

## REPORT OF THE WSCUC TEAM

For Reaffirmation of Accreditation

To Western University of Health Sciences

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The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be made available to the public by publication on the WSCUC website.

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# SECTION I. OVERVIEW AND CONTEXT

## A. Description of Institution and Accreditation History

Western University for Health Sciences (WesternU) is a private, non-profit university, educating a workforce dedicated to the health of individuals and communities. The university has a main campus in Pomona, California and a branch campus in Lebanon, Oregon. Founded in Pomona as a school of osteopathic medicine in 1977, WesternU has grown to include nine graduate colleges, offering degrees in 14 health professions and health science disciplines, as well as two nurse practitioner certificates. Student enrollment in the 2017-18 academic year was 3,848. The Lebanon branch campus currently offers a single program that leads to a Doctor of Osteopathic Medicine degree. During the site visit to the Lebanon campus, it was learned that the College of Allied Health Professions plans to offer a post-professional doctoral degree in Physical Therapy in Lebanon starting May 2018, and an entry-level Doctorate in Physical Therapy Program is in the process of development with a possible launch in 2020.

The institutional mission of Western U is, "To produce, in a humanistic tradition, health care professionals and biomedical knowledge that will enhance and extend the quality of life in our communities." President Wilson has articulated an ambitious vision for the campus which is consistent with this mission and is based upon five pillars which will guide strategic actions: 1) interprofessional, 2) collaboration and partnerships, 3) revenue diversity, 4) innovation and operational excellence, and 5) educational excellence and online learning.

Western University of Health Sciences was granted candidacy by the WASC Senior College and University Commission (WSCUC) in 1990 and received initial accreditation in 1996. Since that time, WesternU accreditation has been reaffirmed twice, most recently in 2010. In reaffirming WesternU accreditation, the Commission called for a Special Visit in spring 2013, which was followed by a second Special Visit in 2014.

WesternU academic programs with initiation dates are summarized in the list below.

1. College of Osteopathic Medicine of the Pacific
  - 1977 Main campus in Pomona, California, Doctor of Osteopathic Medicine (DO)
  - 2011 Branch campus in Lebanon, Oregon, College of Osteopathic Medicine of the Pacific-Northwest, Doctor of Osteopathic Medicine
2. College of Allied Health Professions
  - 2003 Doctor of Physical Therapy (DPT) opened as master's program 1992; transitioned to doctoral program 2003
  - 1986 Master of Science (MS) in Health Professions Education
  - 2000 Master of Science (MS) in Physician Assistant Studies (program opened 1990; transitioned to master's degree 2000)
3. College of Pharmacy
  - 1996 Doctor of Pharmacy (PharmD)

- 1996 Master of Science in Pharmaceutical Sciences (MSPS)
- 4. College of Graduate Nursing
  - 1998 Doctor of Nursing Practice (DNP)
  - 1998 Master of Science in Nursing/Family Nurse Practitioner (MSN/FNP);
  - 1998 Master of Science in Nursing (MSN)
  - 1998 Master of Science in Nursing Entry-Level (MSN-E);
  - 1998 Post-Master's Family Nurse Practitioner (FNP) Certificate;
  - 1998 Emergency Nurse Practitioner (ENP) Certificate
- 5. College of Veterinary Medicine
  - 1998 Doctor of Veterinary Medicine (DVM)
- 6. College of Dental Medicine
  - 2009 Doctor of Dental Medicine (DMD)
- 7. College of Optometry
  - 2009 Doctor of Optometry (OD)
- 8. College of Podiatric Medicine
  - 2009 Doctor of Podiatric Medicine (DPM)
- 9. Graduate College of Biomedical Sciences (2010):
  - 2010 Master of Science in Biomedical Sciences (MSBS)
  - 2010 Master of Science in Medical Sciences (MSMS)

## **B. Description of Team's Review Process**

The team reviewed the Institutional Report and supporting documents in preparation for the Offsite Review (OSR) which occurred on November 30 and December 1, 2017. Six lines of inquiry were identified to structure the accreditation visit: 1) Governance and decision-making; 2) Institutional learning outcomes; 3) Institutional diversity; 4) Research and scholarship; 5) Health sciences masters' degree programs and 6) College of Osteopathic Medicine of the Pacific-Northwest (COMP-NW). In addition, 11 areas of supporting documentation were requested and made available by the university.

Team members also reviewed previous Commission commendations and recommendations related to the 2010 reaffirmation of accreditation and the 2013 and 2014 special visits. The recommendations from the 2014 special visit directed the team to examine some specific areas where ongoing work by the university was indicated. These areas pertained to: 1) faculty participation in shared governance; 2) evidence of institution-wide quality assurance efforts, including assessment of institutional learning outcomes and completed program reviews; 3) development of policies and procedures related to faculty appointments and performance; and 4) the role of the board of trustees in succession planning and evaluation of administrators.

The team found the most recent institutional report, and supplemental materials demonstrated ongoing progress in responding to these recommendations. The accreditation visit was structured to incorporate both physical campuses of the institution as well as online programs. Before the visit to the Pomona, California main campus, two team members visited the Lebanon, Oregon branch campus. A two-day visit included a campus tour led by students in the

College of Osteopathic Medicine. Meetings were held with the college dean and newly appointed vice dean as well as two members of the board of trustees who had substantial experience with the development of the Lebanon campus as well as the recent search for a new university president. The Lebanon visit also provided an opportunity to meet with representatives from departments providing student support services as well as the associate dean for outcomes and assessment. Separate meetings were scheduled with faculty, students and community supporters.

All five team members visited the Pomona campus and spent two full days reviewing documents and interacting with numerous constituent groups representing faculty, students, staff and administration. The six Lines of Inquiry delineated in the paragraph above provided the overarching framework for the visit and meeting schedule. Meetings were held with the president, provost, chief financial officer, and board of trustees, as well as the dean's council, WSCUC steering committee, and members of major university committees and task forces. Open meetings were held with students, faculty, staff and alumni associated with specific programs. The team also met with faculty senate leaders, campus researchers, and personnel who provide student services and academic support services.

A confidential email directory was created which generated 9 responses from students and faculty. The team members were ably assisted in their work by the WSCUC staff liaison, Tamela Hawley.

### **C. Institution's Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence**

The team found the institutional report to be well-written and informative with appropriate links to supplemental resources. In the self-review discussed under Component 2 of Section II, the writers provided an honest and thoughtful appraisal of university strengths and areas where improvement is needed. In addition, the university promptly responded to requests for additional information.

