REPORT OF THE WSCUC TEAM

For Reaffirmation of Accreditation

To: California Baptist University

May 6-9, 2019

Team Roster

Judie Wexler, Chair
President, California Institute of Integral Studies

Andrew Allen, Assistant Chair
Vice President for Institutional Effectiveness and Strategic Initiatives, University of San Diego

Paul Alexander
Vice President for Academic Affairs, Hope International University

Kevin Tilden
Executive Vice President and Chief Financial Officer, Concordia University Irvine

Amy Wallace
Associate Vice President for Academic Affairs, California State University, Channel Islands

Maureen Maloney
Vice President and Staff Liaison, WASC Senior College and University Commission

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

A. Description of California Baptist University and its accreditation history .................. 3
B. Description of the Team’s Review Process ...................................................................... 6
C. California Baptist University’s Reaccreditation Report: Quality and rigor of the report and supporting evidence ................................................................................................... 8

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to Previous Commission Actions .......................................... 9
B. Component 2: Compliance: Review underWSCUC Standards and Compliance with Federal Requirements; Inventory of Educational Effectiveness ....................................................... 10
C. Component 3: Degree Programs: Meaning, quality, and integrity of the degrees .......... 17
D. Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation .......................................................................................... 21
E. Component 5: Student Success: Student learning, retention, and graduation ............. 25
F. Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence .............................................................................................................. 29
G. Component 7: Sustainability: Financial viability, preparing for the changing higher education environment ......................................................................................................................... 33
H. Component 8: Theme: The Division of Online and Professional Studies .................. 37

SECTION III – COMMENDATIONS AND RECOMMENDATIONS ................................ 43

APPENDICES ..................................................................................................................... 46

A. Federal Compliance Forms
   1. Credit Hour Review
   2. Marketing and Recruitment Review
   3. Student Complaints Review
   4. Transfer Credit Review
B. Distance Education Review
A. Description of California Baptist University and Accreditation History

Founded as California Baptist College in 1950 in El Monte, California, the college moved in 1955 to Riverside, California to accommodate anticipated growth. As this growth was realized and as a result of its expanded academic program offerings, California Baptist College became California Baptist University in 1998.

California Baptist University (CBU) is a private non-profit university with over 10,000 undergraduate and graduate students and currently occupies over 160 acres on its main campus. CBU is a religiously sponsored institution through the California Southern Baptist Convention (CSBC) who controls and financially supports CBU and elects the members of its board of trustees. CBU’s current Carnegie Classification is Master’s Colleges & Universities: Larger Programs.

CBU’s mission and core values follow from its Baptist heritage. CBU is committed to the Great Commission to spread the teachings of Jesus Christ to all nations of the world. CBU encourages and supports students to “Live Your Purpose” by providing “a Christ-centered educational experience that challenges its graduates to become individuals whose skills, integrity and sense of purpose glorify God and distinguish them in the workplace and in the world.” In partial fulfillment of its mission, 100% of the faculty and staff are Christian.
CBU’s core values are known as the “Core 4.” These four core values are: academically prepared, biblically rooted, globally minded, and equipped to serve. The intent is to align these core values with the university’s student learning outcomes, although, as discussed later in this report, the alignment is not always readily evident.

CBU is organized into six divisions, two of which directly oversee degree programs. The Division of Academic Affairs oversees 10 colleges and schools and is responsible for the traditional on-campus academic programs (60 bachelor’s degrees, 53 master’s degrees and 2 doctoral degrees). The Division of Online and Professional Studies (OPS), created in 2010, is responsible for the online academic programs (24 bachelors, 14 masters and 2 doctoral programs). Given its growth and development since the last reaffirmation of accreditation review in 2010, CBU chose to describe OPS as its component 8 theme. CBU’s online programs are reviewed in component 8 below and in the Distance Education appendix.

CBU has grown rapidly under the current president’s leadership; he began his presidency in 1994. Total enrollment more than doubled from 4,715 students in 2010 to 10,486 students in 2018 (7,855 undergraduate and 2,631 graduate students). OPS itself grew from 711 students in 2010 to 2,406 students in 2018 (OPS students are primarily non-traditional undergraduates; 1,702 undergraduates and 704 graduates). The board of trustees has set an enrollment goal of 12,000 students by the year 2025.

CBU serves underserved and underrepresented student populations. CBU has been listed as a Hispanic-serving institution by the Hispanic Association of Colleges and Universities since the 2012-13 academic year, with 35.3% of its student population being Hispanic. And according to the U.S. Department of Education, CBU is eligible for specialized federal grants and loans for Hispanic
students. CBU is also listed as a minority serving institution with over half of the student population coming from underrepresented groups. In addition, 44% of CBU first-year students are Pell grant recipients, indicating a significant population with high financial need.

CBU has 367 full-time faculty (58 in OPS) and 754 adjunct faculty (322 in OPS) in fall 2018. The full-time faculty are 67% white, 14% Asian, 7% African American and 6% Hispanic (with the remaining categories falling into smaller percentages).

Growing enrollment has demanded the construction of new facilities. Since 2010 new structures include: the new Robert K. Jabs School of Business Building, a new recreation center, the multi-building College of Health Science campus, a new sporting and events center, and a new building for the College of Engineering. Additional facilities are contemplated under CBU’s strategic plan.

CBU’s budget for the 2018-2019 academic year is $321 million. CBU is tuition dependent with tuition and fees comprising 88.4% of total revenues. CBU’s endowment is $50 million and it carries $348 million in debt.

CBU’s most recent reaffirmation of accreditation by the WSCUC Commission is the February 18, 2011 action letter. The 2011 Commission action letter identified seven areas of concern:

- Ensuring financial strength and sustainability.
- Planning for enrollment and program growth.
- Supporting new doctoral programs.
- Developing systems for data collection, analysis and use.
• Enhancing the assessment of student learning.

• Improving and aligning program review.

• Measuring, understanding, and supporting student services.

Commission actions since 2011 include: (a.) accepting CBU’s 2013 Interim Report, and (b.) twenty-seven Substantive Change approvals. The Substantive Change approvals were primarily for distance education programs and crossed four degree levels (1 associate, 11 bachelors, 12 masters, and 3 doctorate degrees).

B. Description of the Team’s Review Process

The Accreditation Visit was structured around lines of inquiry which draw from the seven areas of concern listed in the 2011 Commission Action Letter and from questions that emerged in the Offsite Review. The team explored how CBU: (a.) has operationalized its assessment processes and how it learns from that system to improve student learning, (b.) defines student success across its programs, modalities, and populations and how it applies what it has learned in order to improve student success, (c.) is planning for financial sustainability into the future, (d.) engages in planning, including who is involved in these activities, and how the various plans align and integrate, and (e.) implements the various dimensions of shared governance.

Table 1 shows where these 5 lines of inquiry intersect with the 9 institutional essays (components) in the team report below.
Table 1

Lines of Inquiry and Institutional Essays

<table>
<thead>
<tr>
<th>Institutional Essays</th>
<th>Lines of Inquiry</th>
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<tbody>
<tr>
<td></td>
<td>Assessment</td>
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<td>1-Action Letter Response</td>
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<td>2-Compliance</td>
<td></td>
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<tr>
<td>Federal Requirements</td>
<td></td>
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<tr>
<td>WSCUC Standard</td>
<td>2</td>
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<tr>
<td>3-Degree Programs</td>
<td>X</td>
</tr>
<tr>
<td>4-Educational Quality</td>
<td>X</td>
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<tr>
<td>5-Student Success</td>
<td></td>
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<tr>
<td>6-Quality Assurance</td>
<td>X</td>
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<tr>
<td>7-Sustainability</td>
<td></td>
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<tr>
<td>8-OPS</td>
<td>X</td>
</tr>
<tr>
<td>9-Reflection</td>
<td>X</td>
</tr>
</tbody>
</table>

The team structured its visit to explore these five lines of inquiry as well as to gain a better understanding of the subject of CBU’s component 8 theme: the Division of Online and Professional Studies.

The team conducted interviews over two days, reviewed the institutional report and its related appendices and other requested material, and the confidential email account. The interviews included: executive leadership, provost leadership team, the WSCUC Steering Committee, OPS leadership, Faculty Senate leadership, Provost Council, representatives from the Assessment and Curriculum Committees, student success leadership and support staff,
members of the board of trustees, faculty, staff, and students.

