REPORT OF THE WSCUC VISITING TEAM

SEEKING ACCREDITATION VISIT 1

For Institutions Seeking Candidacy

To University of West Los Angeles

December 6 – 8, 2016

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The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. 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. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be 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 Visit

The University of West Los Angeles (UWLA) was founded in 1966 as a private, nonprofit school of law dedicated to serving underrepresented communities with the aim of democratizing the legal profession. UWLA was accredited by the State Bar of California Committee of Bar Examiners in 1978. In 2002, the university acquired the San Fernando Valley College of Law, which became a second UWLA campus and in 2007 was relocated to Chatsworth, its current location. In 2012, UWLA added the School of Graduate Studies, which converted to the School of Business in 2015.

The principal campus is located in West Los Angeles near the Los Angeles International Airport; the Chatsworth location is approximately 35 miles away. UWLA’s School of Law offers the degree program of juris doctor at both of these campuses. School of Business programs are delivered through a hybrid educational model, offering both a BS in Business Administration degree as well as an MS in Organizational Leadership and Business Innovation. School of Business residential instruction takes place at the Los Angeles campus exclusively. At the time of the team visit, total enrollment numbered 218 students, the majority of whom (209) are enrolled in the School of Law, the rest being enrolled in the School of Business’s hybrid MS program. Currently there are no students in the undergraduate business administration program, but plans are to enroll the first cohort in spring 2017.

UWLA is governed by a Board of Managers with 13 members, three of whom have a familial or financial interest in the institution. The university employs 51 faculty, four full-time in the School of Law, one full-time in the School of Business, and the rest adjunct, as well as 27
administration and staff members. UWLA president Robert W. Brown has served in his role since 1998; his executive team (direct reports) consists of the legal counsel, the CFO, the human resources director, the School of Law dean, the School of Business dean, and the director of admissions and enrollment.

UWLA began pursuing WASC accreditation in 1976, which it received in 1983. As the result of concerns with the school’s financial viability, WASC issued an Order to Show Cause in 1999, imposed a Warning in 2003, and withdrew accreditation in 2006. In 2009, UWLA reapplied for eligibility, which WASC granted in 2011. In the meantime, UWLA became a for-profit institution when it was acquired by Sapere Aude, LLC in 2010. In August 2013, UWLA submitted its letter of intent to pursue WSCUC candidacy. The school’s stated purpose for seeking accreditation is “to improve its programs for the benefit of its students in achieving their learning goals and to fulfill its mission of providing ‘…opportunities that empower students of great diversity…’” A CPR visit for candidacy took place in April 2014, with a finding that the institution was not yet ready for the EER. After the university provided WASC with updates on financial viability, institutional reporting, assessment and program review, and board development, its eligibility was extended to June 30, 2017.

The Seeking Accreditation Visit, the subject of the present report, was scheduled for late 2016. The SAV team visited the main campus December 6 – 8, 2016, and one of the team members followed up with a visit to the Chatsworth campus on December 14. The team found both campuses to offer modern, well-maintained and well-appointed facilities, including technology-ready classrooms and study spaces, computer stations, Wi-Fi, libraries, offices, and meeting and break rooms.
B. The Institution’s Seeking Accreditation Visit 1 Report: Alignment with the Letter of Intent and Quality and Rigor of the Review and Report

The institution has gone through several shifts since its initial application for eligibility in 2009. As previously mentioned, there was an earlier review for candidacy in 2014 with recommendations indicating the institution had more work to do before moving forward with another visit. After conversations with WSCUC, it was determined that the current visit was to be a Seeking Accreditation Visit 1 (SAV1) as opposed to a continuation of the prior process. Consequently, the original Letter of Intent is not relevant, and this report instead focuses on alignment between the issues raised in the Eligibility Review Committee Letter and the institution’s approach to the SAV1 review.

In terms of the quality of the SAV1 Report, the team found it to be well organized and clear. It conveyed an accurate sense of the institution. In that regard, it was much improved as compared to the previous review’s report. Also, the process for writing it was much more inclusive than what occurred for the 2014 report, with involvement from staff and administrators across the institution on a WASC Steering Committee. Faculty were also involved in reviewing drafts of the self-study and providing input. Further, meetings for all faculty were held to provide a forum for discussion of the self-study and compliance with the CFRs.

It was evident from the self-study that the institution was taking the WSCUC process seriously and doing its best to improve upon the last report. Thus, the institution did a better job this time of presenting an overall picture of UWLA and changes made since the last review. It was not, however, as self-reflective as the team would have liked. Some sections were terse, with little explanation of implications or full context. In addition, the evidence for each Standard was not always thorough, with some missing pages and mislabeled documents.
Overall, the team found that the data and evidence in the report were helpful in evaluating the extent to which the institution meets the Standards. Further, it was evident that UWLA used the self-study and candidacy process to gain a greater understanding of its effectiveness, systems of quality improvement, and student learning.

C. Response to Issues Raised in the Eligibility Review Committee Letter

UWLA was tasked with ten recommendations following the 2014 CPR visit. These recommendations are listed below, followed by a summary of the university’s response to each of them.

1. “The team recommends that the institution take immediate steps to restore both short and long-term financial viability. This should be evidenced by a board-approved financial management plan, a facilities utilization plan, and appropriate documentation (to include the most recent audited financial statements, year-to-date financial statements, and three years of board reviewed budget projections including cash budgets aligned with the strategic plan). This should be supported by an explanation of the rationale for projections and the assumptions behind them (CFR 3.4).”

UWLA’s response centers on cost cutting measures and close monitoring of budgets over the past two years in order to achieve financial stability. The governing board’s Administration, Finance and Institutional Planning Committee is charged with reviewing the annual budget and recommending it to the board, which meets regularly to review and approve budgets and financial statements. This committee is also responsible for the institution’s strategic plan.

UWLA has developed a board approved plan to sustain itself financially both short-term and long-term as evidenced by a board resolution approving the budgets for 2016, 2017, and 2018. The short-term plan is to raise $1.5 to $2 million to fund its operation and to obtain WSCUC
accreditation. Accreditation is seen as key to attracting more students because it will allow access to federal financial aid. The long-term plan is to increase enrollment significantly enough at both the School of Law and School of Business so that UWLA will generate surpluses starting in 2018. In addition, UWLA employs an independent accounting firm to audit its financial statement annually and has received clean audit opinions.

2. “The team recommends that the institution support and demonstrate its commitment to evidence-based decision making by 1) hiring a qualified, full-time Director of Institutional Research, and 2) systematically collecting and making accessible, both internally and externally, aggregated and disaggregated student success data in a format that meets WASC expectations.”

The university responded to this recommendation by creating an institutional research (IR) office staffed by a director who also serves as the school’s library director. The institutional research director has training through Humboldt State’s graduate institutional research certificate program as well as through peer mentorship and involvement in professional groups. The IR director works closely with UWLA’s director of faculty development and assessment, who has completedWSCUC’s Assessment Leadership Academy training. The IR office regularly collects student success data – including graduation rates, bar passage rates, retention rates, and time-to-degree – which it disseminates internally and externally and publishes on the UWLA website. In sum, the team found a pattern of evidence demonstrating UWLA’s commitment to evidence-based decision making through institutional research functions.

3. “The team recommends the School of Law immediately develop student learning outcomes at the course level that are mapped to the assessment of carefully developed program learning outcomes.”
UWLA has responded thoroughly to this recommendation by developing student learning outcomes at all levels. The team saw ample evidence of the School of Law’s course learning outcomes that map to learning outcomes for the JD program and differentiate introductory, developing, and mastery levels of proficiency. These PLOs, in turn, align with the institutional learning outcomes. The same applies to the programs offered by the School of Business.

4: “The team recommends that both the School of Law and the School of Graduate Studies implement comprehensive program review prior to the next visit. The team further recommends that the institution provide evidence of actions taken as a result of reflection on assessment results and the effects of those actions on student learning.”