The narrative which follows provides evidence and support for the various commendations and recommendations that appear in the final section of this report. The team was impressed with how WesternU embraced the challenges of growth and innovation and is creating a culture of evidence essential to quality assurance. Stable enrollment, positive learning outcomes, and a strong financial history provide a solid foundation for the institution's growth and development in the years ahead.

## **SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS**

### **A. Component 1: Response to previous Commission actions**

The 2018 Institutional report, offsite review and accreditation visits to the Pomona and Lebanon campuses, documented appropriate, ongoing responses to prior recommendations by the Commission. The evaluation team conducted a comprehensive review of institutional activities and evidence as part of the reaffirmation of accreditation review process. Two lines of inquiry for the 2018 accreditation visit were drawn from prior recommendations: 1) governance and decision making; and 2) institutional learning outcomes. In addition, four other Lines of Inquiry were identified during the offsite review: 3) institutional diversity; 4) research and scholarship; 5) health sciences master's degree programs; and 6) culture of evidence at the Lebanon branch campus.

#### B. Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements inventory of Educational Effectiveness indicators

The WesternU Reaffirmation Steering Committee led the campus in a review of WSCUC Standards and related Criteria for Review (CFR) incorporating input from faculty, staff, administrators and students. Appendices with the institutional report included the Review Under WSCUC Standards, Compliance with Federal Requirements Worksheet and Inventory of Educational Effectiveness Indicators.

The team's finding, which is subject to Commission review, is that the institution demonstrated sufficient evidence of compliance with each of the four Standards. All CFRs were rated as "We do this well; area of strength for us" or "Aspects of this need our attention." The team acknowledges that plans are in place to address CFRs where the institution identified a need for attention and follow up action.

#### Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives.

The institutional report clearly identifies Program and Course Learning Outcomes which are consistent with the mission and values of the university. Eight institutional learning "domains" are identified (rather than institutional learning outcomes), and a process is in place where program assessment data is used to track student performance relating to each learning domain. The values of humanistic caring, interprofessional collaboration, student-centeredness, innovation and quality were expressed consistently by stakeholders during the site visits and were often referred to a "WesternU Way" of approaching institutional mission (CFR 1.1, 1.2). These values are reflected not only in the academic curriculum but also in a strong commitment to community service and the public good.

The WesternU self-review process identified two issues as needing attention, namely diversity and transparency in fiscal functions. Stakeholders at both the Pomona and Lebanon campuses understand the need to increase diversity in the health professions and are addressing challenges related to recruitment, retention and graduation of individuals under-represented in the health professions (CFR 1.4).

For the Lebanon campus, 60% of matriculants at COMP-NW come from the Pacific Northwest. Admissions processes by design seek students who have an interest in practicing in rural areas, particularly the Pacific Northwest region. The university is committed to responding to a profound shortage of health providers in this region and receives substantial support from health care organizations and businesses in the local community. The site visit to the Lebanon campus clearly demonstrated the positive impact the university has had on the surrounding community. Students are active participants in their community and the community responds with great affection for what they call “their medical students.” Beyond this, the influx of students and faculty has directly boosted the town’s economy and vitality. The location of the medical school in Lebanon was one of the factors which led to the development of a veteran’s health care facility, creating 300 new jobs. A casual stroll through the town demonstrated the presence of a “scrubs shop” testifying to the role healthcare education plays in business development.

In contrast, the Pomona campus is located in a more populated, ethnically and racially diverse metropolitan Los Angeles area. While the impact of WesternU might not be as noticeable as in a small town, it is clear to the team that students, faculty, and staff have a long standing, positive relationship with their surrounding community and that the university is an important force driving economic development in the region. As race and ethnicity demographics for the Pomona student body differ from the Lebanon campus, each site is reflecting upon their unique community and what is required to best prepare graduates for work in an increasingly diverse society. WesternU has created an Inclusion and Humanism Task Force to support this work but it is at an early stage in terms of functioning.

The board, president, and members of the Inclusion and Humanism Task Force are aware that the community surrounding the Pomona campus differs from the current student body in terms of race and ethnicity. WesternU has engaged in sustained attempts to foster STEM initiatives and interest in healthcare professions among students in local schools. A Master of Science in Medical Science (MSMS) program is offered to strengthen competitiveness of underrepresented students when applying to doctoral programs such as medicine and dental medicine. The program has increased the percentage of underrepresented minorities in the COMP from 2% to 6%. All graduates have moved forward with more advanced education or found employment in a health profession or related field.

For COMP-NW, the dean, board of trustees, and faculty are strongly committed to the mission of the Lebanon campus which is to serve the rural Pacific Northwest. Diversity is operationalized by assessing factors such as rural versus urban, first in family to pursue higher education, sexual orientation and veteran status. Pipeline programs exist to link COMP-NW students to local youth who are encouraged to pursue careers in science and health care. The assistant dean of students conducts seminars early in the curriculum to identify unconscious bias on the part of students and community experiences such as practicing “street medicine” provide learning experiences with the uninsured. Seminars related to sexual orientation are presented by LGBTQ students and many students rotate to Portland where patients represent greater racial diversity. The Dean hopes to develop a COMP-NW master’s program to recruit local

Native Americans for university study. Currently, prospective COMP-NW students are not recruited from the Pomona MSMS program or doctoral applicant pools to increase race and ethnicity of incoming classes.

Neither campus of WesternU has yet assessed race and ethnicity of clinical faculty who provide the majority of clinical instruction for students and contribute to their professional identity formation. Concepts such as cultural humility and unconscious bias are not evaluated during programs or at the time of graduation. In addition, it appears that grant and scholarship funds are minimally used, if at all, to increase the diversity of the student body on either campus. Transparency in budgetary planning, allocation and management is another area identified in the institutional report as needing improvement (CFR 1.7). Two faculty members on the newly created University Budget Advisory Committee (UBAC) communicated the desire of the faculty at large to better understand the budgeting process and how allocation decisions are made. UBAC is in the process of developing informational materials for this purpose and scheduling sessions with faculty senate representatives so they can communicate information to the larger faculty group. Since this is only the second budget cycle since creation of the UBAC, there is still more work to be done to accomplish these objectives.