C. California Baptist University’s Reaccreditation Report: Quality and Rigor of the Report and Supporting Evidence

By the time the university’s Interim Report was submitted, CBU had made clear progress on the seven areas of concern identified by the WSCUC Commission. The institutional report for this comprehensive review, however, presented a more limited picture, often lacking clear analysis or reflection on the areas of concern. Even after the institutional report was rewritten at the team’s request, the team found many documents to be overly descriptive and lacking in analysis that would enable us to understand how CBU assessed the quality of education being provided. (CFR 4.3)

The team report provides evidence and support for all of the various commendations and recommendations that appear in the final section of this document.
SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

Based upon the Interim Report, the 2013 WSCUC Interim Report panel determined that their concerns had been met in all seven areas outlined above and encouraged CBU to continue the momentum demonstrated in each area as it prepared for its upcoming Offsite Review and Accreditation Visit. However, a number of the concerns from the last visit reappeared in the lines of inquiry for this visit and in the recommendations after the visit: financial planning, academic planning, and assessment.
Component 2: Compliance: Review under the WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators

WSCUC Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

CBU’s mission is published and readily available, and its purposes fall within recognized academic areas and disciplines. (CFR 1.1) Educational objectives are widely recognized throughout the institution, are consistent with stated purposes, and are demonstrably achieved. California Baptist University regularly generates, evaluates, and makes public data on its websites about student achievement, including measures of retention and graduation, and evidence of student learning. (CFR 1.2)

CBU has a published policy related to academic freedom (found in the Faculty Employee Manual, called Academic Freedom and Responsibility, policy 3.004). As a faith-based school, CBU states that, “In Christian education there should be a proper balance between academic freedom and academic responsibility. Freedom in any orderly relationship of human life is always limited and never absolute. The freedom of a teacher in a Christian school, college, or seminary is limited by the pre-eminence of Jesus Christ, by the authoritative nature of the Scriptures, and by the distinct purpose for which the school exists.” Faculty at CBU must be Christian and adhere to its Statement of Faith policy. CBU’s academic offerings are consistent with its faith-based mission, and the team learned directly from the president that this means that, for example, CBU would not offer programs in alcohol-related or gaming industries since those would be inconsistent with their mission. (CFR 1.3)
The institution has demonstrated institutional commitment to the principles enunciated in the WSCUC Equity and Inclusion Policy. A good practice cited in the policy is that, “institutions seek and nurture diversity within their student bodies, faculty, administrative staff, and governing boards.” CBU has noteworthy success in achieving a diverse student body. Now is the time for CBU to make similar advances among the senior leadership and board of trustees. (CFR 1.4)

After discussion with senior leadership and trustees, the team verified that CBU does not experience interference in its academic programming or educational functions by the California Southern Baptist Convention. There was an initial concern of the team, after reading that the CSBC “owns and operates” CBU. The team learned that “operations” are delegated to the CBU president. (CFR 1.5)

CBU has published policies on student grievances and complaints, refunds, etc (see the appendix, “Student Complaints Review”). (CFR 1.6)

CBU’s finances are regularly audited by qualified independent auditors. The team has a specific recommendation related to CBU’s financial statements in component 7 below. (CFR 1.7)

The institution is committed to honest and open communication with the Accrediting Commission. (CFR 1.8)

The team’s finding, which is subject to Commission review, is that California Baptist University has provided sufficient evidence to demonstrate compliance with Standard 1.
WSCUC Standard 2: Achieving educational outcomes through core functions

The CBU Inventory of Educational Effectiveness Indicators (IEEI) notes there are outcomes for each academic program, and that these outcomes and expectations are communicated to students via the website, syllabi, and various marketing materials. These bachelors, masters, and doctoral degrees are created by faculty with student and stakeholder input via college and university level curriculum committees. Policies and procedures include support to assist faculty in creation of course and program learning outcomes at both the undergraduate and graduate levels. The team found that each approved degree program clearly lists outcomes and maps them to accrediting requirements as appropriate. (CFR 2.1, 2.2, 2.4, 2.12)

The institutional report evidences a systematic process in place to review degree programs via both an annual assessment process and a 5-year program review cycle. CBU has invested in technology to support these processes, engage various stakeholders, and document success and areas in need of improvement. The team found that while some degree programs are engaging in thoughtful and systematic assessment in order to continuously improve learning, others are just beginning to develop a culture of assessment and data use. CBU noted in the Review Under the Standards that the university is working to move beyond the “this is what we have always done” attitude for assessment and continuous improvement. Overall, the team did find that student-centered improvements were being made to curriculum and experiences as a result of student learning data and program review, but the extent of these efforts vary greatly across programs and have not been well captured in the provided documentation. (CFR 2.4, 2.5, 2.7)
CBU’s Review under the Standards notes that it has been a challenge to find faculty with
doctorates and with a mission fit. The addition of so many masters and doctoral degrees in recent
years has no doubt made hiring and retaining appropriate faculty difficult, and it is not clear that
all programs have the quality and number of faculty needed. In addition, it was noted that these
programs grew out of existing undergraduate degrees, which may or may not have had faculty
prepared to teach or support student scholarship at the graduate level, in the new modality, or for
the number of students admitted.

Program quality and capacity need to be considered for recent and planned degrees to
proactively mitigate the challenge and ensure qualified faculty. Appendix 3.4 was provided to
offer evidence on faculty scholarship, but the document did not provide context for metrics,
benchmarks based on other similar institutions, or desired goals to determine how CBU intends
to address the faculty scholarship concern in an institution that has recently added doctoral
programs, expanded degree offerings at all levels, and expanded in an online modality. CBU is
beginning to create support for faculty scholarship by hiring the dean of research. Faculty will
need additional time and resources for this initial step to be successful. With a 4-4 workload for
all faculty, they are challenged to commit to significant scholarship, a particular concern for
faculty teaching in doctoral programs. (CFR 2.8, 2.9)

The institutional report shows that CBU has increased its capacity to gather and analyze
data around academic supports, co-curricular activities, retention, and graduation. CBU has used
a large general category of institutions to benchmark its success or need for improvement in
retention and graduation. Overall the undergraduate retention rate provided mirrors that of peer
private/not-for-profit 4-year institutions, and no gap exists when disaggregated between males
and females. CBU has also begun to disaggregate by race, and has identified specific subpopulations (Hispanic/Latino and African American/Black) that are not being retained at the same rate despite being a large percentage of the overall student population. CBU is encouraged to further analyze the disaggregated data to better ascertain programs and other factors enhancing the retention of specific groups. (CFR 2.10, 2.11)

CBU has developed and implemented retention plans based on best practice but has not yet set targets or analyzed results to determine if the activities are enhancing overall retention and graduation. No evidence was provided prior to the visit on how the plans are impacting retention or graduation, but the team found that there had been implementation and that CBU intends to track impact. The team also found that CBU was disaggregating data by modalities for both graduation and retention, and that data were being discussed in its planning committee and as part of the comprehensive assessment plan. (CFR 2.10, 2.11)

The team’s finding, which is subject to Commission review, is that California Baptist University has provided sufficient evidence to demonstrate compliance with Standard 2.

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

Faculty hold degrees at least one level above that which they are teaching. Faculty are engaged in ongoing professional training as well as a well-defined professional review process. As enrollment has increased, new faculty have been added where needed. Key faculty are engaged in the assessment of the teaching and learning process (CFR 3.1, 3.2, 3.3).
The audited financial statements for CBU as of June 30, 2018 reflect assets of approximately $546 million, liabilities of $372 million and net assets of $174 million. For fiscal year (FY) 2017-2018 CBU experienced a positive change in net assets before other charges of $9.3 million. Additional analysis on key financial indicators over the period 2013-14 through 2017-2018 can be found in Section II, component 7 of this report.

Institutions participating in Title IV programs are required by the U.S. Department of Education (USDE) to demonstrate financial responsibility. USDE determines an institution’s financial responsibility through calculation of a composite score based upon certain financial ratios. Institutions receiving a composite score of 1.5 or greater are considered fully financially responsible. The annual composite score for CBU for 2013-14 through 2017-18 has been above 1.5 (CFR 3.4).

The university has appropriate governance structures in place for basic operational needs: financial, physical plant, personnel, student safety, and student success. The university is governed by a group of pastors and professionals that support the mission of the university. The trustees are organized into appropriate structures and committees to provide general oversight of the various departments at the institution.

The team’s finding, which is subject to Commission review, is that California Baptist University has provided sufficient evidence to demonstrate compliance with Standard 3.
Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

There is a general scheme and structure for collection of evidence that is used in verifying that courses and their outcomes are meaningfully tied to program learning outcomes. CBU has a well-designed process for program review and the tracking of outcomes, although the data analysis varies in its depth and identification of impactful results. (CFR 4.1) However, this report, under components four and six, will identify the areas in which the assessment systems should be improved to make more meaningful use of the assessment activities so that they are certain to allow for course and program changes and that the system of assessment itself is more carefully analyzed so that it might mature. Additionally, it is not clear that the university regularly and systematically engages external stakeholders for the purposes of review and benchmarking in the areas of strategic planning, program assessment, and co-curricular assessment and planning for an ever changing landscape of higher education. (CFR 3.6, 3.8, 3.9)

CBU has a well-developed institutional research department that is able to provide, track, and analyze data. Institutional data are held in a number of different areas and would probably benefit from better coordination and integration. (CFR 4.2) The president describes using research data in determining which new programs to implement although it remains unclear to the team where that analysis is held in the university. The university’s impressive growth demonstrates its skill in implementing programs for which there is substantial interest from prospective students and employers.

