featuring a great deal of one-on-one and small group interaction among faculty and a highly motivated group of students. It is therefore not surprising that A.C.T.’s retention and graduation rates are very high – the five-year average graduation rate is above 90%, with several recent classes graduating 100% of students enrolled. During the past six years, A.C.T. has admitted 8-12 students per year to its three-year MFA Program; its total enrollment varies between 30 and 35 students per year. As a result, it is difficult to analyze retention and graduation rate statistics due to the low numbers involved, and no attrition patterns can be discerned; only five students total have withdrawn from A.C.T. since 2011 (2 Caucasian males, 2 Caucasian females, 1 African-American male). In addition, as previously described, A.C.T.’s curriculum requires students to complete the degree in three years, so time to completion is not an issue at this institution. By all measures, A.C.T. is doing an excellent job of retaining and graduating its students.
Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence

The visit team identified two issues that appeared in Lines of Inquiry focusing on Standard 4: the development of a culture of assessment and the creation of a systematic program review. These issues are still the heart of the need for improvement at A.C.T. and remain prominent concerns, as they have been since the Interim Report of 2013. The Commission Action letter of December 2013 stated: “By the time of the scheduled reaffirmation process in 2017, the panel expects that the visiting team will find robust evidence of the direct assessment of learning outcomes with concrete examples of the results being used to improve teaching…. Assessment findings should be formally reported and put to use through program review and other planning processes.” This is still not completely the case and it appears that informal feedback is still the currency of assessment at A.C.T. No substantive improvement toward assessment and program improvement have been made since the Interim Report of 2013 and since the creation of the A.C.T. Readiness Rubric. Faculty earnestly attempt to address the need for outcomes in their syllabi, but these outcomes are not systematically studied for possible program improvement. Program improvement appears to be made the old-fashioned way—through discussion among faculty and leadership, using student input and surveys.

Culture of Assessment (CFR 1.2, 2.3-2.7, 4.2-4.5)

The 2013 A.C.T Interim Report describes in detail how the institution responded to the action letter of March 3, 2010, and details faculty discussion and feedback on the use of rubrics to assess student learning. The Interim Report also includes a number of positive responses to the rubrics and how they presented some challenges but have also provided “more consistent vocabulary,” “touchstones for evaluation” and perpetuated an otherwise “oral tradition” of teaching acting. In addition to rubrics, the 2017 Institutional Report details the many different ways students are graded and evaluated in a holistic manner to help them achieve the goals of an advanced degree prepare them
for life after their education. Indeed, the “A.C.T Readiness” rubric is a detailed and substantive evaluation that seems destined to encourage high performance and standardized review according to useful institutional performance baselines. However, there seems to be little evidence of systematic analysis of the use of rubrics across classes or across professors. The evidence provided in regards to systematic processes of assessment—mostly evaluations of students by faculty, and evaluation of faculty by students, provided during the line of inquiry process—does not fully meet the expectation of “a continued development of a culture of assessment.”

The March 2017 Report discusses commendable actions such as “constantly interrogating our own practices” (p. 69) and implementing a full-time core faculty (p. 70), but the written evidence provided in the report and appendix is insufficient to conclude that these activities are deeply ingrained in the structure of A.C.T., nor does the response to the Lines of Inquiry indicate that these practices are as systematic and organized as they might be, or should be. Without more comprehensive comparative data, the decision-making around improvement and change will continue to appear anecdotal in nature. This is not to take away from A.C.T.’s prestige, its excellent retention rate, or the evidence of success of its graduates—their “Geary Readiness”—but it does point to the need for systematic structures in order to maintain success, grow, and track the trajectories of faculty and students across time and in differing contexts.