## Standard 2: Achieving Educational Objectives Through Core Functions.

Degree programs at WesternU are dedicated to preparing individuals for graduate level health science professions. These programs are implemented by a sufficient number of qualified full-time, part-time and adjunct faculty who insure learning outcomes are met in didactic, laboratory and clinical courses (CFR 2.1). Academic programs maintain comprehensive student catalogs and student handbooks which clearly communicate academic policies, requirements, and procedures (CFR 2.2). As a graduate institution, WesternU courses have clearly stated course and program learning outcomes which emphasize the importance of scholarly activity and clinical expertise in the discipline. Most programs are professionally accredited and are taught at an advanced graduate-level (CFR 2.2b, CFR 2.3). Institutional learning “domains” are identified and academic programs are charged with identifying relevant measures for each of the eight domains (CFR 2.3). Course, program and institutional outcomes are tracked each semester by the Assessment and Program Review Committee which reviews assessment data from programs and links the data to specific institutional learning domains in SharePoint software.

WesternU demonstrates a clear commitment to evidence-based assessment (CFR 2.4). Faculty are involved in the assessment of student learning at the program and course levels. Evidence of student learning is used to develop strategies for program improvement (CFR 2.4). Most programs at WesternU strongly emphasize the application of knowledge within professional practice settings. Student activities within practice settings are overseen by clinical professors and preceptors, creating robust opportunities for students to receive feedback and improve performance (CFR 2.5). More broadly, WesternU has created sufficient resources to assist students needing tutoring or other forms of remediation needed to succeed academically (CFR 2.5).



Strong summative assessments are linked to program learning outcomes and verified through professional licensure examinations and thesis/culminating projects for master's students. WesternU students consistently meet or exceed national averages in passing board exams, demonstrating that students have met program learning outcomes (CFR 2.6). Sophisticated formative assessments are conducted within courses and tracked carefully using Progress IQ software. Students have ready access to this formative data and can use it to identify areas where extra attention or formal remediation is indicated.

Program review is increasingly becoming institutionalized within WesternU though the institution's self-review suggested there were challenges developing institutional learning outcomes for co-curricular units. WesternU has created a strong internal program review process that heavily utilizes professional accreditation standards and self-study guidelines. Since the four master's program on the Pomona campus have no outside accreditation, they participate in both an internal and external review process as defined by the campus (CFR 2.7). While WesternU seems to be broadly in compliance with WSCUC standards on program review, the team recommends the university continue to refine the program review process so that all programs benefit from ongoing, timely assessment.

While WesternU has traditionally emphasized teaching as a core responsibility of faculty, in recent years it has taken steps to more strongly emphasize research. Significant funds have been designated for laboratory facilities to support bench research and attractive start-up packages for new faculty. A campus meeting with research faculty revealed pride in what has been accomplished by WesternU faculty scholars in recent years and satisfaction with pre-award and post award support for extramural grants. Faculty interviews revealed an understanding of the tenure and promotion process within each college as well as expectations for balancing teaching responsibilities with service commitments and scholarly activities. Some junior faculty suggested their annual performance reviews would be more helpful if the evaluation guidelines more closely followed those used for tenure and promotion reviews (CFR 2.8 and CFR 2.9).

Retention and graduation rates for WesternU professional programs are at or above national levels, demonstrating a strong commitment to student success (CFR 2.10). Co-curricular programs exist and many provide academic learning support to those in need (CFR 2.11 CFR 2.13). However, as already mentioned, assessment of co-curricular programs is still being refined. Program course requirements are clearly communicated to students through a comprehensive catalog. In addition, faculty and professional staff provide robust advising to students across all programs (CFR 2.12). WesternU does not accept transfer students into its existing professional health science programs (CFR 2.14).

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

As a relatively young institution, WesternU has recruited a well-qualified faculty and staff to support academic programs at both the Pomona and Lebanon locations. A high level of employee satisfaction was recognized in a national ranking as one of the Best Places to Work. The institution's self-review indicated this is an area that may need some attention in the future and it may be linked to concerns about lack of clarity regarding budget priorities. Comments from current students in some master's programs suggest there might be an overreliance on adjunct faculty limiting accessibility to faculty mentors and opportunities for student research. This should be examined through the program review process (CFR 3.1). Regular evaluation processes are in place within each college though the university is exploring the desirability of moving tenure and promotion decisions to a university committee (CFR 3.2).

In an open meeting with staff, there was general consensus that staff are asked "to do more with less" and improve effectiveness through improved efficiencies. They reported that merit compensation increases did not seem to be linked to annual performance reviews and that their individual and aggregate contributions to the institution were often not recognized. They did comment favorably on the strong benefits package offered to employees and the fact that salary increases were supported by the institution (CFR 3.2).

At COMP-NW, faculty report that the new organ system-based curriculum is the focus of faculty development on campus. Volunteer clinical faculty expressed interest in both assisting with the new curriculum and in other faculty development opportunities. Staff reported tuition remission and reimbursement benefits were available for their professional development and this was a significant contributor to job satisfaction. A number of staff reported receiving one or more promotions to higher level positions within the University (CFR 3.3).

In all interactions with the team, WesternU board members, administrators, faculty, staff, students, and community supporters displayed a culture of integrity, mission-driven performance, responsibility, and accountability for their actions (CFR 3.6). Faculty, students, and community leaders reported they had outstanding opportunities for informal communication with administrators in most colleges. The faculty senate has been assigned a larger role in ensuring communication with the faculty at large but perceived effectiveness varies across colleges (CFR 3.7). Staff expressed some concern about the adequacy of personnel and infrastructure to support the University's Achieving Aspirations strategic vision. In addition, meetings with staff suggested a need to update standards, policies and procedures in the employee handbook (CFR 3.7).

The president, provost/chief operating officer, and chief financial officer are full-time executives with primary responsibility for the institution. A sufficient number of other administrators are employed to provide effective educational leadership and management (CFR 3.8). The president and board members agree that the search two years ago for a new president was a pivotal event in the board's development. Oversight for financial matters has been a strength of the board but they are now providing more oversight for academic matters. Board members make time to attend campus events at both the Pomona and Lebanon campuses and provide opportunities in board meetings for institutional and academic leaders to share information and

gain perspective on board responsibilities. The president and board members shared a plan to gradually increase the size and diversity of the board in the years ahead (CFR 3.9).

WesternU has initiated significant steps to engage the creativity and insights of faculty to improve the quality of education and research. The faculty senate has embraced broader responsibilities including playing a role in peer review and revising the faculty handbook. It will also be charged with communicating to the faculty at large information conveyed by the new university budget advisory committee (UBAC). Some colleges regularly solicit faculty and staff views on the effectiveness of chairs, deans, and senior administration (CFR 3.10).