The School of Law makes annual compliance reports to the California Bar Examiners of the State Bar of California (CBE) and in 2015 underwent a CBE review, which required internal as well as external (peer) review. This review led to a five-year renewal of accreditation by the CBE. In terms of its own program review processes, UWLA has created a number of formal plans, policies, guides, and tools for comprehensive assessment (e.g., Assessment and Program Review Handbook, program review cycles, annual planning cycles, Non-Academic Assessment Resource Manual, Learning Outcomes Matrix, etc.). Review of first-semester performance and bar passage rates has led to curricular changes, specifically the introduction of a legal writing course required for students achieving a 2.3 or lower GPA in their first semester. The institution has also conducted reviews of one of the PLOs for the JD program 2016 and one of the PLOs for the business MS program in summer and fall 2016, respectively. These reviews consisted of course-level outcome assessment of SLOs mapped to the relevant PLOs for eleven law courses and two business courses. The assessment reports show preliminary interpretation by the faculty of the assessment data. Additional meetings are planned for spring 2017, when curricular
changes will be considered to improve student learning in the assessed areas. Student surveys have also been administered to assess student services.

5. “The team recommends that the board fully complies with the WASC Policy on Independent Boards (which may require expanding the number of Managers) and engages in board development activities to ensure that the board fulfills its fiduciary obligations and WASC expectations. Based on these development experiences, the board should carefully consider its current practice of presidential evaluation, and look for ways to include board-initiated, measurable performance criteria.”

UWLA is governed by a Board of Managers whose bylaws show compliance with the WASC Policy on Independent Boards in number, engagement, and fiduciary obligations. The board has recently grown from nine to 13 members, of whom three, including the university president, are invested. The board fulfills its fiduciary obligations through its Audit Committee and Administration, Finance and Institutional Planning Committee. The team was able to review a self-assessment performed by board members in 2016 as well as the self-assessment the president submitted to the board in 2016. One of the board members explained during the team interview how the next step in the board’s presidential evaluation process is to apply key performance metrics, which the board has developed.

6. “The team recommends that the institution engage in a comprehensive strategic planning process led by the Board of Managers, that includes all relevant stakeholders and is carefully aligned with the budget.”

UWLA showed evidence of an offsite strategic planning session held in December 2015 and attended by members of the faculty, staff, administration, and Board of Managers. The 2015/16 strategic goals were assigned to the appropriate staff and university committees (e.g.
faculty senate, IR and assessment, WASC steering), some of which had yet to be created (e.g. facilities, student development, faculty development). Portions of the next strategic planning process (SWOT analyses conducted by staff and board, respectively) have been completed, and senior staff reported that a follow-up strategic planning session had just taken place the first weekend in December 2016. Team interviews with the president and CFO revealed the need for more intentional alignment of budget with strategic planning.

7. “The team recommends that the institution take immediate steps to develop a faculty staffing plan that ensures adequate full-time faculty resources for the School of Law based upon systematic self-reflection and benchmarking ratios of full-time to part-time faculty from other similar WASC accredited institutions.”

UWLA has reported that both the School of Business and the School of Law have internal policies on full-time and adjunct faculty hiring and conduct internal reviews to confirm adequacy of faculty staffing for educational effectiveness. The School of Business’s current enrollment of nine students in the MS program is sufficiently covered by one full-time professor and several active adjunct professors out of a potential pool of 50. The team viewed the staffing plan for the School of Business, which calls for the hiring of one additional full-time faculty per 75 new students. Full-time business professors teach 12 units per year. The School of Law employs four full-time faculty members, one of whom is the academic dean, and 33 adjunct faculty members, for a 1:8 ratio of full-time to adjunct. Full-time law professors are required to teach 18 units per year while adjuncts teach up to six units per semester. With 209 students currently enrolled in the JD program, the ratio of full-time faculty to students is about 1:52. The self-study references benchmarking these ratios against similar institutions; however, the team did not see evidence or hear details of this process.
8. “The team recommends that all institutional publications, including the website, be regularly reviewed to ensure accuracy and consistency. Student success data, including retention and graduation rates, performance on licensure exams, and other relevant evidence of achievement, must be published in usable formats on the institutional website and other institutional publications, disaggregated by ethnicity, gender and other institutionally relevant variables.”

For the most part, UWLA has responded effectively to this recommendation. The uwla.edu website is regularly edited and revised, the most recent update having been performed in September 2016 to ensure accuracy and transparency. Marketing materials reviewed by the team were also found to contain consistent and accurate information. The university website publishes student success data, disaggregated for gender and ethnicity, on the institutional research page and provides a link to bar passage information. While student success data available for review included time to degree as well as 5-year completion data showing percentages of attrition and completion, the team did not encounter exhibits identified specifically as “retention” data. Furthermore, the links to bar passage information went to an external site that was difficult to navigate.

9. “Given the disappointing quality of the institution’s submissions for the CPR visit, the team recommends that the institution approach future WASC reviews with a great deal more attention, seriousness, and reflection. The institution should ensure that adequate resources are available to produce a thoughtful, complete, and well-written self-study as well as accurate and complete data exhibits. The self-study should use data effectively and reflect upon the challenges facing the institution.”
As previously mentioned, the team found that UWLA approached the SAV review with seriousness and reflection and put much effort into preparing for the visit. The institution created a WASC Steering Committee, consisting of approximately 10 faculty, staff, and administration members who met weekly-biweekly to facilitate a university-wide review process. CFRs were disseminated to various offices and stakeholders to obtain a multiplicity of perspectives, which were collated and analyzed for the self-study. While the self-study addresses all CFRs under the Standards, the responses are at times rather short and lack specificity. Data exhibits are occasionally mislabeled or missing, and are often limited to one or two samples, creating the impression of a dearth of evidence. On the other hand, the institution was largely able to provide additionally requested evidence. While the submission for the SAV review appears to show significant improvement over that of the CPR, future self-studies should include more reflection and ensure proper vetting of linked exhibits.

10. “The team recommends that both the School of Law and School of Graduate Studies review their current credit hour policies and processes to ensure compliance with the WASC definition of a credit hour.”

The School of Law and School of Business have met this requirement for all programs as evidenced by the credit hours and attendance requirements for the JD program and the credit hour policies for the two hybrid business programs (MS and BS).
SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

**Institutional Purposes**

UWLA has the following mission statement published on its website:

*Through the strengths and virtues of education in the classroom, online or in life, UWLA provides opportunities that empower students of great diversity to live successfully inspired lives.*

The Board of Managers approved the mission on March 29, 2012 (exhibit 1.1.1 in the self-study). UWLA is to be commended for its mission of inclusiveness and diversity and for its historic commitment to seek to support students who might not otherwise have the opportunity to attend law school. UWLA employs admissions policies that consider a range of factors. In addition, UWLA offers flexible schedules for students.

While the mission statement does not refer specifically to law and business, there are two other mission statements. There is a mission statement for the School of Law, which is on the website under the School of Law tab and is also found in the School of Law catalog (exhibit 1.1.4). There is also a mission statement for the School of Business, but the team could not locate it on the website; however, it is in that school’s catalog (exhibit 1.1.3).

Taken together these statements describe the institution’s purposes and these fall within recognized academic areas of law and business. However, the team could not locate evidence of faculty involvement in the development of these mission statements (CFR 1.1).

UWLA has adopted institutional learning outcomes and published these on the website, in program catalogs, and in student information handbooks (exhibits 1.2.1, 1.2.2, 1.2.3). In addition, UWLA has program learning outcomes for the School of Business, with one set for the
bachelor’s degree program (exhibits 1.2.4, 1.2.5, 1.2.6) and one for the master’s degree program (exhibits 1.2.7, 1.2.8, 1.2.9). UWLA has also adopted PLOs for the School of Law (exhibits 1.2.10, 1.2.11). The PLOs appear appropriate for each discipline. As was the case for the mission statements, the team could not locate evidence of faculty involvement in the development of the PLOs; however, when meeting with the team, the full-time faculty stated that they were involved in the drafting process. Given this disconnect, the team recommends that evidence of faculty governance be recorded and documented going forward.