The team’s finding, which is subject to Commission review, is that California Baptist University has provided sufficient evidence to demonstrate compliance with Standard 4.
Component 3: Degree Programs: Meaning, quality, and integrity of the degrees

CBU has defined the meaning, quality and integrity of its degrees in ways that make sense. The institution aligns learning outcomes to its mission and core values and uses the Degree Qualification Profile to establish distinctions across degree levels. However, the team surfaced two overarching issues with discerning the meaning of CBU degrees: defining a degree program differently based on the delivery method or modality; and, providing evidence that the institution uses student achievement results to ensure that degree levels are differentiated appropriately.

The IEEI listed programs offered by different modalities as distinctively different degrees. The actual program learning outcomes were not necessarily listed on the IEEI, but a review of the CBU website revealed a different set of learning outcomes for a degree program offered face to face (f2f) compared with it offered online. Table 2 provides one illustration of many cases where a program’s f2f and online outcomes were not essentially the same.

**Table 2**

**Bachelor of Science (BS) in Accounting Program Learning Outcomes**

<table>
<thead>
<tr>
<th>Traditional Face-to Face</th>
<th>Online</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Identify and describe key theories and practices in the areas of accounting, finance, marketing, management, economics, and business law.</td>
<td>1. Exercise the use of business concepts related to micro and macroeconomics.</td>
</tr>
<tr>
<td>1.2 Apply knowledge and principles to business scenarios in the areas of accounting, finance, marketing, management, and economics.</td>
<td>2. Apply business concepts related to accounting.</td>
</tr>
<tr>
<td>2.1 Use critical thinking to identify issues, collect and examine information, evaluate evidence, and draw conclusions.</td>
<td>3. Apply business concepts related to business finance.</td>
</tr>
<tr>
<td>2.2 Use creative thinking to synthesize ideas and expertise, and take appropriate risk in developing innovative approaches to address business problems.</td>
<td>4. Integrate business concepts related to international business.</td>
</tr>
<tr>
<td>2.3 Integrate knowledge and values from various disciplines and transfer skills to the workplace.</td>
<td>5. Integrate business concepts related to law.</td>
</tr>
</tbody>
</table>
In this illustration, while some outcomes are similar, they are not the same. Program outcomes vary in number and content, and the IEEI indicates the outcomes are assessed using different methods. The institution did not provide an effective rationale for these differences. This approach puts the integrity of, for example, the BS in Accounting at risk where learning outcomes and curriculum differ based on modality. The meaning and integrity of a degree assures there would be no distinction made by delivery method when using this bachelor’s degree to apply for advanced study or relevant employment.

There is limited evidence that programs offered by different modalities map their outcomes, operations and assessments as a single degree. Furthermore, the CBU catalog lists two distinct roadmaps for general education (GE), one titled traditional (referring to f2f) and one titled online. The team concluded this was not merely a different pathway through one general education program; the total number of units of GE units varied across modalities.

CBU’s institutional report and IEEI assert outcomes are distinctive across graduate degree levels, but the team did not find sufficient evidence to support this assertion despite this being a concern in past reviews. (CFR 2.2b) CBU indicates that masters’ level programs have a culminating expectation which includes a paper, project, exhibit, performance or other
appropriate demonstration reflecting the integration of knowledge acquired, and all doctoral level programs require a dissertation or dissertation project (CFR 2.8). CBU provided project or thesis/dissertation titles, but did not include the level of expectations appropriate for each degree level for research, original thought, and other outcomes associated with graduate study. CBU also did not provide any analysis of how student work meets degree outcomes. CBU provided feedback from students in doctoral programs albeit only indicating whether or not papers or projects were completed. Improvements proposed by these programs focused on clarity and general learning support (library, writing, presenting) and not on meeting explicit discipline level expectations.

It was unclear to the team how a culminating project for a bachelor of science in nursing (BSN), master of science in nursing (MSN) and doctorate in nursing practice (DNP) differ. The team could not ascertain how the differing expectations are communicated, operationalized and assessed across faculty. CBU provided a list of Exercise Physiology student research but the team could not determine which research was done at the master’s level or at the doctoral level. In addition, the relationship between that list and CBU’s BS in Exercise Science and MS in Kinesiology was unclear. CBU reviews their BA and MA in English together, but only one action entry in “additional future actions” appears to pertain to the MA. The action is to review the thesis proposal in order to facilitate completion. This action refers to a section of the plan for English albeit that section does not mention graduate education except to prepare undergraduates for graduate programs. Finally, CBU described its efforts to assess student learning in the MS in Athletic Training, in relation to national standards. The institution noted that it has engaged an outside advisory board to better align outcomes with industry standards and improve learning to
meet employer needs. However, it was unclear to the team how this alignment effort exemplifies masters level expectations explicitly. (CFRs 2.2b, 2.6)
Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation

CBU has experienced significant growth in recent years in both the traditional face to face programs as well as online. Personnel and resources have been dedicated to making certain that educational quality and the structures to ensure high quality programs are maintained but these efforts may not have kept pace with this growth. There appear to be significant disconnects between policies and practices in terms of depth of analysis, usefulness of course and program assessments and the breadth of stakeholders engaged in meaningful assessment activities. to the team found ample evidence that assessment tasks were completed, but less evidence that results were used to meaningfully improve courses and programs so that student success is maximized. Much data is collected. Some of it is meaningfully disaggregated but much is lacking that at present.

One of the characteristics noted by the team is the uneven nature of program review. Some reviews are deeply considered with meaningful follow up while others are done much more at a surface level. Additionally, follow up reports on program reviews are seldom more substantive than “keep monitoring” and “satisfactory.” There is no doubt that most programs are well conceived but the use of a sophisticated assessment system to support ongoing growth, adaptation and evolution is unsubstantiated.

The Core 4 are symbolically and intuitionally important but their usefulness and meaningfulness for the purposes of assessment is limited. There seem to be “force fits” between the Core 4 and ILOs. Additionally, it is unclear how core competencies intersect meaningfully and consistently with courses, programs and the assessment system. Finally, without widespread
external benchmarking with targeted industries, competitors, and like-minded institutions, CBU runs the risk of becoming isolated and out of touch in terms of academic quality, marketplace relevance and institutional success. There is danger in defining success in internally defined ways without including external comparisons and measurements (CFRs 2.6, 2.7, 4.1, 4.3, 4.4, and 4.6).

The institutional report notes that the USOs, general education outcomes, and core competencies, are woven throughout the curriculum, and assessed via the National Survey of Student Engagement (NSSE) and within degree programs (CFR 2.2a). The institutional report notes that the NSSE is being used to assess the core competencies, but this is a self-assessment and not a direct measure of outcomes achievement. Maps of general education courses to the USOs were presented in Appendix 4.6. Degree level assessment reports found in the appendices note that assessment of non-major learning is being conducted, but it is less clear that results are being considered across undergraduate degree programs to enhance learning. One example provided data without context on rubrics used, achievement expectations, or overall conclusions. Another provided data that was a tally of a yes or no that students completed a paper or project. Information about Academic Community & Global Engagement in Appendix 3.2 indicates that students are engaged in these activities, but no context is given to what percentage engage or if students who do engage are any more biblically rooted or globally minded as aligned in Appendix 3.1.

The institutional report and subsequent requested material also show that the uneven implementation of the annual assessment and program review processes across programs, and even the same program due to modality, has meant some are stuck in early assessment phases
while others are periodically closing the loop. The annual assessment for BS Biology provided that 100% completed an assignment to meet SLO #6 so no change was needed, but gives no indication of what SLO #6 is or how students met or did not meet it. The program review action plan for Biological Sciences does not provide additional insights. The action plan never mentions which degrees were reviewed. Much of the review focuses on admitting students to the program and their acceptance at graduate programs when apply. The website shows 4 BS degree programs, but there is no content on who is learning what or graduating with which degree. The annual assessment for BA Applied Theology provided the outcome, rubric, analyzed results, and noted that outcomes were met despite 43% and 36% being met in specific areas. Only a more robust rubric was suggested. The annual assessment for Single Subject Credential found in Appendix 4.8 indicates students have not been passing the edTPA performance-based assessment test at the level expected (65% passed on the first try, significantly below the goal of an 80% pass rate) and that students were entering student teaching without strong lesson planning skills. These results led to courses being restructured and a common lesson plan template implemented. The program saw passage rates increase and outcomes being met in following years. The Appendices 4.9a-c emphasize the inconsistency noted through the examples above. Degree programs that have implemented their comprehensive assessment plan are doing a lot of assessment. The assessment reports also show that there may be some closing of the loop capacity building to be done in order to move toward consistently using assessment data to improve the quality of education. Programs such as Single Subject Credential should serve as models for those looking to fully engage faculty across the disciplines with the CBU program review and annual assessment processes. Programs have indicated the need for assessment redesign, but it may also take a shift away from alignment to consider assessments and
considerations in order to move beyond results such as “monitor or “stay the course”. Just because targets are met or nearly met does not mean there might not be something to consider for those 25% to 30% that are not meeting learning outcomes. A more holistic approach may also allow faculty to better connect student achievement to overall programmatic change across courses as well as pull in academic support services to help with the often cited areas of need (e.g., library research, writing, oral presentation) which may also well be hurdles to student’s ability to convey what was learned.
Component 5: Student Success: Student learning, retention, and graduation