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

The evaluation of student learning and assessment of institutional effectiveness are critically important responsibilities in higher education. Since 2001, WSCUC Commission action letters encouraged WesternU to implement academic and co-curricular program reviews. In 2010, WesternU conducted its first set of internal academic program reviews and has since focused on refining these processes. The WASC special visit report in 2014 urged the university to “provide strong evidence of progress in assessing student learning and in reviewing academic and co-curricular programs.” The institutional report and site visits to Pomona and Lebanon verify that substantial progress has been made. In addition, there is evidence that faculty and administrators are increasingly engaged in assessment activities (CFR 4.1, 4.3, 4.4).

The team acknowledges a detailed program review process as outlined in figure 6.1 (p.45) and the associated appendices of the WesternU institutional report. Advances have been made in strengthening overall communications, engagement of campus constituencies, integration with strategic planning, refining review guidelines and standards, as well as clarifying committee roles and responsibilities (CFR 4.1, 4.3, 3.4, 2.7,2.1). A review of WesternU's 2017 CFR 4 survey results, and conversations with faculty members, the Assessment and Program Review Committee, and faculty development officers, revealed an appreciation for the progress made. Although these efforts are duly noted, concerns still remain regarding the depth, breadth and application of assessment and program review processes. Wide variations in knowledge, awareness and exposure to quality assurance processes was revealed through site visit conversations. In addition, aligning program reviews with the schedules of professional accrediting bodies lends programs to a 5-7-year cycle for review. Since an initial review in 2010, the majority of academic programs have received only one review while only 3 of 8 co-curricular programs have undergone the process. Given that many professional programs require annual progress reports of some kind, preparing written summaries and sharing these results with relevant stakeholders could provide pertinent, formative information upon which programs could be evaluated and adjusted more frequently. Annual progress reports for co-curricular programs could also generate important information that could be used for trend analyses. For example, an annual progress report for programs such as LEAD (who, beginning in 2013, experienced significant usage declines among certain academic programs) could prove useful in identifying service needs and prevent further attrition.

The Center for Academic and Professional Enhancement (CAPE) has a plethora of programs, workshops, and weekly presentations to support the teaching and learning needs of faculty and staff. Trend data shows that services, although plentiful, have been greatly under-utilized on both the Oregon and Pomona campuses. The team found overlap in CAPE services and subsequent ability to build capacity in program review, teaching performance, and innovative curriculum (CFR 3.3, 4.3, 4.4). Although participation in faculty development is not required by the institution, CAPE representation and input throughout college and university committees that influence teaching and curriculum could increase awareness of program offerings. In addition, deliberate conversations and collaborations with college deans may inspire greater synergy in offering faculty development activities in concert with required college-wide activities.

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

The meaning of a WesternU degree originates from the core values of excellence in professional practice and engaging with the community in a humanistic fashion to promote quality of life. The president described his university as being strongly mission oriented towards these values, and the visiting team found evidence that staff, faculty, and especially students demonstrated a commitment to the mission of helping others through their work.

Over the past decade the meaning of a WesternU degree has been operationalized into 8 institutional learning outcome domains which indirectly connect with the values of professional excellence, community service, and humanism. These domains are: 1) critical thinking; 2) breadth and depth of knowledge in their discipline; 3) interpersonal communication skills; 4) collaboration skills; 5) ethical and moral decision-making skills; 6) lifelong learning skills; 7) evidence-based practice and 8) humanistic practice. In addition, for graduates from a professional program, they must demonstrate in their programs and on licensure exams that they meet national standards for their chosen profession.

WesternU has created a campus-wide effort to ensure that the 8 ILO domains are embedded in all programs and are meaningfully assessed. Program learning outcomes within WesternU degrees are explicitly linked to the ILO domains. A review of 10 randomly selected syllabi across multiple programs revealed that ILOs are systematically included in course syllabi, along with a description of assessment activities linked to each ILO.

The ILO assessment process involves an annual review of course outcome data by members of the Program Review and Assessment Committee. They work in pairs and use a rubric to score the alignment of submitted course data with program outcomes and institutional outcomes. Outcome data is rated as initial, emerging or developing. The institutional report stated the most developed measures were for 3 ILOS which measure critical thinking, interpersonal communication and evidence-based practice.

The meaning, quality and integrity of degrees at WesternU are ensured through rigorous quality assurance processes, such as program review, professional accreditation reviews, and ongoing

reviews of course, program, and institutional learning outcomes by the Program Review and Assessment Committee. Faculty help ensure the quality and integrity of academic programs through service on curriculum, academic standards and policies, academic support services and planning, and university faculty affairs committees.

Ten of the academic programs at the university prepare graduates for well-defined career paths and participate in rigorous professional accreditation reviews which serve the purpose of program review. Master's programs, inter-professional education courses, and co-curricular programs follow locally developed program review guidelines which also require preparation of a self-study and input from an external consultant.

It would seem that all WesternU graduates should demonstrate achievement of specific learning outcomes linked to the 8 ILO domains, if they truly reflect what it means to be a graduate from the institution. Perhaps the current ILOs do not yet capture what faculty and administrators believe are the essential attributes and competencies for graduates (CFR 1.1).

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

Evidence reviewed by the visiting team demonstrates that degree programs at WesternU are oriented towards student learning. Most degree programs are professionally accredited and have clearly defined program and course learning outcomes embedded within curricula that is taught at an advanced level (CFR 2.2b, CFR 2.3). Retention and graduation rates within WesternU's professional programs are at or above national levels, demonstrating a strong commitment to student success (CFR 2.10).

Faculty are involved in the assessment of student learning at the program and course levels. Most on-going assessment activities at WesternU are developed within the mandates of professional accreditation agencies that cover most programs. Degree programs at WesternU emphasize the application of knowledge within professional practice settings, and have clearly defined learning outcomes. Student activities within practice settings are overseen by clinical professors and preceptors, creating robust opportunities for students to receive feedback and to improve performance (CFR 2.5). More broadly, evidence of student learning is used to develop strategies for program improvement (CFR 2.4).

Degree programs have adequate resources that include didactic faculty, clinical faculty, and part-time preceptors that work with students during clinical portions of programs (CFR 2.1). Academic programs and support services, such as library, information technology and financial aid, seem adequately staffed with personnel committed to student success. The Learning Enhancement and Academic Development (LEAD) program, provides tutoring and remediation services to support academic success though utilization rates have declined in recent years (CFR 2.5, 2.11, 2.13).

The need for facility improvements emerged as a theme in most meetings with staff, faculty, and students. It was noted that some colleges, such as pharmacy, enjoy recently renovated, state-of-the-art classrooms, while other colleges are operating in older facilities in need of upgrades such as improved WiFi and more power outlets to support portable computers. While the visiting team found no evidence that facility issues were hindering student outcomes, improvements to facilities will be important going forward.