UWLA has an Office of Institutional Research, and the website includes information about graduation rates and time to degree broken down by different demographics. As to the rate at which UWLA graduates pass the California Bar Exam (CBEX), the UWLA website includes a link to the California State Bar website with reports for each administration of the CBEX with pass rates for takers by law school. The team could not locate evidence that UWLA makes readily available the pass rates of its graduates. The dean of the School of Law provided a PowerPoint presentation that he delivers at open house events for prospective students, and this presentation includes clear and specific information about first time and eventual bar pass rates for UWLA graduates. What was not clear was how many of the graduates of the School of Law intend to take the bar exam; the team received inconsistent information on this issue during the visit.

The self-study refers to the report UWLA submitted to the State Bar of California and the Committee of Bar Examiners. Exhibit 2.1.7 includes a 2014 analysis of UWLA’s compliance with standards for the California Committee of Bar Examiners.

Information about the School of Business programs is presented through the Bureau for Private Post-Secondary Education (BPPE) and its annual report form (exhibit 1.2.15). UWLA
states that a BPPE Performance Fact Sheet is shared with each student upon enrollment. Fact sheets are located on the UWLA website (CFR 1.2).

*Integrity and Transparency*

UWLA states in the self-study that the institution has adopted policies protecting academic freedom for students, but each exhibit cited refers to faculty academic freedom (exhibits 1.3.1, 1.3.2, 1.3.3). Moreover, the team could not locate exhibit 1.3.4. As discussed in section I.C., incomplete evidence was an area of concern noted by the CPR team that visited UWLA in April 2015.

The exhibits cited above as well as exhibit 1.3.5 set out the policies for protecting the academic freedom of faculty, but these policies do not specify similar protections for staff, nor could the team locate policies regarding such protections for students. Furthermore, the team could not locate evidence of practices related to protecting academic freedom to evaluate the effectiveness of these policies and procedures.

UWLA has policies and procedures for addressing student complaints for the School of Law (exhibit 1.3.6). These address complaints generally, as well as more specifically, those related to harassment or discrimination. The procedures do not specifically address student concerns about academic freedom, although the UWLA self-study specifies student academic freedom as one issue covered by these procedures. Nonetheless, the procedures are quite detailed and appear adequate. At the end of this exhibit within the paragraph related to dissemination of the policies, procedures, and outcomes the team encountered the question “Are we doing this?” The team recommends that UWLA clarify its practices and ensure that faculty and staff understand and adhere to them.
The procedures for the School of Business bachelor’s program (exhibit 1.3.7) and for the master’s degree program (exhibit 1.3.8) are nearly identical and are less detailed than the procedure for the School of Law, yet appear adequate. Faculty members are made aware of these procedures because they are included in the Faculty Handbook (exhibit 1.3.9; CFR 1.3).

UWLA has comprehensive non-discrimination policies (exhibits 1.4.1, [1.4.2 could not be located] 1.4.3, 1.4.4 and 1.4.5). Although the exhibit cited for student diversity only illustrates the breakdown based on gender (exhibit 1.4.6), the IR website pages include more demographic information. The team could not locate examples of hiring practices intended to achieve diversity.

The self-study discusses the forums available for discussions about the curriculum and the current and future state of UWLA, as well as the open-door policy of faculty and staff encouraging the debate of a variety of issues. Some exhibits provided evidence of co-curricular activities or programs intended to enrich the UWLA community (exhibit 2.11.4, for example; CFR 1.4).

The self-study states that UWLA’s primary and only purpose is to operate as an academic institution. UWLA has operated as a for-profit institution since 2010, when Sapere Aude, LLC acquired the university. It is clear that education is UWLA’s primary purpose and that it operates autonomously using a Board of Managers’ (BOM) to provide oversight of the president, finances, and all operations.

The process for the Board of Managers’ (BOM) review of the president appears to consist of a self-assessment written by the president; the team did not locate evidence that the BOM responded to this written self-assessment. The team discussed the process for reviewing the president’s performance with the BOM. In that discussion, the members of the BOM listed a
number of specific performance goals that the BOM has focused on in consultation with the president. The members of the BOM stated that they have been pleased to find President Brown very open to their critiques, suggestions, and feedback. Members of the BOM emphasized that they consider themselves “the boss.” Nevertheless, they also emphasized that one of the board’s primary areas of focus is student success. Thus, there was no evidence that corporate interests interfere with the educational mission of the institution (CFR 1.5).

While the team did not find the institution to be willfully misleading when presenting retention and graduation data, more granularity as to retention data would increase transparency. In addition, a breakdown of how many students are academically disqualified and how many are reinstated as well as how the latter subsequently perform can indicate whether academic support programs and initiatives are working. Furthermore, more detailed information on bar exam participation and passage would be helpful to prospective students as well as program reviewers. The team suggests that greater clarity on these points would be beneficial.

UWLA has comprehensive policies and procedures for the School of Law and the School of Business for students, faculty, and staff. These policies cover equal employment opportunity practices, unlawful harassment, academic freedom, non-discrimination, grading policies, grievance procedures, academic standards, and disability accommodations.

In conversations with the VP and director of admissions, the team learned that the admissions and recruiting team is upfront with prospective students about UWLA’s low first time bar pass rate. Admissions also lets prospective students know of the programs and resources UWLA provides to support first time passage. Nevertheless, the April 2014 WASC CPR team pointed out that bar passage results are not readily accessible, and this concern persists (CFR 1.6).
The institution has written policies in place governing its business and financial practices. CPA firm Vasquez & Company LLP conducts annual audits. The Board of Managers reviews the financial report. These policies and practices are evidence of UWLA’s attempts to operate with the integrity and responsibility needed to best serve students.

To better prepare its employees for carrying out the core functions of the institution, the team suggests that UWLA invest in the professional development of leadership in key areas such as enrollment, institutional research, and student support services, as well as academic leadership of the School of Business. While the team recognized the significant progress UWLA has made in the area of assessment of student learning, the team recommends that UWLA engage in a comprehensive strategic planning process that engages the Board of Managers at a central and deep level. Such a plan can be most effective in setting measurable goals across the institution and ensuring these will be evaluated often. The team has included a more detailed analysis of the financial status and sustainability of UWLA in the discussion of Standard 3 below (CFR 1.7).

The president and other UWLA leaders have been upfront and candid about the institution’s financial situation. In an effort to diversify, UWLA has recently established a School of Business, which includes an undergraduate completion program. The success of these endeavors will require attention to a number of key areas including enrollment, institutional research, and student support in addition to achieving financial stability. Several of UWLA’s leaders and board members referred to the challenges that the lack of accreditation creates. While accreditation will certainly support the institution’s plans and initiatives, the team emphasizes that many other strategic areas, such as those mentioned in this report, are also important for UWLA’s success.
The team received inconsistent messages about the status of the CFO, hearing from some that the interim CFO is in fact the permanent CFO, and from others that the CFO is interim. Due to the importance of this position given the financial issues UWLA faces, it is imperative that UWLA be clear about the status of that position and that a permanent CFO be in place as soon as possible (CFR 1.8).

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

*Teaching & Learning*

As previously noted, UWLA offers three degree programs, the JD, the MS in Organizational Leadership and Business Innovation, and the BS in Business Administration. The self-study presented evidence, confirmed by the team members through onsite review and interviews, demonstrating that these academic programs are appropriate in content, standards, and degree level (CFR 2.1).

The juris doctor program has an 85-unit requirement, of which 55 units are in course work mandated by the State Bar of California to meet the content of the California Bar Examination, 18 units are required professional practice-based courses, and the remaining 12 units are electives; these courses are also largely practice oriented. The School of Law undergoes regular self-studies (annual CalBar report) that provide evidence of the appropriateness of the law curriculum. In late 2015, the School of Law underwent a five-year site visit conducted by a three-member panel headed by the Director of Educational Standards, California State Bar. The team reviewed evidence of this visit, including valuable feedback provided by the reviewers. Unfortunately, the California State Bar review team have yet to submit their written report to the institution as evidenced by email communication from the team chair promising the report for January 2017.
The MS degree requires 36 units (12 courses) for graduation, which can be completed full-time over 14 months. The BS program is a degree completion program requiring the transfer in of 54-60 lower-division units, including General Education, and the completion of the remaining 60-66 units at UWLA in lower-division (24) and upper-division (18) business courses, and 18 units in one of five available concentrations (Organizational Leadership and Management, Marketing, Finance, International Business, Entertainment). While the School of Business programs generally demonstrate appropriate academic course work and graduation requirements, the faculty might also review the curricula for alignment with the Lumina Degree Qualifications Profile or a similar framework to demonstrate relevant high-quality learning designed with student needs at the center.