CBU has processes in place to gather and analyze data. However, the team found limited and uneven implementation of these processes to connect results with improvements to student learning. Significant faculty engagement to analyze assessment results for each program learning outcome, and this same engagement to assess results across outcomes is needed to ensure learning and enact improvements. Similarly, cross programmatic assessment of USOs and the core competencies is needed to better define what it means to be academically prepared, biblically rooted, globally minded, equipped to serve; systematic methods to assess these universal and core expectations are important to ensure CBU graduates are meeting those outcome no matter which degree. (CFR 2.2a, 2.2b)

CBU’s institutional report shows that CBU has increased its capacity to gather and analyze data about retention and graduation, co-curricular activities, and academic supports. CBU uses peer institutions to benchmark its success or need for improvement in retention and graduation. (CFR 2.10)

Retention

CBU demonstrated that its undergraduate retention rate mirrors that of peer private/not-for-profit 4-year institutions, and no achievement gap exists between males and females when rates are disaggregated by gender. CBU has also begun to identify and disaggregate by specific subpopulations (Hispanic/Latino and African American/Black) that are not being retained at the same overall rate despite being a large percentage of the overall student population. Analyses of data for the African American/Black and Hispanic/Latino subpopulations should be documented
and used to better understand success or needed improvements for retention. In the spirit of CBU’s focus on best practices, the institution should disaggregate and examine achievement data for additional subpopulations including nonresident alien, race/ethnicity unknown, and two or more races; evaluating all potential student profiles is important to surface concerns that otherwise remains invisible.

As a result of their data, CBU developed and implemented a comprehensive retention plan. Although that plan does not specifically consider the identified subpopulations nor define desired achievement goals, it does incorporate many best practices for retention. As CBU acquires data, it will be important to consider which, and to what extent, specific programs within the plan are impacting overall and subpopulation student retention. The plan has been in place now for a few years, and CBU has been discussing the impact of the writing center and a supplemental instruction program that began in 2017-18. (CFR 2.10, 2.11)

Unlike undergraduate retention, graduate student retention rates were not provided and success was not defined in the institutional report. The team found that conversations were happening about graduate student success, but not consistently across programs and modalities; those conversations have not been consistently documented or organized into a plan for graduate student retention and graduation. For example, CBU did indicate that the Graduate Council supported the need for improved writing and academic supports to retain and graduate students. It needs to move beyond conversations to set goals and determine means to assess those goals. Systematic examination of graduate student data across programs and levels are needed in order to identify success and the specific needs different than those of the undergraduate students. (CFR 2.10, 2.11)
Graduation

Overall undergraduate graduation rates mirror national averages and the Graduation Rate Dashboard. As CBU notes, however, once data are disaggregated there are large achievement gaps between subpopulations. The team found that CBU has begun conversations about these gaps, but has yet to develop a student success plan beyond best practices for retention supports and services. Integrating graduation data with academic progress, advising, and degree pathways data may provide a better idea of the areas of concern and serve as a basis for a more robust student success plan for undergraduates. It will also be important to integrate data across modalities (traditional face to face and OPS for identical degrees) and operations in order to examine how modality might help or hinder retention and graduation. Component 5 of the institutional report and supporting appendices provided overall and some disaggregation of undergraduate data, while component 8 provided OPS data but without disaggregation. Because retention and graduation data and retention strategies were presented differently according to modality it was not possible to compare retention and graduation for the same degree and program by modality. Comparative analysis was further complicated by differences in learning outcomes and accessibility of courses by modality. (CFR 2.10, 2.11)

Despite the recent addition of so many new masters and doctoral level degrees viaWSCUC substantive change and the corresponding increase in the number of graduate students, CBU has no clear definition or data analysis of graduate student success. The report notes that nearly 30% of their degrees granted are masters, and that percentage is expected to grow. No doctoral level data was given in the report. Time to degree expectations for degrees and reporting
by specific degree (MS Applied Mathematics, PsycD Clinical Psychology, etc.) needs to be considered so to disaggregate, compare modalities, or benchmark to understand success and create improvement plans. (CFR 2.10, 2.11)
Component 6: Quality assurance and improvement: Program review, assessment, use of data and evidence

CBU has a systematic process in place to review degree programs via both an annual assessment process and a 5-year program review cycle, and the university has invested in technology to engage various stakeholders. Evidence showed while some degree programs are engaging in thoughtful and systematic assessment in order to continuously improve learning, others are just beginning to develop a culture of assessment and data use. CBU noted the challenge of “this is what we have always done” in its Review Under the Standards. The team also found on the visit that success is documented, while challenges and plans for improvement are more likely to be discussed and acted upon with little to no documentation. Some programs have been collecting data, but the data may not always be direct or useful for curricular or co-curricular change to improve learning. Some program reviews have a large amount of data, but lack meaningful context and analysis for each outcome. Action plans often indicate “maintain” and few indicate “improve”. Those that indicate “improve” remain vague, aspirational, and lacking definitive deliverables. Overall, the team found may program review reports were vague and lacked critical reflection and deep analysis. CBU should achieve consistent quality in program reviews across degree programs and better utilize assessment data to improve student learning. (CFR 2.4, 2.5, 2.6, 2.7)

The exception to this general finding appears to be the programs that have corresponding professional accreditation, which require periodic review of specific outcomes tied to recognized professional standards (There was no systematic listing or mention of professional accreditors in the annual assessment or program review samples provided). These programs could serve as
models for those looking to fully engage faculty across the disciplines with the CBU program review and annual assessment processes beyond data gathering and compilation. This model for program review would encourage questions including what specific successes and specific improvements are being identified for each degree program; what plans and resources are being employed to maintain success and improve learning; and how does CBU know that implemented actions are having a positive impact?

The new and recently proposed degrees housed in the Online and Professional School were launched with more robust assessment plans and understanding of their roles in the program review processes. This has meant that some degree programs in the Online and Professional Studies may be more engaged in closing the assessment loop, which may further differentiate the learning experiences and challenges students experience depending on the modality selected despite receiving the same degree. Program review is administered via the program’s main academic unit and, then, separated out as a result of mode of delivery. Assessment and program review are conducted for the degree programs within each modality, which has resulted in barriers to deliver, assess, and improve regardless of mode of delivery as noted in WSCUC Standard 2. Inconsistent resources and capacity across these two modalities has resulted in inconsistent application of program review processes, results, and improvement plans for the same degree (CFRs 2.7, 2.10).

As noted, all programs have developed clear and appropriate learning outcomes. Some have identified student products and corresponding assessment tools, but many assessment reports indicate there is no specific plan to assess each outcome. Annual assessment reports provided by CBU have many examples of exemplary work by individual students but lack
summative data and narratives explaining weaknesses related to specific performance on outcomes. Appendix 4.8 evidences assessment, analysis, and loop closing for those that have external benchmarks. Few examples of program review or annual assessment were provided for programs that are not professionally accredited.

There was clear evidence that employer, student, and external review feedback was a valued part of program review, but unclear on how this feedback was then being used to enhance student learning and success. (CFR 2.7).