The visiting team interviewed faculty involved with course and program level assessment from four graduate masters programs that are not professionally accredited. Interviews, along with evidence from program reviews and annual ILO data collection, demonstrate a high level of faculty involvement but varied familiarity with common assessment practices, such as use of rubrics and formative and summative assessment strategies (CFR 2.4). The team noted that assessment expertise was strongest in master's programs housed within colleges that also had professional accreditation responsibilities and weakest in the MSBS program in the College of Biomedical Sciences which had no professional accreditation demands. Faculty development to increase implementation of evidence-based assessment practices is particularly needed within this college, but should be emphasized across the university.

Over most of its history, WesternU has emphasized teaching as the core responsibility of faculty. In recent years it has taken steps to more strongly emphasize research and scholarly activity. During the site visit, faculty engaged in bench research reported significant improvements in laboratory facilities and staff support for grant writing and management. Faculty workload policies differ by college, and are explained in college faculty handbooks. Interviews with faculty showed that faculty understand tenure and promotion expectations and thought their dean had provided an appropriate workload assignment (CFR 2.8 and CFR 2.9).

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

Overall, the team found the student success measures, such as board pass rates, graduation rates, and time to degree aligned with professional accreditation standards, and were accessible to the public via the university's website. The review team was provided program completion information based on gender, program type (i.e., doctorate, MS professional, and MS Research) and ethnicity. Both the "on time" graduation rates and the "graduation rates (those completing degrees within the calendar year)" are impressive. The "on time" graduation rates ranged between 86% and 90% across program types and for each ethnic category except African-Americans (68%). While the low percentage of "on time" graduation of African-Americans is concerning, further review shows 85% of these students complete their educational requirements and graduate within another year. Nonetheless, the discrepancy in "on time" graduation rates begs for more consideration from institutional leaders to identify, understand, and address factors that may hinder enrollment and impede the "on time" graduation of African-American students. WesternU's 2016 licensing pass rates were presented by academic programs. Student performance on licensing exams is strong, ranging from 88% in the college of optometry to 100% in the colleges of dental and podiatric medicine. The institution provided a table showing four-year trends (2013-2016) in student placements within eight

months of graduation. WesternU does an excellent job of tracking students and can account for 87% of its graduates within a given year. However, approximately 3% of WesternU's graduates are unemployed after eight months and another 11% are unaccounted. In addition, residency/internships comprise 40% of student placements which are technically temporary. As such, capturing employment data on students upon completion of residency and internship programs may offer a more accurate view of job placements.

The institutional report provided student success figures which included information on enrollment, graduation and licensing pass rates (CFR 2.10). In 2015, WesternU graduated an inaugural class from the College of Osteopathic Medicine of the Pacific (COMP) in Lebanon Oregon. Although some data has been provided, the majority of student success data for the COMP-NW cohorts was not available in the institutional report. Future inclusions would be welcomed in order to render a comprehensive and accurate review of the institution's overall performance. Five-year trend data for the WesternU Pomona campus showed relatively steady enrollment of approximately 3800 students among which, Caucasian (40%), Asian (35%) and African-American (2.7%) displayed the most consistent enrollment, while the percentage of Hispanic/Latino students rose from 4.5% (2012) to 7.3% (2016). The review team noted the shift (from 4.5% (2012) to 8.1% (2016)) in percentages of students identified as representing "two or more races." Equally surprising was the percentage of students (6.3%) who selected "race/ethnicity is unknown" as an ethnic identifier. If combined, these two groups comprise 513 students or 14% of the student population. The fact that these students have not been disaggregated in any other student success tables (other than demographics) suggests that WesternU has a rich population of students on campus whose presence, success, and impact is virtually unknown.

WesternU, through its 2017 Institutional Report and onsite conversations with stakeholders, identified diversity as a continuing area of concern (CFR 1.4, 2.10). The office of institutional research and effectiveness (OIRE) is instrumental in capturing data and conducting data analyses that paint the diversity canvas of the institution. Site conversations with the WSCUC Institutional Committee suggested that WesternU is populous with diverse students. However, since approximately 15% of the student population (those identified as representing "two or more races and those whose "race/ethnicity is unknown") have not been folded into the student success landscape, the depth of diversity is unclear. An inclusion and humanism task force, chaired by the director of OIRE, was recently formed to assess diversity issues. Thus, the visiting team recommends that future student data be demographically disaggregated by academic program and institutional location so that a more vivid picture can be seen. Additionally, it is hoped that the new inclusion and humanism task force will guide units through the process of data capture and use of this information for decision-making about programs, enrollment, marketing, scholarships etc.

WesternU identified three different institutional support entities that promote and ensure student success (CFR 2.13). Among them is the Office of Career and Professional Development (OCPD) which aids in preparing medical students for board exams and residency interviews. Second is the "Supporting Student Success" program sponsored through the college of

pharmacy. The support student success program uses Progress IQ, an academic monitoring software, to obtain “real-time” alerts on students who perform below expectation on course quizzes and exams. Essentially, Progress IQ serves as an impetus to capture and guide at-risk students to academic support services. Further review of documents submitted by the institution show extensive faculty efforts to identify, remediate, and improve the academic performance of students. Through a variety of structured student/faculty consultations, reviews and processes, programs such as the doctor of osteopathic medicine and the doctor of physical therapy have incorporated exemplar approaches for using performance data to improve student academic success.

Finally, the Learning Enhancement and Academic Development (LEAD) program offers an array of support services, including academic counseling, tutoring, well-being and test-taking strategies. Available reports indicate robust usage by students from varying academic programs. Trends in program utilization showed the highest student usage occurred during years 2012 and 2013. By 2015, student usage of LEAD services dropped significantly with the highest declines ranging from 50% to 100% within the 3-year period. The institutional report does not include a table on student attrition demographics. Disaggregated, annual program impact data would shed light on the types of students who seek LEAD services, their retention in the program, and the effectiveness of LEAD on improving student academic outcomes (CFR 2.11).

An important aspect of student success which can be easily overlooked are indirect experiences influencing student outcomes. During the campus visit, the visiting team collected a “wish list” of factors students felt would enhance their experience at WesternU. In short, students expressed a need for more common study space, access to academic support services for all students regardless of academic performance, financial scholarships within their perspective disciplines, and healthy food choices. Conversations with students enrolled in the Masters’ programs revealed salient concerns regarding the lack of access to updated desktop computer equipment and healthier food options. Although most students ultimately use personal laptops as an alternative to campus computers, challenges still exists for students with physical disabilities whose limitations are better suited for desktop computers. Given that WesternU is a health sciences institution, students were dismayed by the lack of healthier food choices in and around campus.