Overall the program review plan for UWLA degrees is solid. Program review includes measurement of SLOs, retention/graduation data, and some external evidence (bar passage rates, evaluators) (CFR 2.7). The team saw evidence of a basic assessment infrastructure that includes formal plans, policies, guides, and tools for comprehensive assessment (e.g., Assessment and Program Review Handbook, program review cycles, annual planning cycles, Non-Academic Assessment Resource Manual, Learning Outcomes Matrix, rubrics, etc.). Review of first-semester performance and bar passage rates has led to curricular changes, specifically the introduction of a legal writing course required for students achieving a 2.3 or lower GPA in their first semester. The institution has also conducted reviews of one of the PLOs for the JD program and one of the PLOs for the business MS program in summer and fall 2016, respectively. These reviews consisted of course-level outcome assessment of SLOs mapped to the relevant PLOs for 11 law courses and two business courses. The assessment reports show preliminary interpretation
by the faculty of the assessment data. Additional meetings are planned for spring 2017, when curricular changes will be considered to improve student learning in the assessed areas.

A full cycle of program review has yet to occur that would show changes beyond the course level or implications for strategic planning and budgeting. From conversations with academic deans and assessment staff, it is apparent that there is a plan for and an understanding of what steps need to be taken next. However, these efforts are in the nascent stage and thus cannot be evaluated at this time.

At the visit, the team had the opportunity to meet with all full-time faculty, one for the School of Business and four for the School of Law, as well as a large number of adjuncts for both schools. All law faculty hold terminal degrees, and many are practicing attorneys. The team commends UWLA for the quality of the faculty, who are successful professionals in their fields. Commitment of full-time and adjunct faculty alike to UWLA’s students and mission was apparent, and the team was impressed with their level of engagement, particularly of the adjunct faculty who participate on faculty committees.

The full-time law faculty have a mentoring role with adjuncts and conduct regular teaching evaluations (peer and student evaluations). As the School of Law has anecdotal evidence showing a correlation between minimum course grades of B- and bar passage in the relevant subjects, full-time law faculty are also responsible for course grading review to control against grade inflation.

UWLA, by virtue of its laudable mission, is not highly selective; faculty must therefore be able to work with students facing academic and life challenges affecting their ability to meet the standards of a rigorous law program. The team was impressed by the time and attention that full-time and adjunct faculty invest in their students; they clearly go above and beyond their
contract hours in helping students reach their academic goals. With even minimal growth, however, the current full-time faculty will likely be overwhelmed by the needs of students, adjuncts, and assessment. Concerning the latter, the team saw evidence that faculty engage in course level assessment; sample syllabi revealed SLOs embedded in faculty standards for assessing student work (CFR 2.6). However, it is important that faculty be more comprehensively involved in programmatic review. For example, the team recommends that UWLA take the next step toward ensuring that faculty understand and use data to make program changes as needed and have increased involvement in future iterations of outcomes at all levels.

With only nine active students in the MS program, and the BS program poised to enroll its first cohort, it is early yet to evaluate educational effectiveness for the School of Business programs. Currently one full-time faculty member and an ample pool of adjuncts are sufficient for the student numbers. The hiring plan calls for the addition of one full-time faculty per 75 new students enrolled. Again, given the standards of admission, the targeted growth, and the plan to recruit international students, it can be expected that more full-time faculty and support services will be needed to appropriately support the needs of students. (CFR 2.1, 2.13). The team also recommends that the School of Business define minimum qualifications for its faculty. For both schools, the team recommends that in the interest of faculty inclusion in decision making, UWLA consider faculty participation in full-time hiring processes, which currently seem to be the purview of the president and deans.

The degrees awarded by UWLA are clearly defined in terms of entry-level requirements and levels of student achievement necessary for graduation. The meaning of each degree is addressed through the learning outcomes, which are defined at the institutional, program, and course level and reflect the institution’s philosophy (CFR 2.2 & 2.3). Team members found clear
evidence that measurable, mission-driven PLOs are mapped and differentiated according to the level of development (introductory, developing, mastery) as well as to the level of area concentrations. UWLA has created pathways to improvement of educational effectiveness and begun to take significant steps towards assessing these learning outcomes systematically. Student support services has developed and published a mission statement and departmental outcomes connected to the ILOs (CFR 2.3). UWLA’s program review cycle includes a non-academic assessment plan for these support services, some of which have been reviewed by means of appropriate student surveys (e.g., employment data through Career Services).

Beyond establishing learning outcomes and outcome assessment, however, it was not clear to the team how UWLA has grappled with defining and integrating the meaning, quality, and integrity of degrees into its institutional processes including assessment. As explained below in Section 5, to show progress in this area, the team recommends improving student services, enhancing curriculum development, and making institutional research more central to the core operations of the institution.

While the self-study demonstrated reflection on how the School of Business courses meet educational need (CFR 2.2a), it was not apparent how the issue of the degrees relating directly to employment was addressed. For this reason, the team recommends UWLA look beyond the institution to evaluate how comparable programs are calibrated for professional preparation; this will help add detail needed to align the business curricula with professional standards. External peer review including the perspective of business practitioners would also be helpful in making these programs more professionally oriented in accordance with the School of Business mission to “develop and enhance [a diverse student population’s] academic and professional business skills and enable them to effectively and immediately contribute to society.”
As noted, UWLA has developed a BS degree in business administration to which it hopes to begin admitting students in spring 2017. Designed as a degree completion program, General Education requirements are completed at other institutions, which is a cost-effective approach for a small undergraduate program. While the self-study listed seven BS courses that are intended to provide enhanced GE study, it did not provide complete discussion of core competencies, which need to be more comprehensively addressed in the assessment process (CFR 2.2a).

As evidenced by the self-study and onsite interviews, UWLA students are highly motivated learners who are actively involved in their learning, appropriately challenged by the curriculum, and engaged by a variety of learning and assessment methods (e.g., written, oral, projects, discussion, Socratic method, case studies, MS capstone course) (CFR 2.5). They receive regular feedback on their academic performance, especially writing skills, and have the opportunity to participate in practical courses (e.g., School of Business: entrepreneurship and marketing practicum courses, School of Law: How to Start a Successful Law Practice course, Moot Court). The Legal Externship Program (LEP) has clearly defined eligibility requirements, deliverables, and credit policies in line with WASC requirements (CFR 2.3). Team interview with IR and assessment indicated that the LEP has not yet been included in program assessment. The team recommends considering this practical experience as well as others in the measurement of program effectiveness as they provide opportunities to gather feedback from multiple perspectives (student, program coordinator, external partners) (CFR 2.6).

Scholarship and Creative Activity

UWLA’s faculty handbook contains detailed information on learning outcomes, and the Faculty Manual for Effective Student Learning Outcomes and Closing the Loop is a user-friendly and comprehensive training/informational resource. UWLA’s assessment director also provides
training to faculty on outcomes development and assessment at regular faculty meetings.

Scholarship, however, is only cursorily addressed in the evidence provided, and the exhibits also show little in the way of scholarly publications or presentations. Interviews with faculty members did give the impression that more than a few engage in scholarship of some kind, and it is possible that this was not adequately captured in the data provided to the team. It would be helpful to see evidence of what the self-study refers to as “defined expectations of research and instructional innovation and scholarship for students and faculty” (page 46).