Again, although it was difficult to ascertain how assessment results were used to strengthen learning in the core competencies, general education, and degree programs, the team found mechanisms were in place and appropriate discussions were being had. The team found that the Assessment Committee was a nice balance of curricular, co-curricular, and operations to engage in tough conversations and well positioned to implement needed change. The Assessment Committee is a strong vehicle for the sharing and dissemination of assessment work and successes, including co-curricular assessment. The team suggests that a more systematic documentation of the committee’s discussions, programs’ subsequent improvements, and evidence of improved student learning will allow external constituents to better gauge CBUs commitment to assessment practice and its connection to continuous improvement. It will also ensure that when comments are made in program review such as “course was offered for the first
time and totally missed the mark” that the degree program has clearly identified the problem and has a plan to address it. In addition, the team reaffirmed that external reviewers were included in the process for all non-professionally accredited degree programs that underwent program review. Therefore, the team suggests their findings be more explicitly called out in program review documentation to better understand their impact on the improvement of student learning and success. (CFR 2.4, 2.5)

The assessment committee has been working with two different technologies, TaskStream and LiveText. Recognizing that using two systems further complicates comparative analysis, CBU has decided to transition to one system. This planned migration to one software system that is consistent across the university will support its ability to do more sophisticated analysis. (CFR 2.4, 2.5, 2.6, 2.7)
Component 7: Sustainability: Financial viability, preparing for the changing higher education environment

Table 3 shows the most recent history for CBU’s enrollment and key financial indicators. The table shows total enrollment split two ways: between undergraduate and graduate students and between online students (OPS) and traditional face-to-face students. The enrollment growth experienced by CBU appears to be well diversified across delivery methods. This broad diversification can help CBU when specific programs face enrollment headwinds while other programs may not be under pressure or may even be growing. In addition, allocations for instruction/academic support and student services as a percentage of the annual operating budgets have increased slightly over the last five years. (CFRs 3.1, 4.7)

Table 3
CBU’s Key Financial Indicators

<table>
<thead>
<tr>
<th>Enrollment (Fall)</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Enrollment</td>
<td>7,144</td>
<td>7,957</td>
<td>8,541</td>
<td>9,157</td>
<td>9,941</td>
<td>10,486</td>
</tr>
<tr>
<td>Undergraduate Enrollment</td>
<td>5,797</td>
<td>6,435</td>
<td>6,630</td>
<td>6,937</td>
<td>7,414</td>
<td>7,855</td>
</tr>
<tr>
<td>Graduate Enrollment</td>
<td>1,347</td>
<td>1,522</td>
<td>1,911</td>
<td>2,220</td>
<td>2,527</td>
<td>2,631</td>
</tr>
<tr>
<td>OPS Enrollment</td>
<td>1,577</td>
<td>1,796</td>
<td>2,005</td>
<td>2,195</td>
<td>2,370</td>
<td>2,406</td>
</tr>
<tr>
<td>Traditional Student Enrollment</td>
<td>5,567</td>
<td>6,161</td>
<td>6,536</td>
<td>6,962</td>
<td>7,571</td>
<td>8,080</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Financial Indicators (FY) (thousands)</th>
<th>2013-14</th>
<th>2014-15</th>
<th>2015-16</th>
<th>2016-17</th>
<th>2017-18</th>
<th>Growth Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net tuition &amp; fees</td>
<td>$130,931</td>
<td>$148,894</td>
<td>$160,880</td>
<td>$172,434</td>
<td>$181,667</td>
<td>8.5%</td>
</tr>
<tr>
<td>Unrestricted operating revenues</td>
<td>156,259</td>
<td>174,154</td>
<td>185,240</td>
<td>202,720</td>
<td>211,259</td>
<td>7.8%</td>
</tr>
<tr>
<td>Total operating expenses (c)</td>
<td>134,067</td>
<td>154,880</td>
<td>167,065</td>
<td>181,250</td>
<td>201,944</td>
<td>10.8%</td>
</tr>
<tr>
<td>Increase in assets before other changes</td>
<td>22,192</td>
<td>19,274</td>
<td>18,175</td>
<td>21,470</td>
<td>9,315</td>
<td>-19.5%</td>
</tr>
<tr>
<td>Other changes</td>
<td></td>
<td></td>
<td></td>
<td>(2,011)</td>
<td>(11,633)</td>
<td>A</td>
</tr>
<tr>
<td>Change in unrestricted net assets</td>
<td>22,192</td>
<td>19,274</td>
<td>18,175</td>
<td>19,459</td>
<td>(2,318)</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td></td>
</tr>
<tr>
<td>Unrestricted net assets</td>
<td>78,504</td>
<td>97,778</td>
<td>115,069</td>
<td>134,528</td>
<td>132,210</td>
<td>13.9%</td>
</tr>
<tr>
<td>Expendable net assets (a)</td>
<td>64,366</td>
<td>64,181</td>
<td>125,092</td>
<td>154,702</td>
<td>105,627</td>
<td>13.2%</td>
</tr>
<tr>
<td>Plant debt (b)</td>
<td>203,179</td>
<td>205,151</td>
<td>270,930</td>
<td>339,064</td>
<td>342,067</td>
<td>13.9%</td>
</tr>
<tr>
<td>Capital expenditures</td>
<td>49,247</td>
<td>31,620</td>
<td>42,756</td>
<td>123,804</td>
<td>67,462</td>
<td></td>
</tr>
<tr>
<td>Viability ratio (a/b)</td>
<td>0.31</td>
<td>0.31</td>
<td>0.46</td>
<td>0.45</td>
<td>0.31</td>
<td></td>
</tr>
<tr>
<td>Primary reserve ratio (a/c)</td>
<td>0.48</td>
<td>0.41</td>
<td>0.75</td>
<td>0.85</td>
<td>0.52</td>
<td></td>
</tr>
</tbody>
</table>

A-2017-18 includes $9,393,000 of bond refinancing costs which is a one-time cost (not typical)

Based upon review of the above table, the institution’s efforts in new program development and student recruitment have resulted in significant increases to net tuition and fee revenues over the past four years. Annual net tuition and fees have increased approximately $51m over the last four years (from $131m in 2013-14 to $182m in 2017-18) which represents an annual growth rate of 8.5%. This has helped to create unrestricted surpluses (before other charges) during this time frame ranging from $9.3m to $22.2m (3.4).

Recently, CBU’s unrestricted surpluses (before other charges) have faced some pressure and have decreased from $21.5m in FY 2016-2017 to $9.3m in FY2017-2108. Factors which have impacted surpluses include a significant increase in the tuition discount rate (from 32.3% in FY 2016-2017 to 40.8% for FY 2018-2019), enrollment pressure in OPS, increased debt levels, and increased facility costs. For FY 2018-2019, the university anticipates some additional pressure and are forecasting an unrestricted surplus (before other charges) of $5m-$7m.

In order to support and drive enrollment growth, the university has continued to invest in campus facilities. Significant projects have included a recreation center, the multi-building College of Health Science campus, a new sporting and events center, a new building for the
College of Engineering and a parking garage. As a result of this expansion, the institution has increased its plant debt from approx. $203m in FY2013-2014 to $342m in FY 2017-2018.

The recent downward trend in unrestricted surpluses combined with the increased debt levels have created pressure on several of the university’s financial ratios. The university’s viability ratio (expendable net assets divided by plant debt) has consistently been below 1.00 (recommended) and decreased from 0.45 to 0.31 from FY2016-17 to FY2017-18, respectively. The university’s primary reserve ratio (expendable net assets divided by operating expenses) also decreased from 0.85 to 0.52. In addition, CBU’s debt service coverage ratio decreased during this same time period from 2.70 to 1.97 (not shown). These represent fairly significant decreases over a one-year period and it is important the university turn the direction of these trends and create more cushion in their financial ratios.

Per the university’s board policy, annual debt payments are limited to 15% or less of the annual operating income. The annual operating income does not include a deduction for tuition discounts but should. This policy is set by the California Southern Baptist Convention and is used by CBU to make decisions about the institution’s ability to take on additional debt. Based upon the university’s increased debt levels, the recent financial pressures, and the challenges today in higher education, the university should establish a more formalized debt management policy. The policy should formalize a structure that bases decisions on multiple and standard higher education metrics. These should include metrics such as the viability ratio, primary reserve ratio, and the debt service coverage ratio.

In reviewing the university’s audited financial statements, the consolidated statement of activities does not separate the change in net assets between operating and non-operating. In
these statements for FY17 and FY18, approximately $4.3m and $2.1m, respectively, of net assets released for capital additions and transfers were included. The institution has recently separated some other changes in net assets related to non-operating expenses in its financial statements. CBU should work with their auditors to review operating revenues as well to determine what should be separated into non-operating. This will help ensure that CBU’s true operating results aren’t masked by capital contributions which could make operating results look stronger than they are.
Component 8: Theme: The Division of Online and Professional Studies

The Division of Online and Professional Studies is CBU’s component 8 theme and is the home for all of CBU’s distance education (DE) programs. Commendations and recommendations in this section reference the required appendix, “Distance Education Review-Team Report.” The appendix specifically addresses: fit with the mission, connection to the institution, quality of the DE infrastructure, student support services, faculty, curriculum and delivery, retention and graduation, student learning and quality assurance processes. The team relied upon the WSCUC Distance Education Review Guide and the Interregional Guidelines for the Evaluation of Distance Education to complete the appendix and this section of the report. Particular attention below is given to addressing the comparability of results across modalities.

OPS has experienced significant growth in a short period of time as was delineated in component 1. In addition, many CBU students who are enrolled in its face-to-face programs also enroll in online courses offered by OPS (40% of the online course students, are enrolled in the on-campus programs).