A few students believed there was some level of misrepresentation of academic programs, particularly as it relates to course offerings, course availability, as well as opportunities for gainful employment within perspective disciplines. For instance, students enrolled in the BSMS are advised that they will study animal and human disease and, although two courses are offered, exposure to animal disease is not extended beyond the second semester. Finally, while some students expressed a desire to have more hands-on techniques and/or clinical rotations included in their instruction, overall, they were pleased with opportunities to conduct research and showed an immense appreciation for the quality of teaching; describing faculty members as intelligent, humble, and highly skilled. Hopefully the “wish list” can serve as an



impetus for engaging Student Government in campus discussions and including representatives on institutional committees where their concerns and interests can be heard and addressed.

#### Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence

WesternU is making admirable progress towards improving academic operations and subsequently student outcomes. In particular, the team noted responses to WSCUC recommendations regarding academic program approval and review, assessment of student learning, and faculty and leadership engagement in institutional decision-making processes (CFR 4.1, 4.3, 4.4).

Previous Special Visit reports recognized WesternU's reliance on professional accrediting boards as primary sources of academic program evaluation. Beginning in 2001, the WSCUC Commission action letters encouraged the institution to develop and implement academic and co-curricular program reviews. A decade later (2010), WesternU conducted its first set of internal academic program reviews and have since focused on refining these processes. To spur continuous improvement in this area, WASC's Special Visit Report of 2014 urged WesternU to "provide strong evidence of progress in assessing student learning and in reviewing academic and co-curricular programs by the time of the next WSCUC interaction."

The team acknowledges a detailed program review process as outlined in figure 6.1 (p.45) and the associated appendices of the institutional report. Advances have been made in strengthening overall communications, engagement of campus constituencies, integration with strategic planning, refining review guidelines and standards, as well as clarifying committee roles and responsibilities (CFR 4.1, 4.3, 3.4, 2.7,2.1). A review of WesternU's 2017 CFR 4 Survey results in culmination with conversations with faculty members, the Assessment and Program Review Committee, and faculty development officers revealed an appreciation for the progress made. Wide variations in knowledge, awareness and exposure to quality assurance processes was also revealed in site visit conversations. Although these efforts are duly noted, concerns still remain regarding processes that minimize the depth and breadth of reviews and subsequent use of this information to influence program outcomes. For example, aligning program reviews with the schedules of professional accrediting bodies lends programs to a 5-7-year cycle of reviews. Since their initial review in 2010, the majority of academic programs have only received one review while 3 of 8 co-curricular programs have undergone the process. An annual or bi-annual review could provide pertinent, timely information upon which programs could be evaluated and adjustments made prior to campus visits by professional accreditors. The same can be said for co-curricular programs such as LEAD, who experienced significant declines (of 50% to 100% depending on the academic program) in usage between 2013 and 2015.

Most health profession programs at WesternU undergo program review through professional accreditation bodies. While the team did not examine evidence regarding professional accreditation review processes, the strong record of student achievement across all

professional programs at WesternU suggests that strong quality control processes are in place (CFR 4.1). It was noted, however, during interviews that professional programs with external accreditation may go long periods without review.

WesternU currently offers four masters programs that are not professionally accredited (MSPS, MSBS, MSHS, MSMS and subject to program review. Since initial WASC reaffirmation in 2010 WesternU has made substantial efforts to introduce rigorous quality control processes across the university. Well-crafted program review guidelines have been adopted through a central process, and a regular schedule of program reviews exists (CFR 2.7). The MSPS, MSHS, and MSMS programs have completed program reviews, and the MSBS was in the final stages of a review at the time of the March 2018 visit. Interviews suggested that faculty have a good knowledge of the academic program review process, and were involved in the process of constructing self-studies.

While strong steps have been made, systematic application of program review is not yet fully established. Several areas of concern exist. First, the culture of evidence is only partially established (CFR 4.1). Evidence used in self-studies to assess student learning is relatively limited and focuses primarily on summative assessment. Multiple indicators, including formative as well as summative assessments should be used to assess student learning.

A second issue is a limited understanding of program review by some faculty. Interviews with faculty revealed that some participants in program review processes had undeveloped knowledge of assessment terminology and processes. While these faculty were well-intentioned, their understanding of the importance of gathering and reflecting data to assess student learning needs to be more fully developed through faculty development or other activities.

A third issue is follow-through on action items contained in MOUs developed through program review. Interviews with faculty suggest that some action items were not implemented. The role of the deans in program review was mentioned as an issue here, often in connection to vagaries in the budgeting process. Both faculty and deans noted that budgeting at WesternU is centralized within the Provost's Office, with uncertainty as to which requests will be funded. As WesternU continues to refine its program review process, it is important that processes be put in place so that deans can credibly commit towards action items that they endorse within MOUs.

In sum, the MS programs which are not externally accredited deserve thoughtful review on a regular basis with effective follow up. The Board, administration, faculty, and staff should continue to use program review, expand the quality of data collected, and more fully embrace a culture of evidence.

Co-curricular review is just starting. Reviews have been completed for the library and the LEAD office. Reviews for other co-curricular areas, such as financial aid and information technology, are in progress. Interviews revealed that staff are aware of the importance of on-going review as an instrument of quality control and are fully committed to the process. The self-study reports

for LEAD and the library generally follow broader WesternU guidelines and provide a variety of evidence regarding the effectiveness of both organizations, for example in relation to utilization rates. Prior to conducting self studies, neither the library or LEAD office had developed student oriented learning outcomes relating to their organization or an assessment plan identifying evidence that could be collected with regards to those outcomes (CFR 2.7). The LEAD self-study developed student learning outcomes and an assessment plan as a product of the self-study, with the intent to collect and reflect upon evidence in the future. Future co-curricular program reviews should emphasize the collection and analysis of data as it pertains to student learning outcomes linked to co-curricular activities.

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

The WesternU institutional report and two site visits documented employee pride and a willingness to set “bold aspirational goals” for the institution. From the president and board to the faculty, staff and administrators, it is clear that WesternU values innovation, nimbleness, and excellence as it prepares to craft the future with a new president and new strategic plan. The commitment to mission remains unchanged and that is to educate in a humanistic tradition health care professionals and to generate biomedical knowledge that will enhance and extend the quality of life in the community. The university is constantly assessing workforce needs for the health professions and ways it can engage the larger community in pipeline programs, service projects, and research. It is financially well positioned to do this work and to grow over time (CFR 4.6, 4.7).