Institutional Learning and Improvement (CFR 4.3-4.6, 3.2)

The 2013 A.C.T. Interim Report, in response to the action letter of March 3, 2010, describes in detail the creation of an ambitious process for Program Review, which was to involve all stakeholders: faculty, staff, students, and board members (p. 9). The Program Review Action Plan outlined multiple elements, including the reconsideration of the MFA Statement of Purpose, the reassessment of course and program learning outcomes, the evaluation of student and faculty assessment, the evaluation of student support services, the consideration of professional development for faculty and staff, the
assessments of planning, budgeting and resource allocation, the consideration of diversity, the assessment of current faculty peer review policy, and an external peer review of the program. The Institutional Report of 2017 briefly touches upon the recommendations from the MFA review to state that “the program is doing well” (p. 80). These conclusions about the well-being of the program are based upon what appears to have been an abridged version of its 2013 program review proposal. Undoubtedly, many conversations took place between the stakeholders since academic leadership and the faculty “took stock of the variety of methods of assessment” (p. 80). The report states that the administration “tabulated the national presence A.C.T. graduates have in the field, and calibrated the progress of classes and individuals from one year to the next in craft and artistry” (p. 80), but the visiting team was presented with no evidence of data gathering. Course evaluations are handwritten, as are student evaluation rubrics. They are kept in files in the office of the Director of Academic Affairs and are readily available for those who have an educational need to know.

The most visible element of the Program Review Action Plan was the external review, conducted in 2015 by a Producing Artistic Director from the ASOLO Repertory Theatre and a former Dean of the School of Theater of the California Institute of the Arts. The external review report presented a positive view of the MFA Program, rich in diversity, creativity, and guided by a distinguished mission. “The bottom line is that this is a great master of fine arts actor-training program on a very positive trajectory to being even greater (p. 5).” The program review noted the importance of the A.C.T. Readiness concept (formerly known as Geary Readiness), the many opportunities for students to perform on the Geary stage and beyond, the integration of students into A.C.T.’s community life, the role of students as Artist Entrepreneurs, and the opportunities for students to make “generative work.” The exposure of students to this variety of acting and life opportunities suggests a healthy, vibrant environment.

The 2015 external review also identified some faculty challenges (p. 13), particularly in the realm of development and creative leaves. These challenges were strongly expressed to the visiting team by
the core faculty, who additionally brought up issues of course load and general work load. It does not appear, however, that academic leadership has addressed these concerns sufficiently. The visit team was concerned to hear that one core faculty had left in 2017 and that two more are planning to leave A.C.T. in 2018. While core faculty unanimously express and demonstrate their commitment to the program and its students, the visit team nonetheless concluded that there is a need for stronger lines of communication with academic leadership, and that A.C.T. might consider the establishment of a more transparent administrative structure to address faculty issues.

Component 7: Sustainability: Financial viability, preparing for the changing higher education environment

Fiscal Resources, Financial and Strategic Planning (CFRs 3.4, 4.6)

The A.C.T. MFA Program is well-regarded in the field, has a track record of notable alumni, and has distinguished A.C.T. among regional theaters in the U.S. Yet this singular program is not a source of net revenue for the theater and in fact must be subsidized through gifts and operating revenue, sources of income that are already stretched thin across an organization challenged by the high cost of doing business in San Francisco.

The need for a “continued focus on financial viability” and a “carefully conceived and integrated strategic program and financial plan...as evidence of specific plans and actions for attaining and maintaining financial viability” was cited in the 2010 Commission action letter, reiterated in the 2013 Interim Report, and underscored in the March 2017 A.C.T. Institutional Report.

The visit team finds that the need persists for a detailed, multi-year strategic and financial plan to secure financial stability of the MFA Program. A.C.T. board and staff leadership are aware of this and have developed several strategies to move the theater and the MFA Program to greater fiscal stability.
Yet these strategies have not yet coalesced into a fully integrated plan, and some of the strategies bring new risks and questions.