Although UWLA understands the need to support and encourage scholarship and innovation, the small number of full-time faculty is a limiting factor as they are spread thin with their roles and responsibilities. Moreover, the lack of faculty promotion or tenure provisions makes it difficult to tie scholarship to faculty performance review. One recommendation is to have full-time faculty complete goal sheets and/or follow the Boyer’s model to include a wide definition of “scholarship” and facilitate faculty reviews. Alternatively, the team recommends that UWLA explore ways not only to recognize scholarship but also to actively support it, e.g. by means of staggered course reductions, sabbaticals, and the like. Structures for faculty professional development have been established, and the “Professional Development Reporting Sheet” indicates that adjuncts are expected to participate in professional development by participating in development hours equivalent to half of their weekly classroom hours in spring and fall combined. It was not clear to the team whether professional development is assessed as part of faculty evaluation. (CFR 2.8)

The institution should enhance efforts to create a graduate culture for the MS program in business, particularly, that requires and supports faculty’s maintaining currency as scholars. Similarly, efforts to develop graduate business students as scholars are in initial stages. Faculty
recognize and make efforts to address the needs of students who are frequently not ready for graduate-level research and writing. The institution should ensure that, in addition to providing sufficient support services, faculty receive training that develops curricular and pedagogical methods for helping underprepared students achieve standards for scholarship necessary for a graduate degree. (CFRs 2.8, 2.9, 2.10)

*Student Learning and Success*

UWLA has demonstrated progress toward identifying and supporting student needs and tracking aggregated and demographically disaggregated student achievement (persistence, completion, time to degree, bar passage rates). The institution also captures student satisfaction data via surveys. While the team did not observe a comprehensive assessment of campus climate, this will become more relevant as enrollment increases. Additionally, access to financial aid through accreditation will also require detailed tracking and reporting of retention and completion data to protect federal and state student aid. Institutional thinking and structuring in the area of data-driven retention efforts is also a predictable need as enrollment, especially of undergraduates, increases. (CFR 2.10) This process should include benchmarking UWLA’s retention and graduation rates against its own aspirations as well as rates of peer institutions. The team recognizes the challenge inherent in UWLA’s admirable mission to provide higher education in law and business to students who would not otherwise have these opportunities. This mission brings with it the responsibility to support academically underprepared students, especially in the graduate business program, whose admissions requirements provide for a rather low minimum undergraduate GPA (2.0, though 2.7 is recommended) and do not call for undergraduate prerequisite courses in the discipline.
UWLA tracks student achievement by means of SAP review, and law students falling below a 2.3 cumulative GPA are required to meet with the dean to revise their projected completion date or reduce to part-time (School of Law Handbook).

UWLA employs a director of student services who is involved in tracking student progress as well as developing and offering student support services (e.g. the legal writing course). The website and program materials (handbooks, etc.) describe typical student support services, including tutoring, financial services counseling, and (online) career services. The team also found thorough complaint procedures as well as a comprehensive disabilities policy. (CFR 2.13)

Student services has a mission statement informed by the school’s ILOs and an assessment plan to evaluate the effectiveness of the student support services. As a small school with limited resources, most attention is currently placed on supporting students’ writing needs and preparation for the bar examination. Law students are provided a legal writing course designed to raise their proficiency in writing for the discipline. Students who have achieved a minimum grade of 2.7 in a given course are also allowed to peer tutor other students currently enrolled in the course. So far, it appears that this system of volunteer tutoring is meeting the needs of law students, who also have online learning resources at their disposal. Due to the infancy stage of the business programs, UWLA currently relies on one full-time professor and a number of willing adjuncts and recent graduates to provide student support services in the discipline. This will likely not be sufficient over time.

To nurture student community and meet high needs for support, the team recommends staff development in the area of academic support (e.g. Americans with Disabilities Act (ADA)) as well as expanded professional tutoring services.
UWLA offers co-curricular programming such as a speakers’ series with business leaders, a law fraternity, and a variety of practice-focused law clinics. The university also hosts an impressive array of clubs, associations, and organizations that reflect the diversity of UWLA’s student population/interest (e.g., Toastmasters, DARE, Black Women’s Lawyers Association, Iranian American Lawyers Association, California Association of Black Lawyers, John M. Langston Bar Association, South Central Los Angeles Regional Center, L.A. City Attorneys Debate). Such activities clearly enrich the educational experiences of UWLA students.

The university partners with West Los Angeles College for co-curricular programs. (CFR 2.11) As UWLA continues to build out co-curricular offerings, the team recommends that they align such programming with academic goals and carry out regular co-curricular assessment.

UWLA provides useful and complete program information at the admissions and enrollment stages and through the program handbooks. Recruitment and marketing materials were found to be clear, accurate, and consistent. Students receive advisement during admissions and orientation (the School of Law provides a one-week (15-hour) introductory “boot camp” to new students). (CFR 2.12)

UWLA’s transfer policies are clear and easily accessible (CFR 2.14). Students who transfer receive personal attention, meeting with the dean and enrollment staff to go over transferability of coursework and their UWLA study plan. To assess the transferability of GE courses into the BS program, the admissions process utilizes an appropriate breadth document adapted from the California State University system. By policy, the school does not award credit for experiential learning. It could be interesting and instructive for the university to track the retention of transfer students.
Standard 3 - Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

Faculty and staff

It is important for the institution to employ faculty and staff in sufficient number, qualification, and diversity to achieve the institution’s educational objectives and to support programs and operations. Faculty and staff should also be evaluated and developed on a regular basis in order to improve teaching and achievement of student learning outcomes.

Overall UWLA has 20 full-time, eight part-time employees, and 22 mostly adjunct faculty members on their payroll. The 2015 financial statements show that out of the $4.5 million operating budget, 36% was spent on administrative, operation and clerical staff salaries, 4% on full time faculty salaries, and 8% on adjunct faculty salaries.

Faculty

To break it down further by schools, the School of Law employs one dean and three full-time faculty members and uses adjunct faculty extensively to teach approximately 200 students. The School of Business is newly developed and has an enrollment of fewer than 10 graduate students in the current term. The first cohort of three to five undergraduate students is expected to start in January 2017. The School of Business currently employs one interim dean, one new full-time faculty member, and several adjunct faculty. The plan is to add more full-time faculty as enrollment grows. All UWLA faculty members are required to have advanced degrees and professional experience in their fields.

The team met with adjunct and full-time faculty separately and found that they are successful professionals in their fields and many have been teaching at UWLA for many years. It came through in the meetings that many faculty members teach at UWLA primarily because of
its mission rather than for personal financial gain. The team was impressed with their level of engagement and dedication, particularly of the adjunct faculty who participate on faculty committees. The team commends the institution on the quality and dedication of the faculty.

At UWLA, faculty are not tenured so there is no formal tenure, retention, and promotion process. However, there are some faculty review practices in place including peer review and student evaluation of instruction. It is less clear how these types of faculty review are used to improve teaching and what formal process is in place to address issues raised by peers or students in the evaluations.

The Faculty Development Department supports full-time and adjunct faculty development activities. Some programs have been established such as a faculty orientation and the UWLA mentorship program. UWLA uses a learning management system, D2L, which can track and assess training for faculty members. The Assessment Department also provides some training and guidance regarding assessment across academic and non-academic areas.

In summary, despite the disproportionally small amount of financial resources allocated for faculty salary and the extensive use of adjunct faculty, the team finds that the faculty is sufficient in number, committed, and qualified to achieve the institution’s educational objectives. This is especially evident at the School of Law.

Administration and Staff

UWLA’s full-time CEO is an accomplished leader who has served the institution with dedication since 1998. Under President Brown’s leadership, UWLA has gone through significant changes such as requiring the LSAT for admission, acquiring the San Fernando Valley law school from the University of La Verne, creating a new business school, financing the enterprise
through the sale of property, and bringing in private investors. His leadership has been central to the success of the institution.

As discussed under Standard 1, the current CFO is an interim appointment. In addition, there are two other interim appointments for key senior positions, the dean of the School of Business and the director of faculty development and assessment. UWLA is currently conducting searches to fill these positions permanently.

It bears repeating that it is important that UWLA finalize the hiring of a permanent CFO who will work closely with the president and the Board of Managers to continue to develop, refine, and implement a financial plan to restore its financial health and to ensure sustainability. (CFR 3.8)

The team met with the core team of staff and noticed that several employees are either new hires or relatively new to their roles. Given the relatively short tenure of some key staff members, the team recommends that professional development planning for staff be developed and implemented. (CFR 3.3)

To support the enrollment of approximately 200 students, the current staffing level of 20 full-time and eight part-time employees, or 36% of operating budget, is sufficient to support programs and operations. In addition, staff members are reviewed once a year by their managers on their performance.