With this background, OPS was created and has grown as a nearly stand-alone unit, which is commendable from the point-of-view of student support services. The division is led by a vice-president who oversees: (a.) enrollment services, (b.) academics, including six department chairs, (c.) marketing and (d.) information technology for the entire university. Services performed in OPS replicate those performed for traditional students and include: student recruitment, admissions, financial aid, student accounts, registrar academic advising, student retention and faculty support. OPS has its own standing committees including the: OPS Admissions and Retention Committee, OPS Assessment Committee, OPS Curriculum
Similarly, OPS needed a better way to track and assess individual student performance in its online programs. The assessment system that existed focused on average student performance (and still exists for the face-to-face programs). In particular, OPS wanted to ensure that each student was achieving the program learning outcomes by graduation. For this purpose, OPS launched Taskstream in 2016 (with rubrics for the OPS general education program implemented in spring 2017). The plan is for the use of Taskstream to expand into the face-to-face programs (beginning with School of Education and College of Health Science in spring 2019).

On the other hand, the team found that the connection between OPS and traditional academic programs to be weak, as discussed below. The CBU (rewritten) institutional report, and in particular the component 8 theme of the division of OPS, is descriptive and not analytical or reflective. In particular, the team did not find a systematic approach comparing the results of online learning to face-to-face learning. This includes both degrees with identical or nearly identical names offered across the two modalities, including general education.

At CBU, the general education program student learning outcomes, curriculum map, and assessment plans are recorded in LiveText (while OPS uses Taskstream). There are six general education learning outcomes for face-to-face and online students: (a.) information literacy, (b.) oral communication, (c.) written communication, (d.) critical thinking, (e.) quantitative reasoning, and (f.) ethical reasoning. These outcomes are assessed differently depending upon the modality. When assessed using face-to-face student work, CBU uses the American Association of Colleges and Universities (AAC&U) Value rubrics. But when reviewing online student work, CBU uses TaskStream’s course level scoring dimensions.
As an example, consider writing competency. The assessment of the written competency student learning outcome in English 123 used the ACC&U written communication Value rubric (5 dimensions: context and purposes for writing; content development; genre and disciplinary conventions; sources and evidence; and control of syntax and mechanics). The percentage of students scoring 2 or higher (out of 4) is compared to a benchmark (85% for some dimensions and at least 10% score greater than 3 on all dimensions). In each of the five dimensions, students scored between 95%-98% exceeding the benchmark (fall 2016).

In contrast, OPS assesses writing communication using course level rubrics. At the course level, writing rubrics may have up to 6 dimensions. These rubric dimensions are different than the AAC&U writing rubric dimensions. For each dimension within a course, a score is calculated as well as the percentage of the total score. Then all of the percentage scores (for each dimension over all of the many OPS courses containing the written communication learning outcome) are averaged and compared to a benchmark of 85%. The calculated average was 91.4% in fall 2016 and the conclusion drawn in CBU’s yearly assessment report is that the criteria was met.

Data for the following year (fall 2017) revealed that the traditional students did not surpass their benchmark for written communication but the OPS students did surpass their (different) benchmark. No explanation and/or reflection of this difference was given in the annual assessment report (the reflection did note that faculty using the AAC&U rubric needed more training).

By itself, it is not clear to the team how the OPS writing communication results can be compared to the ones for the traditional face-to-face students. The two modalities use different
measures and use different statistics. The annual assessment report noted in the reflections column that the, “Associate Provost for Educational Effectiveness: Begin the process of implementing Taskstream on the main campus for consistent data.”

Also concerning to the team is that there are about 15 undergraduate degree programs with the same name in the face-to-face modality as in the online modality. But the learning outcomes differ. As an example, the English BA degree is taught with the same name in both modalities. Over 30 units (of the nearly 50 units required) are the same. It is understandable that the requirements may vary, given the different student populations that the two programs draw from (but face-to-face students are allowed to take online courses). The face-to-face BA English program has 5 program student learning outcomes while the online program has 10 learning outcomes (Table 4). These learning outcomes are similar but different.

For example, regarding written communication, the face-to-face student learning outcome is for the student to be able to write, edit, and revise a well-organized essay using clear syntax, dictation and style. Somewhat differently, the written communication student learning outcome for OPS students is that they should be able to effectively present information orally and in writing.

As with general education assessment, the face-to-face learning outcome is assessed using the AAC&U Value rubric and the online learning outcome is assessed across the course level Taskstream rubrics. For face-to-face students, work from English 201 was assessed using the AAC&U written communication rubric. At least 60% of the students scored a 2, 3, or 4 on each dimension of the rubric (assessed in 2017-18) meeting the set criteria (scores ranged from 82% to 92% across the five dimensions). Separately for the online students, about 75 scores were
averaged over 17 courses for an average score of 84.78% (assessed in 2018-19). The assessment plan reported this score as “healthy” but noted a wide range of failing dimensions (36 out of the 75 scores did not exceed the 80% goal). But these online results stand in isolation of those for the face-to-face students. Again, the team is not sure how to compare the face-to-face results with the online results given the different methodologies employed.

Table 4
BA in English Program Learning Outcomes

<table>
<thead>
<tr>
<th>Traditional Face-to-Face</th>
<th>Online</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Writing, Editing, Revising: Write, edit, and revise a well-organized essay using clear syntax, diction, and style.</td>
<td>1. Effectively present information orally and in writing.</td>
</tr>
<tr>
<td>2. Critical Interpretation/Analysis: Critically interpret texts based on literary theory, genre, and context.</td>
<td>2. Describe the major genres of American, British, and World Literature.</td>
</tr>
<tr>
<td>3. Research: Identify, navigate, and evaluate appropriate research tools and incorporate scholarly research into their own writing.</td>
<td>3. Effectively write and research literary analyses.</td>
</tr>
<tr>
<td>4. Faith: Explain his or her worldview as well as biblical principles in relation to the creation and interpretation of literature.</td>
<td>4. Identify key elements of the structure of the English language.</td>
</tr>
<tr>
<td>5. Breadth of Literary Knowledge: Demonstrate familiarity with a variety of literary traditions including prominent authors, genres, literary movements, and styles.</td>
<td>5. Effectively engage with and demonstrate knowledge of critical theory and literary criticism.</td>
</tr>
<tr>
<td></td>
<td>6. Articulate issues of multiculturalism and diversity in literature.</td>
</tr>
<tr>
<td></td>
<td>7. Memorize passages of literature.</td>
</tr>
<tr>
<td></td>
<td>8. Become self-directed scholars.</td>
</tr>
<tr>
<td></td>
<td>9. Discuss and articulate the importance of key authors and issues of canon to the discipline of English.</td>
</tr>
<tr>
<td></td>
<td>10. Articulate a Christian approach to studying literature.</td>
</tr>
</tbody>
</table>

Likewise, CBU did not reflect upon or analyze enrollment data, including gender and
ethnicity, for programs with the same name but different modality. The team was provided with overall enrollment, race and ethnicity data for the face-to-face and online programs. Online students are composed of a higher percentage of underrepresented populations (fall 2018): White students comprise 38.8% of the overall undergraduate population (versus 34.5% online). Hispanic/Latinos comprise 36.5% of the overall undergraduate population and almost the same as white students (versus 41.4% online), African American/Black comprise 6.8% of the overall undergraduate population (versus 11.2% online). The online undergraduate students are predominantly female. Are there certain online programs that are more (or less) attractive for female or underrepresented students?

CBU did provide the annual overall retention rates for face-to-face students and online students (replicated in the appendix, Distance Education Review) as part of the request for additional documentation prior to the campus visit.
By the time the university’s Interim Report was submitted, CBU had made clear progress on the seven areas of concern identified by the WSCUC Commission. The institutional report for this comprehensive review, however, presented a more limited picture, lacking clear analysis or reflection on the areas of concern. Even after the institutional report was rewritten at the team’s request, we found the documents to be overly descriptive and lacking in analysis that would enable us to understand how CBU assessed the quality of education being provided.

**Commendations**

**Growth:** The university has experienced impressive growth in size, facilities, and resources under the leadership of the president. Equally impressive has been the growth in students from underrepresented groups.

**Mission:** CBU has a clear mission that appears to be well understood and supported by the campus. The university’s core values (biblically rooted, globally minded, academically prepared, and equipped to serve) align well with the mission and provide a way for internal and external constituents to understand CBU’s identity. The campus is proactive in monitoring and meeting student needs in support of their overall educational success.

**Leadership:** There is a strong group of vice presidents and deans who exhibit commitment to the mission and to working collegially and entrepreneurially to advance CBU.
The team supports the steps to build collaboration across the university, holding the doors open between different areas of responsibility.

**Assessment Systems:** CBU has a well-defined system for assessment and program review. The Assessment Committee is a strong vehicle for the sharing and dissemination of assessment work and successes, including co-curricular assessment. This work will be further strengthened by the planned migration to software systems that are consistent across the university.