A.C.T. has been operating under the guidance of a 10 year visioning plan and three year business plan created in 2010/11. The board and leadership wisely assessed that due to the rapidly changing economic, business, real estate, and cultural landscape in San Francisco, A.C.T. should develop an updated 3-5 year strategic plan. The board’s planning committee decided on a plan format and process in fall 2016. However, the announced departure of the artistic director has put further planning work on hold. Once a new artistic and executive director are hired, A.C.T. should develop its proposed 3-5 year strategic plan to address pressing financial, facility and programmatic issues that require multi-year solutions.

Facilities & Technology Planning (CFRs 3.4, 3.5)

A.C.T.’s lease for 30 Grant Street (home to the MFA Program) is up in 2023. A.C.T. has been anticipating this and recognizes that owning rather than leasing would have a positive impact on the business model. The A.C.T. Institutional Report states that options are being “reviewed and considered” and that “ownership of an A.C.T. campus is the top strategic goal for A.C.T. and its Board of Trustees”. Further, the report mentions that the board is working with local developers and city government on this goal. A detailed plan (timeline, people responsible, working groups defined, etc.) on this process would give confidence that a viable solution was in development. Within the 30 Grant Street learning spaces, technology resources are adequate but not robust and can hinder rather than facilitate communication and learning. For example, students noted that classes taught online by faculty off-site can be compromised by unreliable wifi.

A.C.T. successfully raised funds for and opened The Strand complex. It is a high quality venue to showcase MFA students and has the potential to bring new audiences to A.C.T. This new audience could prove a new source of earned and contributed support, but it will take some years to realize that
growth. As A.C.T. reports in the Institutional Report, “There are myriad issues associated with maximizing both an artistic and economic return for A.C.T. on [The Strand].” In the short term The Strand is another A.C.T. enterprise that is being subsidized by $600,000 in bridge funding from donors.

On the other hand, the institution is developing new sources of revenue. For example, A.C.T. launched an MFA Program Board to help with fundraising and to increase the program’s visibility. The goal is to bring in new dollars for the academic program, rather than redirecting philanthropic support that would have gone to the theater as a whole. The institution holds an annual fall fundraiser, whose proceeds help to support the MFA Program, as well as the Young Conservatory and the Education Department. In addition, in 2014 A.C.T. launched the San Francisco Semester (SFS) non-degree program, which is generating net profits. A.C.T. had a successful endowment campaign which resulted in endowment interest covering 6% of operating budgets thanks to more prudent investment policies.

Leadership & Decision-Making (CFRs 3.6, 3.7, 3.8)

Further challenging progress on an effective multi-year plan and a stronger business model is A.C.T.’s leadership transition in both the artistic director and executive director positions. Board leaders understand their role is especially vital during this transition, and they are committed to serving as stewards of the vision and strategic priorities of the MFA Program. The search for a new artistic director has highlighted the MFA Program as essential and integral to the theater.

Component 8: Optional essay on institutional specific themes

Not included in the Institutional Report.

Component 9: Reflection and plans for improvement

The 2017 Institutional Report provides a summary of A.C.T.’s findings and conclusions resulting from its self-study process. The report lists a number of key areas in need of improvement, and it cites
progress made since 2016 in several of those areas -- for example, increased dialogue involving program administration, faculty, and students; and formation of the Equity, Diversity, Inclusion Council. The report reviews a number of significant recent changes and improvements at A.C.T., including the growth of the Education Department and its programs, the opening of the Strand, and the creation of the MFA Program Board, among others. The visit team notes, however, that several key areas highlighted in the 2013 Commission Action Letter -- most notably the continued development of a culture of assessment and continued focus on financial viability -- are addressed only indirectly in the report’s conclusion. In addition, the visit team wishes to emphasize the importance of building a strong administrative and faculty leadership team amidst a time of high faculty and staff turnover, as well as developing a multi-year strategic and financial plan that provides a clear path to longer-term institutional sustainability.

SECTION III – OTHER TOPICS (such as Substantive Change)

Not included.