Fiscal resources

It is essential for the institution to have a long and stable future, especially as it is seeking access to federal financial aid should it attainWSCUC candidacy status. Given that UWLA is tuition dependent and faces enrollment challenges, the team did not find its current financial
condition to be stable as evidenced by its having generated deficits three out of four years (from 2012 to 2015) and anticipating to generate a deficit of approximately $100,000 in 2016.

The institution’s balance sheet remains fragile. The independently audited financial statement for 2015 shows total equity (reserve) of $143,226 as of December 31, 2015. UWLA does not own property and has few assets. Excluding intangible assets of $843,746 in goodwill, the institution has negative equity (reserve) of $700,520. In other words, UWLA has more liabilities than tangible assets.

Cash flow is also a major concern. Cash as of December 31, 2015 was only $132,466. Small setbacks such as lower than projected enrollment or higher than expected uncollectible student receivables, could easily deplete the cash on hand. Furthermore, UWLA does not have a line of credit. It does, however, have a contingency bank card with a credit limit up to $100,000. To ensure sufficient cash is available to fund ongoing operations as well as to develop and grow the undergraduate and graduate business programs, securing new capital infusion is critical and urgent.

UWLA has developed a plan to restore its financial health. The short-term plan is to raise $1.5 to $2 million capital to fund its operation and to obtain WSCUC accreditation. In 2016, the president contributed $75,000 of his personal funds to capital. The long-term plan is to increase enrollments significantly. The institution projects in the budgets for the next three years that attainment of accreditation, which allows access to federal financial aid, will increase School of Law enrollment by 50% over current enrollment in 2018. In addition, UWLA also projects that the diversified offerings and the recruitment of international students will increase School of Business enrollment to 50 graduates and 100 undergraduates in 2018.
So far, UWLA has a $500,000 capital infusion commitment from an investor contingent on obtaining candidacy. The team was told there may be two or three other investors interested in investing similar amounts. UWLA senior administration and the board indicated they believe that once the university has obtained WSCUC candidacy, the capital infusion will come and higher enrollment goals can be achieved.

The team recommends that UWLA develop a clearer plan to achieve financial stability and sustainability. For example, one possibility is to develop an in-depth marketing and recruiting plan that will help achieve the target enrollment projections for 2018. While UWLA has initiated steps to diversify, to increase future enrollment, and to raise new capital investment, the team stresses the importance of making immediate progress in these areas. (CFR 3.4)

Finally, in terms of integrity and accountability in its financial reporting, UWLA has received clean audit reports from an independent audit firm.

*IT Resources*

There are some IT resources to support academic programs. Faculty teaching online classes receive training in this area. The School of Business courses are hybrid, and the school provides introductory training on using D2L, the online learning management system. There are also some, albeit limited, library resources including electronic subscriptions to support programs (e.g., ProQuest, Lexis, Westlaw).

*Organizational structures and decision-making processes*

It is imperative to have proper oversight built into the organizational structure that leads to operational success. The organization chart shows clear reporting lines for administrative staff. However, the formal decision-making processes governing who makes what decisions, when and under what circumstances, are less clear. To support effective and sustainable
institutional capacity and educational effectiveness, the team recommends that the institution develop and formalize organizational structures and decision-making processes so that they are clear and consistent with its purposes and support effective decision making. For example, the team recommends that UWLA review and document the faculty governance structure, create charges for faculty and staff committees, and document the work of those committees more comprehensively. (CFR 3.6, 3.7, 3.10)

The organization chart shows, and team interviews confirmed, that some executive leadership positions are held by members of the same family. While the Employee Handbook has a strict conflict of interest policy regarding the employment of family members, it is not clear how decisions regarding hiring, evaluating, or salary setting of such employees are based on objective criteria. The team recommends that criteria for personnel decisions be explicit so as to ensure they are merit based and free of conflicts of interest.

Board of Managers

The institution and its governing board need to be effectively independent from the university’s investors to avoid compromising the mission of the institution because of the interests of those investors. UWLA has an independent and diverse board of managers. The BOM bylaws prescribe a majority of non-invested managers and the terms for managers. In addition, there are different BOM committees with different charges. The team noted that several members joined the board quite recently.

As mentioned under Standard 1, the level of the board’s involvement in reviewing the president’s past performance and setting his compensation is unclear. While the team was told about specific and measurable goals for the president in the future, it was not apparent how these
would figure into the evaluation process nor how the prior evaluation had been used to inform the president of his performance to date.

The board was clear with the team that they believe the biggest challenge facing the institution to be its lack of accreditation, not financial issues. UWLA has developed a financial plan based on that view for future years and projects to achieve surpluses. The team recommends that UWLA take steps to ensure that the board has the knowledge and tools to be effectively engaged in the development of financial plans and to monitor the implementation of such financial plans (CFR 3.9)

**Standard 4: Creating An Organization Committed To Quality Assurance, Institutional Learning, and Improvement**

**Quality Assurance Processes**

Institutional Assessment. While the self-study and interviews with university administration, faculty, students, and staff show UWLA’s earnest efforts to fulfill its mission (CFR 4.1), a concrete strategic plan and the positive implications it would have for achieving quality assurance, institutional learning, and improvement, remains one of the largest areas of opportunity for UWLA.

Currently, the institution leans upon a three-pronged approach to gain multi-stakeholder understandings of its resources and strategic position. It utilizes a strategic planning committee representing various institutional perspectives (e.g., Board of Managers, academic leadership, WASC Steering Committee), academic and student support analysis (source of their SWOT analysis), and the *Institutional Effectiveness and Program Review Handbook* for a formalized approach to assessment (CFRs 4.5, 4.6, 4.7). As these three pieces continue to develop, there is room for more cohesive and intentional planning that can be communicated and disseminated.
throughout the institution. A strategic plan would drive the selection of data to be collected, analyzed, interpreted, and utilized for quality assurance and institutional improvement (CFR 4.2). At this time, for example, the team found that data should be available to determine the efficacy of non-academic support systems, the number of UWLA students sitting for the bar, yield numbers on application and enrollment, and sample size of students in the summer 2016 analysis of student learning outcomes (details below).

To its credit, UWLA established the Institutional Research Department (IRD), headed by the director of library and institutional research (CFR 4.2). IRD currently collects employment data, end-of-course surveys, student demographics, and student success indicators (e.g., program completion rates, times to degree, correlation to bar passage rates). The data are described as being communicated to both internal and external stakeholders, and can be viewed on the UWLA website. At the time of the team visit, IRD efforts included completing and posting employment outcome reports and summary online. IRD also provided information for first-, second-, and third-year students’ time to degree during the California Bar Examiners visit (CFR 4.2).

IRD efforts portray the institution’s intention to ensure the quality of their programs and degrees. However, these efforts can be buttressed by a concrete strategic plan to prioritize data collection needs. With the IRD director also responsible for the library and administrative online learning management systems, the department is understandably still in its inchoate stages and has limited capacity for in-depth analysis. For example, UWLA’s self-study reports that the IRD regularly makes comparisons to like-institution data. Currently, while like-institution data may be gathered, there is no clear indication that the institution utilizes such comparative data to
inform institutional assessment plans. Also, student data tracking described above should progress to more in-depth and reflective levels of analysis (CFR 4.2).

UWLA has received feedback from external sources (CFR 4.2). The institution refers to institutional reviews including the BPPE annual report, submitted for the School of Business. The BPPE report includes institutional data, albeit without need for in-depth analysis or application. As noted, UWLA had an onsite visit in 2015 from the Committee of Bar Examiners (CBE). The three-member review team provided feedback on common challenges in admissions, attrition, and graduation rates for comparable institutions. The CBE team also shared positive remarks on the School of Law’s practice of assuring an even grade distribution. UWLA continues to refine this work by having trained graders—currently faculty—control for validity and grading norms across courses. Consistency in grading practice is also important to UWLA’s School of Law faculty as they mentioned anecdotal evidence of a correlation between grades in bar subject area courses and bar passage. Specifically, in the team’s meeting with the full-time faculty, they indicated that minimum grades of B- in bar subject area courses increases students’ chances for passing the bar in their experience.