WesternU is financially stable and has excess debt capacity to allow for additional financing to support the new strategic plan. Financial statements are audited by independent accountants who have issued unmodified opinions related to those financial statements. The University has a fiscally prudent practice of adopting balanced operating budgets and is working to increase fiscal transparency through interactions with the new University Budget Advisory Committee (UBAC). Approximately 90% of the operating revenue is derived from tuition and the administration and board are seeking ways to reduce this risk and diversify revenue (CFR 3.4). This is reflected in one of the “pillars” of the Achieving Aspirations strategic vision.

While staff and students did not express a deficiency in information technology resources, they did comment on differences between the quality of facilities in “old” and “new” campus spaces. The general population of staff and students noted WiFi access interruptions within classrooms as an issue (CFR 3.5). This may have implications for prioritizing future capital projects.

Personnel needs will also need to be assessed as the university moves forward with new strategic initiatives. Some staff expressed concerns about the adequacy of personnel and infrastructure to support the University’s Achieving Aspirations strategic vision.

Faculty, students, and community leaders reported they had outstanding informal input through administrators in most colleges, but that formal processes for such input may not always be effective. The faculty senate is just beginning to assume a larger role in academic communications and decision making.

. Component 8: Optional essay on institutional specific themes N/A

Component 9: Reflection and plans for improvement

Under the leadership of its new president, WesternU is engaged in a dramatic transformation that aims to maintain the strengths reflected in its mission and embodied by its community as the “WesternU Way.” The loyalty and engagement of students, staff, faculty, administrators, and board members is readily evident. The strong financial base and outstanding student achievements for its doctoral level professional students provide a solid base for this transformation. The depth and breadth of the support of its communities both in Pomona and Lebanon has added to the family-like atmosphere. The development of a service-oriented institutional research capacity provides a nexus for many of the transformational changes anticipated.

Transformation at WesternU includes:

- enhanced board governance capacity that builds on the loyalty of the current board;
- enhanced shared governance as exemplified by institution-wide participation in the development of a new Strategic Plan, a broader role of faculty governance structures, and the new University Budget Advisory Committee;
- identification of the issue of diversity through the self-study process that led to the formation of the Inclusion and Humanism Task Force;
- evolving penetrance of a culture of evidence that includes the use of ILOs and faculty development.

The next years should allow WesternU to demonstrate its continued development in these areas. This should allow it to continue to produce outstanding healthcare professionals who will serve its communities in the “Western Way.”

**SECTION III - OTHER TOPICS (such as Substantive Change)**

**SECTION IV – COMMENDATIONS, AND RECOMMENDATIONS**

Commendations

- To the board, administration, faculty, staff, and students, for internalizing the mission of WesternU and embodying the “WesternU Way.”

- To the administration, faculty, staff, students, and community supporters of COMP-NW for creating a welcoming learning environment for students and improving the health and community of the Pacific Northwest.
- To the WesternU students, faculty, staff, and administration who engage with and serve their communities in a sustainable manner.
- To the board, administration, faculty, and staff for conducting a successful search process for the new president who seems to fit well with the institution.
- To the director and staff in Institutional Research and Effectiveness for creating a vibrant and effective institutional research capacity. They are central to fostering a culture of evidence at the university.
- To the faculty, staff and administrators who have expanded research and scholarly activity at WesternU through development of research facilities, recruitment of talented faculty and staff, and securing of extramural and intramural funds to support this work.
- To the board and administration for the financial stability of WesternU and efforts to seek .diversification of revenue streams.
- To the president and administration for initiating a strategic planning process that will engage all WesternU constituents.
- To the administration, faculty, and staff on consistently producing students who successfully achieve their professional goals.

## Recommendations

### Board of Trustees CFR 3.9

The board takes its fiduciary role seriously and has successfully conducted a search process for the new president. The Board should continue to expand its capacity and effectiveness to provide appropriate oversight of institutional integrity, policies, and ongoing operations. It should seek members with diverse qualifications and experiences to help govern an institution of higher learning and meet the mission of WesternU to its communities.

### Shared Governance CFR 4.2, 3.4, 2.7

WesternU has initiated significant steps to engage the creativity and insights of faculty to improve the quality of education and research. The faculty senate has embraced broader responsibilities including playing a role in peer review and revising the faculty handbook. The University Budget Advisory Committee (UBAC) is developing mechanisms to improve the budgeting process and increase transparency. Some colleges regularly solicit faculty and staff views on the effectiveness of chairs, deans, and senior administration. The Board,

administration, faculty, and staff should collaborate to strengthen these initiatives, implement them throughout the university, and enhance bidirectional communication between all levels of WesternU so that front-line faculty and staff are fully engaged and have psychological safety to help improve the educational environment and innovate.

#### Diversity CFR 1.4, 2.10

In the self-study, WesternU stakeholders identified diversity as a continuing area of concern. Diversity (including underrepresented minorities in medicine) benefits all students, the healthcare teams on which they serve, and enhances the quality of life in the communities served. The Inclusion and Humanism Task Force has started to assess these issues. The Board, administration, faculty, and staff should devote meaningful resources to create a diverse and inclusive learning environment at both campuses and among WesternU clinical preceptors. This ultimately will provide health providers that best serve the community.

#### Culture of Evidence CFR 4.2, 2.7

WesternU has built a robust institutional research capacity and engages in institutional learning and improvement. Systematic application of program review is not yet fully established. Co-curricular review is just starting. Professional programs with external accreditation may go long periods without review. The role of the deans in this process may vary. The results of the review may not always get implemented. The MS programs which are not externally accredited deserve thoughtful review on a regular basis with effective follow up. The Board, administration, faculty, and staff should continue to use program review, expand the quality of data collected, and more fully embrace a culture of evidence.

#### Institutional Learning Outcomes CFR 2

WesternU has selected eight ILO domains and has embedded them in every course. With the impending development of a new strategic plan, administration, faculty, staff, and students should consider reviewing the ILOs, aligning them with the “Western Way,” and improving their assessments within programs.

#### Faculty Development CFR 3.2, 3.3

The Center for Academic and Professional Enhancement (CAPE) has numerous programs, workshops, and weekly presentations to support the learning needs of faculty and staff. However there is a need to strengthen the culture of evidence and expertise in program review, instructional pedagogy, and innovative curriculum design.

# WESTERN UNIVERSITY OF HEALTH SCIENCES COMPLIANCE WITH FEDERAL REQUIREMENTS

## 1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Under the federal requirements referenced below, WSCUC is required to demonstrate that it monitors the institution's credit hour policy and processes as well as the lengths of its programs.