**Recommendations**

**Meaning of the Degree:** CBU offers a number of degrees in both its traditional face-to-face format and in its Division of Online and Professional Studies (OPS) yet the learning outcomes for degrees with the same name are not consistent across delivery methods; similarly, general education requirements differ across modalities. The meaning of the degree is unclear when outcomes for the same program and degree differ within one university. Programs by the same name should be guided by the same program learning outcomes, including for general education. (CFR 2.1, 2.2, 2.2a)

**Academic Quality Assurance:** The team found the discussion of assessment during the visit to be helpful and informative but many of the program review reports were vague and lacking critical reflection and deep analysis. CBU should achieve consistent quality in program reviews across degree programs and better utilize assessment data to improve student learning. (CFR 2.7)

**Diversity:** CBU has noteworthy success in achieving a diverse student body. Now is the
time for CBU to make similar advances among the senior leadership and Board of Trustees. (CFR 1.4, 3.6, 3.9)

**Student Success:** CBU should improve student graduation and retention rates, particularly for underrepresented minority (URM) students; support for the proposed Summer Bridge program and on-going analysis of the efficacy of this and other improvement efforts are important to student success. Similarly, ongoing analysis of graduate student retention and graduation rates needs to be undertaken. (CFR 1.4, 2.2b, 2.6, 2.10)

**Supporting Scholarship:** CBU is beginning to create support for faculty scholarship by hiring the dean of research. Faculty will need additional time and resources for this initial step to be successful. (CFR 2.8)

**Financial Sustainability:** The university has experienced some recent financial headwinds. These include a significant increase in the tuition discount rate, enrollment pressure in OPS, increased debt levels, and increased facility costs. These factors have created pressure on the annual operating surplus and key financial ratios. The university should establish a more formalized debt management policy that bases decisions on multiple and standard higher education metrics. (CFR 3.4)

**Financial Reporting:** CBU has recently contracted with a new auditor with higher education experience. It should work with the auditor to adopt reporting practices that clearly separate operating and non-operating change in net assets. (CFR 3.4)
## APPENDICES

### A. FEDERAL COMPLIANCE FORMS

#### 1. CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM (Amy)

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible? ☑ YES ☐ NO</td>
</tr>
<tr>
<td>Where is the policy located? <a href="https://calbaptist.edu/about/higher-education-opportunity-act-compliance">https://calbaptist.edu/about/higher-education-opportunity-act-compliance</a> Actual credit hour policy verified at: <a href="https://insidecbu.calbaptist.edu/ICS/icsfs/ICU_Credit_Hour_Policy_.pdf?target=740a121b-b5a0-40a5-8b95-18a138d5b6ff">https://insidecbu.calbaptist.edu/ICS/icsfs/ICU_Credit_Hour_Policy_.pdf?target=740a121b-b5a0-40a5-8b95-18a138d5b6ff</a></td>
<td></td>
</tr>
<tr>
<td>Process(es)/ periodic review of credit hour</td>
<td>Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? ☑ YES ☐ NO</td>
</tr>
<tr>
<td>Does the institution adhere to this procedure? ☑ YES ☐ NO</td>
<td></td>
</tr>
<tr>
<td>Comments: Curriculum process includes adherence to policy. Course adherence to policy affirmed by registrar each time course offered as part of the course schedule and periodic program review via Course Hour Audit.</td>
<td></td>
</tr>
<tr>
<td>Schedule of on-ground courses showing when they meet</td>
<td>Does this schedule show that on-ground courses meet for the prescribed number of hours? ☑ YES ☐ NO</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed? 10</td>
</tr>
<tr>
<td>Please review at least 1 - 2 from each degree level.</td>
<td>What kind of courses (online or hybrid or both)? online</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? bachelors, masters, and doctoral</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Behavioral Science, Early Childhood Studies, Human Services, Information Systems, English, Business, Communications, Public Administration</td>
</tr>
<tr>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? ☑ YES ☐ NO</td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td>Sample syllabi or equivalent for other kinds of courses that do not meet for the</td>
<td>How many syllabi were reviewed? 7</td>
</tr>
<tr>
<td></td>
<td>What kinds of courses? Directed Study, Seminar, Lab, Practicum, Clinical Skills</td>
</tr>
<tr>
<td></td>
<td>What degree level(s)? bachelors, masters, and doctoral</td>
</tr>
<tr>
<td></td>
<td>What discipline(s)? Education, Engineering, Music, Nursing, Physician Assistant</td>
</tr>
</tbody>
</table>
prescribed hours (e.g., internships, labs, clinical, independent study, accelerated)

*Please review at least 1 - 2 from each degree level.*

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:

Sample program information (catalog, website, or other program materials)

<table>
<thead>
<tr>
<th>How many programs were reviewed? All</th>
</tr>
</thead>
<tbody>
<tr>
<td>What kinds of programs were reviewed? All</td>
</tr>
<tr>
<td>What degree level(s)? All</td>
</tr>
<tr>
<td>What discipline(s)? All</td>
</tr>
</tbody>
</table>

Does this material show that the programs offered at the institution are of a generally acceptable length? ☒ YES ☐ NO

Comments:

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>
<tbody>
<tr>
<td><strong>Federal regulations</strong></td>
<td>Does the institution follow federal regulations on recruiting students? ☒ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Degree completion and cost</td>
<td>Does the institution provide information about the typical length of time to degree? ☒ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Does the institution provide information about the overall cost of the degree? ☒ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td></td>
<td>Projected length of time to degree and cost are presented for graduate programs.</td>
</tr>
<tr>
<td></td>
<td>Annual Undergraduate Tuition Cost is easy to access online.</td>
</tr>
<tr>
<td>Careers and employment</td>
<td>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? ☒ YES ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Does the institution provide information about the employment of its graduates, as applicable?</td>
</tr>
</tbody>
</table>
**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.
3 - STUDENT COMPLAINTS REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s student complaints policies, procedures, and records.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints?  
☑ YES ☐ NO  
If so, is the policy or procedure easily accessible? Is so, where?  
Student Handbook: [https://calbaptist.edu/CBU%20Student%20Handbook%202018.pdf](https://calbaptist.edu/CBU%20Student%20Handbook%202018.pdf)  
Pg 7-9 Judicial/Non-Judicial  
Pg 14 Honor Code  
Pg 15 Title IX  
Pg 28 Chapel  
Pg 31 Academic Appeals  
Pg 44 Appeals under Student Services  
Title IX Website Information: [https://calbaptist.edu/about/title-ix/](https://calbaptist.edu/about/title-ix/)  
Parking Appeals: [https://calbaptist.edu/safety-services/parking-citation-appeals](https://calbaptist.edu/safety-services/parking-citation-appeals)  
Academic Appeals: [http://catalog.calbaptist.edu/content.php?catoid=3&navoid=187#academic-policies](http://catalog.calbaptist.edu/content.php?catoid=3&navoid=187#academic-policies)  
(Scholastic Regulations and Student Grievances)  
Comments:  
From CBU undergraduate catalogue page 56: Student Grievances  
A student wishing to express concerns or grievances about academic matters, involving coursework or interactions with instructors in and out of the classroom, should ordinarily follow a regular order of contacts. The first contact would be between the student and the instructor involved so that there is opportunity for each to address the issues that directly affect them. If the student feels unable to approach the instructor directly or does not believe the issue has been fully resolved with the instructor, the next contact would be with the Chair of the Department or Dean of the School or College having oversight of that course. If issues remain unresolved at these levels, the final academic point of contact would be the Academic Dean of Online and Professional Studies for Online and Professional Studies Program courses or the Dean of Academic Services for Traditional Program courses.  
| Process(es)/procedure | Does the institution have a procedure for addressing student complaints?  
☑ YES ☐ NO  
If so, please describe briefly: |
<table>
<thead>
<tr>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the institution maintain records of student complaints? ☒ YES ☐ NO</td>
</tr>
<tr>
<td>If so, where?</td>
</tr>
<tr>
<td>Student Services in Maxient System</td>
</tr>
<tr>
<td>Academic in CX System</td>
</tr>
<tr>
<td>Both of these systems are only accessible from campus.</td>
</tr>
<tr>
<td>Does the institution have an effective way of tracking and monitoring student complaints over time? ☒ YES ☐ NO</td>
</tr>
<tr>
<td>If so, please describe briefly:</td>
</tr>
<tr>
<td>Reports can be pulled from both systems based on different parameters to evaluate complaints over time. Only accessible from campus.</td>
</tr>
<tr>
<td>Comments:</td>
</tr>
</tbody>
</table>

*§602-16(1)(ix)*

See also WASC Senior College and University Commission’s Complaints and Third Party Comment Policy.
4 – TRANSFER CREDIT POLICY REVIEW FORM

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

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit?  
✓ YES ☐ NO  
If so, is the policy publically available?  
✓ YES ☐ NO  
If so, where?  
https://insidebu.calbaptist.edu/ICS/Academics/Transfer_Course_Information.jnz  
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?  
✓ YES ☐ NO  
Comments: |