At the time of the visit, one limited example of UWLA’s use of IRD-gathered data was provided; it sought to rectify data filtering mistakes emerging from the institution’s online transcript system. Developing formalized and strategic data gathering, utilization, and application efforts is an area for future growth (CFRs 4.2, 4.3) as are periodic reviews of the IRD’s research function as it continues to evolve.

**Learning Outcomes.** One area where UWLA has shown recent improvement is in its assessment practices. UWLA established the WASC Steering Committee comprised of staff, faculty, and administration. The steering committee supported the process of building its assessment capacity
(CFRs 4.1, 4.4, 4.5, 4.6). As mentioned previously, UWLA has recently hired an Assessment Leadership Academy (ALA)-trained assessment director. The institutional learning outcomes are aligned to the mission; program learning outcomes are refined; and some course learning outcomes at the School of Law have been measured against the PLOs. Learning outcomes are also mapped and aligned from ILOs to CLOs.

Assessment planning at UWLA is proposing a three-year review cycle for the ILOs. There is also noteworthy work involving the PLOs. First, PLOs were recently refined to meet the institution’s move away from American Bar Association standards. The PLOs were initially modeled after American Bar Association standards and now reflect more standards of practice—a shift that reflects the institution’s move away from ABA. Also, the PLOs will be placed on a five-year program review process necessitating collaboration across the university: program assessment plans (working with program chairs, programs are focusing on the evaluation of two PLOs per year); annual assessment reports; external peer review; and action plan (CFRs 4.4, 4.5, 4.6). Learning outcome measurement is a relatively recent endeavor, and efforts are in progress to track and analyze data on learning and to determine how assessment outcomes will be applied to the improvement of structures, services, processes, curricula, pedagogy, and overall learning (CFR 4.1).

For example, the School of Law, headed by the academic dean and in collaboration with faculty, assessed the SLOs of 10 School of Law courses in summer 2016. Students in the identified courses completed a multiple-choice exam related to three course learning outcomes that map to PLO 6: “Can employ the professional skills necessary of a member of the bar.” The criteria were set to anticipate students achieving at least 75% on the SLOs. Results show that five courses met the 75% mark for SLO1, five courses for SLO2, and one course for SLO3. Faculty
interpreted the results and provided recommendations on adjustments for these courses. As a follow-up to the recommendations, School of Law faculty will meet in the spring of 2017 to discuss ways to update the courses (CFR 4.4, 4.5, 4.6).

The CLOs, per the assessment guide, are to be reviewed semi-annually by faculty (CFR 4.4). Indeed, beyond these newly established efforts toward the Program Assessment Plan and the PLO6 analysis described above, other considerations of CLO assessment were anecdotal and informal as they were typically relayed by faculty during the site visit.

The team commends UWLA for their development of a legal writing class in response to external review input. This curricular addition exemplifies how UWLA is making an effort to respond to external feedback as the impetus for change. The CBE reviewers had affirmed how UWLA’s cumulative bar passage rates reflect “the direct correlation with exam writing and mentorship” (self-study, page 19). The 2-unit legal writing course is offered to all students and is mandatory for those earning a 2.3 GPA or lower in their first semester in the JD program. Students also have the option to audit the course. UWLA’s administration is currently analyzing end-of-year grades against pre- and post-writing course performance. The legal writing course also demonstrates collaboration across institutional departments as faculty developed its curriculum, IRD collected relevant data, and student services provided instruction and academic support (CFRs 4.4, 4.5, 4.6)

_Institutional Learning and Improvement_

Through its newly established assessment practices, UWLA continues to demonstrate work toward institutional improvement. As a whole, if efforts by leadership at all levels were framed by an institution-wide strategy, the strength, efficiency, impact, application, and
evaluation of data would be useful in promoting intuitive learning and improvement (CFR 4.3, 4.6).

Institutional learning and improvement are mustered via formal and informal means. Formally, the assessment guide outlines overall assessment and program review strategies and cycles. At the time of the visit, these were in their early stages, but the guide does outline a process that can be driven by a strategic plan. The budding collaboration between the assessment director and faculty, faculty and deans, and deans with student services are all promising indicators that leadership at these levels is committed to data-driven institutional improvement (CFR 4.3, 4.4). As the promise of collaboration is heavily dependent on communication between departments, in the future, it will be helpful for UWLA to create a communication plan to support the overall strategic plan. At this time, communication and discussion regarding learning outcomes occur via Survey Monkey, School of Business faculty senate, and at the School of Law retreat (CFR 4.5).

Faculty. As mentioned in Standard 3, one of UWLA’s strengths is its faculty. Within faculty is a growing realization that the standards of performance (e.g., in course learning outcomes) can ultimately be integrated into a line of inquiry to improve teaching and curriculum (CFR 4.4). More specifically, UWLA has also made efforts to determine whether faculty recruitment, hiring, orientation, and evaluation are aligned with their educational objectives (CFR 4.3). Review of faculty CVs and conversations with both part-time and full-time faculty members indicated that they are generally well qualified for their roles in terms of degree level and professional experience. Several students during the widely-attended site visit interviews commented on the advantage of having faculty with field-relevant expertise in the classroom.
Faculty also displayed a very student-focused and community-centric demeanor that aligns to UWLA’s desire to support non-traditional student populations. For example, faculty were noted for providing feedback on papers to students not enrolled in their courses. UWLA professors were also described as being greatly accommodating with their availability and responsiveness.

Also of note are the number of faculty (and staff) members who are UWLA graduates and contribute to the on-going synergy and focus on the institution’s mission. At the same time, future opportunities to hire non-UWLA alumni can provide students with a diversity of perspectives and experience.

In-house professional development for part-time faculty members is comprised primarily of orientation sessions and general meetings, typically headed and organized by the School of Law dean and faculty chairs. Select members of the faculty also reported attending several job-related, professional conferences including WASC ARC.

Another theme emerging from conversations with faculty is that they seemed reflective, often adjusting different aspects of their classroom instruction to accommodate student learning. This approach, of course, is a natural response to classroom teaching to “meet the learners where they are,” and this type of agile instruction can contribute positively to learning. Since UWLA faculty express a strong dedication to student learning, both full- and part-time faculty could benefit from professional development focusing on andragogy. To complement their subject matter expertise, a deeper understanding of learning theory and course design (e.g. purposes of objective and course outcomes) as well as specific professional development on supporting the adult learner are a necessity for an institution that prides itself on less-restrictive enrollment policies.
In addition, the team recommends that course-level adjustments made by faculty should also be swept into a larger and more thoughtful plan of collecting data across courses to refine programs, with the purpose of improving student learning from a multiplicity of perspectives (i.e., faculty, course, and program). Data gathering and feedback will be particularly important as the new hybrid (online and face-to-face) modality at the School of Business develops (CFRs 4.4, 4.5, 4.6).

There is also room to refine the current course development process to more formally engage faculty input. For example, both full- and part-time faculty members have the academic freedom to propose new elective courses. Currently such proposals are reviewed and approved mainly by the academic deans. One recommendation is to standardize a process involving other stakeholders, particularly the faculty senate, to ensure faculty ownership of curriculum (CFR 4.4, 4.5, 4.6).