<b>Material Reviewed</b>	<b>Questions/Comments (Enter findings and recommendations in the Comments sections as appropriate.)</b>	
<b>Policy on credit hour</b>	Is this policy easily accessible? XX YES NO	
If so, where is the policy located? Faculty Handbook located on Academic Senate page on WesternU website		
<b>Comments:</b>		
<b>Process(es)/ periodic review of credit hour</b>	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) XX YES NO	
If so, does the institution adhere to this procedure?	XX YESXX YES NO	
<b>Comments:</b> Academic Standards and Policy Committee of Academic Senate completes the reviews		
<b>Schedule of on-ground courses showing when they meet</b>	Does this schedule show that on-ground courses meet for the prescribed number of hours?	XX YXXXX YES NO
<b>Comments:</b> Schedules are available to students and faculty in each college		
<b>Sample syllabi or equivalent for online and hybrid courses</b> Please review at least 1 - 2 from each degree level. New information in red text	How many syllabi were reviewed? 6	
Type of courses reviewed: XX online XX hybrid		
What degree level(s)? AA/AS BA/BS XX MA XX Doctoral		
What discipline(s)? Nursing and Interprofessional Education (IPE)		
Are students doing the amount of work per the prescribed hours to warrant the credit awarded?	XX YEXXX YES No	
<b>Comments:</b> Nursing is developing standard measures for assigned work in online courses. Some missing elements on syllabi are communicated with individual colleges		

<p>Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) Please review at least 1 - 2 from each degree level. New information in red text</p>	<p>How many syllabi were reviewed? A total of 10 syllabi were randomly reviewed. See the list below:</p> <ol style="list-style-type: none"> <li>1. GN 6201 Health Assessment</li> <li>2. GN 6502 Clinical Practicum: Nursing of Adults and Older Adults 1</li> <li>3. OM 5121 Neuroscience System</li> <li>4. OM 7070 Pediatrics</li> <li>5. PHSC 6202 Computer Aided Drug Design</li> <li>6. PHARM 5501 Pharmacokinetics</li> <li>7. PHARM 6306 Pharmacy Practice XVI</li> <li>8. GCBS 6503 Neuroanatomy</li> <li>9. HSCI 5102 Principles of Instructional Design</li> <li>OPOTM OPOTM 7011 Patient Care Services XI</li> </ol>
<p>What kinds of courses? didactic</p>	
<p>What degree level(s)? AA/AS BA/BS XX MA XX Doctoral XX</p>	
<p>What discipline(s)? Biomedical Sciences, Pharmacy, Podiatry, Optometry, and Dental Medicine</p>	
<p>Are students doing the amount of work per the prescribed hours to warrant the credit awarded?</p>	<p>XX YE XX YES NO</p>
<p>Comments: One syllabus listed weeks instead of hours. College asked to correct in the syllabus</p>	
<p>Sample program information (catalog, website, or other program materials)</p>	<p>How many programs were reviewed? 2</p>
<p>What kinds of programs were reviewed?</p>	
<p>What degree level(s)? AA/AS BA/BS XX MA XX Doctoral</p>	
<p>What discipline(s)? Nursing, osteopathic medicine</p>	
<p>Does this material show that the programs offered at the institution are of an acceptable length?</p>	<p>XX YE XX YES NO</p>



## 2 - MARKETING AND RECRUITMENT REVIEW FORM

Under federal regulation §602.16(a)(1)(vii), WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices.

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
<b>**Federal regulations</b>	Does the institution follow federal regulations on recruiting students? p YXX YES NO
Comments: WesternU does not provide any incentive compensation, including commissions, bonus payments, merit salary adjustments, and promotion decisions, based solely on success in enrolling students.	
Degree completion and cost	Does the institution provide information about the typical length of time to degree? p YXX YES NO
Does the institution provide information about the overall cost of the degree? p Y XX YES NO	
Comments: Information regarding the typical length of time to degree and overall cost of the degree can be located on the Prospective Student website, in printed Recruitment and Marketing Materials, and in the current University Catalog. Our single certificate program, the Post-Master's Family Nurse Practitioner certificate also publishes an annual Gainful Employment Disclosure.	
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? XX YES NO
Does the institution provide information about the employment of its graduates, as applicable? XX YES NO	

Comments: Placement and employment information for all Colleges is provided on our Academic Outcomes website.

### 3 - STUDENT COMPLAINTS REVIEW FORM

Under federal regulation\*§602-16(1)(1)(ix) WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? XX YES NO
If so, Is the policy or procedure easily accessible? Where? University Catalog	
Comments: The University's issue and dispute resolution procedure is located in both the General and College specific sections of the University Catalog. Protocol for Input on Matters of Student Concern can be found on in page 12-16 of University Catalog.	
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? XX YES NO If so, please describe briefly: Student Complaint processes are managed by each College. Colleges utilize the University procedures as outline in the University or program section of the University Catalog.
If so, does the institution adhere to this procedure? XX YES NO	
Comments: If complaint procedures are not adhered to, students have the option of filing a complaint or concern about adherence to complaint procedures with the Office of Academic Affairs	

Records	<p>Does the institution maintain records of student complaints? XX YES NO</p> <p>If so, where? Records are maintained by the individual Colleges. Data collected by the Office of Institutional Research confirms that 9 of WesternU' s 9 Colleges have not had any formal complaints filed by students.</p>
<p>Does the institution have an effective way of tracking and monitoring student complaints over time? XX YES NO</p> <p>If so, please describe briefly: Records are maintained by each college where the complaint is filed either in the Office of the Dean, or the Office of Academic Affairs. If a student complaint is filed in the Office of University Student Affairs, the Vice President of University Student Affairs maintains record of the complaint and resolution. There have been no formal complaints filed by students with the Office of University Student Affairs naming the University or any of its colleges. Complaints file with the Department of Education are maintained in the Office of University General Counsel.</p>	
<p>Comments:</p>	

(See also WSCUC Senior College and University Commission's Complaints and Third Party Comment Policy.)

#### 4 – TRANSFER CREDIT REVIEW FORM

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

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	<p>Does the institution have a policy or formal procedure for receiving transfer credit?</p> <p>XX YES NO</p>
<p>Is the policy publicly available? XX YES NO</p> <p>If so, where? University Catalog</p>	
<p>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?</p> <p>XX YES NO</p>	
<p>Comments: For those Colleges that accept transfer credit, the transfer credit policy is outlined in the individual College section of the University Catalog.</p>	