*§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.
C. DISTANCE EDUCATION

Institution: California Baptist University

Name of Reviewer: Andrew Allen

Date/s of review: May 6-9, 2019

1. Programs and courses reviewed:

Reviewed online courses:
- BEH391, Intermediate Statistics With Computer Applications, Fall 2018, Psychology BA
- ENG123, Survey of British Literature, Fall 2018, Undergraduate English course
- BUS530, Marketing Management, Summer 2018, Master of Business Administration
- BUS775, Topics in Human Resource Management, Summer 2018, Doctor of Business Administration
- BUS780, Comprehensive Experience, Fall 2018, Doctor of Business Administration

Reviewed online discussion boards and grading rubric for:
- BEH391, Intermediate Statistics With Computer Applications, Fall 2018
- ENG123, Survey of British Literature, Fall 2018, Undergraduate English course
- BUS530, Marketing Management, Summer 2018, Master of Business Administration
- BUS775, Topics in Human Resource Management, Summer 2018, Doctor of Business Administration
- BUS780, Comprehensive Experience, Fall 2018, Doctor of Business Administration

Reviewed online and on-ground programs for:
- General Education
- BA English
- BA and BS in Business Administration

2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)
At California Baptist University, distance education is centralized and offered in the division of Online and Professional Studies (OPS). Online courses are delivered through the Blackboard learning management system. OPS uses Quality Matters guidelines to develop their online courses.

Between August 2011 and September 2018, CBU has had 25 distance education programs successfully go through the Substantive Change Review process. Online enrollment has been a major source of total enrollment growth at CBU.

In total, OPS offers 42 distance education programs across four degree levels: Associate (2), Bachelors 24), Masters (14), and Professional Doctorate (2).

OPS enrolls 1,702 undergraduate students and 704 graduate students for a total of 2,406 students (fall 2018).

OPS has 58 full-time tenure track faculty and 322 adjunct faculty (fall 2018).

The fall-to-fall retention rate for undergraduate online programs is 73.6% (fall 2017 start). The 6-year graduation rate for students beginning fall 2011 is 52.5%.

3. Nature of the review (material examined and persons/committees interviewed)
   - Reviewed the 2018-19 Undergraduate Catalogue
   - Reviewed the 2018-19 Graduate Catalogue
   - Reviewed WSCUC Institutional Report
   - Reviewed the CBU Strategic Plan
   - Reviewed enrollment and retention information produced by the Office of Institutional Research
   - Reviewed information on the CBU website and the InsideCBUportal for program requirements, admissions requirements, tuition, students services and other resources
   - Reviewed online Blackboard courses, syllabi, discussion boards and their rubrics listed in 1. above.
   - Interviewed OPS leadership team, faculty and staff (assessment director, instructional designers).
   - Interviewed the WSCUC Steering Committee, Provost Council, Faculty Senate.
**Observations and Findings**

<table>
<thead>
<tr>
<th>Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)</th>
<th>Observations and Findings</th>
<th>Follow-up Required (identify the issues)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Fit with Mission.</strong> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?</td>
<td>Online learning is appropriate for CBU’s mission and purpose by preparing students who are academically prepared, biblically rooted, globally minded, and equipped to serve. At CBU, online learning is offered through its division of Online and Professional Studies which has its own faculty for teaching students and its own staff for providing student support. (CFRs 1.1, 4.7).</td>
<td>none</td>
</tr>
<tr>
<td><strong>Connection to the Institution.</strong> How are distance education students integrated into the life and culture of the institution?</td>
<td>Distance education students receive CBU’s Christ-centered educational experience that integrates academics with spiritual and social development opportunities. Most of CBU’s online students are local and are invited to the same activities as the traditional face-to-face students. Distance education students are invited to bring their families to some of these events. (CFRs 1.2, 4.5, 4.6)</td>
<td>none</td>
</tr>
<tr>
<td><strong>Quality of the DE Infrastructure.</strong> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?</td>
<td>CBU uses Blackboard for its learning management system. This platform is widely used across the nation, and is well-known for its high quality and stability. CBU has dedicated staff to support online learning as well as contracts with third-party vendors for additional student support. (CFR 3.5)</td>
<td>none</td>
</tr>
<tr>
<td><strong>Student Support Services:</strong> What is the institution’s capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</td>
<td>Student readiness for online learning is informed by Smarter Measure. This information is used for advising and mentoring. CBU provides online orientation. All students are required to successfully complete GST 101, Essentials for Online and Professional Studies, to help them transition to university and online studies. Students have adequate access to learning resources, including library, labs etc. Publications and advertising are accurate and contain necessary information such as program goals, requirements, and calendar. CBU uses rolling admissions. There are two 8-week sessions in each of the fall, spring and summer sessions (there is a Session 3 that runs the full length of the semester). Students are encouraged to enroll at least four weeks before a session begins. Transfer students utilize the OPS Fast Track to Success program to expedite the transfer of credit process. In addition, CBU, has a one-stop student advising service with an advisor assigned to each student. Because most CBU online students are local, they are encouraged to come to campus for additional services, such as tutoring (online tutoring is available through Smarthinking in which content experts work with students with a virtual whiteboard). (CFRs 2.10, 2.12, 2.13).</td>
<td>none</td>
</tr>
</tbody>
</table>
### Faculty

Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?

OPS has 58 full-time faculty and 322 adjunct faculty who teach CBU’s online students. Faculty go through an extensive screening process before they are allowed to teach. Faculty are involved in both designing and evaluating curriculum as well as assessment of student learning. OPS has its own curriculum and assessment committees. Faculty receive mandatory annual training for online learning through CBU’s Online Faculty Yearly Training program that includes modules on biblical integration, Blackboard, policies and procedures and forms, grades, and evaluations. (CFRs 2.4, 3.1-3.3)

### Curriculum and Delivery

Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)

OPS has a rigorous curriculum vetting process. New degree programs are proposed in response to market opportunities. Curricula are designed by in-house faculty (many of which have to conform to professional standards). Curricula are designed based on Quality Matters guidelines and use a standardized Course Design Worksheet to ensure quality.

Degrees and programs with identical names appear in both the face-to-face and online environments (including general education). But the learning outcomes vary across these modalities. As result the meaning of the degree becomes unclear.

OPS provided examples of program reviews and their resulting action plans for improvement for the Bachelor of Arts in Early Childhood Studies, the Bachelor of Science in Criminal Justice, the Bachelor of Arts in Business Administration, and the Bachelor of Arts in Communication Studies. (CFRs 2.1, 2.2, 4.3, 4.4)

### Retention and Graduation

What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions’ online offerings? If any concerns exist, how are these being addressed?

Retention data for the undergraduates in the online modality (OPS) appear to be lower than that for the face-to-face modality (TRAD). Yes. See recommendations.

<table>
<thead>
<tr>
<th>Starting Fall Term</th>
<th>BOPS</th>
<th>TRAD</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>70.6%</td>
<td>78.3%</td>
</tr>
<tr>
<td>2013</td>
<td>67.9%</td>
<td>81.2%</td>
</tr>
<tr>
<td>2014</td>
<td>70.6%</td>
<td>76.3%</td>
</tr>
<tr>
<td>2015</td>
<td>67.0%</td>
<td>75.7%</td>
</tr>
<tr>
<td>2016</td>
<td>71.6%</td>
<td>77.9%</td>
</tr>
<tr>
<td>2017</td>
<td>73.6%</td>
<td>75.4%</td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
<td>Notes</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>Student Learning</td>
<td>While lower retention rates are observed for online students, they do not appear to be out of line with national norms. (CFR 1.2)</td>
<td></td>
</tr>
</tbody>
</table>
| **Student Learning**                  | **How does the institution assess student learning for online programs and courses?** Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings?**  
OPS has an assessment director and committee for analyzing student learning outcomes. In OPS uses Taskstream to help it assess student learning. The five-year program review cycle is followed by a “loop-year” in which student learning is examined across the program. Based upon observed student learning and feedback, online courses are continually updated (e.g., English 113 has been revised 9 times in its 10 years of existence). (CFRs 2.3, 2.5, 2.6, 4.3)                                                                                                                                                                                      | none  |
| Contracts with Vendors                | **Contracts with Vendors.** Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on Contracts with Unaccredited Organizations?**  
Outside vendors are used for the learning management system, tutoring, customer relationship management, and course evaluations. These vendors comport with theWSCUC policy on Contracts with Unaccredited Organizations. (WSCUC policy on Contracts with Unaccredited Organizations)                                                                                                                                                                                                                                          | none  |
| Quality Assurance Processes           | **Quality Assurance Processes:** How are the institution’s quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?**  
Program review is the primary way that OPS ensures the effectiveness of its programs. The program reviews utilize external reviewers or professional accrediting bodies to ensure quality. (CFRs 2.4, 4.1, 4.2)                                                                                                                                                                                                                      | none  |