The team was told that one of the informal means of improvement occurs in collaborative meetings among members of administration, faculty, alumni, and students. UWLA’s self-study references student feedback in informal meetings as a valuable indicator of their perspective of faculty and program performance (CFR 4.5). In addition to the anecdotal evidence of faculty performance, UWLA conducts annual, observation-based reviews of full- and part-time faculty to, “assure fairness, quality, and model of delivery … is up-to-date and accurate” (self-study, page 20). The School of Law professors are evaluated by a faculty peer or administrator who performs the classroom observations. The evaluation is focused on the areas of subject knowledge, clarity of presentation, pace/use of time, enthusiasm/interest in the subject matter, interaction with students, effective use of teaching aids, and class control. Students contribute to faculty evaluations via end-of-course surveys, which are delivered online via Survey Monkey.
The institution is also growing in its approach to evaluating staff and administration as well as using feedback from those assessments as it applies to the improvement of the institution. It would be helpful to include performance assessments of the deans in this cycle of review. As UWLA looks to the opportunity for relationships with neighboring community colleges as well as cooperative agreements with universities in China (e.g., the MOU with Zhengzhou Xinlian University), another recommendation is to solidify the goals that consider the institution’s academic programs and fiscal future, set forth by the Board of Managers for the president, into measurable key performance indicators that can be aligned and integrated into a concrete strategic plan (CFR 4.5, 4.6, 4.7).

SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION

Degree Programs: Meaning, Quality, and Integrity of Degrees

UWLA has been making strides in assuring that the budding undergraduate and graduate degrees in business as well as the long-established law degree resonate with quality and integrity. The institution has put initial efforts in place to measure student learning outcomes. For example, UWLA has engaged in the development of the WASC Steering Committee, growth of the Institutional Research Department, and cyclical assessment practices, as described in Section 2, Standard 4 of this report. UWLA has also initiated plans to utilize the data in a way that contributes to degree integrity and quality; for instance, a follow-up, faculty discussion will ensue in spring 2017 to fortify courses with weak alignments to PLOs. Moreover, there is evidence of efforts to begin infusing a richness to the degree via the offering of supplemental,
field-related topical clinics at the School of Law, student participation in advocacy competitions, and efforts to build student community via societies (e.g., Delta Theta Phi).

Going forward, the team recommends in order to assure the meaning, quality, and integrity of its degree programs that UWLA devote increased attention to improvement in three main areas:

- Additional support should be dedicated to student services to nurture student community and student learning needs. Some thoughts here include professional development in areas of student support (e.g., staff training on ADA compliance and services), increased tutoring, and the introduction of additional co-curricular opportunities.

- As the School of Business begins to offer degrees at both the undergraduate and graduate levels, and while efforts to measure learning outcomes are still in the developing stages, it is recommended that UWLA utilize a framework such as the Lumina Degree Qualifications Profile (DQP) to ensure adequate rigor at each degree level. Along these same lines, the School of Business should consider appropriate alignment to professional standards and ethics that can enrich the meaning and quality of the degree from both a student and a marketability point of view.

- Once a more specific and firm strategic plan is in place, UWLA is encouraged to increase collaborative efforts between academics and institutional research to collect, track, analyze, and utilize data to support bar passage and student career outcomes.

*Educational Quality: Core Competencies and Standards of Performance at Graduation*

One of UWLA’s biggest milestones is their establishment of the institutional research and assessment departments, who along with the administration, and to some extent faculty, have helped to align and define institutional, program, and course learning outcomes. Contributions
toward student learning and absorption of core competencies is emerging because of UWLA’s work in assuring consistency in grade distributions, hiring professors with rich professional experience, and initial efforts in measuring student learning outcomes.

The strategic collection, analysis, and utilization of data is a behemoth task, and as these capacities are put into place, UWLA is encouraged to continue pursuing a process to secure their understanding of the relationship between curricular and co-curricular offerings and bar passage rates. The university may also benefit from moving informal student/faculty/administration dialogue pertaining to students’ academic needs to a process whereby student services receives systematized communication of student support needs. The institution may begin by bringing observations and data to regularly scheduled meetings held by student services with goals of creating action items to meet needs.

*Sustainability: Preparing for the Changing Higher Education Environment*

UWLA has largely addressed the issues of sustainability and preparation for the changing higher education environment in the context of its objective to achieve accreditation, which will help secure a needed infusion of funding, as well as envisioned growth in enrollment resulting from accreditation and the commitments of local community colleges and Zhengzhou Xinlian University in China.

UWLA also needs to focus more thoughtfully on the development of processes and communication. Specifically, systems are required to track changes in preparation for growth and sustainability, including the development of a clear articulation of the BS in Business Administration, a broader and more inclusive distribution of responsibilities from executive leadership to the faculty to ensure that processes and information are not limited to only a few decision makers. The institution should also consider upcoming governmental roadblocks, for
example regulations concerning international students or restrictions on student loans at for-profit universities. Furthermore, UWLA, as a student-centric institution, should make efforts to include stronger support of the whole student in its resources planning.

SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS

The IEEI reflects what is demonstrated in the self-study narrative under the relevant CFRs. It appears that assessment concepts and scaffolding are largely in place. Except for some PLO reviews in summer 2016 and some survey results, no partial or full cycle of program review has taken place as of fall 2016. Further, most of the columns describing who interprets the evidence, the process, and how the findings are used are identical for each program. Thus, while UWLA appears to be on the right track regarding putting solid assessment practices in place, there is still work to do on this to close the loop and engage a broader audience in using data.

SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATION

Commendations

1. The team commends the institution for its comprehensive development of student learning outcomes. Team members found clear evidence of measurable, mission-driven outcomes at the course, program, and institutional level that are clearly mapped and differentiated according to the level of development. UWLA has taken significant steps to assess these learning outcomes systematically and create pathways to improvement of educational effectiveness.

2. UWLA is clearly serving its social justice-driven mission to deliver quality, practice-oriented legal education to a diverse and underserved population with the aim to democratize the
legal profession. Moreover, the commitment to the mission of faculty, staff, students, alumni and board members is commendable and sincere. The team was impressed with how many students, alumni, and adjunct faculty took time to come to campus to meet with the team.

3. The team commends the institution on the quality of the faculty; they are successful professionals in their fields, and the team was impressed with their level of engagement, particularly of the adjunct faculty who participate on faculty committees.

4. The team commends UWLA on implementing a more organic and inclusive process to prepare for this review. In particular, creation of the WASC Steering Committee and enhanced communication across the institution were evidence of broad engagement with and buy-in for the WASC process.

Recommendations

1. The team recommends that UWLA develop a clearer plan to achieve financial stability and a sustainable financial model. Because UWLA is tuition dependent and facing enrollment challenges, it continues to face financial instability as evidenced by having generated deficits in four of the last five years. UWLA’s balance sheet remains fragile and cash flow is also a major concern. While UWLA has initiated steps to diversify and generate revenue through increasing enrollment by creating the business school, as well as seeking out capital investment, the team stresses the importance of making immediate progress in these areas.

2. It is important that UWLA finalize the hiring of a permanent CFO who will work closely with the president and the board of managers to continue to develop, refine, and implement a sustainable financial model and balanced budgets. The team recommends that UWLA take steps to ensure the board has the knowledge and tools to be effectively engaged in the budget process.
3. To support effective and sustainable institutional capacity and educational effectiveness, the team recommends that the institution develop and formalize organizational structures and decision-making processes that are clear and consistent with its purposes and support effective decision making. For example, the team recommends that UWLA review and document the faculty governance structure, create charges for faculty and staff committees, as well as document the work of those committees more comprehensively.

4. In an effort to assure the meaning, quality, and integrity of the degree, the team recommends increased attention toward the improvement of:

- Student services to nurture student community and student learning needs (e.g., ADA trained staff, tutoring and co-curricular opportunities)
- Curriculum development and academics including program learning outcome alignment to professional standards for the undergraduate business degree as well as alignment to the Lumina Degree Qualifications Profile (or similar framework) to assure adequate and appropriate degree rigor.
- Making IR a more central focus, with data being used for planning and decision making in a more strategic manner. This would involve, for example, expanding the current half-time IR position to full time and engaging IR more comprehensively with faculty and staff, including collecting, tracking, analyzing, and utilizing data to support tracking bar passage rates and student career outcomes.

5. The team recommends UWLA further develop and implement a more comprehensive approach to strategic planning that has measureable goals and objectives and is data driven, aligned with the budget, and integrated across the institution.
6. It is important that faculty be more involved in program level assessment. While it was evident to the team that faculty engage in course level assessment, UWLA needs to take the next step towards ensuring faculty understand and use data to make program level changes.

APPENDICES

Four federal compliance forms