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

Commendations

The team commends A.C.T. for the following:

1. The Board of Trustees and the MFA Board, for developing deeply engaged ways to support and encourage students in the MFA Program and for supporting the program financially and through civic involvement.

2. The deep integration and collaborative spirit around education at A.C.T., which includes not only the MFA Program, but the entire Education Program, including the Fellows, the Young Conservatory, the San Francisco Semester, and the Summer Training program.

3. An engaged, knowledgeable staff (many recently hired) who use A.C.T.’s mission as the driving force of their activities and collaborate effectively to identify and address key issues.
4. The acquisition and development of the Strand, for the ways it has invigorated and strengthened the MFA Program.

5. The academic leadership, for responding to student initiatives and requests and developing the Citizen Artist program, which benefits not only the MFA students but also the larger community.

6. The development of the A.C.T. Readiness Rubric and the ways it has already been used for faculty evaluation of students.

7. The whole organization’s commitment to, and deep engagement in, making a thoughtful and effective leadership transition as the top two executive positions will be filled by new leaders within the next twelve months.

8. Recruiting and retaining an excellent, articulate, diverse, highly engaged student body.

9. A dedicated faculty, including both Core and Adjunct Faculty, who are strongly committed to students’ academic and professional growth and development.

10. An artistic and executive director who embrace and support the educational mission of the MFA Program in the context of the overall artistic growth and development of the institution.

**Recommendations**

1. Once a new artistic director and executive director are hired, A.C.T. should develop a 3-5 year strategic plan that addresses physical facilities, programming, and education initiatives, to be accompanied by a financial and implementation plan with a specific timeline.

2. While A.C.T. has created an overall framework for assessment by developing the Readiness Rubric and using it to assess individual student performance, A.C.T. should also use assessment findings generated with the Rubric for academic program improvement in curriculum and pedagogy.
3. The MFA Program should collaborate with the Education Program on matters of academic program assessment, particularly around curricular elements related to community engagement and devised work.

4. A.C.T. should develop clear governance and representation structures for faculty and students that provide opportunities for transparent communication with the administration.

5. A.C.T. should invest significant effort in improving organizational health, particularly as it relates to faculty and staff workloads, and to faculty evaluation and professional development.

6. A.C.T. should clarify the role and responsibilities of core faculty to strengthen faculty leadership.

7. A.C.T.’s faculty should be empowered as a group to develop enhanced assessment and program review processes that lead to regular improvements to curriculum and pedagogy, and that address the changing nature of the field of theater.

8. As A.C.T. rebuilds its staff and administration, it should develop structures and processes that ensure clear, transparent, and timely communication among faculty, staff, administration, and students.

9. A.C.T. should develop comprehensive, clear, linear grievance policies and processes for both employees and students and communicate them clearly.

10. A.C.T. should develop a plan to address student indebtedness issues as articulated by members of the administration and the Boards.

11. A.C.T. should enhance its technological support for student learning, such as providing email accounts for students and improving wifi access.
APPENDICES

The report includes the following appendices as separate attachments:

A. Federal Compliance Forms

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

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on credit hour | Is this policy easily accessible? X YES □ NO  
If so, where is the policy located? MFA Bulletin, online, Policies and Procedures  
| Process(es)/ periodic review of credit hour | Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? X YES □ NO  
If so, does the institution adhere to this procedure? X YES □ NO  
Comments: Through MFA/Institutional program review. |
| Schedule of on-ground courses showing when they meet | Does this schedule show that on-ground courses meet for the prescribed number of hours? X YES □ NO  
Comments: |
| Sample syllabi or equivalent for online and hybrid courses  
*Please review at least 1-2 from each degree level.* | How many syllabi were reviewed? NA  
What kind of courses (online or hybrid or both)? NA  
What degree level(s)? □ AA/AS □ BA/BS □ MA □ Doctoral NA  
What discipline(s)? NA  
Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? □ YES □ NO NA  
Comments: |
| 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.* | How many syllabi were reviewed? NA  
What kinds of courses?  
What degree level(s)? □ AA/AS □ BA/BS □ MA □ Doctoral  
What discipline(s)?  
Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? □ YES □ NO  
Comments: Course credit is awarded according to the policy one credit hour is equivalent to 30 contact hours. There are no courses that do not meet for the prescribed hours. |
| Sample program information (catalog, website, or other program materials) | How many programs were reviewed? 1  
What kinds of programs were reviewed? MFA in Acting  
What degree level(s)? □ AA/AS □ BA/BS □ MA □ Doctoral  
What discipline(s)? Acting  
Does this material show that the programs offered at the institution are of a generally acceptable length? □ YES □ NO  
Comments: [http://www.act.sf.org/home/conservatory/mfa_program.html](http://www.act.sf.org/home/conservatory/mfa_program.html) |

Review Completed By: [Signature]
Date: 12/11/17
2 - MARKETING AND RECRUITMENT REVIEW FORM

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

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</th>
</tr>
</thead>
</table>
| **Federal regulations** | Does the institution follow federal regulations on recruiting students?  
  x YES □ NO  
  Comments: In compliance with federal requirements, under Title IV, Section 487 (a)(2) of the Higher Education Act (HEA), A.C.T. does not provide incentive compensation to employees or third-party entities for their success in securing student enrollments. Recruiters are drawn from alumni and faculty and are paid a flat rate for a visit or workshop given to a university. They also receive a per diem rate for any day that they travel out of town, even if they are not visiting a school on one of those days. A.C.T. pays for hotel and flights, and reimburses recruiters for their rental cars. Payment is not tied to successful enrollment of any individuals. |
| Degree completion and cost | Does the institution provide information about the typical length of time to degree?  
  x YES □ NO  
  Does the institution provide information about the overall cost of the degree?  
  x YES □ NO  
  Comments: |
| Careers and employment | Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable?  
  x YES □ NO  
  Does the institution provide information about the employment of its graduates, as applicable?  
  x □ YES □ NO  
  Comments: |

*§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:  
Susan Avila  
Date: 12/6/17
3. Student Complaints Review Form

POLICY

Does the institution have a formal procedure for student complaints? Yes.

Is the policy easily accessible? Yes, this can be found in the MFA/Certificate Program Policies and Procedures and in the Student Handbook (pp. 11-12, 20-26, p. 31).

Comments: The institution has substantive procedures for handling student complaints, however, there should be improvements so that their is a clear

PROCEDURE

Does the institution have a procedure for addressing student complaints? Yes, in addition to a general grievance policy found on p. 31 on the handbook, the institution has grade appeal procedures, sexual harassment, bullying and conduct procedures. However, lines of complaint and appeal were not always clear.

RECORDS

Does the institution maintain records of student complaints? Yes, in the Office of Academic Affairs.

Does the institution have an effective way of tracking records over time? Yes, records are maintained for at least 5 years and are subject to appropriate privacy and legal policies.

[signed] Andrew Wallis, Visit Team member
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>
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<tbody>
<tr>
<td>Transfer Credit Policy(s)</td>
<td>Does the institution have a policy or formal procedure for receiving transfer credit? &lt;br&gt;x ☐ YES ☐ NO &lt;br&gt;If so, is the policy publicly available? &lt;br&gt;x ☐ YES ☐ NO &lt;br&gt;If so, where? &lt;br&gt;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? &lt;br&gt;x ☐ YES ☐ NO &lt;br&gt;Comments: &lt;br&gt;ACT states very clearly that all students must complete their entire curriculum, which means they do not accept any transfer credit</td>
</tr>
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*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

1. Are publicly disclosed in accordance with 668.43(a)(11); and
2. Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

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

Review Completed By: Cynthia Westerbeck  
Date: December 6, 2017